

PAIA MANUAL
OF
DATANETICS PTY LTD
("DATANETICS")

Registration Number: 2019/264073/07

In accordance with Section 51 of the **Promotion of Access to Information Act No. 2 of 2000 (as amended, "PAIA") and Section 55 of the Protection of Personal Information Act No. 4 of 2013 (as amended, "POPIA")

Updated: June 2025

Approved By:

A handwritten signature in black ink that reads "CJ van Niekerk". The signature is written in a cursive style with a large, stylized 'C' and 'J'.

CJ van Niekerk

Managing Director

Contents

1. Introduction	4
1.1 Objective	4
1.2 Application and Responsibilities	4
2. Company Contact Details (PAIA Section 51(1)(a))	5
3. Information Regulator’s Guide	6
4. PAIA: Section 51(1)(b)	7
5. Applicable Legislation (PAIA Section 51(1)(c))	8
6. Schedule of Records Available (PAIA Section 51(1)(d))	10
7. Form of Request (PAIA Sections 18 and 53(1); POPIA Section 23)	13
8. Prescribed Fees and Procedure (PAIA Section 54).....	14
8.1 Completion of Request for Access Form	14
8.2 Notification of Extension Period (if required)	14
8.3 Access Fees and/or Deposit	14
8.4 Decision on Request	15
8.5 Grounds for Refusal by Datanetics	15
8.6 Records That Cannot Be Found or Do Not Exist	15
9. Third-Party Information	16

1. Introduction

1.1 Objective

The “Promotion of Access to Information Act No. 2 of 2000” (“PAIA”) gives effect to the constitutional right to access information held by the State or any other person or entity when such information is necessary to exercise or protect a right. PAIA enables individuals and entities to request records from public or private bodies.

The “Protection of Personal Information Act No. 4 of 2013” (“POPIA”) promotes the protection of personal information processed by public and private entities.

Under PAIA, a private entity like Datanetics must provide requested information if the requester demonstrates that the record is required to exercise or protect a right, and no grounds for refusal under PAIA apply.

Section 51 of PAIA mandates private entities to create a PAIA Manual to guide individuals on accessing information held by the entity. This document is Datanetics’ PAIA Manual, outlining the records it holds and the process for requesting access.

Datanetics is committed to protecting personal information, as detailed in its “Privacy Statement” (available at [Privacy Statement Datanetics] (<https://www.datanetics.co.za>)). The Privacy Statement explains how Datanetics collects, uses, and shares personal information, as well as data subjects’ rights regarding their personal information.

1.2 Application and Responsibilities

This PAIA Manual outlines the duties of Datanetics’ appointed Information Officers, who ensure compliance with PAIA and POPIA requirements.

Datanetics mainly operates in the “information and communications technology (ICT)” sector.

2. Company Contact Details (PAIA Section 51(1)(a))

The Managing Director, as the head of Datanetics under PAIA, has authorized the following contact person to ensure compliance with PAIA, as confirmed by a resolution of the Datanetics Board:

PAIA Manual Contact Person: CJ van Niekerk

Designation: Datanetics Managing Director

Physical Address:

12 Carlswald Gardens

8 Looper Street

Carlswald, 1685

Postal Address:*

Postnet Suite 71

Private Bag X121

Halfway House, 1685

South Africa

Telephone: +27 82 850 3563

Email: cj@datanetics.co.za

Website: www.datanetics.co.za

3. Information Regulator's Guide

The "Information Regulator" has published a Guide to assist individuals in exercising their right to access information under PAIA and POPIA. The Guide is available from the Information Regulator's website <https://info regulator.org.za/paia-uidelines/>

Requests to inspect or obtain a copy of the Guide must follow "Form 1 of Annexure A" to Government Notice No. R.757, dated 27 August 2021, as per the PAIA Regulations.

For inquiries about the Guide, contact the Information Officer or the Information Regulator at:

Postal Address:

JD House

27 Stiemens Street

Braamfontein, Johannesburg

General Enquiries: +27 (0)10 023 5200

Website: www.info regulator.org.za

4. PAIA: Section 51(1)(b)

PAIA allows requesters to access records from a private body like Datanetics if the record is needed to exercise or protect a right. Public bodies requesting records must act in the public interest.

Requests under PAIA must follow the prescribed procedures and fees, detailed below.

Under “Section 23 of POPIA” (read with Sections 18 and 53 of PAIA), data subjects (e.g., customers, employees, or third parties) may request confirmation of records containing their personal information held by Datanetics, free of charge. Requesters may also request a copy or description of such records, subject to PAIA’s prescribed fees.

5. Applicable Legislation (PAIA Section 51(1)(c))

Datanetics maintains records as required by the following South African legislation (as amended and applicable, where disclosure is mandatory):

1. Auditing Professions Act, No. 26 of 2005
2. Basic Conditions of Employment Act, No. 75 of 1997
3. Broad-Based Black Economic Empowerment Act, No. 53 of 2003
4. Companies Act, No. 71 of 2008
5. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
6. Competition Act, No. 89 of 1998
7. Constitution of the Republic of South Africa, No. 108 of 1996
8. Consumer Protection Act, No. 68 of 2008
9. Customs and Excise Act, No. 91 of 1964
10. Electronic Communications Act, No. 36 of 2005
11. Electronic Communications and Transactions Act, No. 25 of 2002
12. Employment Equity Act, No. 55 of 1998
13. Financial Intelligence Centre Act, No. 38 of 2001
14. Hazardous Substances Act, No. 15 of 1973
15. Identification Act, No. 68 of 1962
16. Income Tax Act, No. 58 of 1962
17. Insolvency Act, No. 24 of 1936
18. Intellectual Property Laws Amendment Act, No. 38 of 1997
19. Labour Relations Act, No. 66 of 1995
20. Medical Schemes Act, No. 131 of 1998
21. National Credit Act, No. 34 of 2005
22. National Environment Management Act, No. 107 of 1998
23. National Environmental Management: Air Quality Act, No. 39 of 2004
24. National Environmental Management: Waste Act, No. 59 of 2008
25. National Health Act, No. 61 of 2003
26. National Water Act, No. 36 of 1998
27. Occupational Health and Safety Act, No. 85 of 1993
28. Pension Funds Act, No. 24 of 1956
29. Protection of Personal Information Act, No. 4 of 2013
30. Prescription Act, No. 68 of 1969

31. Promotion of Access to Information Act, No. 2 of 2000
32. Protected Disclosures Act, No. 26 of 2000
33. Regulation of Interception of Communications and Provision of Communication-Related Information Act, No. 70 of 2002
34. Securities Services Act, No. 36 of 2004
35. Skills Development Act, No. 97 of 1998
36. Skills Development Levies Act, No. 9 of 1999
37. Unemployment Insurance Contributions Act, No. 4 of 2002
38. Value Added Tax Act, No. 89 of 1991

6. Schedule of Records Available (PAIA Section 51(1)(d))

Datanetics holds the following categories of records, accessible upon request under PAIA or POPIA:

Category	
Director's Office	<ul style="list-style-type: none"> - Accounting Records - General Correspondence - Internal Reports and Communications - Investment Records - Management Reports - PAYE Records - Tax Records - Transactional Records - Treasury Dealing and Settlement Records - VAT Records - Contracts and Agreements - Minute Books - Proxy Forms - Records of Director Appointments - Records of Resolutions - Share Registration Records - Statutory Records
Human Resources	<ul style="list-style-type: none"> - HR Policies and Procedures - Health and Safety Records - Labour Relations Records - Leave Records - Medical Aid Records - Payroll Reports - Pension Records - Salary Records - SETA Records - Skills Development Levies

	<ul style="list-style-type: none"> - Standard Terms and Conditions of Employment - Statutory Records - Training Records - UIF Records
Administration	<ul style="list-style-type: none"> - Audit Reports - General Administration Records - General Correspondence - Risk Management Records - Compliance Records - Insurance Records - Disaster Recovery Plans - Policy Records - Software Licensing - AI Ethics
Legal	<ul style="list-style-type: none"> - Agreements - General Correspondence - Immovable Property Records - Internal Reports and Communications - Legal Records - Litigation Records - Intellectual Property Records (Trademarks, Patents, Designs, Copyright) - Statutory Records - Working Files
Personal Information (POPIA Section 23)	<ul style="list-style-type: none"> - Information relating to a data subject, including but not limited to: <ul style="list-style-type: none"> - Race, gender, sex, pregnancy, marital status, nationality, ethnicity, social origin, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language, birth - Education, medical, financial, criminal, or employment history

	<ul style="list-style-type: none"> - Identifying numbers or symbols, biometric information, blood type - Personal opinions, preferences, private or confidential correspondence, views, or opinions of others - Consumer or purchasing patterns - Email, physical, or location information, online identifiers, telephone, or mobile numbers
Special Personal Information	<ul style="list-style-type: none"> - Religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sex life, criminal behaviour, biometric information <p>*Note:* References to personal information include special personal information unless otherwise stated.</p>

7. Form of Request (PAIA Sections 18 and 53(1); POPIA Section 23)

To request access to records, follow these steps:

- Use "Form 2" (Request for Access to a Record of a Private Body), available on the Information Regulator's website (PAIA Form 2 (<https://info regulator.org.za/paia-guidelines/>)).
- Submit the request to the Datanetics Information Officer.
- Provide sufficient details, including:
 - The record(s) requested
 - The requester's identity (and proof of capacity if acting on behalf of another)
 - The preferred form of access (e.g., postal address, email, or fax number in South Africa)
 - Any additional notification preferences (e.g., phone or email)
 - The right the requester seeks to exercise or protect, with an explanation of why the record is needed.

8. Prescribed Fees and Procedure (PAIA Section 54)

The following applies to requests:

- A prescribed request fee must be paid before processing.
- If preparing the requested record exceeds six hours, a deposit (up to one-third of the access fee) may be required.
- Requesters may challenge the request fee or deposit through a court application.
- Records will not be released until fees are paid.
- Fee details are available on the Information Regulator's website ([PAIA Form 3] (<https://inforegulator.org.za/paia-guidelines/>)).

Submitting "Form 2" does not guarantee access. Access may be restricted under "POPIA Section 23(4)(a)" or "PAIA Chapter 4". Providing false or misleading information may lead to legal action.

If access is granted, an access fee will be charged for searching, reproducing, and preparing records, as prescribed by PAIA.

8.1 Completion of Request for Access Form

When completing "Form 2":

- Fill in all fields clearly.
- Attach a copy of the requester's identity document.
- For corporate requesters, include written authorization for the representative.
- Mark "N/A" for inapplicable questions and "NIL" for questions with no information to disclose.
- Add extra pages if needed, clearly referencing the relevant question.

8.2 Notification of Extension Period (if required)

Datanetics will respond within 30 days of receiving a request. This period may be extended by up to 30 days under specific circumstances, with details provided in the extension notification.

8.3 Access Fees and/or Deposit

Requesters will be informed of any access fees or deposits required, including payment methods. Deposits are refundable if the request is denied.

8.4 Decision on Request

Requesters will be notified whether the request is approved or denied. If denied, reasons will be provided, and the requester may appeal to a court (for PAIA requests) or the Information Regulator (for POPIA requests), with details on the procedure and timeline.

8.5 Grounds for Refusal by Datanetics

Datanetics may refuse access to records in the following cases:

- To protect personal information of a third party (including deceased individuals) from unreasonable disclosure.
- To safeguard commercial information (e.g., trade secrets, financial, scientific, or technical data) that could harm Datanetics or a third party.
- If disclosure breaches a confidentiality agreement with a third party.
- If disclosure endangers an individual's life or safety.
- If disclosure compromises property security or transportation means.
- If disclosure affects witness protection or public safety.
- If the record is privileged in legal proceedings (unless privilege is waived).
- If disclosure harms Datanetics' commercial or financial interests, contractual negotiations, or competitive position.
- If the record is a copyrighted computer program owned by Datanetics.
- If the record contains research information for Datanetics or a third party.
- If the information is not yet public.

8.6 Records That Cannot Be Found or Do Not Exist

If a record cannot be found or does not exist, Datanetics will notify the requester via affidavit or affirmation, detailing the steps taken to locate the record.

9. Third-Party Information

If a requested record contains third-party information, Datanetics must attempt to contact the third party to inform them of the request. The third party may consent to or oppose the disclosure. The Datanetics Information Officer will consider the third party's response when deciding whether to grant access.