

# **PAIA MANUAL**

**Prepared in terms of section 14 and 51  
of the Promotion of Access to  
Information Act 2 of 2000 (as amended)**

**DATE OF COMPILATION: 28/03/2022**



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### 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |                    |   |
|-----|--------------------|---|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer   |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer;   |
| 1.3 | <b>“IO”</b>        | Information Officer;  |
| 1.4 | <b>“Logitech”</b>  | Logi Peripherals Technologies (South Africa) (Pty) Ltd, registration number 2006/031887/07; |
| 1.5 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;  |
| 1.6 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000 (as Amended);                          |
| 1.7 | <b>“POPIA”</b>     | Protection of Personal Information Act No. 4 of 2013 (as Amended);                          |
| 1.8 | <b>“Regulator”</b> | Information Regulator; and  |
| 1.9 | <b>“Republic”</b>  | Republic of South Africa  |

### 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by Logitech which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of Logitech, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;



- 2.3 know the description of the records of Logitech which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if Logitech will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if Logitech has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether Logitech has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LOGITECH**

#### **3.1. Chief Information Officer**

Name: Mark Gittelson – Managing Director  
Tel: +27 11 513 3380  
Email: [mgittelson@logitech.com](mailto:mgittelson@logitech.com)



### 3.2 Access to information general contacts

Email: [privacy@logitech.com](mailto:privacy@logitech.com)

### 3.3 National or Head Office

Postal Address:

The Fourways Business Centre  
Design Quarter Fourways  
Leslie Road cnr William Nicol Drive  
Fourways, 2055

Physical Address:

The Fourways Business Centre  
Design Quarter Fourways  
Leslie Road cnr William Nicol Drive  
Fourways, 2055

Telephone: +2711 236 8600

Email: [legal-emea@logitech.co.za](mailto:legal-emea@logitech.co.za)

Website: <https://www.logitech.com/en-za>

## 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated under PAIA and POPIA.

4.2. The Guide is available in each of the official languages.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
  - 4.3.2.1. the Information Officer of every public body, and
  - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3.3. the manner and form of a request for-
  - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
  - 4.3.6.1. an internal appeal;

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<sup>1</sup> Section 17(1) of PAIA - *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA - *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA - *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA - *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations to the PAIA made in terms of section 92<sup>11</sup>.

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<sup>5</sup> Section 14(1) of PAIA - The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA - The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA - The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA - The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA - The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA - The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that - "The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

## 5. RECORDS AUTOMATICALLY AVAILABLE

General information about Logitech can be accessed via the internet on <https://www.logitech.com/en-za>, which is available to all persons who have access to the internet.

Category of records	Types of the Record	Available on Website
Products	Current product information	X
Services	Current services information	X
Contact information	General contact information	X
Public facing policies and notices	Privacy Policy	X
Public facing policies and notices	Cookie policy	X

## 6. DESCRIPTION OF THE RECORDS OF LOGITECH WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The following legislation creates the obligation for Logitech to keep certain records:

- Basic conditions of Employment no 75 of 1997
- Broad Based Black Economic Empowerment Act No 53 of 2003
- Companies Act No 71 of 2008

- Consumer Protection Act No. 68 of 2008
- Copyright Act No 98 of 1978
- Electronic Communication and Transaction Act No 25 of 2002
- Employment Equity Act No 55 of 1998
- Income Tax Act No. 95 of 1967
- Insolvency Act no 24 of 1936
- Labour Relations Act no. 66 of 1955
- Occupational Health and Safety Act No. 85 of 1993
- Skills Development Act No. 97 of 1998
- Unemployment Insurance Act no 63 of 2001
- Value Added Tax Act no 89 of 1991

Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other person must follow the request for access to the records procedure as outlined in this manual.

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LOGITECH

Subjects on which Logitech holds records	Categories of records
Records in relation to the Companies Act	Registration documentation, Memorandum of Incorporation, Minutes of board and shareholder meetings, Appointment of directors, auditors, company secretary where applicable.
Finance and Accounting	Accounting records, Annual Financial Statements, Asset registers, Auditor's report, Bank Statements, Invoices, rental agreements.
Income Tax Records	PAYE records, VAT records, VAT clearance certificates.
Personnel records	Personal information, employment contracts, attendance registers, disciplinary records, salary records, leave records
Supplier records	Company and contact details, application forms, website login profiles, invoices, receipts

<b>Subjects on which Logitech holds records</b>	<b>Categories of records</b>
Insurance records	General insurance
Electronic communication and transactions records	Records pertaining to the specific purpose of the communications or transactions.

## **8. PROCESSING OF PERSONAL INFORMATION**

### **8.1 Purpose of Processing Personal Information**

The purposes for which we process personal information includes but is not limited to:

- 8.1.1 provision of products and services to customers
- 8.1.2 employee administration
- 8.1.3 transacting with suppliers
- 8.1.4 maintaining records
- 8.1.5 recruitment
- 8.1.6 general administration
- 8.1.7 financial requirements
- 8.1.8 compliance with legal and regulatory requirements
- 8.1.9 facilities management

### **8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto**

The categories of Data Subjects and of the information or categories of information relating thereto includes but is not limited to those set out below in the:

- 8.2.1 Privacy Policy
- 8.2.2 Processing Notice

Categories of Data Subjects	Personal Information that may be processed
Customers (B2B)	Employee name, organization name, corporate email address, job title, phone number, usage data, device identifiers, account information
Customers (B2C)	Name, email address, phone number, usage data, device identifiers, username, payment information, purchase history, home address, postcode, languages, configurations,
Suppliers	Contact details, employment information, feedback, estimations, personal identification information, visual information, user account information
Employees/Contractors	Contact information, education and skills, electronic information, employment information, dependents information, financial information, government identifiers, habits and personality information, health & wellness information, health insurance information, personal identification information, professional experiences and affiliations, travel & expenses, workplace welfare, gender, race, user account information
Prospective customers/leads	Contact information, employment information, personal identification
Prospective employees	Contact information, education & skills, previous employment information, job application details, salary wage expectation, personal identification information, professional experience and affiliations
Research participants	Contact information, electronic information, personal identification, social media account information, account information, habits and personality information
Technology & Gaming partners	Contact details, employment information, feedback, estimations, personal identification information, visual information, user account information

### 8.3 The recipients or categories of recipients to whom the personal information may be supplied

The recipients or categories of recipients to whom the personal information may be supplied includes but is not limited to those set out below in the:

8.2.1 Privacy Policy

8.2.2 Processing Notice

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Qualifications for qualification verifications	South African Qualifications Authority
Contact information	South African Police Services
Payment details	Third party payment suppliers
Usage data	Third party analytics providers
Purchases	South African Authorities (on request)

### 8.4 Planned transborder flows of personal information

The Company may transfer data transborder (mainly to the United States) in order to store data with third party cloud storage providers.

### 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, each Logitech entity processing personal data subject to the Promotion of Access to Information Act, and other applicable data protection and privacy laws, implements



various up to date technical and organisational measures to ensure confidentiality, integrity and availability appropriate to the risk including but not limited to:

- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT infrastructure

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on Logitech's website: [www.logitech.co.za](http://www.logitech.co.za)

9.1.2 at the office of Logitech for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the regulations to the PAIA, shall be payable per each A4-size photocopy made.

## **10. UPDATING OF THE MANUAL**

This manual will be updated by Logitech on a regular basis and if material changes occur.

***Issued by***

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***Mark Gittelson***  
***Managing Director***