



# PAIA Manual

**Company** Columbus Technologies (Pty) LTD




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**Controlled by** I. Morgan

**Reviewed by** T. Fourie

CLM-IT-POL-04	Columbus Technologies PAIA Manual			Rev.1.1
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## 1 OBJECTIVE

The Promotion of Access to Information Act, 2000 (the “Act”) gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights.

On request, the private body or government is obliged to release such information unless the Act expressly states that the records containing such information may or must not be released.

This manual informs requestors of procedural and other requirements which a request must meet as prescribed by the Act. The objective of this manual is to provide information according to the requirements of the PAIA Act for:

Company: Columbus Technologies (Pty) Ltd  
(the “company”)

Registration Number: 2002 / 021179 / 07

With registered address at:

28 Wenning Street

Groenkloof

Pretoria 0181

## 2 PAIA MANUAL

### 2.1 Nature of the business

- IT Consulting and professional services
- IT and IT Security Value Added reseller
- IT Managed Services and Managed Security Services Provider
- Training Provider
- Talent Resourcing and Management

### 2.2 Contact Details

#### 2.2.1 Directors

- Mavis Khumalo (Owner)
- Theo Fourie (Operations)

## 2.2.2 Information Officers

- Theo Fourie (Information Officer)
- Iain Morgan (Deputy Information Officer)
- Lynn Bester (Deputy Information Officer)

## 2.2.3 Physical Address

28 Wenning Street  
Groenkloof  
Pretoria  
0181

## 2.2.4 Postal Address

PostNet Suite 40  
Private Bag X108  
Centurion  
0046

## 2.2.5 Email

[contact@columbussa.co.za](mailto:contact@columbussa.co.za)

## 2.3 Guide of human rights commission / information regulator

A guide to the Act (as contemplated under section 10 of the Act) is available from the South African Human Rights Commission. The guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide and its contents should be directed to:

### **The South African Human Rights Commission:**

PAIA Unit (the Research and Documentation Department)

Postal address:

Private Bag 2700  
Houghton  
2041

Telephone: +27 11 484-8300

Fax: +27 11 484-7146

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

Or, alternatively, its successor,

## **The Information Regulator (South Africa)**

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2017

E-Mail: [inforeq@justice.gov.za](mailto:inforeq@justice.gov.za)

### **2.4 Access to records held by the company**

If the requirements for access to company records have been met, then the records may be accessed by the requester.

A requester is any person making a request for access to a record of the Company and in this regard, the Act distinguishes between two types of requesters:

### **2.5 Personal Requester**

A personal requester is referred to as a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, the Company will provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by the Company.

### **2.6 Other Requester**

This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, the Company is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by the Company.

### **2.7 Request Procedure**

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requester must complete the prescribed form enclosed herewith in Addendum A and submit same as well as payment of a request fee and a deposit, if applicable to the information officer at the postal or physical address, or electronic mail address stated herein. The prescribed

form must be filled in with enough particularity to at least enable the information officer to identify:

- The record or records requested;
- The identity of the requester;
- What form of access is required; and
- The postal address or fax number of the requester.

A requester must state that he or she requires the information in order to exercise or protect a right, and clearly state the nature of the right to be exercised or protected. The Requester must also clearly state the reason or explanation of why the requested record is required for the protection of that right.

The Company will process a request within 30 (thirty) days, unless the requestor has stated special reasons which would satisfy the information officer that circumstances to accelerate this request.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required.

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 the information officer. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the information officer.

## 2.8 Decision

Within 30 (thirty) days of receipt of a request, the company shall decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The company retains the right to extend the 30 (Thirty Day) period, to grant or deny such a request if the request is for large volumes of information or the information required is in storage or held at another office of the company and the information cannot be reasonably obtained within 30 days of the request.

The information officer or deputy information officer will notify the requester in writing should an extension be necessary.

## 2.9 Fees

The Act provides for two types of fees:

A request fee, (which will be a standard fee) and an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs where applicable.

When a request is received by the information officer of the Company, the Information officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing of the request. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the information officer shall notify the requester to pay as a deposit. The prescribed portion of the access fee which would be payable if the request is granted.

The information officer shall withhold a record until the requester has paid the fee or fees as indicated. A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is refused, then the information officer shall repay the deposit to the requester.

## **2.10 Categories of records held by the company in terms of Section 51(1)(E) of the Act**

### 2.10.1 Companies Act Records

- Documents of incorporation
- Memorandum of Incorporation
- Minutes of Board of Directors meetings
- Records relating to the appointment of directors / auditor / secretary / public officer and other officers
- Share Register and other statutory registers

### 2.10.2 Financial Records

- Annual Financial Statements
- Tax Returns
- Accounting Records

- Banking Records
- Bank Statements
- Electronic banking records
- Asset Register
- Rental Agreements
- Invoices

### 2.10.3 Tax Records

- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory compliances:
  - VAT
  - Skills Development Levies
  - UIF
  - Workmen's Compensation

### 2.10.4 Personnel Documents and Records

- Employment contracts
- Contact details (telephone numbers and e-mail addresses) of employees and Independent contractors
- Disciplinary records
- Salary records
- Disciplinary code
- Leave records
- Training records

### 2.10.5 Learner Records

- Attendance records

- Course completion records
- Contact details (telephone numbers and e-mail addresses) of learners

#### 2.10.6 Client Documents and Records

- Contact details (telephone numbers and e-mail addresses) of clients
- Company / CC registration details
- Physical and postal addresses
- Service Level Agreement details

#### 2.10.7 Partner and Supplier records

- Partner and Supplier contracts
- Contact details (telephone numbers and e-mail addresses) of clients
- Company / CC registration details
- Physical and postal addresses
- Service Level Agreement details

## 2.11 POPIA

### 2.11.1 Purpose of Processing

The Company uses the Personal Information under its care in the following ways:

- Rendering service according to instructions given by clients
- Staff and learner administration
- Keeping of accounts and records
- Complying with tax laws

### 2.11.2 Categories of Recipients for Processing the Personal Information

The Company may supply the Personal Information to service providers who render the following services:

- Capturing and organising of data;
- Storing of data;
- Sending of emails and other correspondence to clients
- Conducting due diligence checks;

### 2.11.3 Actual or planned transborder flows of personal information

The Company may transfer data trans-border in order to store data with third party cloud storage providers.

### 2.11.4 General description of information security measures

The Company employs up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Measures include:

- Firewalls;
- Endpoint protection software and update protocols;
- Intrusion Detection;
- Logical access control;
- Secure setup of hardware and software making up the IT infrastructure;
- Outsourced Service Providers who process Personal Information on behalf of the Company are contracted to implement security controls;
- Encryption where needed;

## 2.12 Remedies:

If Request for information is refused

### 2.12.1 Internal Remedies

The Company does not have internal appeal procedures. As such, the decision made by the information officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if the request has been refused and the requester is not satisfied with the outcome/response from the information officer.

### 2.12.2 External Remedies

A requestor that is dissatisfied with the information officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a court for relief.

Similarly, a third party dissatisfied with the information officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a court for relief.

For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

### 2.13 Availability of the manual

The manual is available for inspection, on reasonable prior notice, at the office of the company free of charge.

## 3 Versioning

### 3.1 Version Control

Version	Date	Author	Description
Draft	2023-07-26	Iain Morgan	Create
1.1	2023-09-08	Iain Morgan	Finalise

### 3.2 Version History

Date	Version	Description of Revision
2023-09-08	1.1	Document finalised