

# **TRIGGER SYSTEMS T/A TRIGGER (“TRIGGER”)**

**Reg: 2016/460285/07**

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE  
PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000**

**COMPLETED: DECEMBER 2021**

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## **PARTICULARS IN TERMS OF THE SECTION 51 MANUAL**

### 1. INTRODUCTION

This Manual is published in terms of Section 14 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

### 2. PURPOSE OF THE MANUAL

The purpose of the Manual is to help you access Trigger information and any other information that we may hold and to which you may be entitled to. PAIA requires us to make the manual available to you so that you know what types of information we have and how you can go about requesting it.

### 3. CONTACT DETAILS (Section 51(1)(a))

The Chief Executive Officer has duly authorized the Information Officer to deal with all matters in connection with requests for information in terms of PAIA.

**Executive Directors:** BJ Booyesen, W Cawood, R Lessing, M Kruger, M Pillay

**Information Officer:** Henriëtte Radmanovic

**Postal Address:** 315 Melk street, Gauteng, 0145, South Africa

**Street Address:** 315 Melk street, Gauteng, 0145, South Africa

**Telephone Number:** 010 824 0620

**Email Address:** info@trigger.co.za

### 4. THE PAIA MANUAL (Section 51(1)(b))

This Manual has been compiled in accordance with Section 10 of PAIA by the South African Human Rights Commission.

The Manual is available from the South African Human Rights Commission.  
Please direct any queries to:

The South African Human Rights Commission:  
PAIA Unit, the Research and Documentation  
Department Telephone

+27 11 484-8300 Number:

Fax: +27 11 484-0582

Website [www.sahrc.org.za](http://www.sahrc.org.za)

E-mail: [paia@sahrc.org.za](mailto:paia@sahrc.org.za)

Postal Address: Private Bag X2700, Houghton, 2041

## 5. NOTICES (Section 51(1)(c))

Notice(s) in terms of PAIA:

At this stage, no notice(s) has/have been published by the Minister on the categories of information available without a person having to request access in terms of PAIA. However, certain records / information is freely available on our website.

## 6. RECORDS WE HOLD

Categories of information collected about you (Subscriber) or those subscribers connected to your user account may include:

- General identification and contact information.
- Your name, address, e-mail address, telephone number, gender, marital status (*Trigger* employees only), date of birth, passwords, alternative contact information (such as listed emergency contacts or contact lists) and activity records (location of your vehicle).
- Identification numbers issued by government bodies or agencies.
- Identity and passport number
- Financial information and bank account details.
- Credit history and credit score and other financial information.
- Medical information (such as medical aid).
- Medical condition and health status (*Trigger* employees only).
- Other sensitive information (*Trigger* employees only).
- We may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud or in the employment process. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs) (*Trigger* employees only).
- Telephone recordings.
- Recordings of telephone calls to and from our representatives and call centers.
- Information to investigate crime, including fraud and money laundering (for example, we will share information with insurers who are investigating an insurance claim or with the SAPS who are investigating a criminal matter).
- Information enabling us to provide products and services.

- Location and identification of your vehicle (for example, vehicle coordinates and vehicle license plate or VIN number).

## 7. RECORDS AVAILABLE IN TERMS OF LEGISLATION (Section 51(1)(d))

Records available in terms of any other legislation applicable to our business:

Broad Based Black Economic Empowerment Act 53 of 2003(as amended) Basic Conditions of Employment Act 75 of 1997(as amended)  
 Companies Act, 71 of 2008  
 Compensation for Occupational Injuries and Diseases Act, 130 of 1993 Competition Act 89 of 1998 (as amended)  
 Criminal Procedure Act No 51 of 1977(as amended) Consumer Protection Act, 68 of 2008  
 Constitution of RSA Act 108 of 1996 (as amended) Copyright Act, 98 of 1978  
 Cross-border Road Transport Agency Act 4 1998 (as amended) Customs and Excise Act 32 of 2014  
 Designs Act 195 of 1993  
 Dangerous Weapons Act 15 of 2013 (as amended) Electronic Communications and Transactions Act 25 of 2002 Employment Equity Act, 55 of 1998  
 Employment Services Act 4 of 2014 Employment Tax Incentive Act 26 of 2013  
 Environment Conservation Act 73 of 1989  
 Financial Advisory and Intermediary Services Act, 37 of 2002 Financial Intelligence Centre Act 38 of 2001 (FICA) (as amended) Firearms Control Act 60 of 2000 (as amended)  
 Further Education and Training Colleges Act 16 of 2006 (as amended by Higher Education and Training Laws Amendment Act.)  
 Independent Communications Authority of SA Act 13 of 2000 (ICASA)(as amended) Income Tax Act, 58 of 1962  
 Intellectual Property Laws Amendment Act 28 of 2013  
 Intellectual Property Rights from Publicly Financed Research & Development Act 51 of 2008  
 Interception & Monitoring Prohibition Act No 127 of 1992 (as amended)  
 Labour Relations Act 66 of 1995(as amended)  
 National Qualifications Framework Act 67 of 2008 (as amended) Occupational Health and Safety Act, 85 of 1993  
 Patents Act 57 of 1978 (as amended)  
 Prescribed Rate of Interest Amendment Act 7 of 1997 Prevention of Organised Crime Act, 121 of 1998  
 Prevention and Combatting of Corrupt Activities, Act 12 of 2004 Private Security Industry Regulating Act No 56 of 2001  
 Private Security Industry Levies Act 23 of 2002  
 Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000  
 Protected Disclosures Act 26 of 2000  
 Protection of Personal Information Act, 4 of 2014  
 Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 (RICA)  
 Short Term Insurance Act of 1998(as amended) South African Revenue Services Act, 34 of 1997 Skills Development Levies Act, 97 of 1998  
 Tax Administration Act 16 of 2016  
 Trademarks Act, 94 of 1993  
 Unemployment Insurance Act, 63 of 2001 Unemployment Insurance Contributions Act 4 of 2002 Value Added Tax Act, 89 of 1991

## 8. RECORDS HELD BY THE COMPANY

In terms of records that may be requested, the mere fact that the information of the company is listed in the Manual does not mean that the information will be made available. The company in terms of Chapter 4 of PAIA, has the right to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of the Act, exist.

For instance, we may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- Trigger's confidential information;
- Information that by agreement between Trigger and a third party, is confidential (for example the content of a confidential agreement);
- another company's personal, commercial or confidential information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings;
- research information; or
- commercial activities of Trigger, which may include trade secrets, intellectual property, proprietary information, financial information, commercial information or technical information which disclosure would likely cause harm to the business interests of Trigger.

We will notify you in writing whether your request has been approved or denied within 30 (thirty) calendar days after we have received a completed Request for Access form. If we cannot find any requested record or it does not exist, then we will notify you that it is not possible to give access to that particular record.

### **Web Page**

The Web Page ([www.Trigger.co.za](http://www.Trigger.co.za)) is accessible to anyone who has access to the Internet. The web page has the following categories:

- About Us (Trigger)
  - What is Trigger
  - Contact
  - News
- Coverage Map
- Pricing
- Features
- My Account Login
  - Subscribers

- Frequently asked questions
- Download Trigger
- Blog
- Disclaimer
- Copyrights
- Information Manual
- Privacy Policy
- Terms and Conditions

### **Company Secretarial and Legal**

- Agreements
- Company Secretarial Records
- Trademarks and Patents

### **Finance**

- Financial Statements
- Management Accounts
- Budgets
- Management Plans
- Asset Registers
- Company Policies
- Banking Records
- Purchasing Records
- Audit Reports

### **Security**

- Records
- Biometric Access Details
- Access codes/ passwords

## Human Resources

- Policies
- Benefits
- Provident Fund
- Staff Records
- Employment Equity Reports
- Skills Development Reports
- Training and Development Records
- Industrial Relations Records
- Payroll Records
- Medical Aid Information

## Operational

- Database
- Database and Computer Software
- Health and Safety Records
- Maintenance Records
- Details

## 8. REQUEST PROCEDURE

Should you request information in terms of PAIA, please complete the prescribed form.

The request form can be accessed on [www.justice.gov.za](http://www.justice.gov.za).  
(A copy of the form is attached as Annexure A)

Remember to indicate the following on the form:

- Form of access required;
- Identify the right you want to exercise or protect and give an explanation why the record is needed for that purpose;
- Specify a postal address or fax number in South Africa or an e-mail address;
- Proof of the capacity in which you are acting, if requesting access on behalf of a third party.

## 9. INFORMATION SECURITY

We secure our data by maintaining reasonable measures to protect personal information from loss or misuse and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete and reliable for its intended use.

## 10. UPDATES TO THIS MANUAL (Section 51(4))

This Manual will be updated and amended from time to time. The updated Manual will be aligned with the Privacy Policy and can be accessed at all times on the website.

## 11. LEGISLATIVE AND REGULATORY FRAMEWORK

This Manual should be read in conjunction with the following legislative framework:

- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2014;
- Electronic Communications and Transactions Act 25 of 2002.

## 12. AVAILABILITY OF THE MANUAL

In accordance with the Regulations to the Act, the Manual is published on Trigger's website at [www.Trigger.co.za](http://www.Trigger.co.za), together with the prescribed form and the fees applicable.

## 13. FEES IN RESPECT OF PRIVATE BODIES

You must pay the requested fee as required by law when submitting a request for access to information.

The prescribed fees are set out in the Fee Schedule which is available from SAHRC, alternatively access the following link:

<https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

You must pay the fees before Trigger hands over the requested information. You have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the records for disclosure.



