

## Bridgestone PAIA Manual

Published in terms of section 51 of the  
Promotion of Access to Information Act 2 of 2000

### 1 Introduction

#### 1.1. About Bridgestone South Africa

Bridgestone South Africa (BSAF) is a subsidiary of Bridgestone. BSAF is head quartered in Vorna Valley, Johannesburg, South African. BSAF specializes in the manufacturing, importing and exporting of vehicle tyres to its franchises and its customers.

BSAF Vorna Valley head office manages the commercial, compliance and strategy of its manufacturing plants, commercial plants and fitment centres across South Africa, Botswana and Namibia.

#### 1.2. PAIA Manual Availability

This manual is published on the Company website at <https://www1.bridgestone.co.za/bridgestone-paia-manual> or alternatively, a copy can be requested from the Group Assurance Manager on the following address:

Bridgestone South Africa Head Office

6 Ridge Road

Vorna Valley

Midrand

1685

Tel: +2711 923 7500

Fax: +2711 974 1865

Duly Authorised Person:

Ms. Scarlate Masiye

Executive Head: Legal, Risk and Compliance

[bsafdataprivacy@bridgestone.co.za](mailto:bsafdataprivacy@bridgestone.co.za)

### 1.3. PAIA and POPIA Guidance Availability

#### 1.3.1. PAIA Guidance

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

South African Human Rights

Commission

Promotion of Access to Information Act Unit

Research and Documentation

Department

Private Bag 2700

Houghton

Johannesburg

2041

Telephone number: (011) 484 8300

Fax number: (011) 484 7146/7

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

### 1.3.2. POPI Guidance

Guides to the POPI Act can be obtained and queries directed to:

The Information Regulator

JD House

27 Stiemens Street

Braamfontein,

Johannesburg, 2001

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za).

### 1.4. Purpose of the Manual

This Promotion of Access to Information Manual (“Manual”) serves the following purposes:

It details records type and the personal information BSAF acquires, processes, stores and disposes

Outlines how both natural and juristic persons can submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”)

Details how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information 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 shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

## 2. Company contact details

BSAF operations are centrally controlled from BSAF Head Office domiciled at:

Bridgestone South Africa Head Office

6 Ridge Road

Vorna Valley

Midrand

1685

Tel: +2711 923 7500

Fax: +2711 974 1865

Duly Authorised Person:

Ms. Scarlate Masiye

Executive Head: Legal, Risk and Compliance

[bsafdataprivacy@bridgestone.co.za](mailto:bsafdataprivacy@bridgestone.co.za)

## 3. Processing of personal information

BSAF continuously commits to upholding the POPI Act and only process personal information in accordance with the current South African privacy. Accordingly, the relevant personal information privacy principles relating to the processing thereof including, but not limited:

Collection

Handling

Transfer

Sharing

Correction

Storage

Archiving

Deletion)

### 3.1. The purpose of processing of personal information by BSAF

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

for health and safety purposes;

to provide pre-school teaching to children of Associates;

to monitor access, secure and manage our premises and facilities;

to transact with our suppliers and business partners, including BSAF dealerships;

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.

to provide or manage any information, products and/or services requested by data subjects;

to help us identify data subjects when they contact BSAF;

to maintain customer records;

to maintain customer vehicle records;

for recruitment purposes;

for employment purposes;

for apprenticeship purposes;

for travel purposes;

for general administration, financial and tax purposes;

for legal or contractual purposes;

### 3.2. Information Categories Relating to BSAF Data Subjects

Categories of data subjects and personal information processed by BSAF include the following:

BSAF dealership and key strategic business partners

Dealership/service centre performance information including dashboards

Dealership/service centre employees, suppliers, customers and contractors

Suppliers:

Supplier personal information

Personal information of supplier representatives

Supplier statutory compliance records and documentation

Supplier competency records, affiliations and certifications

Employees:

Health and safety records

Employee disability information

Employee medical information

Employee personal information

Employee Pension and Provident Fund Information

Employee contracts

Time and attendance records

Surveillance records

Employment history

Payroll records

Job applicants

Background checks

Criminal checks

Curriculum vitae and application forms

Copy of qualifications and affiliations

Visitors

Physical access records

Electronic access records and scans including biometric and ID/Driver's License/Passport scans

Surveillance records

### 3.3. Record Types

Based on Information Classification and Data Retention Policy supported by our internal Information Transfer Processes, BSAF retains the following types of documents and records:

Accounting Records and Documents:

Accounting system documentation

Vat and other tax records and documentation

Contracts and Agreements

Correspondences

Employee records

Insurance documentation

Investment records

Patents

Pension Records

Shares Registration Records

Statutory Compliance

### 3.4. Retention Duration

BSAF's data will be retained in terms of applicable South African legislative data retention prescription and the European Data Protection Regulation. BSAF will apply the longest duration between the two regulations.

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

BSAF may share the personal information of our data subjects for any of the purposes outlined in Section 3.1, with: the following:

Bridgestone Group Companies in South Africa and in other countries

BSAF dealerships and service centres

Bridgestone information process operators

Service providers and agents who perform services on our behalf.

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

Legal or regulatory purposes requires Bridgestone to avail information including for purposes of existing or future legal proceedings

In the event of sale or acquisition of one or more business where we may transfer our rights under any customer agreement we have with you;

BSAF in participating in the prevention of fraud, loss, bribery or corruption as per the Prevention and Combating of Corruption Activities Act 12 of 2014;

Operator Agreement bound operators who perform services and process personal information on our behalf of BSAF

Required to improve the quality of our service and/or products unless explicitly stated during data collection

### 3.6. Information security measures to protect personal information

Bridgestone has implemented reasonable technical and organisational measures to protect of personal information processed by BSAF and its Operators i.e., third parties that process personal information on behalf of BSAF.

Bridgestone continuously implements and monitors technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction. Furthermore, BSAF ensures that operators who process personal information on behalf of Bridgestone apply adequate safeguards as outlined in the Bridgestone POPI Management System and related Operator Agreement

### 3.7. Trans-border flows of personal information

BSAF 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 the POPI Act and the European Union General Data Protection Regulation (EU GDPR) or under the condition whereby the data subject consents to transfer of their personal information to third parties in foreign countries.

BSAF continuously ensures that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the POPI Act.

## 4 Prescribed request forms and fees

### 4.1. Form of request

In order for BSAF to facilitate a request for access to information, correction and/or omission, the requester must do the following:

Access the request form on [Bridgestone.co.za/paia](https://www.bridgestone.co.za/paia)

Provide sufficient detail to enable the Company to identify:

The exact record(s) requested.

The requestors full contact details(and, if an agent is lodging the request, proof of capacity) including the South African postal address, email address or fax number of the requestor.



If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

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.

#### 4.2. Prescribed fees

Where Bridgestone has voluntarily provided the Information Regulator with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question. The applicable fees for reproduction as referred to above are:

For every photocopy of an A4-size page or part thereof

R 1.00

For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form

R 1.00

For a copy in a computer-readable form on a compact disc or DVD

R 100.00

A transcription of visual images, for an A4-size page or part thereof

R 70.00

For a copy of visual images

R 70.00

A transcription of an audio record, for an A4-size page or part thereof

R 70.00

For a copy of an audio record

R 50.00

#### 4.3. Request Fees

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

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 detailed Fee Structure is available on the website of the Company, at the following address [Bridgestone.co.za/paiafees](http://Bridgestone.co.za/paiafees)

#### 4.4. Access to prescribed forms and fees

Prescribed forms and fees are published on the Company website or, alternatively, copies can be requested from the Group Assurance Manager (see contact details in section 2). Prescribed forms and fees can be found on the Company website.

### 5. Remedies

#### 5.1. Internal Remedies

BSAF does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

## 5.2. External Remedies

External remedies are subject to the provisions of the Act, a requestor that is dissatisfied with an Information Officer's refusal to disclose information, may within 180 days of notification of the decision, apply to a Court for relief. Likewise, a third party dissatisfied with an Information Officer's decision to grant a request for information, may within 180 days of notification of the decision, apply to a Court with appropriate jurisdiction for relief

## 6. Decisions

Within 30 days of receipt of the request, BSAF decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

BSAF may further extend the 30 day period within which BSAF has to decide whether to grant or refuse the request by a further period of not more than 30 days if the request is for a large number of information, or the request requires a search for information held at another office Bridgestone Office or third party archiving company and the information cannot reasonably be obtained within the original 30 day period. BSAF will notify the requester in writing should an extension be sought.