

PAIA MANUAL

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

AiTronetiX (Pty) Ltd (registration number 2021/786421/07)

DOCUMENT CONTROL	
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Approved by	The Director (head of the private body)

1. LIST OF ACRONYMS AND ABBREVIATIONS

TERM	MEANING
"Company", "we", "us"	AiTronetiX (Pty) Ltd
"DIO"	Deputy Information Officer
"IO"	Information Officer
"Minister"	Minister of Justice and Constitutional Development
"PAIA"	Promotion of Access to Information Act 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator (South Africa)
"Republic"	Republic of South Africa

2. PURPOSE OF THIS MANUAL

2.1 This manual helps members of the public to:

- see which categories of our records are available without a formal PAIA request;
- understand how to request access to a record, with a description of the subjects on which we hold records and the categories of records held on each subject;
- know which records we keep in terms of other legislation;
- contact the Information Officer, who assists requesters;
- find the Regulator's Guide on how to use PAIA;
- know why and how we process personal information, about whom, to whom it may be supplied, whether it is transferred outside the Republic, and how we keep it secure.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

ITEM	DETAILS
Registered name and number	AiTronetiX (Pty) Ltd, registration no. 2021/786421/07, a private company
Head of body and Information Officer	The Director, who is also the Information Officer
Deputy Information Officer	None designated
Telephone	+27 67 241 8196
Fax	None
Email for PAIA and POPIA requests	info@aitronetix.com
General email	info@aitronetix.com
Physical address (registered office)	14 Regency Drive, Route 21 Business Park, Pretoria, 0157
Postal address	Same as physical address
Website	aitronetix.com

ITEM	DETAILS
Further contact details	Available on request by email to info@aitronetix.com , subject to POPIA.
Business hours	Monday to Friday 08:00–17:00, excluding public holidays

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN IT

- 4.1** The Regulator has, in terms of section 10(1) of PAIA, updated and made available the Guide on how to use PAIA ("Guide") for anyone who wishes to exercise a right under PAIA or POPIA. It is available in each official language and in braille.
- 4.2** The Guide describes the objects of PAIA and POPIA; the contact details of information officers and deputy information officers; how to request a record from a public or private body; the assistance available from information officers and the Regulator; all remedies, including complaints to the Regulator and court applications; the duty to publish manuals (sections 14 and 51) and voluntary disclosures (sections 15 and 52); fee notices (sections 22 and 54); and the regulations under section 92.
- 4.3** The Guide can be obtained from the Regulator's website (<https://infoeregulator.org.za/paia/>), on request from the Information Officer, or inspected at our office during business hours in English.

5. RECORDS AVAILABLE WITHOUT A REQUEST (SECTION 52)

- 5.1** No notice under section 52(2) has been published. The records below may be accessed without a formal request:

CATEGORY	TYPE OF RECORD	ON WEBSITE	ON REQUEST
Public policies	Privacy Policy, Cookie Notice, Terms of Use, Legal Disclosure (ECT Act s43)	Yes	Yes
Access to information	This manual	Yes	Yes
Marketing	Website content and service descriptions; brochures	Yes	Yes

6. RECORDS KEPT IN TERMS OF OTHER LEGISLATION, AND RETENTION PERIODS

- 6.1** We keep the following records because legislation requires it. Unless a longer period applies, each is kept for at least the period shown. Records under audit, objection, dispute or litigation are kept until the matter is finally resolved (Tax Administration Act s32).

CATEGORY OF RECORD	LEGISLATION	RETENTION PERIOD
Registration certificate and CIPC name-change certificate, Memorandum of Incorporation and amendments, securities register	Companies Act 71 of 2008 ss 24, 50	Life of the company
Register of directors, shareholder and board resolutions and minutes, annual financial statements, accounting records	Companies Act ss 24(1), 24(3), 28	7 years (past directors: 7 years after they leave)
Income tax, provisional tax and PAYE returns and supporting records	Tax Administration Act 28 of 2011 ss 29(3), 32	5 years from submission of the return; we keep 7 years to match the Companies Act
VAT records	Value-Added Tax Act 89 of 1991 s55, read with Tax Administration Act s29	5 years from submission of the relevant return
Employee written particulars; records of time worked and remuneration (if the Company has employees)	Basic Conditions of Employment Act 75 of 1997 ss 29(4), 31	3 years after termination (s29); 3 years from the last entry (s31)

CATEGORY OF RECORD	LEGISLATION	RETENTION PERIOD
Records required by collective agreements, arbitration awards or sectoral determinations (if any)	Labour Relations Act 66 of 1995 s205	3 years from the event or end of the period
Employee names, ID numbers, monthly remuneration and workplace address (UIF)	Unemployment Insurance Act 63 of 2001 s56(2)(c); Unemployment Insurance Contributions Act 4 of 2002	The Act sets no period; 5 years in line with Tax Administration Act s29
Register of earnings (COIDA)	Compensation for Occupational Injuries and Diseases Act 130 of 1993 s81	4 years after the last entry
Client identification and transaction records	Financial Intelligence Centre Act 38 of 2001 ss 22–24	Not applicable: the Company is not an accountable institution (Schedule 1)
Records of processing, consents, objections and data subject requests	POPIA ss 14, 17	No longer than necessary for the purpose (s14(1)); see section 8.6
Electronic records generally	Electronic Communications and Transactions Act 25 of 2002 s16	Sets the method, not a period: records must stay accessible, in their original format, with origin, destination and time data
Contracts, quotes and claims	Prescription Act 68 of 1969 ss 11(d), 12	Claims prescribe after 3 years from when they become due and known; we keep contracts 7 years after they end
This manual	PAIA s51	Current version plus superseded versions for 7 years

6.2 SARS Government Notice 787 of 1 October 2012 (GG 35733) requires electronic tax records to be kept at a place physically located in the Republic unless a senior SARS official authorises otherwise.

7. SUBJECTS ON WHICH WE HOLD RECORDS

SUBJECT	CATEGORIES OF RECORDS
Corporate and statutory	Records listed in section 6; CIPC filings and correspondence; resolutions; this manual
Finance and tax	Invoices, quotes, bank statements, management accounts, SARS correspondence
Clients and projects	Proposals, agreements, NDAs, statements of work, project files, deliverables, correspondence
Suppliers, partners and operators	Supplier agreements, operator agreements (POPIA s21), purchase records
Human resources (if any)	Employment contracts, payroll, leave, tax and UIF records
Marketing and website	Enquiries, marketing consents and opt-outs, website analytics reports
Information technology and security	System and account registers, access logs, security incident records
Legal and compliance	Legal opinions, disputes, POPIA and PAIA requests, Regulator correspondence

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose. We process personal information to answer enquiries and prepare proposals; to provide and invoice our AI products, services and governance work; to manage suppliers and operators; to market our services to people who have consented or are existing clients (POPIA s69); to secure our systems; to meet legal, tax and company-law duties; and to protect our legal rights.

8.2 Data subjects and categories of information.

DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Clients and prospective clients (individuals, and contact persons of companies)	Names, job titles, contact details, company name and registration number, project and requirement details, correspondence, billing details
Website visitors	Contact form details; spam-check technical data (e.g. IP address); analytics data, with consent only
Suppliers, partners and operators	Names, contact details, registration and tax numbers, bank details, contract terms
Employees and contractors (if any)	Identity number, contact details, qualifications, bank details, tax number, remuneration, leave and performance records
Director and shareholders	Names, identity numbers, addresses and shareholding, as filed with CIPC

8.3 Recipients. Personal information may be supplied to:

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS
Tax, payroll and financial records	SARS; our bank; our accountant or tax practitioner
Company and director records	CIPC
Email, documents and website data	Operators who host our email, documents and website (section 8.4)
Records relevant to a dispute or legal duty	Legal advisers, courts, the Regulator and law enforcement, where the law requires or permits

8.4 Planned transborder flows. Zoho does not yet operate a South African data centre. The following operators store information outside the Republic; each transfer relies on POPIA s72(1):

OPERATOR AND SERVICE	INFORMATION	COUNTRY	SECTION 72 GROUND
Zoho Corporation – Zoho Mail	All business email and attachments	United States (Zoho US data centre, Quincy and Dallas)	s72(1)(a) binding operator agreement; s72(1)(c) for enquiries and client work
Google – Analytics	Website usage data	United States and other countries	s72(1)(b) consent
Website hosting, spam check and form delivery (Cloudflare, Resend)	Contact and order form data	Global networks	s72(1)(a), (c)
Google (Google Drive, Calendar)	Business documents and scheduling	Servers that may be outside South Africa	s72(1)(a)

8.5 Security measures. We implement, or are implementing, reasonable technical and organisational measures to protect the confidentiality, integrity and availability of personal information (POPIA s19), including:

- unique accounts with strong passwords and multi-factor authentication on email and cloud services;
- encrypted connections (TLS) to our mail and web providers, and encrypted, password-protected devices;
- up-to-date operating systems, anti-malware and regular backups;
- written operator agreements with service providers (POPIA s21) and confidentiality undertakings;
- a breach procedure to notify the Regulator and affected data subjects as soon as reasonably possible (POPIA s22).

8.6 Retention of other records (proposed internal periods). Where no statute in section 6 sets a period:

RECORD	PROPOSED PERIOD	BASIS
Client contracts, proposals, project files and correspondence	7 years after the engagement ends	POPIA s14(1)(b); Prescription Act s11(d)
NDAs	7 years after the confidentiality obligations end	POPIA s14(1)(c)

RECORD	PROPOSED PERIOD	BASIS
Enquiries that do not lead to an engagement	12 months after the last contact	POPIA s14(1)
Marketing contacts	Until consent is withdrawn or the person opts out; then only name and contact detail on a do-not-contact list	POPIA ss 11(3)(b), 69
Website analytics (GA4)	14 months	POPIA s14(1)
Supplier and operator records	7 years after the contract ends	POPIA s14(1)(b)
Job applications (if any)	12 months after the position is filled, unless the applicant consents to longer	POPIA s14(1)(d)
CCTV footage and visitor registers (only if the Company operates its own)	CCTV: 30 days unless needed for an incident; visitor registers: 12 months	POPIA s14(1)
PAIA and POPIA requests, complaints and Regulator correspondence	3 years after the final decision or outcome	POPIA s14(1)(b)
Security incident and breach records	5 years after closure	POPIA ss 14(1)(b), 22

8.7 When a period ends, records are destroyed, deleted or de-identified so that they cannot be reconstructed (POPIA s14(4)–(5)).

9. HOW TO REQUEST ACCESS TO A RECORD

- 9.1** Complete **Form 2** (Request for Access to Record, Regulation 7 of the PAIA Regulations, 2021), available at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>, and send it to the Information Officer by email or by hand at the addresses in section 3.
- 9.2** The requester must give enough detail to identify the record and the requester, state the form of access required, identify the right to be exercised or protected and explain why the record is needed for it (PAIA ss 50, 53), attach proof of identity and, if acting for another person, proof of authority.
- 9.3** We will decide within 30 days (s56), which we may extend once by up to 30 days on notice (s57). No decision within the period is a deemed refusal (s58). Where a record concerns a third party, we notify that party (s71).
- 9.4** Access may be refused only on the grounds in PAIA ss 62–70, such as protecting a third party's privacy, commercial or confidential information, safety, legally privileged records, or our own trade secrets and research.
- 9.5** There is no internal appeal against a decision of a private body. Within 180 days a requester may complain to the Regulator (ss 77A–77B) or apply to court (s78).
- 9.6** Data subjects who want to correct or delete their personal information use POPIA Form 2 (Regulation 3); to object to processing, POPIA Form 1 (Regulation 2). Both are on the Regulator's website.

10. FEES

10.1 Fees are prescribed in Annexure B of the PAIA Regulations, 2021 (private bodies). A personal requester, who asks for their own personal information, pays no request fee (s54(1)).

ITEM	FEE
Request fee (not payable by a personal requester)	R140.00
Photocopy or printed copy of an A4 page	R2.00 per page or part
Copy on flash drive (supplied by requester) or compact disc (supplied by requester / by us)	R40.00 / R40.00 / R60.00
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on flash drive or compact disc	R40.00 (by requester) / R60.00 (CD supplied by us)
Transcription or copy of visual images	At the service provider's quoted cost



ITEM	FEE
Search and preparation, per hour or part, excluding the first hour	R145.00, up to R435.00 in total
Deposit, if search and preparation exceed 6 hours	One third of the access fee
Postage, email or other electronic transfer	Actual cost

11. AVAILABILITY OF THIS MANUAL

11.1 This manual is available on aitronetix.com, for inspection at our registered office during business hours, from the Information Officer on request (at the photocopy fee in section 10), and to the Regulator on request.

12. UPDATING OF THIS MANUAL

12.1 The head of the Company reviews this manual at least once a year and whenever contact details, records or processing activities change.

Issued by

Director and Information Officer, AiTronetiX (Pty) Ltd

Date: _____