



**Unique Group**

Strength in Depth

## PAIA MANUAL

UNIQUE HYDRA (Pty Ltd  
Registration Number: 00/014571/07  
(Herein referred to as "The Company")

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

DATE OF COMPILATION: 01/12/2021  
DATE OF REVISION: 01/12/2022

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**Personal Information and Special Personal Information already existing within the Public Domain.**

*This policy shall not apply to Personal Information and Special Personal Information in instances where such information already exists within the public domain - for example but not limited to press releases, Facebook, LinkedIn, Social profile links, public records, or public criminal record, etc.*

## 1. INTRODUCTION

Unique Hydra Pty Ltd (a company registered in Cape Town, South Africa with company Reg. No. 2000/014571/07) is a 100% subsidiary company of Unique System FZE, a leading manufacturer and supplier of marine and diving equipment to the oil and gas industry and based in the UAE. The product and service range includes design and manufacture of air, mixed gas and saturation diving equipment, marine winches, certified man-rider winches, and specialized rigging equipment.

Unique Hydra (Pty) Ltd, Cape Town is a prominent integrated subsea and offshore solution provider and a leading manufacturer and supplier of deep-sea marine and commercial diving & life support equipment to the oil and gas industry and based at 152 Gunner Circle Epping, Cape Town.

A guide has been compiled in terms of Section 10 of PAIA by Unique Hydra (Pty) Ltd. It contains information required by a person wishing to exercise any right, contemplated by PAIA.

This Guide is available for inspection, inter alia, at the office of the offices of Unique Hydra (Pty) Ltd at the physical address above.

## 2. LIST OF ACRONYMS AND ABBREVIATIONS

- “CEO” Chief Executive Officer
- “DIO” Deputy Information Officer.
- “IO “ Information Officer.
- “Minister” Minister of Justice and Correctional Services.
- “PAIA” Promotion of Access to Information Act No. 2 of 2000(as
- Amended.
- “POPIA” Protection of Personal Information Act No.4 of 2013.

- “Regulator” Information Regulator; and
- “Republic” Republic of South Africa

### 3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 3.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 3.3. know the description of the records of the body which are available in accordance with any other legislation.
- 3.4. 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.
- 3.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 3.6. know if the body 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.
- 3.7. know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.8. know the recipients or categories of recipients to whom the personal information may be supplied.
- 3.9. know if the body 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
- 3.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### 4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE COMPANY

##### 4.1. Company Details:

Trade name: UNIQUE HYDRA (Pty) Ltd

DTI Registration name: UNIQUE HYDRA (Ltd) Pty

PAYE/SARS No: 7080737614

Industry/Sector: MANUFACTURING

Province: WESTERN CAPE PROVINCE.

Tel No: 021 534 3600

Fax No: 021 534 3610

Postal address: PO BOX 895, EPPING INDUSTRIAL, EPPING,7475

Physical address: 152 GUNNERS CIRCLE, EPPING INDUSTRIAL,

Name & Surname of the CEO/Accounting Officer: Rodney McKechnie

Email address: [rodney.mckechnie@uniquegroup.com](mailto:rodney.mckechnie@uniquegroup.com)

##### 4.2. Chief Information Officer

Rodney James McKechnie

Managing Director, Unique Hydra Cape Town

Tel No: 021 534 3600

Fax No: 021 534 3610

Postal address: PO BOX 895, EPPING INDUSTRIAL, EPPING,7475

Physical address: 152 GUNNERS CIRCLE, EPPING INDUSTRIAL,

Appointed by:

Himanshu Suresh Gandhi

Chief Executive Officer Unique Group FZE

1D/07E, Hamriyah Free Zone, Sharjah, UAE,

+971 6 5130333

[harry.gandhi@uniquegroup.com](mailto:harry.gandhi@uniquegroup.com)

- 4.3. Deputy Information Officer (NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.

Name: Anna Maria Nieuwoudt

Tel No: 021 534 3600

Fax No: 021 534 3610

Postal address: PO BOX 895, EPPING INDUSTRIAL, EPPING,7475

Physical address: 152 GUNNERS CIRCLE, EPPING INDUSTRIAL,

- 4.4 Access to information general contacts  
Rodney James McKechnie – Managing Director  
Annerie Nieuwoudt – HR Manager

Email: [rodney.mckechnie@uniquegroup.com](mailto:rodney.mckechnie@uniquegroup.com)

[Annerie.nieuwoudt@uniquegroup.com](mailto:Annerie.nieuwoudt@uniquegroup.com)

4.5 **National or Head Office**

Unique Group FZE

1D/07E, Hamriyah Free Zone, Sharjah, UAE,

+971 6 5130333

[harry.gandhi@uniquegroup.com](mailto:harry.gandhi@uniquegroup.com)

Website: [www.uniquegroup.com](http://www.uniquegroup.com)

5. **GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 5.1. 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 in PAIA and POPIA.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of-
- 5.3.1. the objects of PAIA and POPIA.
- 5.3.2. the postal and street address, phone, and fax number and, if available, electronic mail address of-
- 5.3.2.1. the Information Officer of every public body, and

- 5.3.2.2. 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>;
- 5.3.3. the manner and form of a request for-
  - 5.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 5.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.
- 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA.
- 5.3.6. 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-
  - 5.3.6.1. an internal appeal.
  - 5.3.6.2. a complaint to the Regulator; and
  - 5.3.6.3. 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.
- 5.3.7. 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.

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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.*

<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.*

- 5.3.8. 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.
- 5.3.9. 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
- 5.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 5.4. 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.
- 5.5. The Guide can also be obtained-
- 5.5.1. upon request to the Information Officer.
- 5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 5.6 A copy of the Guide is also available in English, for public inspection during normal office hours.

**6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

Public Product Information	Freely available on <a href="http://www.uniquegroup.com">www.uniquegroup.com</a>
Media Releases	Freely available on <a href="http://www.uniquegroup.com">www.uniquegroup.com</a>
Marketing information	Available on request
Public customer information	Freely available on <a href="http://www.uniquegroup.com">www.uniquegroup.com</a>
Product Brochures	Available on request

<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.”



**7. DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

No	Ref	Act
1	No 61 of 1973	Companies Act
2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 95 of 1967	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 37 of 2002	Financial Advisory and Intermediary Services Act
8	No 75 of 1997	Basic Conditions of Employment Act
10	No 25 of 2002	Electronic Communications and Transactions Act
11	No 2 of 2000	Promotion of Access of Information Act
12	No 30 of 1996	Unemployment Insurance Act
13	No 13 of 2002	Immigration Act
14	No 97 of 1998	Skills Development Act
15	No 130 of 1993	Compensation for Occupational Injuries & Health Diseases Act
16	No 9 of 1999	Skills Development Levies Act

**8. SUBJECTS AND CATEGORIES OF RECORDS HELD AT PHYSICAL ADDRESS BY THE COMPANY**

- Attendance registers
- Correspondence
- Founding Documents (originals kept at company secretary and copy docs in soft copy kept on site)
- Licences (categories)
- Minutes of Management Meetings
- Minutes of Staff Meetings
- Shareholder Register (originals kept at company secretary and copy docs in soft copy kept on site)
- Statutory Returns
- Conditions of Service
- Employee Records
- Employment Contracts
- Employment Equity Records
- General Correspondence
- Industrial and Labour Relations Records
- Information relating to Health and Safety Regulations
- Pension and Provident Fund Records
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies

- Salary Surveys
- Skills Requirements
- Staff Recruitment Policies
- Statutory Records
- Training Record

## 9. PROCESSING OF PERSONAL INFORMATION

### 9.1. Purpose of Processing Personal Information

The Company shall use personal information only for the purposes for which it was collected and agreed with the employee. In addition, where necessary personal information may be retained for legal or research purposes. (For example: to confirm and verify the identity of the employee or to verify that the employee is an authorised user for security purposes or for audit and record keeping purposes or in connection with legal proceedings.

The Company may disclose personal information to the Unique Group Head Office in FZE (Dubai) who is involved in the processing and reporting on Human Resources statistics to the Unique Group CEO and Board or Directors. The Company have an agreement in place to ensure that Unique Group is compliant with the privacy requirements of the Protection of Personal Information Act.

The Company is legally obligated to provide adequate protection of the personal information processed and shall prevent unauthorized access and use of personal information. The Company shall continuously review the security controls and related processes to ensure that employee personal information remains secure.

The Company shall ensure that any personal information distributed to other parties is treated with the same level of protection by that party as the Company is obligated to maintain.

Personal information is information which is about a living identifiable person (a 'data subject') and affects that person's privacy (whether in his/her personal or family life, business or professional capacity) in the sense that the information has the person as its focus or is otherwise biographical in nature and identifies a person, whether by itself, or together with other information in the organisation's possession or that is likely to come into its possession. Personal information covered by POPI includes details of an employee's salary and bank account, e-mails about an incident, a supervisor's notebook, an individual employee's personnel file, leave records, performance reviews.

Special personal information is information concerning an individual's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information, the criminal behaviour of a person subject to the extent that such information relates to the alleged commission by the employee of any offence or any proceedings in respect of any offence allegedly committed by an employee or about the disposal of such proceedings.

Special personal information processed by an employer might typically be about an employee's physical or mental health as a part of medical records, records obtained as part of a pre-employment medical questionnaire or examination, various drug or alcohol test results, sick leave records, pre-employment screening records relating to criminal convictions and any aspect of special personal information.

Personal information of children shall not be processed by the Company save for the following conditions: Permission is granted by a competent person; it be necessary in terms of law; it be necessary to comply in terms of international law; for a historical statistical purpose in public interest; if deliberately made available by the child with consent of a competent person; the Information Regulator has granted permission – notice in Government Gazette, in public interest, with safeguards to protect the personal information of the child.

Processing of personal information shall be limited to lawful processing in a reasonable manner that does not infringe on the privacy of the employee. The purpose of processing shall be adequate, relevant, and not excessive and with the consent of the employee, which consent may under certain circumstances be withdrawn if the personal information is excluded in terms of Section 6 of the Act.

In terms of section 6 of POPI, the following instances of processing personal information are specifically excluded from its application: (i) in the course of purely personal or household activities; (ii) information that has been de-identified to the extent that it cannot be identified again; and (iii) by or on behalf of a public body which involves inter alia, national security, defence or public safety and identification for the purpose of identification of those involved in money laundering or terrorism. Section 7 of POPI also includes other exclusions for journalistic, literary, or artistic purposes.

Personal information must be obtained directly from the applicant for employment or outsourcing employee, unless the information is derived from a public record, or the employee has consented to the use of another source or has made the information public on for instance social media. The processing limitation is especially relevant to the verification of information furnished by applicants for positions when only relevant and adequate information should be sought and verified. For example, an employer is permitted to require a prospective employee to provide proof of qualification and if necessary, verify the qualification with the relevant institution but the employer will not be entitled to anything more than confirmation.

**9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto**

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender, and race

9.3. The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

9.4. Transborder flows of personal information

An agreement is in place and available on request. This agreement stipulates the terms and conditions upon which the Disclosing party (Unique Hydra (Pty) Ltd) and the Receiving Party (Unique Group Head Office, 1D/07E, Hamriyah Free Zone, Sharjah, UAE) shall disclose confidential information to the other, which terms and conditions constitute a binding and enforceable agreement between the Parties and the employees employed by the Parties to manage all confidential and/or HR related information.

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

The Company is legally obligated to provide adequate protection of the personal information processed and shall prevent unauthorized access and use of personal information. The Company shall continuously review the security controls and related processes to ensure that employee personal information remains secure.

Security policies and procedures cover:

- Physical security.
- Computer and network security.
- Access to personal information.
- Secure communications.
- Security in outsourcing and activities or functions within our reasonable ability.
- Retention and disposal of information.
- Acceptable usage of personal information.
- Governance and regulatory issues.
- Monitoring access and usage of private information.

- Investigating and reacting to security incidents.

The Company shall ensure that any personal information distributed to other parties is treated with the same level of protection by that party as the Company is obligated to maintain.

## 10. AVAILABILITY OF THE MANUAL

10.1. A copy of the Manual is available-

10.1.1. On [www.uniquegroup.com](http://www.uniquegroup.com)

10.1.2. head office of the Unique Group, 1D/07E, Hamriyah Free Zone, Sharjah, UAE, and the Cape Town Office of Unique Hydra for public inspection during normal business hours.

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

10.1.4. to the Information Regulator upon request.

## 11. FORM OF REQUEST

To facilitate the processing a request, the following procedure will dictate:

11.1. Use the prescribed form, available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za).

- Address your request to the Managing Director.
- Provide sufficient details to enable the COMPANY to identify:
  - The record(s) requested.
  - The requester (and if an agent is lodging the request, proof of capacity).
  - The form of access required.
  - The postal address or fax number of the requester in the Republic.
- 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 requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

## 12. PRESCRIBED 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 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).

### 13. UPDATING OF THE MANUAL

The Managing Director as assigned as Chief Information Officer, will on a regular basis update this manual.

*Issued by*



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**Rodney McKechnie**  
Managing Director