

PAIA Manual of SIR – Symbix Industrial Relations (Pty) Ltd

(Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended (“PAIA”))

1. Contact Details

Head of Private Body: Director – Symbix Industrial Relations (Pty) Ltd

Email: compliance@sirlegal.co.za

Website: www.sirlegal.co.za

2. Purpose of the Manual

This manual is published in compliance with Section 51 of PAIA. Its purpose is to:

- Assist members of the public in understanding what records are held by Symbix Industrial Relations (Pty) Ltd (“SIR”).
- Outline procedures for requesting access to records.
- Ensure transparency and compliance with PAIA and the Protection of Personal Information Act (POPIA).

3. Guide on PAIA

The South African Human Rights Commission (SAHRC) publishes a guide to assist individuals in exercising their rights under PAIA.

It is available at:

- www.sahrc.org.za or
- from the Information Regulator at www.inforegulator.org.za (inforegulator.org.za in Bing).

4. Categories of Records Held

4.1. Company Records

- Company registration and statutory records.
- Shareholder agreements, trust deeds, and company secretarial records.

4.2 Labour Law Advisory Records

- Client contracts and service agreements.
- Advisory notes, disciplinary codes, and workplace procedures.

4.3 Financial Records

- Annual financial statements.
- Tax records (VAT, PAYE, SARS submissions).
- Budgets and management accounts.

4.4 Employment and HR Records

- Employee contracts.
- Disciplinary records.
- HR policies and procedures.

4.5 Marketing and Website Records

- Website content.
- Branding and promotional material.

4.6 Records Required in Terms of Legislation

- **Companies Act:** Share register, director details.
- **Labour Relations Act:** Employment contracts, disciplinary records.
- **Basic Conditions of Employment Act:** Employee leave and wage records.
- **Tax Acts:** PAYE, VAT, and income tax submissions.
- **POPIA:** Records of processing activities.

5. Records Available Without Request

- Privacy Notice (available on our website).
- Company information published on our website.

6. Records Available on Request (Subject to PAIA)

Access may be requested to records not automatically available. Requests must comply with PAIA and may be refused on grounds set out in the Act (e.g., privacy of third parties, commercial confidentiality, security concerns).

7. Request Procedure

- Complete Form C (Request for Access to Record of Private Body), available from the Information Regulator's website.
- Submit to the Head of Private Body at compliance@sirlegal.co.za.
- Proof of identity may be required.
- Requests will be acknowledged within 30 days, unless extended under PAIA.

8. Fees

Fees are prescribed under PAIA Regulations and published by the Information Regulator.

- Request fee.
 - Reproduction fees (per page, CD, etc.).
 - Search and preparation fees.
 - Postage costs.
- Note:** The official fee schedule is available from the Information Regulator's website.

9. Grounds for Refusal

Requests may be refused if disclosure would:

- Violate privacy of third parties.
- Breach confidentiality agreements.
- Endanger security.
- Be contrary to public interest.

10. Decision Process

The Head of the Private Body will notify the requester in writing of the decision to grant or refuse access, including:

- Reasons for refusal (if applicable).
- Information on remedies available.

11. Remedies

If your request is refused, you may:

- Lodge a complaint with the Information Regulator.
- Apply to the High Court for appropriate relief.

12. Processing of Personal Information (POPIA)

Symbix Industrial Relations (Pty) Ltd processes personal information in accordance with POPIA.

- **Categories processed:** Employee data, client information, supplier details.
- **Purpose:** Contractual obligations, compliance, HR management, and operational needs.
- **Data subject rights:** Access, correction, and deletion of personal information.

13. Availability of the Manual

This PAIA Manual is available:

- On our website: www.sirlegal.co.za
- At our offices during business hours.
- On request via email.

14. Updating of the Manual

This manual will be updated as required to reflect changes in legislation, company operations, or compliance requirements.

Issued by: Symbix Industrial Relations (Pty) Ltd
02/02/2026