

ASTRON ENERGY (PTY) LIMITED
(formerly known as Chevron South Africa (Pty) Limited)
MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (“the Act”)

1. PURPOSE

The purpose of this Manual is to provide information to assist in a request for access information in terms of the PAIA from Astron Energy (Pty) Limited (referred to as “the Company”, “we” or “us” throughout this Manual).

2. DETAILS OF ASTRON ENERGY
Section 51(1)(a)(i) of the Act

NAME OF BODY : ASTRON ENERGY (PTY) LIMITED

REGISTRATION NUMBER: : 1911/001154/07

HEAD OF BODY : CEO : THABIET BOOLEY

INFORMATION OFFICER : BRIDGETTE DARIES

PHYSICAL ADDRESS : 5 CENTURY BOULEVARD, CENTURY CITY,
CAPE TOWN, 7441, SOUTH AFRICA

POSTAL ADDRESS : P.O. BOX 714, CAPE TOWN, 8000, SOUTH
AFRICA

TELEPHONE NO. : +27 21 403 7911

E-MAIL ADDRESS : privacy@astronenergy.co.za

WEBSITE : <https://www.astronenergy.co.za/home/>

3. OTHER PRESCRIBED INFORMATION
Section 51(1)(A)(II) of the Act

The Minister of Justice and Constitutional Development has not made any regulations prescribing any other information that needs to appear in this Manual.

4. GUIDE IN TERMS OF SECTION 10 OF PAIA
Section 51(1)(b)(i) of the Act

The Human Rights Commission has compiled a guide in terms of Section 10 of the Act which contains information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. The guide is available in each official language of South Africa.

In terms of the Section 110 of the Protection of Personal Information Act 4 of 2013 the functions of the Human Rights Commission in terms of the Act have been transferred to the Information Regulator.

Any queries regarding the Section 10 guide should be addressed to and access to the guide can be obtained from:

The Information Regulator

Physical Address 3rd Floor Braampark, Forum 3
33 Hoofd Street
BRAAMFONTEIN
JOHANNESBURG
2017

Postal Address P.O. Box 31533
BRAAMFONTEIN
JOHANNESBURG
2017

Telephone +27 (0) 10 023 5200

General e-mail infoereg@justice.gov.za

Complaints email complaints.IR@justice.gov.za

5. **RECORDS AVAILABLE WITHOUT REQUEST**
Section 51(1)(b)(ii) of the Act

Not Applicable.

6. **RECORDS KEPT IN TERMS OF LEGISLATION**
Section 51(1)(b)(iii) of the Act

Records are kept as required in terms of the following main laws, among others:

Atmospheric Pollution Prevention Act 45 of 1965
Basic Conditions of Employment Act 75 of 1997
Broad Based Black Economic Empowerment Act No. 53 of 2003
Companies Act 71 of 2008
Compensation for Occupational Injuries and Diseases Act 130 of 1993
Competition Act 89 of 1998
Consumer Protection Act 68 of 2008
Copyright Act 98 of 1978
Customs and Excise Act 91 of 1964
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Environment Conservation Act 73 of 1989
Financial Intelligence Centre Act 38 of 2001
Gas Act 48 of 2001
Income Tax Act 58 of 1962
Labour Relations Act 66 of 1995
National Environmental Management Act 107 of 1998
National Credit Act 34 of 2005
National Key Points Act 102 of 1980
National Water Act 36 of 1998
Occupational, Health and Safety Act 85 of 1993
Petroleum Pipelines Act 60 of 2003
Petroleum Products Act 120 of 1977
Protection of Personal Information Act 4 of 2013
Regulation of Interception of Communications and Provision of
Communication related Information Act 70 of 2002
Skills Development Act 97 of 1998
Skills Development Levies Act 9 of 1999
Unemployment Insurance Act 63 of 2001
Unemployment Insurance Contributions Act 4 of 2002
Value-Added Tax Act 89 of 1991

7. **CATEGORIES OF RECORDS HELD**
Section 51(1)(b)(iv) of the Act

The following subjects and categories of records are held:

SUBJECTS	CATEGORIES
RETAIL	
Network and Business Support	<ul style="list-style-type: none"> • Royalties • Advertising Fund Contributions • Management Service Fees • Advertising & Sales Promotions • Franchise Advisory Council records • Branded Marketer records • Strategic Partnership records • Network planning and development records • Maintenance and Construction records
Property and Facilities Optimisation	<ul style="list-style-type: none"> • Lease agreements • Supply and Sales Agreements • Franchise Agreements • Title deeds • Service Station Site files
Customer Service Centre	<ul style="list-style-type: none"> • Customer Data • CD records/audio recordings • Customer Agreements • E-mails recording orders, maintenance requirements, customer complaints and general queries
Automation	<ul style="list-style-type: none"> • Development specifications of product proposals • Technical specifications • Test plans / prescriptions / results • Project documentation
Card Operations	<ul style="list-style-type: none"> • Application forms • Alliance agreements • General supplier agreements
Training and Programs	<ul style="list-style-type: none"> • Course outlines and programmes • Register of delegates
SUPPLY, TRADING AND OPTIMISATION	
Supply	<ul style="list-style-type: none"> • Buy/Sell Contracts • Term and Spot Deals • Pipeline Agreement • Import and Export records • Trading Contracts • Product Exchange Agreements • Product Scheduling records

Trading	<ul style="list-style-type: none"> • Barge Contracts • SFF storage contract
Pricing and Business Support	<ul style="list-style-type: none"> • Pricing studies • Pricing records • Business analysis studies • Business performance records • Sales records • Consumption records • Inventories • Procurement contracts • Transfer Pricing Agreements • Accounting records
COMMERCIAL AND INDUSTRIAL MARKETING	
Sales Support	<ul style="list-style-type: none"> • Customer contracts • Sales and Discount records
Business Development	<ul style="list-style-type: none"> • New Business Development plans and records (Hubspot)
CAPITAL PLANNING AND EXECUTION	
Strategic Planning	<ul style="list-style-type: none"> • Corporate and strategic planning records • Special project data
COMPANY SECRETARIAL	
Company Records	<ul style="list-style-type: none"> • All records relating to incorporation and administration of the Company some of which are available from the Companies and Intellectual Property Commission (CIPC). • Memorandum of Incorporation • Directors' names • Documents of Incorporation • Minutes of Board of Directors meetings • Written resolutions • Records relating to appointment of directors, auditor, secretary, public officer or other officers • Share register and other statutory registers • Shareholder policies and guidelines • Other statutory records

MANUFACTURING	
Refinery Operations	<ul style="list-style-type: none"> • Product storage and handling data • Quality and protection procedures • Plant service, reliability and maintenance records • Product engineering and inspection records • Operational procedures and manuals • Manufacturing data
Reliability and Maintenance	<ul style="list-style-type: none"> • Planning and Scheduling records • Equipment Integrity records
Safety, Health Environment and Quality	<ul style="list-style-type: none"> • Environmental, health, safety, quality assurance and risk data
Technical Services	<ul style="list-style-type: none"> • Quality management and certification • Production records • Inventories • Sales records • Designs, Process and Product Engineering records • Certificates of quality (Fuels) • Product specifications • Sample service reports • Minutes of industry technical committee meetings • General accounting and administration records
PROCUREMENT	
	<ul style="list-style-type: none"> • Supplier contracts • Surveying and Inspections Contracts • Shipping Contract • Supplier data • Tender documents • Quotations / proposal requests
LEGAL SERVICES	
	<ul style="list-style-type: none"> • Collections and claims • Litigation • Company secretarial • General legal matters • Contracts

HUMAN RESOURCES	
Administration	<ul style="list-style-type: none"> • Employee records including personal information • Employment contracts • Employee salary, leave and training records • Compensation and benefits records including medical aid, pension and provident funds • Learning and Development records • HR Policies and administration • Industrial relations including records of disciplinary processes and proceedings • Organisational development • Talent Acquisition • Wellness Program • BBEE and Transformation • Employment Equity Plan • Other statutory records
STAKEHOLDER ENGAGEMENT AND CORPORATE AFFAIRS	
	<ul style="list-style-type: none"> • Corporate and Government Affairs policies and criteria • Corporate Social Investment/ Donation and Sponsorship records • Stakeholder information • Crisis Communication plans • Press releases • Company brochures, publications, promotions and reports
LUBRICANTS	
	<ul style="list-style-type: none"> • Customer Contracts • Sales records (Daily and Monthly Sales Reports) • Price/Discount records • Product information and specifications (Product Data Sheet) • Material safety data sheets
New Business Development	<ul style="list-style-type: none"> • New Business Development plans and records (Hubspot)

SAFETY, HEALTH, ENVIRONMENT AND QUALITY	
	<ul style="list-style-type: none"> • Health, environment and safety standards manuals • Health, environment and safety reviews, assessments and audits • Major hazardous installations assessment working documents (HES) • Remediation records • Health, environment and safety performance statistics • Incident reports
LOGISTICS	
Transport and Operations	<ul style="list-style-type: none"> • Stock registers/inventories • Quality Control Certificates and Records • Sales records • Audit records • Inspection reports • Transport agreements • Depot site plans and records • Bulk storage tank tables • Lease/Concession agreements • Joint Venture agreements • Maintenance records • Vendor upload details • Security and Driver information
Lubricants Supply Chain	<ul style="list-style-type: none"> • Stock records • Planning and scheduling records • Shipping records • Maintenance records • Inspection records • Equipment manuals • Project Data Packs • Plant plot plans • Plant Isometrics and P&ID • Electrical One line diagrams • Tank As-built drawings
INFORMATION TECHNOLOGY	
Office of the Chief Information Officer	<ul style="list-style-type: none"> • IT Risk and Compliance records • Data Privacy Policy and records
IT Operations	<ul style="list-style-type: none"> • Operational Process Documentation
Retail Systems	<ul style="list-style-type: none"> • Brand records

FINANCE	
	<ul style="list-style-type: none"> • Accounting records • Customer data • Banking records, Statements and Bank Details • Electronic Banking records • Financial Agreements • Import and Export records • Invoices • Asset register • Insurance • Income Tax and VAT records
INTERNAL AUDIT AND COMPLIANCE	
	<ul style="list-style-type: none"> • Company Audit records • Company Policies • Compliance Guidelines and Standards
FACILITIES MANAGEMENT	
	<ul style="list-style-type: none"> • Security records • Building records • Facility Contractor records • Mailing records
GENERAL RECORDS	
	<ul style="list-style-type: none"> • Correspondence • SAP records • Administrative documents

8. PROTECTION OF PERSONAL INFORMATION ACT REQUIREMENTS
Section 51(1)(c)(i) to (iv) of the Act

8.1 Purpose for Processing Personal Information

Personal information collected by Astron Energy from data subjects is used for the following purposes:

- a) Entering into contracts with customers and suppliers, managing these contracts and these relationships in general;
- b) Entering into contracts of employment for permanent and contractor positions and applications for employment, and manage the relationship with employees in general;
- c) Providing goods or services and executing transactions for customers and suppliers;

- d) Providing information about Astron Energy products and services through marketing communications;
- e) Participating in promotions and competitions;
- f) Facilitating use of our Websites to offer a more consistent experience;
- g) Understanding our data subjects' needs better;
- h) Keeping our data subjects' records up to date;
- i) Enforce debts;
- j) Processing customer requests or complaints; and
- k) Processing the personal information of employees for forensic purposes.

8.2 Categories of Data Subjects and Information

a) Categories of Data Subjects

Customers, Prospective Customers or Leads, Suppliers, Employees, Prospective Employees, Recruiters and Medical Practitioners providing services related to Employees, Contractors, Consultants, Debtors and Creditors, Directors and Shareholders, Visitors and Entrants to Promotions and Competitions

b) Categories of Information

Include, but are not limited to:

Information relating to account numbers, race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, birth of person, education or medical, financial criminal or employment history, identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifies, other particular assignment to the person, biometric information, personal opinions, views of preferences, correspondence which may be of a private or confidential nature, views or opinions of another individual about the person and name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

8.3 Recipients of Personal Information

We share the following people personal information that we process in the ordinary course of business to fulfil our obligations to our employees, customers or clients:

- contractors, vendors, or suppliers;
- agents, distributors, or other resellers;
- operators, other responsible parties, or co-responsible parties; and
- third party vendors to help us maintain our services and where we have outsourced our administrative functions.

8.4 Planned Transborder Flow of Personal Information

We send personal information outside of South Africa to various countries including Botswana and the UK. We will only transfer data to other countries who have similar privacy laws to South Africa or recipients who can guarantee the protection of personal information to the same standard that we must protect it.

8.5 Information Security

Astron Energy is committed to protecting the security of personal information. While no security measure can guarantee against compromise, we use a variety of security technologies and procedures to help protect data from loss, misuse, unauthorized access, alteration and destruction or disclosure.

Astron Energy follows the CIA triad principle to ensure confidentiality, integrity and availability of data whenever it is required. Systems that store and process data have redundancy built into them and are backed up on a regular basis. This ensures that data is retained in accordance with the Astron Energy data retention policy. Astron Energy ensures that data is adequately protected through the use of several solutions including Data Loss Prevention (DLP) system, Secure Socket Layer (SSL) encryption and Transport Layer Security (TLS). A further layer of security is provided by the utilisation of BitLocker encryption on all workstations and adhoc encryption on our email gateway where ENCRYPT is specified in the subject of the email.

Astron Energy also takes reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use

9. REQUEST FOR ACCESS TO RECORDS
Section 53 of the Act

In terms of Section 53 of the Act the following process must be followed when requesting access to any record held by Astron Energy:

- 9.1 The requester must use the prescribed form (a copy of which is set out in Part VII below) to make the request for access to a record and the request must be accompanied by the request fee (if applicable). The request must be addressed to the Information Officer and made to the physical or postal address or electronic mail address set out in paragraph 2 above. A request for access to a record must be made on the prescribed form - see Annexure A.
- 9.2 The requester must provide sufficient detail on the request form to enable the Company to identify the record and the requester. The requester should also indicate which form of access is required and if, in addition to a written reply, the requester wishes to be informed of the decision in any other manner, the requester should state the manner and the necessary particulars to be informed in the other manner.
- 9.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 9.4 If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of Astron Energy.
- 9.5 If the requester does not use the standard form Astron Energy may:
 - reject the request due to lack of procedural compliance;
 - refuse it if you do not provide sufficient information; or
 - delay its response to the request.
- 9.6 Astron Energy will evaluate and consider all requests to us in terms of the Act. If Astron Energy approves the request for access to our records, then Astron Energy will decide how to provide access to the requester – unless the requester has asked for access in a specific form. Publication of this Manual does not give rise to any rights to access information records, except in terms of the Act.

10. GROUNDS FOR REFUSAL
Section 62 to 70 of the Act

Astron Energy may have to refuse a requester access to certain records in terms of the Act to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

Astron Energy will notify the requester in writing whether its request has been approved or denied within 30 calendar days after Astron Energy have received a completed request for access form. If Astron Energy cannot find any requested record or it does not exist, then Astron Energy will notify the requester by way of affidavit that it is not possible to give access to that particular record.

11. REQUEST FEES FOR REQUEST FOR ACCESS TO RECORDS

Section 54 of the Act

- 11.1 Astron Energy will by notice to the requester seeking access to a record, other than a personal requester, require the requester to pay the prescribed request fee before processing the request.
- 11.2 Should the search for a record in respect of which a request has been made, other than a personal requester, and the preparation of the record for disclosure would, in the opinion of Astron Energy, require more hours than prescribed for this purpose, Astron Energy will by notice require the requester, other than a personal requester, to pay a deposit of not more than one third of the request fee which would be payable if the request were granted.
- 11.3 The requester may lodge a complaint to the Information Regulator or by application to court against the tender or payment of the request fee or of a deposit, subject to the applicable procedure and time periods as determined by the Information Regulator.
- 11.4 The fee payable by the requester will be the fee as determined by the Minister by notice in the Government Gazette from time to time.
- 11.5 Astron Energy will inform the requester within 30 days from receipt of the request for access to a record, or within any extension of this time period, of its decision on whether or not access to the record will be granted.

12. AVAILABILITY OF MANUAL

This Manual is available on the Astron Energy Website, for public inspection at its principal place of business during normal business hours, to any person upon

request and upon payment of a reasonable fee and is available to the Information Regulator upon request.

13. **UPDATES TO THE MANUAL**

This Manual will be updated whenever Astron Energy makes material changes to the current information.

Revised August 2022

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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:

.....
.....
.....
.....

2. Reference number, if available:

.....
.....
.....
.....

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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.....
.....
.....
.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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:

.....

.....

.....

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

.....

.....

.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

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?

.....

Signed at this day of year

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE

MANAGEMENT SIGN-OFF

Role	Signature	Date
Bridgette Daries Information Officer	<i>Bridgette Daries</i>	18 August 2022
Thamsanqa Khanye Data Privacy Officer	<i>Thamsanqa Khanye</i>	18 August 2022
Dylan Adriaans OCIO Manager	<i>Dylan Adriaans</i>	18 August 2022
Lizel Oberholzer Legal Counsel	<i>Lizel Oberholzer</i>	25 August 2022
Jill Koopman Corporate Affairs Manager	<i>J. Koopman</i>	12 September 2022