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VDM CARGO SOLUTIONS (PTY) LTD
PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000

Version 2.0 | June 2026 | Registration No: 2013/233396/07

This Manual has been compiled in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA"). It is intended to facilitate requests for access to records held by VDM Cargo Solutions (Pty) Ltd and to promote a culture of transparency and accountability.

1. INTRODUCTION

The Promotion of Access to Information Act 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information held by both public and private bodies, as enshrined in section 32 of the Constitution of the Republic of South Africa, 1996. PAIA enables any person to access information that is required for the exercise or protection of any right.

VDM Cargo Solutions (Pty) Ltd is a private body as defined in PAIA and is accordingly required to compile and make available this manual to inform members of the public of the records it holds and the process for requesting access to such records.

This manual has been updated to align with the amendments introduced by POPIA and with the revised regulations published by the Information Regulator.

2. THE ACT

PAIA was enacted on 3 February 2000 and gives effect to the right of access to any information held by the State or any other person, where such information is required for the exercise or protection of any rights. Where a request is made in terms of PAIA, the body to which the request is made is obliged to release the information, except where PAIA or another law expressly provides that the information may or must not be released.

The Act sets out procedural requirements for such requests, including timeframes for decision-making, fee structures, and grounds for refusal. Section 9 of the Act recognises that the right to access to information is not unlimited and is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality, and effective governance.

3. PURPOSE OF THIS MANUAL

This manual is intended to assist members of the public to:

- Understand the categories of records held by VDM Cargo Solutions (Pty) Ltd that are available without a formal PAIA request;
- Make a request for access to records by providing a description of the subjects on which VDM Cargo Solutions holds records and the categories of records held on each subject;

- Identify records available in accordance with other applicable legislation;
- Access the contact details of the Information Officer and Deputy Information Officer;
- Obtain a description of the guide on how to use PAIA, as updated by the Information Regulator, and how to access it;
- Understand whether VDM Cargo Solutions processes personal information and for what purpose;
- Know the categories of data subjects and the categories of information processed in relation to each;
- Know the recipients or categories of recipients to whom personal information may be supplied;
- Know whether personal information is transferred outside the Republic of South Africa and to which recipients;
- Know what security measures VDM Cargo Solutions has in place to protect personal information.

4. CONTACT DETAILS

4.1 Information Officer

Name	Pieter Gideon Grobler
Designation	Chief Financial Officer (CFO)
Physical Address	43 Gemini Street, Brackenfell Industrial, Brackenfell, 7560
Postal Address	PO Box 1169, Brackenfell, 7561
Telephone	021 300 1552
Cell	082 533 5218
Email	gideon@vdmcargosolutions.com

4.2 Deputy Information Officer

Name	Will-Marie van der Merwe
Designation	General Manager
Physical Address	43 Gemini Street, Brackenfell Industrial, Brackenfell, 7560
Postal Address	PO Box 1169, Brackenfell, 7561
Telephone	021 300 1552
Cell	083 414 2598
Email	wm@vdmcargosolutions.com

4.3 General Company Information

Name of Private Body	VDM Cargo Solutions (Pty) Ltd
Registration Number	2013/233396/07
VAT Number	4510265699
Physical Address	43 Gemini Street, Brackenfell Industrial, Brackenfell, 7560
Postal Address	PO Box 1169, Brackenfell, 7561
Telephone	021 300 1552
Fax	086 425 8635

Email	franco@vdmcargosolutions.com
Website	www.vdmcargosolutions.com

5. GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of Section 10(1) of PAIA as amended, updated and made available the Guide on how to use PAIA ("the Guide") in an easily comprehensible form. The Guide is available in each of the official languages and in braille.

The Guide may be obtained from the following sources:

- Upon written request to the Information Officer of VDM Cargo Solutions (Pty) Ltd at the contact details above;
- From the website of the Information Regulator: www.inforegulator.org.za
- By inspection at the offices of VDM Cargo Solutions during normal business hours.

5.1 Information Regulator Contact Details

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P O Box 31533, Braamfontein, Johannesburg, 2017
PAIA Queries	PAIA.IR@justice.gov.za
Complaints	complaints.IR@justice.gov.za
General Enquiries	inforeg@justice.gov.za
Website	www.inforegulator.org.za
Telephone	010 023 5207

6. RECORDS AUTOMATICALLY AVAILABLE TO THE PUBLIC

In terms of Section 52(2) of PAIA, a private body may voluntarily make certain categories of records available without requiring a formal PAIA request. A Section 52(2) notice regarding categories of records available without a formal request has to date not been published by VDM Cargo Solutions (Pty) Ltd.

The following documents are, however, available to members of the public upon request to the Information Officer, without the need for a formal PAIA request:

- This PAIA Manual
- The VDM Cargo Solutions Privacy Policy (available on the company website)
- The company's standard Terms and Conditions of Service

7. RECORDS HELD BY VDM CARGO SOLUTIONS (PTY) LTD

The following table sets out the categories of records held by VDM Cargo Solutions (Pty) Ltd. Access to the documents listed below may be subject to the grounds of refusal set out in Section 12 of this Manual.

Category	Records
Financial Records	VAT records, PAYE records, UIF records, SDL records, management accounts, audited financial statements, fixed asset register, bank statements, invoices, credit notes, debit notes, statements

Human Resources	Employment contracts, personnel files, payroll records, leave records, disciplinary records, training records, SEESA records, EMP201 submissions
Operational / Freight	Customs entries and supporting documentation, bills of lading, airway bills, house bills, shipping instructions, delivery notes, freight invoices, COD records, client files
Compliance	AEO application documentation, FICA/KYC records, FIC TFS screening records, POPIA compliance records, PAIA manual and request forms
Corporate	Company registration documents, MOI, share register, director details, CIPC records, VAT registration, bank mandates
Client Records	Credit applications, client onboarding documents, account statements, age analysis, correspondence
Supplier Records	Supplier invoices, supplier statements, payment records, supplier agreements, foreign supplier documentation
IT and Systems	System access records, IT policies, data backup records, Pastel accounting records, Shipshape system data
Marketing	Company profile, promotional material, website content, marketing correspondence

8. RECORDS REQUIRED IN TERMS OF LEGISLATION

Records are kept by VDM Cargo Solutions (Pty) Ltd in accordance with legislation applicable to its business, which includes but is not limited to the following:

Legislation	Act Number
Promotion of Access to Information Act	2 of 2000
Protection of Personal Information Act	4 of 2013
Customs and Excise Act	91 of 1964
Labour Relations Act	66 of 1995
Basic Conditions of Employment Act	75 of 1997
Employment Equity Act	55 of 1998
Compensation for Occupational Injuries and Diseases Act	130 of 1993
Unemployment Insurance Act	63 of 2001
Unemployment Insurance Contributions Act	4 of 2002
Value Added Tax Act	89 of 1991
Income Tax Act	58 of 1962
Companies Act	71 of 2008
Consumer Protection Act	68 of 2008
Financial Intelligence Centre Act	38 of 2001
Broad-Based Black Economic Empowerment Act	53 of 2003
Skills Development Act	9 of 1997
Skills Development Levies Act	9 of 1999
Electronic Communications and Transactions Act	36 of 2005
Occupational Health and Safety Act	85 of 1993
Constitution of the Republic of South Africa	108 of 1996

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

VDM Cargo Solutions (Pty) Ltd collects and processes personal information only to the extent necessary for the following purposes:

- Employees: administration of employment contracts, payroll processing, SARS submissions, UIF contributions, Skills Development Levy, Workers' Compensation submissions;
- Clients: credit applications, invoicing, customs clearance submissions to SARS, freight and logistics service delivery;
- Suppliers: procurement, credit applications, payment processing, SARS compliance;
- Regulatory compliance: FICA KYC/AML obligations, FIC Targeted Financial Sanctions screening, SARS AEO compliance.

9.2 Categories of Data Subjects and Information Processed

Category of Data Subject	Personal Information That May Be Processed
Clients / Customers	Full name, identity/passport number, company registration number, VAT number, contact details, physical and postal address, banking details, customs registration numbers, shipping and cargo information
Suppliers / Agents	Company name, registration number, VAT number, contact details, address, banking details, director information
Employees	Full name, identity number, date of birth, gender, race, address, contact details, qualifications, employment history, banking details, tax number, UIF number, emergency contact details, work permit (where applicable)
Job Applicants	Full name, identity number, contact details, qualifications, employment history, references
Visitors	Name, contact details, vehicle registration, visit purpose (maintained in visitor log)

9.3 Recipients of Personal Information

Personal information collected by VDM Cargo Solutions (Pty) Ltd may be disclosed to the following categories of recipients, where necessary and in accordance with applicable law:

- South African Revenue Service (SARS) — for tax, customs and excise compliance;
- Financial Intelligence Centre (FIC) — for KYC/AML compliance obligations;
- Department of Employment and Labour — for UIF and workmen's compensation purposes;
- Shipping lines, airlines, port and terminal operators — for freight service execution;
- Overseas freight agents and logistics partners — for origin and destination service execution;
- Banks and financial institutions — for invoicing, payment processing and debtor finance;
- Payroll and HR service providers — for payroll administration;
- Auditors and professional advisors — for audit, legal and compliance purposes;
- IT and systems service providers — for operational software and data storage;
- Any other recipient required by law or by court order.

9.4 Transborder Flows of Personal Information

Given the international nature of VDM Cargo Solutions' freight forwarding and customs clearing operations, personal information may be transferred to overseas recipients in the following circumstances:

- Client names, contact details and shipment information may be shared with overseas freight agents and logistics partners in the origin or destination country of a shipment;
- Customs documentation may be shared with foreign customs authorities where required by international trade regulations.

Where personal information is transferred outside the Republic of South Africa, VDM Cargo Solutions will ensure compliance with section 72 of POPIA and that the recipient country offers an adequate level of data protection or that appropriate safeguards are in place.

9.5 Information Security Measures

VDM Cargo Solutions (Pty) Ltd has implemented the following security measures to ensure the confidentiality, integrity and availability of personal information:

- POPIA information security policies are in place and reviewed annually;
- All company computers are subject to a standard usage policy;
- Active antivirus and endpoint protection on all devices;
- Password protection on all company devices and systems;
- Multi-factor authentication (MFA) on critical systems;
- VPN access control for remote access;
- Regular staff awareness training on physical and cybersecurity;
- Regular security audits and reviews;
- Physical access controls at company premises;
- Role-based access control — information is accessible on a need-to-know basis only.

10. REQUEST PROCEDURE FOR OBTAINING ACCESS TO RECORDS

Any person wishing to request access to a record held by VDM Cargo Solutions (Pty) Ltd must follow the procedure set out below.

10.1 Completing the Request Form

The requester must complete the prescribed Form 2 (Annexure B to this Manual) and submit it to the Information Officer at the postal or physical address, or by email, as stated in Section 4 of this Manual. The prescribed form must contain sufficient particulars to enable the Information Officer to identify:

- The record or records requested;
- The identity of the requester;
- The form of access required, if the request is granted;
- The postal address, fax number or email address of the requester.

10.2 Right to Be Exercised or Protected

The requester must state that the information is required in order to exercise or protect a right, and must clearly state the nature of that right and why the requested record is necessary for its exercise or protection.

If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is being made, to the reasonable satisfaction of the Information Officer.

Where a requester is unable to complete the prescribed form due to illiteracy or disability, such person may submit the request orally.

10.3 Processing Timeframe

VDM Cargo Solutions (Pty) Ltd will process the request and notify the requester of the decision within 30 days of receipt. This period may be extended by a further 30 days where the request is for a large volume of information

or where a search of records held at another location is required. The requester will be notified in writing of any such extension.

The requester will be informed of the outcome of the request by means of Form 3 (Annexure C to this Manual).

11. FEES

PAIA provides for two types of fees:

- A request fee — a standard fee payable by every requester before the request is processed;
- An access fee — calculated based on reproduction costs, search and preparation time, and any postal costs.

The Information Officer will notify the requester of any applicable fees. A record will be withheld until all prescribed fees have been paid. Where a request is refused after a deposit has been paid, the deposit will be refunded to the requester.

No.	Description	Amount
1	Request fee payable by every requester	R140.00
2	Photocopy / printed black & white copy of A4-size page	R2.00 per page
3	Printed copy of A4-size page	R2.00 per page
4	Copy on flash drive (provided by requester)	R40.00
4	Copy on compact disc (provided by requester)	R40.00
4	Copy on compact disc (provided to requester)	R60.00
5	Transcription of visual images per A4 page	Outsourced — subject to quotation
6	Transcription of audio record per A4 page	R24.00
7	Copy of audio recording on flash drive (provided by requester)	R40.00
8	Search and preparation — per hour (excluding first hour, max R435.00)	R145.00 per hour
9	Deposit — if search exceeds 6 hours	One third of total access fee
10	Postage, email or other electronic transfer	Actual cost

12. GROUNDS FOR REFUSAL OF ACCESS

The Information Officer of VDM Cargo Solutions (Pty) Ltd may refuse a request for access to a record on the following grounds:

12.1 Mandatory Grounds for Refusal

- The mandatory protection of the privacy of a third party (natural person), where disclosure would involve the unreasonable disclosure of personal information in contravention of POPIA;
- The mandatory protection of commercial information of a third party, including trade secrets, financial or commercial information the disclosure of which could harm the third party's interests, or information disclosed in confidence;
- The mandatory protection of confidential information of third parties protected by agreement;
- The mandatory protection of safety of individuals and property;
- The mandatory protection of records that would be regarded as legally privileged in legal proceedings;
- The mandatory protection of records that would reveal the identity of a confidential source of information.

12.2 Discretionary Grounds for Refusal

- The commercial activities of VDM Cargo Solutions (Pty) Ltd, including trade secrets, financial or commercial information the disclosure of which could harm VDM's interests, or information that could place VDM at a disadvantage in negotiations or commercial competition;
- Research information of VDM Cargo Solutions or a third party, where disclosure would reveal the identity of the researcher or the subject matter and would place the research at a serious disadvantage;
- Requests that are clearly frivolous or vexatious, or that would involve an unreasonable diversion of resources.

Should a record requested not be found after a diligent search, the Information Officer will notify the requester by means of an affidavit that it is not possible to give access to the record.

13. DECISION AND INTERNAL REMEDIES

VDM Cargo Solutions (Pty) Ltd will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect by means of Form 3 (Annexure C).

The 30-day period may be extended by a further period of not more than 30 days where the request is for a large volume of information, or where a search for information held at another location is required and the information cannot reasonably be obtained within the original 30-day period. The requester will be notified in writing of any extension.

13.1 Internal Remedies

A requester who is aggrieved by the decision of the Information Officer may submit a complaint to the Information Regulator on the prescribed form at:

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P O Box 31533, Braamfontein, Johannesburg, 2017
Complaints Email	complaints.IR@justice.gov.za
General Enquiries	inforeg@justice.gov.za
Website	www.inforegulator.org.za

14. AVAILABILITY OF THIS MANUAL

This Manual is available:

- For inspection at the premises of VDM Cargo Solutions (Pty) Ltd at 43 Gemini Street, Brackenfell Industrial, Brackenfell, 7560, during normal business hours;
- On the website of VDM Cargo Solutions (Pty) Ltd at www.vdmcargosolutions.com;
- Upon written request to the Information Officer.

This manual will be reviewed and updated annually, or sooner where required by changes in legislation or company operations.

APPROVED AND SIGNED BY THE INFORMATION OFFICER

VDM Cargo Solutions (Pty) Ltd

Signed:

Name: Pieter Gideon Grobler (CFO)

Date: _____

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ANNEXURE A: FEE SCHEDULE

The following fees are applicable to any request for access to records held by VDM Cargo Solutions (Pty) Ltd, in accordance with the regulations published under PAIA:

No.	Description	Amount
1	Request fee payable by every requester	R140.00
2	Photocopy / printed black & white copy of A4-size page	R2.00 per page or part thereof
3	Printed copy of A4-size page	R2.00 per page or part thereof
4a	Copy on flash drive (provided by requester)	R40.00
4b	Copy on compact disc (provided by requester)	R40.00
4c	Copy on compact disc (provided to requester)	R60.00
5	Transcription of visual images per A4-size page	Outsourced — subject to quotation
6	Copy of visual images	Outsourced — subject to quotation
7	Transcription of audio record, per A4-size page	R24.00
8a	Copy of audio recording on flash drive (provided by requester)	R40.00
8b	Copy of audio recording on compact disc (provided by requester)	R40.00
8c	Copy of audio recording on compact disc (provided to requester)	R60.00
9	Search and preparation per hour or part thereof, excluding first hour (maximum R435.00)	R145.00 per hour
10	Deposit if search exceeds 6 hours	One third of total access fee
11	Postage, email or other electronic transfer	Actual expense

Fees are subject to adjustment in accordance with updated PAIA regulations from time to time.