INFORMATION REGULATOR
SOUTH AFRICA

POPIA Compliant
PAIA Compliant

LASER STENCIL TECHNOLOGY

# PAIA & POPIA MANUAL

## *LASER STENCIL TECHNOLOGY (PTY) LTD*

***Drafted In Terms Of Section 51 Of:***

*The Promotion Of Access To Information Act 2 Of 2000 (PAIA) &*

*The Protection Of Personal Information Act 4 Of 2013 (POPIA)*

## DOCUMENT INDEX


**1. TITLE & DOCUMENT CONTROL** ..... 3
1.1. TITLE ..... 3
1.2. COMPANY PARTICULARS ..... 3
1.3. DOCUMENT CONTROL ..... 3
1.4. STATUS & LEGAL REVIEW ..... 3
**2. DEFINITIONS & INTERPRETATION** ..... 3
2.1. DEFINITIONS ..... 3
2.2. INTERPRETATION ..... 3
**3. INTRODUCTION & PURPOSE** ..... 3
3.1. CONSTITUTIONAL FOUNDATION ..... 3
3.2. SECTION 51 OF PAIA ..... 3
3.3. PURPOSE ..... 4
**4. COMPANY OVERVIEW** ..... 4
4.1. NATURE OF BUSINESS ..... 4
4.2. GOVERNANCE ..... 4
4.3. RECORDS ENVIRONMENT ..... 4
**5. CONTACT DETAILS OF THE INFORMATION OFFICERS** ..... 4
5.1. INFORMATION OFFICERS ..... 4
5.2. DEPUTY INFORMATION OFFICERS ..... 4
5.3. FUNCTIONS ..... 4
**6. GUIDE ON HOW TO USE PAIA & HOW TO OBTAIN ACCESS TO THE GUIDE** ..... 4
6.1. STATUTORY GUIDE ..... 4
6.2. ASSISTANCE ..... 5
6.3. PRESCRIBED PAIA FORMS ..... 5
**7. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL REQUEST** ..... 5
7.1. GENERAL ..... 5
7.2. METHOD OF ACCESS ..... 6
7.3. EXCLUSIONS ..... 6
**8. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION** ..... 6
8.1. APPLICABLE LEGISLATION ..... 6
8.2. NATURE OF RECORDS ..... 6
8.3. QUALIFICATION ..... 6
**9. SUBJECTS & CATEGORIES OF RECORDS HELD BY LASER STENCIL TECHNOLOGY** ..... 6
9.1. CORPORATE GOVERNANCE ..... 6
9.2. FINANCE, TAX & PROCUREMENT ..... 7
9.3. EMPLOYEES & LABOUR ..... 7
9.4. CUSTOMERS, MARKETING & SALES ..... 7
9.5. SUPPLIERS & SERVICE PROVIDERS ..... 8
9.6. TECHNICAL, MANUFACTURING & INTELLECTUAL PROPERTY ..... 8
9.7. INFORMATION TECHNOLOGY & SECURITY ..... 8
9.9. PRIVACY & PAIA ..... 9
**10. PROCESSING OF PERSONAL INFORMATION UNDER POPIA** ..... 9
10.1. RESPONSIBLE PARTY & PURPOSE ..... 9
10.2. CATEGORIES OF DATA SUBJECTS ..... 9

10.3. CATEGORIES OF PERSONAL INFORMATION ..... 10
10.4. LAWFUL PROCESSING PRINCIPLES ..... 10
10.5. SPECIAL PERSONAL INFORMATION & CHILDREN ..... 10
10.6. RECIPIENTS & OPERATORS ..... 10
10.7. CROSS-BORDER TRANSFERS ..... 11
10.8. SECURITY SAFEGUARDS ..... 11
10.9. SECURITY COMPROMISES ..... 11
10.10. DATA-SUBJECT RIGHTS ..... 11
10.11. INFORMATION OFFICERS' OBLIGATIONS ..... 11
**11. LASER STENCIL TECHNOLOGY, SAFETY & REGULATORY COMPLIANCE ..... 12**
11.1. OCCUPATIONAL HEALTH & SAFETY ACT ..... 12
11.2. LASER MACHINERY & PLANT ..... 12
11.3. RISK ASSESSMENTS & PROCEDURES ..... 12
11.4. TRAINING, SUPERVISION & PPE ..... 12
11.5. MAINTENANCE & INSPECTIONS ..... 12
11.6. INCIDENTS & RECORDS ..... 13
11.7. TECHNICAL CONFIDENTIALITY ..... 13
**12. PROCEDURE FOR REQUESTING ACCESS TO RECORDS ..... 13**
12.1. SECTION 50 THRESHOLD ..... 13
12.2. FORM & SUBMISSION ..... 13
12.3. IDENTITY & CLARIFICATION ..... 13
12.4. DECISIONS ..... 13
12.5. SEVERABILITY ..... 13
**13. FEES ..... 14**
13.1. SECTION 54 REQUEST FEE ..... 14
13.2. ACCESS & DEPOSIT FEES ..... 14
13.3. SECTION 56 DECISION & PAYMENT ..... 14
13.4. CURRENT TARIFFS ..... 14
**14. GROUNDS FOR REFUSAL OF ACCESS ..... 14**
14.1. GENERAL ..... 14
14.2. PROTECTED INTERESTS ..... 14
14.3. OTHER IMPEDIMENTS ..... 14
14.4. PUBLIC-INTEREST OVERRIDE ..... 14
**15. REMEDIES AVAILABLE TO REQUESTERS ..... 15**
15.1. INTERNAL PROCESS ..... 15
15.2. EXTERNAL REMEDIES ..... 15
15.3. PRESERVATION OF RIGHTS ..... 15
**16. AVAILABILITY & UPDATING OF THIS MANUAL ..... 15**
16.1. AVAILABILITY ..... 15
16.2. UPDATING ..... 15
16.3. LANGUAGES & ACCESSIBILITY ..... 15
**17. APPROVAL ..... 15**
17.1. APPROVAL STATEMENT ..... 15

- ***To request records, use the contact details in Section 5 & follow the procedure in Section 12;***
- ***Section 7 identifies records available without a formal request;***
- ***Sections 8 & 9 describe other record categories;***
- ***Fees are addressed in Section 13;***
- ***Grounds of refusal are addressed in Section 14;***
- ***Remedies for requesting refusal are addressed in Section 15;***
- ***Personal-information processing is addressed in Section 10;***
- ***Availability of this Manual is addressed in Section 16.***

## 1. TITLE & DOCUMENT CONTROL

### 1.1. TITLE

This document is the **PAIA & POPIA Manual of Laser Stencil Technology (Pty) Ltd** (The Company).

### 1.2. COMPANY PARTICULARS

**Registration Number:** 2004/011096/07

**Physical Address:** 400 Roan Crescent, Corporate Park North, Unit 3 Rambo Junxion, Randjespark, Midrand, 1685

**Postal Address:** PO Box 1711, North Riding, Randburg, 2032

**Telephone:** 011 793 1311/8

**Website:** www.lstec.co.za

### 1.3. DOCUMENT CONTROL

**Effective Date:** 30 June 2026

**Version:** 1.2 - Controlled Version Of This Manual.

**Next Review Date**: 30 June 2027

**Document Owner:** Information Officers

**Approval Authority:** Duly Authorised Director

### 1.4. STATUS & LEGAL REVIEW

This Manual is a compliance document & must be read with PAIA, POPIA, regulations made under those Acts & other applicable law. It should be reviewed after material legal or operational change. Nothing in it constitutes a waiver of any lawful ground of refusal or privilege.

## 2. DEFINITIONS & INTERPRETATION

### 2.1. DEFINITIONS

- **Company:** Refers To Laser Stencil Technology (Pty) Ltd, A South African Private Company Engaged In SMT Stencil Manufacturing & Supply.
- **Data Subject:** Refers To *Operator, Personal Information, Processing, Record, Responsible Party & Special Personal Information* Bearing The Meanings Assigned In POPIA.
- **Information Officers:** Refers To The Persons Contemplated In Paia & POPIA, Including A Duly Authorised Deputy Information Officer Where The Context Permits.
- **PAIA:** Refers To The Promotion Of Access To Information Act 2 Of 2000, As Amended.
- **POPIA**: Refers To The Protection Of Personal Information Act 4 Of 2013, As Amended.
- **Requester:** Refers To a person requesting access to a record of Laser Stencil Technology , including personal requests.

### 2.2. INTERPRETATION

References to legislation include amendments, regulations & successor legislation. Headings aid navigation & do not limit interpretation. If this Manual conflicts with applicable law, the law prevails.

## 3. INTRODUCTION & PURPOSE

### 3.1. CONSTITUTIONAL FOUNDATION

Section 32(1) of the Constitution of the Republic of South Africa, 1996 provides: “Everyone has the right of access to - (a) any information held by the state; and (b) any information that is held by another person and that is required for the exercise or protection of any rights.” Section 32(2) requires national legislation to give effect to that right & permits reasonable measures to alleviate the administrative & financial burden on the state.

***The quoted right is not an unrestricted right to all private information. In relation to a private body, the requester must show that the requested record is required for the exercise or protection of a right, subject to PAIA’s procedures & lawful grounds of refusal.***

### 3.2. SECTION 51 OF PAIA

Section 51 requires the head of a private body to compile & make available a manual containing prescribed contact particulars, a description of the PAIA guide, categories of automatically available records, applicable legislation, subjects & categories of records held, & prescribed information concerning the processing of personal information.

### 3.3. PURPOSE

This Manual explains Laser Stencil Technology's records, how access may be requested, how personal information is processed & protected, & how Laser Stencil Technology manages information relating to laser technology, manufacturing safety & regulatory compliance. It is intended to promote transparency without compromising privacy, safety, confidential commercial information, intellectual property or legal privilege.

## 4. COMPANY OVERVIEW

### 4.1. NATURE OF BUSINESS

Laser Stencil Technology manufactures & supplies laser-cut surface-mount technology (SMT) stencils to the electronic assembly industry, together with related products & services. Its additional services include laser cutting of customer-designed precision metal parts.

### 4.2. GOVERNANCE

Laser Stencil Technology is governed under the Companies Act 71 of 2008 & its constitutional documents. Operational & compliance responsibility is allocated among the director, management, the Information Officer, Deputy Information Officer & appropriately trained personnel.

### 4.3. RECORDS ENVIRONMENT

Records may exist in paper or electronic form, on premises, in approved cloud or business systems, or with lawful operators & professional advisers. The categories listed in this Manual are not confirmation that a particular record exists or is disclosable.

## 5. CONTACT DETAILS OF THE INFORMATION OFFICERS

### 5.1. INFORMATION OFFICERS

**Name**: Donovan Jeffery

**Capacity**: Managing Director

**Email**: Don@lstec.co.za

**Telephone:** 011 793 1311/8

**Physical Address For Service**: 400 Roan Crescent, Corporate Park North, Unit 3 Rambo Junxion, Randjespark, Midrand, 1685

**Postal Address**: PO Box 1711, North Riding, Randburg, 2032

### 5.2. DEPUTY INFORMATION OFFICERS

**Name**: James Leslie

**Email**: Admin.ISO@lstec.co.za

**Telephone:** 011 793 1311/8

**Physical Address For Service**: 400 Roan Crescent, Corporate Park North, Unit 3 Rambo Junxion, Randjespark, Midrand, 1685

**Postal Address:** PO Box 1711, North Riding, Randburg, 2032

### 5.3. FUNCTIONS

The Information Officer, assisted by the duly authorised Deputy Information Officer, must encourage & monitor compliance with PAIA & POPIA; maintain & update this Manual; receive & determine PAIA requests within the scope of lawful authority; ensure that a compliance framework is developed, implemented, monitored & maintained & that a personal-information impact assessment is performed as required by Regulation 4; oversee internal awareness, security safeguards, incident response & cooperation with lawful regulatory processes; & ensure that required registrations, designations & delegations are completed.

## 6. GUIDE ON HOW TO USE PAIA & HOW TO OBTAIN ACCESS TO THE GUIDE

### 6.1. STATUTORY GUIDE

The Information Regulator has, in terms of Section 10(1) of PAIA as amended, updated & made available the revised Guide on how to use PAIA (the Guide), in an easily comprehensible form & manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA & POPIA. The Guide is available in each of the official languages of the Republic & in braille. The Guide describes the objects of PAIA & POPIA; the postal & street address, phone & fax number &, if available, electronic mail address of the Information Officer of every public body & of every Deputy Information Officer of every public & private body designated in terms of Section 17(1) of PAIA & Section 56 of POPIA; the manner & form of a request for access to a record of a public body under Section 11 of PAIA & of a private body under Section 50 of PAIA; the assistance available from the Information Officer of a public body & from the Regulator in terms of PAIA & POPIA; all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA & POPIA, including the manner of lodging an internal appeal (public bodies), a complaint to the Regulator, & an application to court; the provisions of Sections 14 & 51 requiring public & private bodies to compile a manual & how to obtain access to a manual; the provisions of Sections 15 & 52 providing for voluntary disclosure of categories of records; the notices issued in terms of Sections 22 & 54 regarding fees; & the regulations made in terms of Section 92 of PAIA.

### 6.2. ASSISTANCE

Members of the public may inspect or make copies of the Guide from the offices of public & private bodies, including the office of the Information Regulator, during normal working hours.

The Guide may be obtained upon request to Laser Stencil Technology's Information Officer or Deputy Information Officer, or from the Information Regulator's website at **https://inforegulator.org.za**. Laser Stencil Technology's website is **www.lstec.co.za**.

***A copy of the Guide is available at Laser Stencil Technology 's registered head office,* 400 Roan Crescent, Corporate Park North, Unit 3 Rambo Junxion, Randjespark, Midrand, 1685**, for public inspection during working hours **Monday to Friday 07:30 to 15:30**, in **English, Afrikaans & isiXhosa**. Laser Stencil Technology's Information Officer & Deputy Information Officer may provide reasonable procedural assistance but cannot give legal advice or formulate a requester's underlying right.

### 6.3. PRESCRIBED PAIA FORMS

***Requesters must use the current prescribed PAIA forms & fee schedule published by the Information Regulator. At the date of this Manual those forms include:***

- **Form 2 – Request for Access to Record [Regulation 7]:**
  The mandatory form a requester must submit to the company to request access to information or records.
- **Form 3 – Outcome of Request & of Fees Payable [Regulation 8]:**
  The form the company uses to respond to a request (granting, partially granting, or refusing access) & detailing any required access fees.
- **Form 4 – Internal Appeal Form [Regulation 9]:**
  Used for lodging a statutory internal appeal in relation to certain public bodies. This form does not apply to Laser Stencil Technology (Pty) Ltd, which is a private body; the remedies available to its requesters are described in Section 15.
- **Form 5 – Complaint Form to the Information Regulator [Regulation 10]:**
  Used by a requester or third party to lodge a PAIA complaint with the Information Regulator.
- **Forms Available At: https://inforegulator.org.za/paia/**

***Complaints concerning interference with the protection of personal information under POPIA use the separate prescribed POPIA complaint form.***

### 6.4. INFORMATION REGULATOR (SOUTH AFRICA):

**Website:** https://inforegulator.org.za

**General Enquiries:** enquiries@inforegulator.org.za

**Telephone:** 010 023 5200

**Toll-Free:** 0800 017 160

**PAIA Complaints:** PAIAComplaints@inforegulator.org.za

**POPIA Complaints:** POPIAComplaints@inforegulator.org.za

**Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017

***Requesters should confirm the Regulator's current physical office address, forms & tariffs on the Regulator's official website before relying on them, as those particulars may change.***

## 7. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL REQUEST

### 7.1. GENERAL

***Subject to availability, confidentiality, intellectual-property rights & ordinary commercial terms, the following may be available without a formal PAIA request:***

- Public Company Particulars
- Published Product & Service Information
- Public Brochures & Catalogues
- Website Notices
- Standard Terms Made Public By Laser Stencil Technology
- Published Privacy Notices
- Job Advertisements
- This Manual

### 7.2. METHOD OF ACCESS

Automatically available records may be inspected on Laser Stencil Technology 's website, requested from the relevant business contact, or obtained at Laser Stencil Technology 's premises by prior arrangement. Reproduction, delivery or commercial charges may apply where lawful.

### 7.3. EXCLUSIONS

Customer data, laser files, CAD data, quotations, pricing models, security information, technical know-how, employee records & third-party confidential information are not automatically available merely because a related product or service is public.

## 8. RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

### 8.1. APPLICABLE LEGISLATION

***Laser Stencil Technology may hold records required by the following legislation, to the extent applicable to its operations:***

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Skills Development Act 97 of 1998
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Unemployment Insurance Act 63 of 2001
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Electronic Communications and Transactions Act 25 of 2002
- Promotion of Access to Information Act 2 of 2000

### 8.2. NATURE OF RECORDS

***Laser Stencil Technology may hold the following records where the corresponding legislation applies: corporate registers & governance records under the Companies Act; tax & VAT records under the Income Tax Act & Value-Added Tax Act; employment & payroll records under applicable labour legislation; skills & training records under the Skills Development Act; UIF & compensation records under the applicable insurance & compensation legislation; occupational health & safety records under the Occupational Health and Safety Act; electronic transaction records under the Electronic Communications and Transactions Act; privacy governance records under POPIA; & access-request records under PAIA.***

***The Categories Below Provide Further Detail:***

- Statutory Registers
- Tax & VAT Records
- Payroll & Employment Records
- Skills & Training Records
- Equity Records Where Applicable
- UIF & Compensation Records
- Occupational Health & Safety Records
- Electronic Transaction Records
- Privacy Governance Records
- PAIA Request Records

### 8.3. QUALIFICATION

Listing legislation does not imply that every statute applies in every circumstance, that every listed record exists, or that a record is accessible. Access remains subject to PAIA, POPIA, retention duties & other law.

## 9. SUBJECTS & CATEGORIES OF RECORDS HELD BY LASER STENCIL TECHNOLOGY

### 9.1. CORPORATE GOVERNANCE

- Constitutional Documents
- Securities & Beneficial Ownership Records (Where Applicable)
- Director & Shareholder Records

- Resolutions
- Minutes
- Delegations
- Policies
- Licences
- Insurance Records
- Compliance Registers
- Legal Opinions
- Litigation Records

### 9.2. FINANCE, TAX & PROCUREMENT

- Accounting Ledgers
- Annual Financial Statements
- Management Accounts
- Banking Records
- Invoices
- Quotations
- Purchase Orders
- Supplier Records
- Tax Records
- VAT Records
- Customs Records, (Where Applicable)
- Budgets
- Asset Registers
- Audit Files
- Expense Records

### 9.3. EMPLOYEES & LABOUR

- Employment Contracts
- Identity Details
- Contact Details
- Payroll Records
- Leave Records
- Performance Records
- Disciplinary Records
- Qualifications
- Training Records
- Employment Equity Records, (Where Applicable)
- Skills Records, Where Applicable
- UIF Records
- Tax Records
- Compensation Records
- Occupational Health & Safety Information
- Access-Control Records
- Incident Records

### 9.4. CUSTOMERS, MARKETING & SALES

- Customer & Prospect Contact Details
- Enquiries
- Proposals

- Quotations
- Orders
- Correspondence
- Delivery Records
- Complaints
- Marketing Preferences
- Account Records
- Payment Records

### 9.5. SUPPLIERS & SERVICE PROVIDERS

- Due-Diligence Material
- Contact Details
- Banking Details
- Confidentiality Undertakings
- Purchase Records
- Performance Records
- Operator's Agreements
- Delivery Records
- Quality Records
- Payment Records

### 9.6. TECHNICAL, MANUFACTURING & INTELLECTUAL PROPERTY

- Customer Data & Specifications
- Laser Files
- Prototypes
- Material Specifications
- Machine Settings
- Traceability Records
- Inspection Results
- Quality-Control Results
- Non-Conformance Records
- Technical Know-How
- Copyright Material

### 9.7. INFORMATION TECHNOLOGY & SECURITY

- System Inventories
- User Records
- Access Record
- Logs
- Backups
- Licences
- Support Records
- Cybersecurity Policies
- Risk Assessments
- Incident Records
- Disaster Recovery Records

### 9.8. HEALTH, SAFETY, ENVIRONMENT & FACILITIES

- Risk Assessments
- Safe Operating Procedures

- Machinery & Plant Records
- Inspection Records
- Maintenance Records
- Training Records
- PPE Issue Records
- Emergency Plans
- Incident Records
- Injury Records
- Occupational Hygiene Records, Where Applicable
- Contractor Files
- Waste Records, Where Required
- Environmental Records, Where Required

### 9.9. PRIVACY & PAIA

- Privacy Notices
- Processing Inventories
- Consent Records (Where Relevant)
- Objection Records (Where Relevant)
- Operator Arrangements
- Security Safeguards
- Impact Assessments
- Data-Subject Requests
- PAIA Requests & Decisions
- Breach Assessments
- Retention Records
- Destruction Records

## 10. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

### 10.1. RESPONSIBLE PARTY & PURPOSE

***Laser Stencil Technology is a responsible party where it determines the purposes & means of processing personal information, alone or in conjunction with others. Where it processes personal information for another responsible party without determining those purposes & means, its obligations as an operator apply. Its purposes for processing as a responsible party include the following:***

- Managing Employment
- Managing Customers & Suppliers
- Meeting Tax, Corporate, Labour, Safety & Other Legal Duties
- Protecting People, Assets, Systems & Rights
- Administering Accounts
- Communicating With Relevant Parties
- Conducting Lawful Marketing
- Establishing, Exercising Or Defending Legal Claims

### 10.2. CATEGORIES OF DATA SUBJECTS

***Data Subjects May Include:***

- Director
- Shareholders
- Employees
- Job Applicants
- Former Employees
- Contractors
- Customers & Their Personnel




- Prospects
- Suppliers & Their Personnel
- Visitors
- Website Users
- Professional Advisers
- Other Correspondents

## 10.3. CATEGORIES OF PERSONAL INFORMATION

***Personal Information May Include:***

- Names
- Identity Details
- Registration Details
- Contact Information
- Employment Data
- Payroll Data
- Financial Details
- Banking Details
- Tax Information
- Qualifications
- Correspondence
- Contractual Records
- Device Identifiers
- System Identifiers
- Access Logs
- Security Logs
- Images Where Lawfully Used
- Health Or Injury Information (Where Necessary & Lawful)

## 10.4. LAWFUL PROCESSING PRINCIPLES

***Laser Stencil Technology Applies POPIA's Conditions For Lawful Processing:***

- Accountability
- Processing Limitation Including: Lawfulness, Minimality & an Appropriate Justification
- Purpose Specification & Retention Control
- Compatible Further Processing
- Information Quality
- Openness & Notification
- Security Safeguards
- Data-Subject Participation

***Personal information must be adequate, relevant & not excessive, collected for a specific lawful purpose, kept accurate where reasonably practicable, retained no longer than authorised, & protected by appropriate technical & organisational measures.***

## 10.5. SPECIAL PERSONAL INFORMATION & CHILDREN

Special personal information & information concerning children will be processed only where a lawful authorisation applies & with safeguards proportionate to the risk. Laser Stencil Technology does not intentionally collect such information beyond legitimate employment, safety, legal or contractual needs.

## 10.6. RECIPIENTS & OPERATORS

***Information May Be Shared Where Lawful & Necessary, With The Following Recipients:***

- Employees Who Require The Information
- Customers
- Suppliers
- Banks

- Insurers
- Auditors
- Professional Advisers
- Payroll Providers
- IT Providers
- Couriers
- Cloud Providers
- Communications Providers
- Authorities
- Courts
- Other Lawful Recipients

***Operators must process personal information under appropriate written arrangements, confidentiality obligations & security obligations.***

## 10.7. CROSS-BORDER TRANSFERS

Laser Stencil Technology has planned transborder flows of personal information where operators or systems used in the ordinary course of business store, host, support or back up information outside the Republic. These flows may include cloud electronic mail & productivity platforms; hosted or outsourced payroll or accounting systems; customer & supplier correspondence routed through international communications providers; courier & logistics tracking platforms; remote information-technology support; & group or vendor systems that process information in other jurisdictions. Recipients or categories of recipients outside South Africa may include cloud & software-as-a-service providers, information-technology support operators, professional advisers, banks & payment processors, & other lawful operators engaged by Laser Stencil Technology. Personal information may be transferred outside South Africa only where Section 72 of POPIA or another lawful basis permits the transfer & appropriate protection is established, taking account of the recipient, jurisdiction, contract & risk. Staff must not initiate a new cross-border disclosure outside approved systems & operator arrangements.

## 10.8. SECURITY SAFEGUARDS

***Laser Stencil Technology will identify reasonably foreseeable risks, establish & maintain safeguards, verify their effective implementation & update them as risks change.***

***Measures May Include:***

- Access Control
- Authentication
- Least Privilege
- Encryption (Where Appropriate)
- Backups
- Physical Security
- Confidentiality Duties
- Supplier Controls
- Training
- Incident Response
- Secure Destruction

## 10.9. SECURITY COMPROMISES

Suspected security compromises must be escalated promptly to the Information Officer or Deputy Information Officer. Laser Stencil Technology will investigate, contain, document & remediate the event. Where there are reasonable grounds to believe that a data subject's personal information has been accessed or acquired by an unauthorised person, the company must notify the Information Regulator &, subject to Section 22 of POPIA, the affected data subject as soon as reasonably possible after discovery. Any delay in notifying a data subject must satisfy the specific requirements of Section 22. Notifications to the Regulator must follow its current prescribed reporting procedure.

## 10.10. DATA-SUBJECT RIGHTS

Subject to POPIA & PAIA, a data subject may request confirmation & access, correction or deletion of inaccurate or unlawfully held information, object to processing on recognised grounds, withdraw consent where consent is relied upon, & complain or pursue a lawful remedy. Identity must be verified & third-party rights protected.

## 10.11. INFORMATION OFFICERS' OBLIGATIONS

***The Information Officers Are Responsible For:***

- Encouraging Compliance,
- Handling Requests,

- Working With Applicable Authorities,
- Maintaining A Compliance Framework,
- Ensuring Awareness & Appropriate Assessments,
- Overseeing This Manual & Supporting Lawful Privacy Governance.
- Operational Owners Remain Accountable For Compliance In Their Functions

## 11. LASER STENCIL TECHNOLOGY, SAFETY & REGULATORY COMPLIANCE

This section describes the safety-related context in which Laser Stencil Technology creates & retains records. It does not replace machine-specific instructions, risk assessments, emergency procedures or other controlled operational safety documents. Requests for safety-related records remain subject to Sections 12 to 15 of this Manual.

### 11.1. OCCUPATIONAL HEALTH & SAFETY ACT

Under the Occupational Health & Safety Act 85 of 1993, Laser Stencil Technology must, as far as reasonably practicable, provide & maintain a working environment that is safe & without risk to employees' health. This includes safe systems of work, plant & machinery that are safe when properly used, identification & mitigation of hazards, information, instruction, training & supervision, & appropriate protective measures.

### 11.2. LASER MACHINERY & PLANT

***Laser Cutting, Engraving & Associated Plant May Present The Following Hazards:***

- Optical Radiation Hazards
- Fire Hazards
- Electrical Hazards
- Mechanical Hazards
- Fume Hazards
- Gas Hazards
- Compressed-Air Hazards
- Sharp-Edge Hazards
- Material-Handling Hazards
- Noise Hazards

***Only authorised & trained persons may operate or maintain machinery. Interlocks, guards, extraction & ventilation, emergency stops, signage & access controls must not be defeated or bypassed.***

### 11.3. RISK ASSESSMENTS & PROCEDURES

***Laser Stencil Technology must maintain suitable risk assessments & safe operating procedures proportionate to its machinery, materials & processes.***

***Assessments Should Address:***

- Commissioning
- Normal Operation
- Set-Up
- Cleaning
- Maintenance
- Foreseeable Abnormal Conditions
- Fire Prevention
- Fumes From Processed Materials
- Contractor Work
- Emergency Response

***Procedures must be reviewed after incidents, process changes or identified deficiencies.***

### 11.4. TRAINING, SUPERVISION & PPE

Personnel must receive role-appropriate induction, machine-specific instruction, refresher training & supervision. PPE must be selected from the risk assessment, issued & maintained, & used together with engineering & administrative controls rather than as a substitute for them. Records should identify the training, competency or authorisation, date, trainer & PPE issued.

### 11.5. MAINTENANCE & INSPECTIONS

***Laser machinery, extraction systems, guards, interlocks, electrical systems, fire equipment & related plant must be inspected, serviced & maintained by competent persons at appropriate intervals.***

***Records Should Include:***

- Asset Identity
- Date
- Work Performed
- Defects
- Corrective Action
- Parts
- Responsible Person
- Return-To-Service Authorisation

### 11.6. INCIDENTS & RECORDS

All injuries, near misses, unsafe conditions, fires, equipment failures & relevant exposures must be reported internally, investigated & retained. Statutory reporting & compensation processes must be followed where applicable. Incident records must be accurate, access-controlled & processed consistently with POPIA while remaining available for lawful safety oversight.

### 11.7. TECHNICAL CONFIDENTIALITY

***The following may embody confidential information, trade secrets, copyright or design rights:***

- Laser Parameters
- Customer Designs
- Production Methods
- Machine Configurations

***PAIA does not require disclosure where a mandatory or discretionary ground of refusal lawfully protects commercial, confidential, safety or third-party interests.***

## 12. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

### 12.1. SECTION 50 THRESHOLD

Section 50 of PAIA provides, in substance, that a requester must be given access to a record of a private body if the record is required for the exercise or protection of any rights, the requester complies with PAIA's procedural requirements, & access is not refused under a ground in Chapter 4 of Part 3. The requester must identify the right and explain why the record is required; mere relevance, curiosity or possible usefulness may be insufficient.

### 12.2. FORM & SUBMISSION

- A request must be made on the prescribed **Form 2 (Request for Access to Record)** under Regulation 7 of the PAIA Regulations, 2021, & submitted to the Information Officer or Deputy Information Officer using the details in Section 5, preferably by email to **Admin.ISO@lstec.co.za** or **Don@lstec.co.za**. Form 2 is available from the Information Regulator at **https://inforegulator.org.za/paia/** & on request from the Information Officer. Laser Stencil Technology's website is **www.lstec.co.za**. The request must provide sufficient particulars to identify the requester & record, specify the preferred form of access, identify the right to be exercised or protected, explain why the record is required, state how notices should be given, & include proof of authority where the requester acts for another person. Repealed Form C must not be used.

### 12.3. IDENTITY & CLARIFICATION

- Laser Stencil Technology may require reasonable proof of identity, authority & address & may seek clarification necessary to identify records or assess the Section 50 threshold. Assistance may be offered where a request is not properly completed.

### 12.4. DECISIONS

- The Information Officer will decide on the request & notify the requester as soon as reasonably possible, but within 30 days after receipt of the request or the particulars required by Section 53(2), subject to Section 56, the third-party notification & intervention provisions, & any lawful extension under Section 57 of PAIA. Notification will be given on the prescribed **Form 3 (Outcome of Request & of Fees Payable)** under Regulation 8. If access is refused, the notice will state adequate reasons & the provisions relied upon without revealing protected contents, together with the procedures & applicable periods for available remedies. If access is granted, the notice will state applicable fees, the form of access & relevant remedies. Failure to give a decision within the applicable statutory period constitutes a deemed refusal. Access may be granted by inspection, copy, electronic transmission or another practicable form, subject to preservation, security & copyright constraints.

### 12.5. SEVERABILITY

- Where a requested record contains both disclosable & protected information, every portion that does not contain protected information & can reasonably be severed from the protected portion must be disclosed in accordance with Section 59 of PAIA. The protected portions remain subject to the applicable grounds of refusal.

## 13. FEES

### 13.1. SECTION 54 REQUEST FEE

- Section 54 of PAIA permits a private body to require a requester, other than a personal requester, to pay the prescribed request fee before further processing. The Information officers will notify the requester of the amount & of any right to challenge it. Processing may be suspended until payment is made.

### 13.2. ACCESS & DEPOSIT FEES

- Where access is granted, prescribed reproduction, search, preparation, postal or other access fees may be payable. If the prescribed preparation time is likely to be exceeded, PAIA permits a deposit in accordance with the regulations.

### 13.3. SECTION 56 DECISION & PAYMENT

- Section 56 requires notice of the decision on a request. If access is granted, the notice must state the access fee payable, the form in which access will be given & the requester's relevant remedies. Access may be withheld until the applicable fee is paid.

### 13.4. CURRENT TARIFFS

- Fees are determined by PAIA & its current regulations, not by this Manual. The current prescribed tariff applies. Laser Stencil Technology may waive a fee only where permitted & appropriately authorised.

## 14. GROUNDS FOR REFUSAL OF ACCESS

### 14.1. GENERAL

Access may or must be refused on grounds in PAIA, subject to its public-interest override & severability provisions. Each request is assessed on its own facts.

### 14.2. PROTECTED INTERESTS

***Grounds May Include Protection Of The Following Interests:***

- Third-Party Personal Information Where Disclosure Would Be Unreasonable
- Third-Party Commercial Information
- Trade Secrets
- Confidential Information
- Information Supplied In Confidence
- Safety Of Individuals
- Security Of Structures, Systems Or Property
- Legally Privileged Records
- Laser Stencil Technology 's Commercial Information
- Laser Stencil Technology 's Trade Secrets
- Laser Stencil Technology 's Know-How
- Laser Stencil Technology 's Research Interests
- Laser Stencil Technology 's Contractual Interests
- Records Whose Disclosure Would Prejudice Research Or Other Protected Interests

### 14.3. OTHER IMPEDIMENTS

A request may also fail because the Section 50 threshold is not met, procedural requirements are not satisfied, or the record does not exist or cannot be found after all reasonable steps. Where a record cannot be found or does not exist, the requirements of Section 55 of PAIA, including the prescribed affidavit or affirmation explaining the steps taken, apply. Any prohibition or restriction in another law must be assessed together with Section 5 of PAIA rather than treated as an automatic ground of refusal. No refusal will be based solely on embarrassment or administrative preference.

### 14.4. PUBLIC-INTEREST OVERRIDE

Under Section 70 of PAIA, Laser Stencil Technology must grant access despite an applicable ground of refusal specified in that section if disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent & serious public-safety or environmental risk, & the public interest in disclosure clearly outweighs the harm contemplated by the relevant ground of refusal.

## 15. REMEDIES AVAILABLE TO REQUESTERS

### 15.1. INTERNAL PROCESS

A private body has no PAIA internal appeal procedure equivalent to that available for certain public bodies. A requester may ask the Information Officers to clarify or reconsider a decision, but such engagement does not suspend statutory time periods.

### 15.2. EXTERNAL REMEDIES

A requester or third party aggrieved by a decision of the head of Laser Stencil Technology, including a deemed refusal, may lodge a PAIA complaint with the Information Regulator on the prescribed **PAIA Form 5 (under Regulation 10)** by email to **PAIAComplaints@inforegulator.org.za** or through the complaint channels currently published by the Regulator. Complaints under Section 77A must be submitted within 180 days of the relevant decision; for a deemed refusal, the applicable starting point must be determined in accordance with PAIA & current official guidance. Court applications are governed by Section 78 & the applicable court rules, including requirements concerning exhaustion of remedies & time limits. A data subject may separately lodge a POPIA complaint using the prescribed POPIA complaint form at **POPIAComplaints@inforegulator.org.za**. Current official guidance, forms, jurisdiction & time limits must be followed.

### 15.3. PRESERVATION OF RIGHTS

Nothing in this Manual limit any right to approach a competent court, exercise contractual rights, report an offence or unsafe condition, or use another lawful dispute-resolution process.

## 16. AVAILABILITY & UPDATING OF THIS MANUAL

### 16.1. AVAILABILITY

This Manual is available in **English, Afrikaans & isiXhosa**. It may be inspected during working hours **Monday to Friday 07:30 to 15:30** at **Laser Stencil Technology** 's principal place of business at **400 Roan Crescent, Corporate Park North, Unit 3 Rambo Junxion, Randjespark, Midrand, 1685**; obtained from the Information Officer or Deputy Information Officer; obtained from the Information Regulator upon request; & published on Laser Stencil Technology 's website: **www.lstec.co.za** . Reasonable reproduction or delivery charges may apply where lawful.

### 16.2. UPDATING

The Information Officer will review this Manual periodically & after significant changes to legislation, processing, systems, products, machinery, corporate particulars or record categories. Superseded copies must be controlled in accordance with Laser Stencil Technology 's retention practices.

### 16.3. LANGUAGES & ACCESSIBILITY

This Manual is currently available in English, Afrikaans & isiXhosa. Laser Stencil Technology will consider reasonable requests for a further accessible format or appropriate assistance, subject to practicality, cost & applicable law.

## 17. APPROVAL

### 17.1. APPROVAL STATEMENT

***This Manual is approved by & on behalf of Laser Stencil Technology (Pty) Ltd & takes effect on 30 June 2026, as recorded in Section 1.3 & the approval particulars below.***

**Name:** Donovan Jeffery
**Capacity:** Managing Director & Information Officer
**Date:** 30 June 2026
**Place:** Midrand

**Name:** James Leslie
**Capacity:** Document Compliance & Deputy Information Officer
**Date:** 30 June 2026
**Place:** Midrand

**End of this Manual**