

PAIA Manual

This manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended).

Updated: 1 May 2026

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1. List of Acronyms and Abbreviations

- 1.1 “PAIA” Promotion of Access to Information Act No. 2 of 2000 as amended;
- 1.2 “POPIA” Protection of Personal Information Act No.4 of 2013;
- 1.3 “Regulator” Information Regulator; and

2. Purpose of PAIA 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 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. Key Contact Details for Access to information for DataSure

3.1 Chief Information Officer

Name: Wendy Moulang

Tel: 0832299251

Email: info@data-sure.co.za

3.2 Deputy Information Officer

As a sole entrepreneur, no Deputy Information Officer has been appointed.

3.3 Access to information general contacts

Email: info@data-sure.co.za

3.4 National or Head Office

Physical Address: Deauville, Parade Ring Road, Milnerton

Telephone: 0832299251

Email: info@data-sure.co.za

Website: data-sure.co.za and luminoautomate.com

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 PAIA

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- 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, and
 - 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 POPIA²;
 - 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 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
 - 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-
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¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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- 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.3.10 the regulations made in terms of section 92¹¹.
 - 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-
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⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to

be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

- 4.5.1 upon request to the Information Officer;
- 4.5.2 from the website of the **Information Regulator**.
- 4.6 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours, or for download from our website-
- 4.6.1 **English**
- 4.6.2 **Afrikaans**
- 4.6.3 **isiXhosa**

5. Categories of records of DataSure which are available without a person having to request access

Record	Available on Website	Available on Request
PAIA Manual	Yes	Yes
Privacy Statement	Yes	Yes
Terms and Conditions	Yes	Yes
PAIA Guidelines	Yes	Yes

6. Description of the records of DataSure which are available in accordance with any other Legislation

Record	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008

7. Description of the subjects on which the body holds records and categories of records held on each subject by DataSure.

Subject	Categories
Strategic documents	Company strategy

	• Product information • Budgets • Meeting notes and recordings
Client information	• Contracts • Client contact information • Invoices • Project plans • Correspondence • Proposals • Documents created for clients • Documents provided by clients
Supplier information	• Contracts • Service level agreements • Billing details • Banking details • Contact information
Company documents	• Company registration • Financial records • Bank statements • CIPC submissions • Tax returns and other information • Shareholder details

8. Processing of personal information

8.1 Purpose of Processing Personal Information

Data Subject	Purpose
Clients	• provide services • communicate • promote our services • manage our relationships • comply with legislation
Suppliers	• communicate • manage our relationships

	• comply with legislation
Prospective clients	• promote our services • communicate

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

Data Subject	Personal information that may be processed
Clients	Name, surname, job title, telephone number, email address, company name, VAT number, physical and/or postal address.
Suppliers	Name, surname, job title, telephone number, email address, company name, VAT number, physical and/or postal address, banking details.
Prospective clients	Name, surname, job title, telephone number, email address, company name

8.3 The recipients or categories of recipients to whom the personal information may be supplied.

Category of Personal Information	Recipients or categories of recipients to whom personal information may be provided
Clients	Cloud storage providers, operational tools (such as project management tools), financial management platforms, AI automation platforms (with explicit consent), accountants.
Suppliers	Cloud storage providers, operational tools, financial management platform, accountants.
Prospective clients	Cloud storage providers, operational tools (such as lead databases), communication services (such as email and SMS).

8.4 Planned transborder flows of personal information

We use a variety of international service providers to help run our business. Where possible, we have signed Data Processing Agreements with service providers. We only use reputable providers and are confident that they have sufficient security in place.

We mostly use these service providers:

- Google Workspace (hosted in the USA) for cloud storage;
- Xero (New Zealand) for financial management;
- Atlassian Cloud for project management (USA / EU);
- Airtable for CRM (USA / EU);
- Zapier (USA)..

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

- DataSure has taken reasonable steps to safeguard personal information from unauthorised access and modification or deletion.
- We make use of trusted partners for processing of personal information.
- Where possible, multifactor authentication is used to provide an additional layer of security for accounts that have access to personal information.

9. Availability of the Manual

9.1 A copy of the manual is available -

9.1.1 at www.data-sure.co.za and www.luminoautomate.com;

9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.3 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 the Manual

The head of DataSure will on a regular basis update this manual.

Issued by:

Wendy Moulang

Chief Executive Officer - DataSure