



**SUMITOMO RUBBER SOUTH AFRICA (PTY) LTD**

**t/a DUNLOP TYRES SOUTH AFRICA**

**REGISTRATION NUMBER: 1997/021619/07**

**("the Company")**

**ACCESS TO INFORMATION MANUAL ("Manual") PREPARED IN ACCORDANCE WITH  
SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000**

**("Act")**

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Contents

1. Introduction .....	2
2. Purpose of the Manual in terms of the Act .....	2
3. Information required in terms of section 51 (1) (a) of the Act: .....	2
4. Details of the Information Officer: .....	2
5. The Act (Section 51 (1) (b)) .....	2
6. Applicable Legislation (Information on subjects and categories of records required in terms of section 51(1)(c) of the Act) .....	3
7. Schedule of Records (Information in terms of section 51(1)(d) of the Act) .....	4
8. Processing of personal information .....	5
9. The purpose of processing of personal information .....	5
10. Categories of Data Subjects and their Personal Information .....	6
11. Recipients or categories of recipients with whom personal information is shared .....	7
12. Information security measures to protect personal information .....	7
13. Trans-border flows of personal information .....	8
14. Form of Request (How to request a record from the company in terms of Section 51 (e)): - .....	8
15. Prescribed Fees (Section 51 (1) (f)) .....	8
16. Refusal of Access and Protection of Information: .....	9
17. Access to prescribed forms and fees .....	9
18. Availability of the Manual .....	9
19. Remedies .....	9

1. Introduction

**SUMITOMO RUBBER SOUTH AFRICA (PTY) LTD t/a DUNLOP TYRES SOUTH AFRICA** conducts business as a manufacturer, imported and supplier of tyres.

2. Purpose of the Manual in terms of the Act

The purpose of this Manual is to assist people wishing to access information in terms of the Act from **SUMITOMO RUBBER SOUTH AFRICA (PTY) LTD**. The Manual provides details of the nature of records and personal information held by the Company and provides guidance on how to request access to these records in terms of the Act. The Manual also serves to provide guidance with regard to the accessing, correction and/or objection to personal information held by the Company in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA").

3. Information required in terms of section 51 (1) (a) of the Act:

**Chief Executive Officer:** Mr. Lubin Marcel Bernard Ozoux

**Company Secretary:** Mr. Pranel Ramcharan

**Directors:**

- 1) Mr. Lubin Marcel Bernard Ozoux
- 2) Ms. Janitha Gulab
- 3) Mr. Masashi Arai
- 4) Mr. Hidekazu Nishiguchi

**Postal & street addresses:**

P O Box 925

892 Umgeni Road

Durban

4000

**Tel no:** 031-242 1111

**Fax no:** 031-242 1605

**E-Mail address:** info@srigroup.co.za

4. Details of the Information Officer:

Mr. Lubin Marcel Bernard Ozoux

5. The Act (Section 51 (1) (b))

The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission (SAHRC), which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041  
Telephone Number: +27-11-877 3600  
Fax Number: +27-11-403 0625  
Website: [www.sahrc.org.za](http://www.sahrc.org.za)

6. Applicable Legislation (Information on subjects and categories of records required in terms of section 51(1)(c) of the Act)

Where applicable to our operations, the Company keeps records in accordance with the following legislation including but not limited to:

- Basic Conditions of Employment Act, No. 75 of 1997
- Broad Based Black Economic Empowerment Act, No.53 of 2003
- Companies Act, No.71 of 2008 (as amended)
- Compensation for Occupational Injuries and Disease Act, No. 130 of 1993
- Competition Act, No. 89 of 1998
- Consumer Protection Act, No.68 of 2008
- Copyright Act No 98 Of 1978
- Customs and Excise Act, No. 91 of 1964
- Customs Control Act No. 31 of 2014
- Customs Duty Act No. 30 of 2014
- Employment Equity Act, No.55 of 1998
- Environment Conservation Act No. 73 of 1989
- Income Tax Act, No. 58 of 1962
- International Trade Administration Act No. 71 of 2002
- Labour Relations Act, No. 66 of 1995
- National Environmental Management Act No. 107 of 1998
- National Environmental Management: Air Quality Act No. 39 of 2004
- National Environmental Management: Biodiversity Act No. 10 of 2004
- National Environmental Management: Waste Act No. 59 OF 2008
- National Regulator For Compulsory Specifications Act No. 5 of 2008
- Skills Development Levies Act, No. 97 of 1998
- Skills Development Act, No. 97 of 1998
- South African Revenue Services Act, No.34 of 1997
- Tax Administration Act no. 28 of 2011
- Unemployment Contributions Act, No.4 of 2002

- Unemployed Insurance Act, 30 of 1966
- Value Added Tax Act, No.89 of 1991.

#### 7. Schedule of Records (Information in terms of section 51(1)(d) of the Act)

The following include but are not limited to the subjects and categories of records held:

##### 7.1. Web page:

The Company's website is accessible to anyone who has internet access and has the following categories:

- About the Company
- Dunlop Zone Channel (dealers) information
- Tyre manufacturing and tyre ranges
- Advice and safety hints
- Current Issues
- Advertising information
- Promotion of Access to Information Act – Manual

##### 7.2. Other Records:

Where applicable to our operations, the Company keeps the following records in including but not limited to:

- **Companies Act:**
  - Documents of Incorporation
  - Constitution of the Company
  - Various registers, minute books and internal resolutions
  - Company documents including the Memorandum of Incorporation, and any amendments thereto.
- **Financial Records:**
  - Accounting records
  - Debtors and creditors information
  - Fixed assets register(s)
  - Inventories
  - Invoices and vouchers
- **Taxation:**
  - VAT Registration certificate
  - Company Tax records
  - STC, PAYE and Capital Gains records
- **Intellectual Property:**
  - Records relating to trade marks, patents, designs, licenses
  - Licensing agreements
- **Insurance:**
  - Records relating to insurance arrangements, policies and claims
- **Moveable and Immovable Property:**
  - Title deeds, lease agreements, mortgage bonds, liens, notarial bonds, hire purchase agreements and security interests on property

- **Agreements:**
  - Agreements in respect of technical aid, licences, agents, distributors, suppliers, customers, banking, loans, indemnities and guarantees, acquisitions and disposals of assets and with service providers
- **Human Resources:**
  - Employee Records
  - Conditions of employment
  - Payroll Records
  - Registrations with Department of Labour
  - Arrangements with service providers
  - Dealings with Unions
  - Labour related matters and benefit funds
  - Disciplinary Records
  - Training Records, manuals and reports
- **Operational Records:**
  - Technical, procurement, production and marketing information, quality and product claims
  - Customer related records
  - Management records
  - Data bases, correspondence, policies & procedures
  - Banking records & legal proceedings
- **Computer and Communication Information:**
  - Procurement, maintenance and data communication arrangements.

#### 8. Processing of personal information

The Company views the protection of personal information in a very serious light and will only process personal information in accordance with applicable laws and regulations. Accordingly, principles entrenched in POPIA relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Company.

#### 9. The purpose of processing of personal information

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects;
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;

- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers, franchisees and business partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

10. Categories of Data Subjects and their Personal Information

A Data Subject may either be a natural or a juristic person. The Company may possess records relating to suppliers, contractors, service providers, employees, visitors, franchisees, independent dealers and customers including but not limited to:

<b>Categories of Data Subjects</b>	<b>Personal Information processed</b>
Employees and job applicants	Employee personal information Employee medical information Employee disability information Employee Pension and Provident Fund Information Employee contracts Employee performance records Payroll records Electronic access records Physical access records Surveillance records Health and safety records Training records Employment history Time and attendance records Curriculum vitae and application forms Criminal checks Background checks
Franchisees and independent dealers	Franchisee/Dealer personal information Franchisee/Dealer performance information Personal information Franchisee/Dealer employees
Customers	Customer personal information Contracts and warranties Customer vehicle information
Suppliers	Supplier personal information Personal information of supplier representatives
Visitors	Physical access records Electronic access records and scans Surveillance records

11. Recipients or categories of recipients with whom personal information is shared

We may share the personal information of our data subjects for any of the purposes outlined above as per Clause 9 with the following, including but not limited to:

- Sumitomo Rubber Industries Group in Japan and other countries;
- our authorised agents and business partners who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them. We will only disclose personal information to government authorities if we are required to do so by law. Our employees, agents and suppliers are required to adhere to data privacy and confidentiality principles.

12. Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by the Company and its operators. The Company undertakes to continuously implement and monitor technical and organisational security measures to protect the personal information held, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction. The Company may use different otherwise-suitable measures and adapt to technological security development, as needed, provided that the level of data protection achieved meets the Company's Information Security requirements, as may be updated from time to time.

- **Access Control of Persons**

The Company shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

- **Data Media Control**

The Company shall implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing personal information of its data subjects.

- **User Control**

The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

- **Access Control to Data**

The Company shall implement suitable measures to ensure that only persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access authorization levels.

13. Trans-border flows of personal information

The Company will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

14. Form of Request (How to request a record from the company in terms of Section 51 (e)):-

The requester must complete the prescribed form (available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za)) and submit this together with the request fee to the Company Secretary at the Company's address, fax number or electronic mail address.

The requester must provide sufficient details to enable the Company to identify:

- (a) The record(s) requested;
- (b) The requester (and if an agent is lodging the request, proof of capacity);
- (c) The form of access required;
- (d) (i) The postal address or fax number of the requester in the Republic;  
(ii) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- (e) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of the prescribed form does not automatically allow the requester access to the requested record.

15. Prescribed Fees (Section 51 (1) (f))

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;



- Records may be withheld until the fees have been paid.
- The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za).

16. Refusal of Access and Protection of Information:

In terms of chapter 4 of the Act, Grounds for Refusal of Access to Records, there is provision for mandatory protection of the following information, save in the special circumstances provided for in the Act:

- Information for the protection of the privacy of third parties who are natural persons (section 63).
- Information for the protection of commercial information of third parties and certain confidential information of third parties (sections 64 and 65).
- Information for the protection of the safety of individuals and the protection of property (section 66).
- Information privileged from production in legal proceedings (section 67).
- Commercial information of the Company (section 68).
- Research information of third parties, and protection of research information of the Company (section 69).

17. Access to prescribed forms and fees

Prescribed forms and fees are can be requested from the Company's Legal Services Department or via email to [info@srigroup.co.za](mailto:info@srigroup.co.za).

18. Availability of the Manual

The manual is also available for inspection at the offices of the Company; on the Company's website and a copy is also available at the South African Human Rights Commission.

19. Remedies

The Company does not have an internal appeals procedure regarding requests made in terms of this manual or the applicable legislation. Accordingly, the decision made by the Information Officer is final. If a request is denied, the requestor is entitled to apply to a court with the appropriate jurisdiction or the Information Regulator for relief.

REVISION / CHANGE	DATE
0. Manual Released	01 January 2014
1. Updated Directors	01 December 2015
2. Updated Directors and POPIA provisions	19 February 2019
3. Updated Directors	5 August 2024