

# PAIA & POPIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000  
and aligned with the Protection of Personal Information Act 4 of 2013



Date of Compilation: 01 March 2026

## 1. Introduction

This Manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and addresses the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA").

Refilwe Bophelo Petroleum (Pty) Ltd ("the Company") operates as a supplier, distributor and transporter of petroleum and fuel products. In the course of its operations, the Company collects and processes operational, commercial, safety, environmental and personal information relating to clients, drivers, contractors, brokers, and suppliers.

Due to the nature of the petroleum industry, the Company processes information linked to:

- hazardous materials
- transport logistics
- environmental compliance
- driver and vehicle operations
- delivery and site records
- commercial pricing and credit

The Company recognises the importance of safeguarding such information while ensuring compliance with transparency and access-to-information legislation.

This Manual explains:

- the types of records held by the Company
- how access requests may be made
- how personal information is processed
- how data subjects may exercise their rights

## 2. Information Governance & Compliance Commitment

The Company acknowledges that the fuel and petroleum sector is a regulated and high-risk industry. Information handled by the Company may be operationally sensitive, commercially confidential, or safety-critical.

The Company is committed to responsible information governance and ensures that information is handled in a manner that protects:

- safety of persons and property
- environmental compliance
- confidentiality of pricing and contracts
- personal privacy
- legal compliance
- operational integrity

Employees, drivers, contractors, and brokers are required to maintain confidentiality and comply with internal data protection and information security standards.

## 3. Purpose of this Manual

The purpose of this Manual is to:

- provide transparency on records held
- outline procedures for requesting access
- explain processing of personal information
- provide Information Officer details
- explain data subject rights
- ensure compliance with PAIA and POPIA

## 4. Availability of the Manual

This Manual is available:

- on the Company website (where applicable)
- at Company offices
- from the Information Officer upon request
- from the Information Regulator

Copies may be provided electronically or in print.  
Reproduction fees may apply where permitted by law.

## 5. Company Details

Registered Name:  
Refilwe Bophelo Petroleum (Pty) Ltd

Physical Address:

Co-Work@Midstream, Mount Quray Road, Midlands Office Park West, Midstream Estate, 1692.

Telephone:

079 701 5480/ 086 666 7145

Email:

[enquiries@refilwebophelo.co.za](mailto:enquiries@refilwebophelo.co.za)

Website:

<https://refilwebophelo.co.za>

## 6. Information Officer

Information Officer:

Refilwe Molefe

Deputy Information Officer:

Neo Molefe

Email:

[neo@refilwebophelo.co.za](mailto:neo@refilwebophelo.co.za)

The Information Officer is responsible for:

- PAIA compliance
- POPIA compliance
- handling access requests
- overseeing data governance
- managing breach notifications

## 7. Information Regulator

Information Regulator (South Africa)

Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

## 8. Categories of Records Held

The Company maintains records in order to conduct its business, comply with legislation, and manage operational risk.

### 8.1. Corporate & statutory records

- registration documents
- licences and permits
- compliance records
- policies and procedures

- governance records

## 8.2. Financial and commercial records

- invoices
- pricing schedules
- quotations
- credit applications
- payment records
- tax records
- banking records

These records are commercially sensitive and access may be restricted.

## 8.3. Client records

- supply agreements
- delivery instructions
- order records
- contact details
- credit records
- communication

## 8.4. Operational fuel & delivery records

Due to the nature of the business, records may include:

- delivery logs
- fuel quantities supplied
- vehicle tracking data
- driver trip logs
- route information
- site instructions
- offloading confirmations
- incident reports
- spillage reports
- safety checklists

These records may be sensitive and access may be restricted where disclosure could compromise safety or commercial interests.

## 8.5. Driver & transport records

- driver identification
- licences
- training records

- employment records
- safety compliance
- vehicle documentation

#### 8.6. Supplier & broker records

- supplier agreements
- broker agreements
- compliance documentation
- pricing records

#### 8.7. Environmental & safety records

- hazardous material handling
- environmental compliance
- incident reports
- OHS records
- spill response documentation

#### 8.8. Website & electronic records

- website enquiries
- communication records
- analytics
- email correspondence

### 9. Processing of Personal Information (POPIA)

The Company processes personal information in accordance with POPIA and only where lawful and necessary.

Personal information may be processed for:

- fuel supply and delivery
- logistics coordination
- driver management
- compliance and safety
- contractual obligations
- communication
- billing and credit

Special personal information

The Company may process:

- driver information

- vehicle tracking data
- incident records
- safety records

Such processing is limited to lawful operational purposes.

## 10. Recipients of Information

Information may be shared with:

- employees
- transport contractors
- brokers
- regulators
- insurers
- law enforcement
- clients where required

The Company does not sell personal information.

## 11. Transborder Information Transfers

Where cloud or logistics systems are used, information may be stored outside South Africa. Appropriate safeguards will be implemented.

## 12. Security Measures

The Company implements reasonable measures including:

- restricted access
- secure storage
- password protection
- confidentiality agreements
- staff awareness
- system safeguards

## 13. Retention of Records

Records are retained only as long as necessary for:

- operational purposes
- legal compliance
- environmental compliance
- financial records
- safety and incident investigations

Delivery and incident records may be retained for evidentiary purposes.

#### 14. Requests for Access to Records

Requests must be submitted in writing to the Information Officer and must include:

- requester identity
- description of record
- purpose
- contact details

Requests will be processed in accordance with PAIA.

Fees may apply.

#### 15. Grounds for Refusal

Access may be refused where disclosure would:

- compromise safety
- reveal confidential pricing
- expose commercial strategy
- violate privacy
- prejudice investigations
- be prohibited by law

#### 16. Data Breach Response

In the event of unauthorised access to personal information, the Company will investigate and notify affected parties and the Information Regulator where required.

#### 17. POPIA Rights

Data subjects may:

- request access
- request correction
- request deletion
- object to processing
- lodge complaints

#### 18. Updating of the Manual

This Manual will be reviewed periodically and updated where necessary.