

PAIA MANUAL

Manual prepared in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000

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Date Signed	See below

1 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

- 1.1 Terms and expressions used in this document shall have the same meanings associated with them as defined in this clause one, and where not defined unless the context clearly provides otherwise, shall have the respective meanings assigned to them as set out in POPIA and PAIA.
- 1.2 "Company" SABINET ONLINE (PTY) LTD (Registration Number: 1996/017856/07) and including all its related or interrelated group companies and subsidiaries. This manual accordingly applies to:
- 1.3 "Head of Business" means as defined in POPIA and PAIA which includes the Chief Executive Officer (CEO), Managing Director (MD) or officer of similar designation from time to time and whose particulars are stated on page 5 of this PAIA manual.
- 1.4 "Information Officer" Information Officer designated by the Head of Business of the Company in terms of PAIA and POPIA. The Information Officer and Data Protection Officer is the same person at Sabinet.
- 1.5 "PAIA" Promotion of Access to Information Act No. 2 of 2000 inclusive of any amendments and regulations thereto from time to time;
- 1.6 "PAIA Manual" Means this Manual of the Company prepared in terms of section 51 of PAIA and as may be amended from time to time;
- 1.7 "POPIA" Protection of Personal Information Act No. 4 of 2013 inclusive of any amendments and regulations thereto from time to time; and
- 1.8 "Private Body" It means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. Sabinet Online (Pty) Ltd is a Private Body.
- 1.9 "Regulator" Information Regulator South Africa.

2 PURPOSE OF MANUAL

This PAIA Manual is useful for the public to:

- 2.1 See the categories of records held by the body which are available without a person having to submit a formal PAIA request;
- 2.2 have 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 CONTACT PARTICULARS – HEAD OFFICE

Company Website Address:	https://sabinet.co.za/
Telephone Number:	012 643 9500
Email Address:	info@sabinet.co.za
S.A. Head Office Physical Address:	Ground Floor, Building B, Westend Office Park, 254 Hall Street, Die Hoewes, Centurion, 0157, South Africa
S.A. Head Office Postal Address:	P.O. Box 51421, Wierdapark, 0149, South Africa

Details:	Information Officer	Head of Business
Name:	Charlene Gail Vorster	Rosalind Annette Inglefield Hattingh
Telephone Number:	012 643 9500	012 643 9500
E-mail Address:	charlene@sabinet.co.za	rosalind@sabinet.co.za

- 4.1 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.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of the objects of PAIA and POPIA, the postal and street address, phone and fax number and, if available, electronic mail address of-
 - the Information Officer of every public body, and
- 4.4 The manner and form of a request for access to records of a private body contemplated in section 50;
 - 4.4.1 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.4.2 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-
 - 4.4.2.1 a complaint to the Regulator; and
 - 4.4.2.2 an application with a court against a decision by the Regulator or a decision of the head of a private body;
 - 4.4.3 the provisions of sections 51[8] requiring a private body, , to compile a manual, and how to obtain access to a manual;
 - 4.4.4 the provisions of sections 52[2] providing for the voluntary disclosure of categories of records by a private body,
 - 4.4.5 the notices issued in terms of sections 54[2] regarding fees to be paid in relation to requests for access; and
 - 4.4.6 the regulations made in terms of section 92[11].
- 4.5 Members of the public can inspect or make copies of the Guide from the offices of the private bodies, including the office of the Regulator, during normal working hours.
- 4.6 The Guide can also be obtained-
 - 4.6.1 upon request to the Information Officer;
 - 4.6.2 from the website of the Regulator (<https://infoeregulator.org.za>)
- 4.7 A copy of the Guide is also available in the English language, for public inspection during normal office hours as well as on the company website (<https://www.sabinet.co.za>)
- 4.8 The contact details of the Information Regulator are:

Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Website:	https://infoeregulator.org.za/
General Enquiries Email:	enquiries@infoeregulator.org.za
Complaints Email:	PAIAComplaints@infoeregulator.org.za

5 REQUESTS FOR ACCESS TO INFORMATION

- 5.1 Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of PAIA and as set out below.
- 5.2 A person who wants access to the Company's records that are not readily available must complete the necessary request forms that are available at the offices of Company at request to the Information Officer, or which forms may be accessed and downloaded on <https://infoeregulator.org.za/paia-forms/>. The completed request form must be sent to the address or email address provided in this manual and marked for the attention of the Information Officer. The Information Officers email address is dpo@sabinet.co.za
- 5.3 When completing the forms set out above, please provide sufficient details to enable the Company to identify:
- 5.3.1 The record(s) requested;
 - 5.3.2 The requester (and if an agent is lodging the request, proof of capacity);
 - 5.3.3 The form of access required;
 - 5.3.4 The postal address of the requester in the Republic;
 - 5.3.5 If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof; and
 - 5.3.6 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.
- 5.4 Requests for information must be made in accordance with the prescribed PAIA procedures and at the rates provided in terms of Regulations 6 and 7 of PAIA.
- 5.5 Information of the Company listed in this manual does not mean that the information will be made available to a person requesting it. The Company retains its rights to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of PAIA exist. Requests for access will be evaluated on a case-by-case basis in accordance with PAIA.

6 INFORMATION AUTOMATICALLY OR PUBLICLY AVAILABLE

The following published information is readily available to the public and may be obtained from the Company without a person having to request access:

- 6.1 Newsletters (excluding subscription product newsletters)
- 6.2 Pamphlets or Brochures
- 6.3 Posters
- 6.4 Marketing and Promotional Material
- 6.5 Information and documents set out on the Company's website as described in the contact particulars section of this manual.

7 INFORMATION AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

The Company retains and processes information and records required in terms of local and, if applicable, international legislation, statutory laws and regulations where applicable to the Company. Please contact our Information Officer for details.

8 DESCRIPTIONS OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The Company retains and processes various categories of records and information relevant to the function of its business, administration, infrastructure, and legal persona, which may include but is not limited to the following categories:

Administration and Statutory Records

- Attendance registers
- Correspondence
- Founding / Statutory Documents
- Licences, Permits
- Minutes and Recordings of Management, Staff, Governing Bodies and shareholder Meetings
- Company Director, Shareholderr and Statutory Registers
- Organizational Policies, Procedures and Codes of Conduct

Human Resource Records

- Conditions of Service
- Employee Records including next-of-kin
- 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 Records

Operation Records

- Brochures and Marketing Publications
- Client and Customer Registry and Particulars
- General and Confidential Correspondence
- Employee Sales Performance, historical and Work-In-Progress
- Marketing, Strategies and Marketing Records
- Production Records
- Sales Records
- Suppliers Registry

Finance Records

- Annual Financial Statements
- Asset Register
- Banking, Financial and Accounting Records
- Budgets
- Contracts
- Employment Equity
- General Correspondence
- Insurance Information, Policies and Claims
- Internal Audit Records
- Management Accounts
- Purchase and Order Information
- Tax Records (company and employee)

Information Technology Records
<ul style="list-style-type: none"> - IT Policies and Procedures - Network Diagrams - User Manuals - Agreements and Licenses - Audits and Audit Trails - User Access Information - Client and Supplier Databases - General Infrastructure, network usage and operational system deployment and development
Intellectual Property
<ul style="list-style-type: none"> - Agreements relating to intellectual property - Copyrights - Litigation and other disputes involving intellectual property - Patents, patent applications and inventions - Designs, trademarks, trade names and protected names
Legal, Agreements and Contracts
<ul style="list-style-type: none"> - Acquisition or disposal documentation - Agreements with and related to contractors, suppliers, distributors, dealers, agencies, clients, customers, governmental agencies, shareholders, officers or directors and other matters relating to the provision of services or materials. - Complaints, pleadings, briefs and other documents pertaining to actual, pending or threatened litigation, arbitration or investigation - Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements
9 CATEGORIES OF DATA SUBJECTS

The Company retains information and records on its engagements with all its stakeholders, whether natural or juristic people, which may include but is not limited to prospective, existing, and former:

- 9.1 Clients, customers and their employees, representatives, agents, contractors and service providers;
- 9.2 Employees (including contractors, agents, temporary and casual employees);
- 9.3 Suppliers, service providers, business partners and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- 9.4 Visitors (walk in) and other people that make enquiries with the Company from time to time physically at the Company's offices or electronically through the Company's website and other media access mediums; and
- 9.5 Group Companies and their employees, representatives, agents, contractors and service providers;

10 CATEGORIES OF PERSONAL INFORMATION PROCESSED

10.1 The Company processes and stores various categories of personal information on its data subjects where relevant for the purpose of fulfilling its business function, objectives, administration, services and products as well as maintaining its legal, compliance and financial reporting requirements, inclusive but not limited to the following types of personal information:

- Authorised signatories, beneficiaries, governing body members and ultimate beneficial owners
- BBBEE information
- Confidential correspondence
- Offences / alleged offences
- Financial, transactional, and banking information
- Founding documents
- Employee Medical, dental and health related information
- Trade union membership of employees
- Educational background information, qualifications, and employment history
- Names of contact people and representatives
- Age, Gender, Nationality and ethnic origin information
- Online identifier or other assignment to the person
- Names, ID / Passport / Registration Numbers, email, physical and postal addresses together with other contact particulars;
- Tax related information;
- personal opinions, views or preferences

11 PURPOSE OF PROCESSING PERSONAL INFORMATION

11.1 Personal information is processed and stored by the Company on its data subjects where relevant for the purpose of fulfilling its business function, objectives, administration, services and products as well as maintaining its legal, compliance and financial reporting requirements. Such processing activities and records may be pursuant to purposes of including but not limited to:

- To manage information, products and/or services requested by and provided to by data subjects
- To help us identify data subjects when they contact us
- To manage our customers and clients and to maintain their records
- Recruitment purposes
- Employment purposes
- Apprenticeship purposes
- Training purposes
- Travel purposes
- General administration
- Financial and tax purposes
- Legal or contractual purposes
- Health and safety purposes
- To monitor access, secure and manage our premises and facilities
- To transact with our suppliers
- To improve the quality of our products and services
- To help us detect and prevent fraud and money laundering under FICA
- To help us recover debts
- Marketing purposes
- Engaging with the public
- Travel and accommodation

12 RECIPIENTS WITH WHOM PERSONAL INFORMATION IS SHARED

- 12.1 In processing personal information, we may share it within our group of companies or with other third parties including our business partners. These include but are not limited to:
- Statutory authorities
 - Law enforcement agencies
 - Tax authorities
 - Medical schemes
 - Employee pension and provident funds
 - Industry bodies
 - Contractors, vendors, or suppliers
 - Payment processors, debt collection agencies
 - Email management, electronic transmission and distribution tools, servers, and service providers, data storage providers and server hosts

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- Group companies
 - Agents
 - Service providers
 - Banks and other financial institutions.
 - Employees of the organisation
 - Employment and recruitment agencies
 - Family, associates and representatives of the person whose personal information is processed
 - Third party verification agencies and credit bureau
 - Trade unions where employees are represented by such

13 TRANSBORDER FLOWS OF PERSONAL INFORMATION

- 13.1 The Company may transfer to, and store personal information we collect on our data subjects, in countries other than South Africa, if the relevant business transactions or situation requires trans-border processing of information, data sharing with international group companies or for the purposes of cloud, back up and other data storage requirements. Where countries may not have the same or higher data protection laws as South Africa, the Company will only transfer the information if we have consent of the data subject, or if it is necessary for the performance or conclusion of a contract between the Company and the data subject.

14 PERSONAL INFORMATION SECURITY MEASURES, DATA BREACHES AND THIRD PARTIES

- 14.1 The Company has identified its security risks over the personal information that it processes in line with POPIA and have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorised access and disclosure, alteration and destruction of personal information. We also take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards.
- 14.2 Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, the Company shall notify the Regulator and the data subject, unless the identity of such data subject cannot be established. The notification will be made as soon as reasonably possible after the discovery of the compromise, considering the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.
- 14.3 When the Company receives personal information from a third party on behalf of a data subject, it assumes confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual, and do not have any objection to our processing their information in accordance with this manual. Where information on third parties is provided by a data subject, or a third party provides information on a data subject, that information may be considered with other personal information.

15 AVAILABILITIES OF MANUAL

- 15.1 A copy of the Manual is available-
 - 15.1.1 on our website, if any;
 - 15.1.2 head office of the body for public inspection during normal business hours;
 - 15.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 15.1.4 to the Information Regulator upon request.

16. REQUESTING ACCESS

- 16.1 Our Information Officer deals with all matters relating to PAIA so we can comply with our PAIA obligations. To request access to a record, please complete Form 2.
- 16.2 Please submit the completed form (together with the relevant request fee as set out in clause 18 below) to our Information Officer's email, or our physical address using the details provided above. Please ensure that the completed form:
 - 16.2.1 has enough information for the Information Officer to identify you, the requested records, and the form of access you require,
 - 16.2.2 specifies your email address or postal address,
 - 16.2.3 describes the right that you seek to exercise or protect,
 - 16.2.4 explains why you need the requested record to exercise or protect that right,
 - 16.2.5 provides any other way you would like to be informed of our decision other than in writing, and
 - 16.2.6 provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory)
- 16.3 If you do not use the standard form, we may:
 - 16.3.1 Reject the request due to lack of procedural compliance;
 - 16.3.2 Refuse it if you do not provide sufficient information, or
 - 16.3.3 Delay it.

17. HOW ACCESS WILL BE PROVIDED

The Information Officer and Head of Business will evaluate and consider all requests received. If it is approved, you will be provided with access unless you ask for access in a specific form which may take more time. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

18. COST OF PROVIDING RECORDS

- 18.1 The request and access fees as set out in Section 54 of PAIA will be charged. The costs can include but are not limited to the following:
 - 18.1.1 The cost of making the record, or transcribing the records,
 - 18.1.2 Postal or delivery fees (if applicable) and
 - 18.1.3 The reasonable time we need to search for the record and prepare the record for you.
- 18.2 A deposit may be asked beforehand. If your request is refused, we will refund you the deposit amount. We have

the right to withhold all records until the fees are paid in full.

19. GROUND S FOR REFUSAL TO ACCESS

- 19.1 In terms of PAIA we are allowed to refuse access to certain records to protect:
- 19.1.1 Someone else's privacy (Section 63);
 - 19.1.2 Another company's commercial information (Section 64);
 - 19.1.3 Someone else's confidential information (Section 65);
 - 19.1.4 Research information (Section 68);
 - 19.1.5 The safety of individuals and property (Section 66) or
 - 19.1.6 Records privileged from production in legal proceedings (Section 67).
- 19.2 We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record.

20. REMEDIES IF ACCESS IS DENIED

- 20.1 The Company does not have an internal appeal procedure that may be followed after a request to access personal information by a data subject is denied, the decision by the Information Officer s of the Company shall be final. If a person is not satisfied with the outcome of the decision following a request for information such person is entitled to apply to a court of competent jurisdiction to take the matter further.
- 20.2 A third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction if they are affected by a request for information from another person that was approved by the Information Officer as set out in this manual.

21. UPDATING OF MANUAL

The Company reserves the right to update this manual regularly from time to time as it deems fit and only the latest published version of this manual may be utilised.

BOARD APPROVAL

THIS Document was reviewed, presented and accepted by the Board on _____.

Director	Signature
Mr D H du Plessis	
Dr M Moyo	

Ms J I Palmer	
Ms L Zingoni	
Ms U Satgoor	
Mr R N Pillay	
Mr D J Abdo (Executive)	
Mr P F Malan (Executive)	
Ms RA I Hattingh (Managing)	