
MANUAL PUBLISHED IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 of 2000

1. INTRODUCTION & PURPOSE OF PAIA MANUAL

- 1.1 LSM Distributors (Pty) Ltd (**LSM**) conducts business as the importer, distributor and retailer of Porsche, Bentley and Lamborghini motor vehicles, automotive components and lifestyle accessories for onward sale to customers.
- 1.2 LSM is also the sole and officially authorised pre-owned Porsche, Bentley and Lamborghini dealer in South Africa in the course of which LSM attends to the service, repair and maintenance of Porsche, Bentley and Lamborghini vehicles.
- 1.1 This Promotion of Access to Information Manual (**Manual**) provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (**PAIA**).
- 1.2 LSM's obligations and responsibilities in respect personal information held by LSM, or request for the correction of the personal information, in terms of the Protection of Personal Information Act 4 of 2013 (**POPIA**) is dealt with in a separate policy.
- 1.3 Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in sections 4 & 5 of this Manual.
- 1.4 This Manual is published on the company websites of LSM:
- <https://dealer.porsche.com/za/johannesburg/en-GB>
- <https://dealer.porsche.com/za/pretoria/en-GB>
- <https://dealer.porsche.com/za/capetown/en-GB>
- <https://dealer.porsche.com/za/umhlanga/en-GB>
- <https://johannesburg.bentleymotors.com/meia/en/home>
- <https://capetown.bentleymotors.com/meia/en/home>
- <https://www.lamborghini.com/en-en/ownership/dealer-locator/lamborghini-johannesburg>
- <https://www.lamborghini.com/en-en/ownership/dealer-locator/lamborghini-cape-town>
- alternatively*, a copy can be requested from the Legal and Compliance Department (see contact details in section 2.1 of this Manual).

1.5 Guides to the PAIA can be obtained and queries directed to:

PAIA
<p>Address: South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041</p> <p>Website: www.sahrc.org.za Email: PAIA@sahrc.org.za</p>

2. CONTACT DETAILS

2.1 Company contact details in terms of section 51 of the PAIA are as follows:

LSM Distributors (Pty) Ltd

Postal Address: P O Box 69993
Bryanston
2021

Physical Address: Corner Witkoppen & Wroxham Roads
Paulshof
2191

Contact number: Tel: +27 11 540 5000

Duly authorised person(s):

Information Officer in terms of the PAIA

Name: **Shaun Harmse**
Designation: **Senior Group Legal Advisor**
Telephone number: **+27 11 540 5000**
E-mail address: Info.officer@porsche.co.za



3. SCHEDULE OF COMPANY RECORDS

3.1 The Company record classification key is as follows:

Classification No.	Access	Classification
1	May be disclosed	Public Access Document
2	May not be disclosed	Request after commencement of criminal or civil proceedings [see section 7 of the PAIA]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal Information of natural persons that belongs to the requestor of that information, or personal information of juristic persons represented by the requestor of that information [see section 61 of the PAIA]
5	May not be disclosed	Unreasonable disclosure of personal information or of Natural person [see 63(1) of the PAIA] or Juristic Person
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [see section 64(a)(b) of the PAIA]
7	May not be disclosed	Likely to harm the Company or third party in contract or other negotiations [see section 64(c) of the PAIA]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [see section 65 of the PAIA]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [see section 66 of the PAIA]
10	May not be disclosed	Legally privileged document [see section 67 of the PAIA]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [see section 64(2); s68(2) of the PAIA]
12	May not be disclosed	Commercial information of Private Body [see section 68 of the PAIA]
13	May not be disclosed	Likely to prejudice research and development information of the Company or a third party [see section 69 of the PAIA]
14	May not be refused	Disclosure in public interest [see section 70 of the PAIA]

3.2 Company records include (but are not limited to) the following:

Departmental records	Subject	Classification No.
Communications/Public Relations Department	Current Product Information	1,4
	Launches and Events Records	5
	Journalist records	5,12
	Media Releases	1
Health, Safety and Environmental Department	Environmental Policy	1
	Environmental Records	11,14
	Health and Safety Records (Employees, Contractors)	5,9
Human Resources Division	Employee Records	4,5,9
	Employment Contracts	4,5
	Personnel Guidelines, Policies and Procedures	12
	Employee Medical Records	4,5,8
	Employee Disability Insurance Records	4,5
	Employee Pension and Provident Fund Records	4,5
	Payroll Records	4,5
	Recruitment Records	4,5
Financial Division	Audited Financial Statements	12
	Tax Records (Company & Employees)	4,12
	Asset Register	12
	Supplier Records	5
	Fleet Insurance Records	5
Legal Services and Compliance Division	General Contract Documentation	6,12
	Company Guidelines, Policies and Procedures	12
	Intellectual Property Records	3
	Employee, customer and supplier information	10
	Immovable Property Records	12
	Statutory Records	12
Sales and Marketing Division	Product Brochures	1
	Owner Manuals	5
	Product Sales Records	1
	Marketing and Future Product Strategies	12
	Customer Information and Database	5,12
	Dealer Agreements and Documents	5,6,7,12,13
	Dealership Records (Dealers, Customers)	4,5
Production / Logistics Division	Vehicle and Components Specifications	12,13
	Importership records	12,13

Customer Interaction Centre	Customer Records	5
Aftersales Department	Motorplans and Warranties	4,5
	Customer Records	4,5
	Service History & Vehicle History	4,5
IT Department	Processing, Testing and Development Records	5
Facilities Management Department	Physical Security Records (Visitors, Suppliers, Contractors, Employees)	5
	Electronic Access & Identity Management Records (Employees, Contractors)	5
	Time and Attendance Records	5

3.3 Please note that by recording a category or subject matter in this Manual *does not* imply that a request for access to such records will be acceded to. **All requests for access will be evaluated on a case by case basis in accordance with the provisions of the PAIA.** In particular, there may be applicable grounds on refusal of such a request, as set out in the Act.

4. FORM OF REQUEST

4.1 To facilitate the processing of your request, kindly:

6.2.1 Use the prescribed form on one of LSM's website(s) or as annexed hereto.

6.2.2 Address your request to the Information Officer(s) stipulated above.

6.2.3 Provide sufficient details to enable LSM to identify:

- o The record(s) requested;
- o The requestor (and, if an agent is lodging the request, proof of capacity);
- o The South African postal address and/or email address of the requestor;
- o The form of access required;
- o If the requestor wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof; and
- o The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

5. PRESCRIBED FEES

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

7.1.1 A requestor is required to pay the prescribed fees as stipulated in the Regulations before a request will be processed.

7.1.2 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).

7.1.3 The requestor may lodge an application to the court against the payment of the request fee and/or deposit.

7.1.4 Records may be withheld until the fees have been paid.

7.1.5 The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za

6. REMEDIES

6.1 LSM does not have an internal appeal procedure regarding PAIA and POPIA requests.

6.2 As such, the decision made by the duly authorised persons in this regard, is final.

6.3 If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or to the Information Regulator, for the desired relief.

ANNEXURE "A"



D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

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2. Reference number, if available:

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3. Any further particulars of record:

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E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

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F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
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G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

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H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

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Signed at this day..... ofyear

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SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE