

PROMOTION OF ACCESS TO INFORMATION MANUAL



Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, and the Protection of Personal Information Act 4 of 2013.

DOCUMENT DETAILS

Organisation	Blue Chip Lubricants (Pty) Ltd
Registration number	M1983001294 - confirm against current CIPC records
Physical address	41 Homestead Road, Kya Sands, Randburg, Gauteng, South Africa
Telephone	011 462 1829
General email	info@bcl.co.za
Website	https://www.bcl.co.za
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Revision and date	Rev 1 - 16 September 2026

DOCUMENT CONTROL

Revision	Date	Description	Approved by
1	16 September 2026	Updated Issue	Kathleen Marais
Responsibility		Requirement	
Document owner		Information Officer	
Review frequency		At least annually and whenever relevant legislation, processing activities, contact details or record categories change	
Controlled location		SharePoint: ISO Quality1 > ISO 9001-2015 > 11 Compliance & Governance	
Public availability		BCL website and BCL head office	

1 PURPOSE OF THIS MANUAL

This Manual explains the records held by Blue Chip Lubricants (Pty) Ltd (BCL), how a person may request access to those records, and how BCL processes personal information. It gives effect to the constitutional right of access to information and assists requesters to follow the procedure required by PAIA.

For a request to a private body, the requester must identify the right that the requested record is required to exercise or protect and explain why access to that record is necessary. Access is subject to PAIA, applicable fees and the statutory grounds on which access may or must be refused.

2 DEFINITIONS AND ABBREVIATIONS

Term	Meaning
BCL	Blue Chip Lubricants (Pty) Ltd
Data subject	The person to whom personal information relates
Information Officer	The head of the private body, or the person registered as Information Officer under POPIA

Term	Meaning
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
Personal information	Information relating to an identifiable living natural person and, where applicable, an identifiable existing juristic person
POPIA	Protection of Personal Information Act 4 of 2013
Record	Recorded information, regardless of form or medium, in BCL's possession or under its control
Regulator	Information Regulator South Africa
Requester	A person making a request for access to a record of BCL

3 CONTACT DETAILS FOR ACCESS TO INFORMATION

PAIA requests and enquiries must be directed to BCL's Information Officer or registered Deputy Information Officer, if appointed. These details must agree with the Information Regulator's registration records.

Role	Contact details
Head of private body / Information Officer	Name: Gary Marais Position: Managing Director Email: gary@bcl.co.za Telephone: 011 462 1829
Deputy Information Officer, if appointed	Name: Kathleen Marais; Email: kathleen@bcl.co.za Telephone: 011 462 1829
Postal address	41 Homestead Road, Kya Sands, Randburg, Gauteng, South Africa
Physical address	41 Homestead Road, Kya Sands, Randburg, Gauteng, South Africa
Website	https://bcl.co.za

4 GUIDE ON HOW TO USE PAIA

The Information Regulator has published a guide explaining how to use PAIA and exercise rights under the Act. It is available in each official language at <https://infoeregulator.org.za/paia/>. Assistance may also be requested directly from the Regulator.

Information Regulator contact	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	enquiries@infoeregulator.org.za
Website	https://infoeregulator.org.za

5 RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

- Information published on BCL's website, including general company and contact information.
- Product information, technical data sheets and safety data sheets made available to customers or the public.

- Quality, delivery, returns, privacy and other public-facing policies published by BCL.
- Marketing material, brochures and public announcements.
- Records that BCL is required by law to make publicly available.

The fact that a category is listed does not mean every record in that category will be released automatically. A formal request may be required where a record contains confidential, commercially sensitive or personal information.

6 RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

BCL may hold records under the following legislation, as amended and only if applicable. The list is not exhaustive and applies only to the extent relevant to BCL:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- National Environmental Management Act 107 of 1998
- National Environmental Management Waste Act 59 of 2008
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

7 SUBJECTS AND CATEGORIES OF RECORDS HELD BY BCL

Subject	Examples of records
Corporate and governance	Company registration records; statutory returns; ownership and director records; policies; delegations; meeting records; licences, permits and certifications
Finance and taxation	Accounting records; invoices; payments; banking records; budgets; financial statements; tax returns; insurance records
Human resources	Employment contracts; job descriptions; payroll; leave; training; competency; disciplinary; performance; health and safety appointment records
Customers and sales	Customer details; quotations; orders; contracts; pricing; delivery records; complaints; returns; satisfaction and correspondence
Suppliers and procurement	Supplier details; approvals; contracts; quotations; purchase orders; delivery and inspection records; performance reviews and nonconformances
Production and operations	Blend sheets; formulations and specifications; plans; batch and traceability records; bottling, decanting, maintenance and inspection records

Subject	Examples of records
Laboratory and quality	Test results; certificates of analysis; equipment registers; calibration; nonconformances; corrective actions; audit and management review records
Health safety and environment	Risk assessments; incidents; appointments; inspections; waste records; contractor and visitor records; emergency and training records
Information technology and security	User accounts; access logs; system and incident records; asset registers; backups; software licences and security records
Legal and regulatory compliance	Legal register; licences and permits; regulator correspondence; statutory submissions; compliance reviews and evidence
Marketing and communications	Website content; catalogues; advertisements; social media; brand and intellectual property records

8 HOW TO REQUEST ACCESS TO A RECORD

1. Complete prescribed Form 2 Request for Access to Record, available from <https://infoeregulator.org.za/paia/>.
2. Identify the record sufficiently and state the preferred form of access.
3. Identify the right to be exercised or protected and explain why the record is required.
4. Provide proof of identity and, when acting for another person, proof of authority.
5. Submit the form and supporting documents to the Information Officer using section 3.
6. Pay any prescribed request or access fee when notified. BCL will apply the fees prescribed under PAIA.

BCL will ordinarily decide a valid request within 30 calendar days, unless PAIA permits an extension. The requester will be notified of the decision, access method, fees, extension or statutory reason for refusal using prescribed Form 3 where applicable.

9 GROUNDS FOR REFUSAL AND REMEDIES

BCL may or must refuse access where PAIA requires or permits refusal, including to protect another person's privacy, confidential third-party information, commercial information, safety, legally privileged information, research information or a legal duty of confidence. Each request will be assessed on its facts.

A requester dissatisfied with BCL's decision, or who receives no response within the prescribed period, may lodge a complaint with the Information Regulator using prescribed Form 5, generally within 180 days, or seek relief from a competent court. A private body does not have the statutory internal appeal process applicable to certain public bodies.

10 PROCESSING OF PERSONAL INFORMATION

10.1 Purposes of processing

BCL processes personal information where necessary for legitimate business operations, contracts, legal compliance and protection of rights. Purposes include recruitment and employment, payroll and benefits, customer and supplier administration, sales and delivery, credit control, regulatory compliance, health and safety, security, quality management, IT administration and business communications.

10.2 Categories of data subjects and information

Data subject	Personal information that may be processed
Employees and applicants	Identity and contact details; employment history; qualifications; banking, payroll, tax, attendance, leave, training, performance, disciplinary, health and safety and benefit information
Customers and customer contacts	Identity, business and contact details; orders; delivery and payment information; communications; complaints and account records
Suppliers contractors and service providers	Identity, company and contact details; banking and tax information; contracts; performance, access, safety and payment records
Visitors and persons on site	Name, contact and vehicle details; access records; CCTV images and health and safety information where applicable
Directors shareholders and representatives	Identity, contact, governance, statutory, ownership and financial information required by law
Website users and correspondents	Contact details, communications, device and usage information, subject to website privacy and cookie arrangements

10.3 Recipients

Information may be shared lawfully and where necessary with authorised employees; payroll, benefit, banking, professional and technology service providers; customers and suppliers; insurers; auditors and advisers; regulators and government authorities; law enforcement; logistics providers; and parties authorised by the data subject or law. Operators and service providers must be subject to appropriate confidentiality and security requirements.

10.4 Cross border transfers

BCL may transfer personal information outside South Africa where necessary for international suppliers, customers or technology services. Transfers will occur only where permitted by POPIA, including adequate protection, appropriate agreements, consent or another lawful exception.

10.5 Security safeguards

BCL applies reasonable safeguards appropriate to the information and risk, including role-based access, authentication, secure storage, backups, malware protection, updates, physical access control, confidentiality obligations, awareness, incident reporting, service-provider controls and secure disposal. Suspected compromises must be reported promptly to Management and the Information Officer.

10.6 Data subject participation

A data subject may request access to personal information and correction or deletion where permitted by POPIA. Requests must be submitted to the Information Officer using the applicable prescribed form available from the Information Regulator.

11 AVAILABILITY OF THIS MANUAL

This Manual is available:

- on BCL's website at <https://bcl.co.za>;
- for inspection at BCL's principal place of business during normal business hours, at no charge;
- on request from the Information Officer, subject to any prescribed reproduction charge; and

- to the Information Regulator when required.

BCL will make the Manual reasonably accessible and arrange an appropriate alternative language or accessible format where required by applicable PAIA requirements and reasonably necessary for access.

12 UPDATING AND APPROVAL

The Information Officer must review this Manual at least annually and whenever BCL's contact details, record categories, processing activities, applicable legislation or PAIA requirements change. The approved current revision must be published on BCL's website and retained at its principal place of business. Obsolete revisions must be controlled under BCL's document control procedure.

Approval	Name	Signature	Date
Information Officer	Gary Marais		16/09/2026
Management approval	Kathleen Marais		16/09/2026

APPENDIX A PAIA REQUEST CHECKLIST

- ☐ Prescribed Form 2 completed and signed
- ☐ Requester's identity verified
- ☐ Authority to act for another person verified where applicable
- ☐ Requested record described sufficiently
- ☐ Right to be exercised or protected identified
- ☐ Need for the record explained
- ☐ Request logged with date received
- ☐ Fees assessed and notified where applicable
- ☐ Decision due date recorded
- ☐ Third-party notification considered
- ☐ Decision and reasons issued using Form 3 where applicable
- ☐ Disclosure or refusal evidence retained
- ☐ Complaint or court remedy explained

APPENDIX B OFFICIAL FORMS AND SOURCES

Resource	Official source
PAIA Guide and forms	https://inforegulator.org.za/paia/
Form 2 Request for Access to Record	https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf
PAIA Manual portal and private-body template	https://eservices.inforegulator.org.za/paiamanuals/
Information Regulator	https://inforegulator.org.za
BCL website	https://bcl.co.za