



PAIA Manual

Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)

Last reviewed: 26 October 2023

Reviewed by: Ray Hall

1. List of Acronyms and Abbreviations

- 1.1. "4CIT" means 4CIT Software Solutions (Pty) Ltd
- 1.2. "CEO" means Chief Executive Officer.
- 1.3. "DIO" means Deputy Information Officer.
- 1.4. "IO" means Information Officer.
- 1.5. "Minister" means Minister of Justice and Correctional Services.
- 1.6. "PAIA" means Promotion of Access to Information Act No. 2 of 2000 (as amended).
- 1.7. "Personal Information" has the meaning ascribed thereto in POPIA.
- 1.8. "POPIA" means Protection of Personal Information Act No. 4 of 2013.
- 1.9. "Regulator" means the Information Regulator.
- 1.10. "Republic" means the Republic of South Africa.

2. Purpose of the Manual

This PAIA manual is useful for the public to:

- 2.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2. have a 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 and Deputy 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 of 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 and the recipients or categories of recipients to whom the personal information may be supplied.

- 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. Key Contact Details for Access to Information of 4CIT

3.1. Information Officer

Name: Ray Hall
Telephone: +27 21 948 1694
Email: ray.hall@4cgroup.co.za

3.2. Deputy Information Officer

Name: Dale Niemand
Telephone: +27 21 948 1694
Email: dale.niemand@4cgroup.co.za

3.3. Access to information general contacts

Email: info@4cgroup.co.za

3.4. National of Head Office

Postal address: PO Box 5471, Tyger Valley, Bellville, Western Cape, 7536
Physical address: Ground Floor, Unit 1, Tyger Valley Chambers 1, 27 Willie van Schoor Drive, Bellville, Western Cape
Telephone: +27 21 948 1694
Email: info@4cgroup.co.za
Website: 4cit.group

4. Guide on How to Use PAIA and How to Obtain Access to the Guide

- 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:

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:

4.3.2.1. the Information Officer of every public body.

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA.

4.3.3. the manner and form of a request for:

4.3.3.1. access to a record of a public body contemplated in section 11.

- 4.3.3.2. access to a record of a private body contemplated in section 50.
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA.
- 4.3.6. 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:
 - 4.3.6.1. an internal appeal.
 - 4.3.6.2. a complaint to the Regulator.
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.
- 4.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- 4.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- 4.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access.
- 4.3.10. the regulations made in terms of section 92.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained:
 - 4.5.1. upon request to the Information Officer.
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
 - 4.6.1. English
 - 4.6.2. Afrikaans

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. The records reflected in the table below are available without a person having to formally request access:

Category of Records	Types of records	Available on Website	Available Upon Request
Company Information	PAIA manual Disclaimer Privacy notice / statement	x	x
Company Information	Other policies Terms and condition		x

RDP

Publications	Website and content	x	
Publications	Advertising Information documents Marketing material Newsletters Presentations Press releases Social media Videos		x

6. RECORDS OF COMPANIES AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

6.1. The records reflected in the table below are available, in accordance with legislation:

Category of Records	Applicable Legislation
Company Information	Companies Act 71 of 2008
Communications Information Information Security and Privacy Policy Privacy Notice / Statement	Electronic Communications Act 36 of 2005 Electronic Communications and Transactions Act 25 of 2002 Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002
Employment Information	Basic Conditions of Employment Act 75 of 1997 Broad-Based Black Economic Empowerment Act 53 of 2003 Compensation for Occupational Injuries and Diseases Act 130 of 1993 Employment Equity Act 55 of 1998 Labour Relations Act 66 of 1995 Skills Development Act 97 of 1998 Unemployment Insurance Act 63 of 2001
Financial Crime Information	Financial Intelligence Centre Act 38 of 2001 Prevention and Combating of Corrupt Activities Act 12 of 2004
PAIA Manual Information security information	Promotion of Access to Information Act 2 of 2000 Protected Disclosures Act 26 of 2000 Protection of Personal Information Act 4 of 2013
Health information	Council for Medical Schemes Levies Act 58 of 2000 Medical Schemes Act 131 of 1998 Occupational Health and Safety Act 85 of 1993 Tobacco Products Control Act 83 of 1993
Insurance information	Insurance Act 18 of 2017 Long-Term Insurance Act 52 of 1998 Short-Term Insurance Act 53 of 1998
Legal information	Interpretation Act 33 of 1957 Justices of the Peace and Commissioner of Oaths Act 16 of 1963 Legal Practice Act 28 of 2014 Promotion of Administrative Justice Act 3 of

	2000 Small Claims Courts Act 61 of 1984
People information	Births and Deaths Registration Act 51 of 1992 Childrens Act 38 of 2005 Civil Union Act 17 of 2006 Consumer Protection Act 68 of 2008 Constitution of the Republic of South Africa (as amended) Maintenance Act 99 of 1998 Marriage Act 99 of 1998 Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Retirement fund information	Friendly Societies Act 25 of 1956 Government Employees Pension Law (1996) Pension Funds Act 24 of 1956
Tax information	Employment Tax Incentive Act 26 of 2013 Income Tax Act 58 of 1962 Organisation for Economic Co-operation and Skills Development Levies Act 9 of 1999 Tax Administration Act 28 of 2011 Tax on Retirement Funds Act 38 of 1996 Unemployment Insurance Contributions Act 4 of 2002 Value Added Tax Act 89 of 1991
Trust property information	Trust Property Control Act 57 of 1988

7. SUBJECTS ON WHICH 4CIT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD

- 7.1. The records reflected in the table below may be formally requested, in terms of the PAIA, but parts, or the whole, of the record may be subject to the grounds for refusal of access to records. Refer to the Guide on how to use the PAIA.
- 7.2. 4CIT reserves the right to refuse access to records if the processing of the record will substantially, and unreasonably, result in a diversion of its resources.
- 7.3. 4CIT reserves the right to refuse access to records that relate to the mandatory protection of:
- 7.3.1. privacy of a third party, who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person.
 - 7.3.2. commercial information of a third party, if the record contains trade secrets of the third party; financial, commercial, or technical, information, which disclosure may cause harm to the financial, or commercial, interests of the third party; and information disclosed in confidence by a third party to 4CIT if the disclosure may place the third party at a disadvantage.
 - 7.3.3. confidential information of a third party, if it is protected in terms of an agreement, or legislation.
 - 7.3.4. safety of natural persons, and the protection of property.

- 7.3.5. records that are regarded as privileged, in legal proceedings.
- 7.3.6. records that are personal information, in terms of the POPIA.
- 7.3.7. commercial activities of 4CIT, including, but not limited to, trade secrets, financial, commercial, or technical, information, and software platforms, or programmes, exclusively developed for the Company.
- 7.4. 4CIT will refuse access if the requests are frivolous and/or vexatious.
- 7.5. The IO, or DIO, may grant access to a record if disclosing the record would reveal evidence of a material contravention of, or failure to comply with, any law, and the public interest in disclosing the record outweighs the harm contemplated in the relevant grounds for refusal of access to records.

Subject on Which 4CIT Holds Records	Categories of Records
Company Records	Incorporation documents Memorandum of incorporation Minutes Resolutions Registers of directors and officers Share registers and other statutory registers Statutory returns to relevant authorities Other statutory obligations Policies and procedures Records relating to appointment of directors, auditors, company secretary, public officer, and other officers
Accounting and Finance Records	Accounting (including books of account) Administration Annual financial statements Asset registers Audit reports Banking Budgets Intellectual property Invoices and credit notes Lease agreements Rental agreements Sale agreements Supporting schedules, and documents, to books of account
Tax Records	Dividends withholding tax Income tax Pay As You Earn (PAYE) Skills Development Levies (SDL) Unemployment Insurance Fund (UIF) levies Workmen's compensation Value Added Tax (VAT)
Legal Records	Documents relating to litigation and/or arbitration

	<ul style="list-style-type: none"> General agreements and contracts Licenses, permits, and authorisations Regulator correspondence
Insurance Records	<ul style="list-style-type: none"> Claims Details of insurance cover, limits, and insurers Insurance policies
Employee Records	<ul style="list-style-type: none"> Arbitration awards Attendance registers Casual employees CCMA proceedings Code of conduct Income tax (PAYE/SDL/UIF) submissions for employees Confidentiality agreements Disciplinary proceedings and internal evaluations Employee personal details Employment conditions and policies Employment contracts Employment equity plan Internal correspondence Internal policies, and procedures Leave Operating manuals Other agreements/contracts Other interventions Medical aid Documents provided by employees Strikes, lockouts, or protest, action Remuneration and benefits Restraint of trade agreements Retirement funds Service Share option schemes registers Share option schemes rules Share purchase scheme register Share purchase scheme rules Training schedules and material Verification reports (credit, criminal, employment, FAIS, identity, qualification)
Client Records	<ul style="list-style-type: none"> Client agreements/contracts and forms Complaints and/or queries Client documents, and information Proposals Transactions and supporting information Verification reports
Service supplier and third party records	<ul style="list-style-type: none"> Code of conduct Conflicts of interest Requests for information Service supplier and/or third party agreements/contracts (including service level agreements)

	<ul style="list-style-type: none"> Tenders Terms and conditions for dealing with suppliers Transactions and supporting information
Information Technology	<ul style="list-style-type: none"> Asset issuing and custodian information Back-ups Disaster recovery testing Incidents and service requests Information and communication technologies (ICT) policies and procedures Network maintenance Operations reports Service level agreements System event logs System performance logs System maintenance checklists System development lifecycle documents
Publications	<ul style="list-style-type: none"> Advertising Information documents Marketing material Newsletters Presentations Press releases Social media Videos Websites and content

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

4CIT processes the personal information of data subjects in the following ways:

- 8.1.1. Executing and/or fulfilling its statutory obligations in terms of the PAIA and/or the POPIA.
- 8.1.2. Executing and/or fulfilling its statutory obligations in terms of other applicable legislation.
- 8.1.3. Executing and/or fulfilling its contractual obligations.
- 8.1.4. Administering employees and potential employees.
- 8.1.5. Keeping accounts, and records.
- 8.1.6. Procurement processes.
- 8.1.7. Visitors to the Company's business premises.

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

4CIT may process information for itself, shareholders (and those of clients), employees (and those of clients), clients (and those of clients), service suppliers (and those of clients), and product suppliers (and those of clients).

Categories of Data Subjects	Personal Information that may be processed
Clients (and those of clients)	Full names; contact details (contact numbers; fax Numbers; email addresses); physical addresses; postal addresses; Unique identifier; identity/registration numbers; confidential correspondence; tax related information; company information; information required in terms of the FAIS Act and the FICA (and other relevant legislation)
Service suppliers and product suppliers (and those of clients)	Full names of contact persons; registered, and trade, names of entities; full names of directors and shareholders, physical addresses; postal addresses; contact details (contact numbers, fax numbers, email addresses); financial information; identity/passport/registration numbers; founding documents; tax related information; authorised signatories' information; broad-based black economic empowerment (B-BBEE) status; associated entities; business strategies; information required in terms of the FAIS Act and the FICA (and other relevant information)
Employees/Key individuals/Representatives (and those of clients)	Gender; pregnancy; marital status; race; age; language; education information (qualifications); financial information; employment history; identity/passport/registration numbers; physical addresses; postal addresses; contact details (contact numbers; fax numbers; email addresses); credit record; FAIS related information; criminal record; well-being and family members; medical; nationality; ethnic and/or social origin; physical and/or mental health; disability; biometric information; professional affiliation; references; CVs/resumes; information required in terms of the FAIS Act and the FICA (and other relevant legislation)

8.3. The recipients or categories of recipients to whom the personal information may be supplied
Subject to any applicable prior approval, 4CIT may supply the personal information of data subjects to service suppliers, who provide the following services:

- 8.3.1. Administration (for example, clients, investments, medical aids, retirement funds).
- 8.3.2. Accounting and/or auditing.
- 8.3.3. Capturing, and organising, personal information.
- 8.3.4. Compliance.
- 8.3.5. Due diligence reviews.
- 8.3.6. Information and communication technologies (ICT).
- 8.3.7. Storing of personal information.

8.3.8. Verification checks (for example, credit (and payment history), criminal, employment history, FAIS related, financial sanctions, identity, qualifications, terrorism).

8.4. The Company may supply the personal information of data subjects to:

8.4.1. Courts, in terms of matters taken on judicial review.

8.4.2. Enforcement agencies, for criminal investigation (for example, National Prosecuting Authority, South African Police Service).

8.4.3. People against whom complaints have been lodged.

8.4.4. Regulators, ombuds, or tribunals, in terms of matters that fall under their jurisdiction.

Categories of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Identity/passport/registration numbers, dates of birth, dates of incorporation, names	Companies and Intellectual Property Commission, Department of Home Affairs, Financial Intelligence Centre, South African Police Services, United Nations, and verification providers
Qualifications	South African Qualifications Authority and verification providers
Credit, and payment history	Credit Bureaus and verification providers
Tax information	South African Revenue Service

8.5. Planned transborder flows of Personal Information

8.5.1. 4CIT has not planned transborder flows of Personal Information.

8.5.2. If it becomes necessary to transfer Personal Information to another country for a lawful purpose, 4CIT will ensure that the person (both legal and natural) to whom the Personal Information will be transferred is subject to a law, binding company rules, and/or binding agreements, which provide a suitable level of protection, and the third party agrees to treat the Personal Information with the same level of protection as 4CIT is required to provide, in terms of the POPIA.

8.5.3. The cross-border transfer of Personal Information will be done with the data subject's consent. However, if it is not reasonably practicable to obtain the data subject's consent, 4CIT will transfer the Personal Information if it will be for the data subject's benefit, and the data subject would have provided consent if it had been reasonably practicable to obtain the consent.

8.6. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

8.6.1. 4CIT has established, and maintains, suitable technical, and operational, measures to prevent loss of, damage to, or unauthorised destruction of, Personal Information, and unlawful access to, or processing of, Personal Information

8.6.2. The suitable measures that 4CIT has taken includes, but is not limited to:

- 8.6.2.1. Access control.
- 8.6.2.2. Agreements with operators, to ensure that they implement, and maintain suitable security controls.
- 8.6.2.3. Anti-virus software.
- 8.6.2.4. Anti-malware software.
- 8.6.2.5. Awareness and vigilance of users.
- 8.6.2.6. Data back-ups.
- 8.6.2.7. Data encryption.
- 8.6.2.8. Defensive measures.
- 8.6.3. The suitable measures are in place to ensure that 4CIT:
 - 8.6.3.1. Identifies the risks (both internal and external) to the personal information that is in its possession and/or under its control.
 - 8.6.3.2. Establishes, and maintains, suitable safeguards against the risks identified.
 - 8.6.3.3. Regularly verifies that the safeguards are effectively implemented.
 - 8.6.3.4. Updates the safeguards when new risks are identified, and when existing safeguards are found to be deficient.

9. AVAILABILITY OF THE MANUAL

- 9.1. A copy of the Manual is available:
 - 9.1.1. At 4cit.group.
 - 9.1.2. head office of 4CIT for public inspection during normal business.
 - 9.1.3. to any person upon request and upon the payment of a reasonable prescribed fee.
 - 9.1.4. to the Information Regulator upon request.
- 9.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

- 10.1. The head of 4cit will on a regular basis update this manual.

Issued by

Rudolph du Plessis

Rudolph du Plessis

CEO