

## **INFOBUILD (PTY) LTD**

### **PAIA MANUAL**

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

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>“CEO”</b>	Chief Executive Officer
1.2	<b>“DIO”</b>	Deputy Information Officer;
1.3	<b>“IO”</b>	Information Officer;
1.4	<b>“Minister”</b>	Minister of Justice and Correctional Services;
1.5	<b>“PAIA”</b> (as	Promotion of Access to Information Act No. 2 of 2000 Amended);
1.6	<b>“POPIA”</b>	Protection of Personal Information Act No.4 of 2013;
1.7	<b>“Regulator”</b>	Information Regulator; and
1.8	<b>“Republic”</b>	Republic of South Africa

## 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 OF INFOBUILD

#### Chief Information Officer

Name: Mr. Johan Jurd

Tel: 011 064 5668

Email: [johan.jurd@infobuild.co.za](mailto:johan.jurd@infobuild.co.za)

#### Deputy Information Officer

Name: Ms. Refilwe Motia

Tel: 011 064 5668

Email: [refilwe.motia@infobuild.co.za](mailto:refilwe.motia@infobuild.co.za)

#### Access to Information of General Contacts

Email: [info@infobuild.co.za](mailto:info@infobuild.co.za)

Website: [www.infobuild.co.za](http://www.infobuild.co.za)

#### Head Office

Postal Address: PO Box 1166, Fourways, 2055

Physical Address: Spaces Business Centre, Willow Wood Office Park, Corner Cedar Road and Third Street, Broadacres, 2021

Telephone: 011 064 5668

Email: [info@infobuild.co.za](mailto:info@infobuild.co.za)

### 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, and
  - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 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<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 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; 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 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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.*

<sup>5</sup> 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.*

<sup>6</sup> 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.*

- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> 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<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 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 and Afrikaans.

## 5. CATEGORIES OF RECORDS OF INFOBUILD WHICH ARE AVAILABLE THROUGH AN ACCESS REQUEST

Category of Records	Types of the Record	Available on Website	Available upon request
Companies Act Records	<ul style="list-style-type: none"> <li>• All trust deeds.</li> <li>• Documents of Incorporation.</li> <li>• Memorandum of Incorporation.</li> <li>• Minutes of meeting of the Board of Directors.</li> </ul>		X

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

	<ul style="list-style-type: none"> <li>• Minutes of meetings of Shareholders.</li> <li>• Proxy forms.</li> <li>• Register of directors' shareholdings.</li> <li>• Share certificates; and</li> <li>• Share Register and other statutory registers and/or records and/or documents.</li> <li>• Special resolutions/Resolutions passed at General and Class meetings.</li> <li>• Records relating to the appointment of:             <ul style="list-style-type: none"> <li>○ Auditors.</li> <li>○ Directors.</li> <li>○ Prescribed Officer.</li> <li>○ Public Officer; and</li> <li>○ Secretary.</li> </ul> </li> </ul>		
Financial Records	<ul style="list-style-type: none"> <li>• Accounting Records</li> <li>• Annual Financial Reports</li> <li>• Annual Financial Statements</li> <li>• Asset Registers</li> <li>• Bank Statements</li> <li>• Banking details and bank accounts.</li> <li>• Banking Records</li> <li>• Debtors / Creditors statements and invoices.</li> <li>• General ledgers and subsidiary ledgers.</li> <li>• General reconciliation.</li> <li>• Invoices.</li> <li>• Policies and procedures.</li> <li>• Rental Agreements; and</li> <li>• Tax Returns.</li> </ul>		X
Income Tax Records	<ul style="list-style-type: none"> <li>• PAYE Records</li> <li>• Documents issued to employees for income tax purposes.</li> <li>• Records of payments made to SARS on behalf of employees.</li> <li>• All other statutory compliances:</li> </ul>		X

	<ul style="list-style-type: none"> <li>○ VAT</li> <li>○ Skills Development Levies</li> <li>○ UIF</li> <li>○ Workmen's Compensation</li> </ul>		
Personal Documents and Records	<ul style="list-style-type: none"> <li>• Address Lists.</li> <li>• Disciplinary Code and Records.</li> <li>• Employee benefits arrangements rules and records.</li> <li>• Employment Contracts.</li> <li>• Forms and Applications.</li> <li>• Grievance Procedures.</li> <li>• Leave Records.</li> <li>• Payroll reports.</li> <li>• Safety, Health and Environmental records.</li> <li>• Salary Records.</li> <li>• Standard letters and notices.</li> <li>• Training Manuals.</li> <li>• Training Records.</li> </ul>		X
Procurement Records	<ul style="list-style-type: none"> <li>• Standard Terms and Conditions for supply of services and products.</li> <li>• Partner, client, contractor and supplier agreements; and</li> <li>• Lists of suppliers, products, services and distribution.</li> </ul>		X
Sales Records	<ul style="list-style-type: none"> <li>• Customer details.</li> <li>• Quotations.</li> </ul>		X
Marketing Records	<ul style="list-style-type: none"> <li>• Advertising and promotional material</li> </ul>		X
Risk Management and Audit	<ul style="list-style-type: none"> <li>• Audit reports.</li> <li>• Risk management frameworks; and Risk management plans</li> </ul>		
Safety, Health and Environment	<ul style="list-style-type: none"> <li>• Workmans comp</li> <li>Complete Safety, Health</li> </ul>		

	<p>and Environment Risk Assessment.</p> <ul style="list-style-type: none"> <li>• Environmental Managements Plans.</li> <li>• Inquiries, inspections, examinations by environmental authorities.</li> </ul>		
IT Records	<ul style="list-style-type: none"> <li>• Computer device usage policy documentation.</li> <li>• Disaster recovery plans.</li> <li>• Hardware asset registers.</li> <li>• Information security policies/standards/procedures.</li> <li>• Information usage policy documentation.</li> <li>• Project implementation plans.</li> <li>• Software licensing.</li> </ul>		

## 6. DESCRIPTION OF THE RECORDS OF INFOBUILD THAT ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>• Memorandum of Incorporation (MOI)</li> <li>• Annual General Meeting Reports</li> <li>• Annual financial statements</li> <li>• Accounting Records</li> <li>• Notice and minutes of all shareholder meetings</li> </ul>	Companies Act 71 of 2008 and other applicable legislation
<ul style="list-style-type: none"> <li>• PAIA Manual</li> </ul>	Promotion of Access to Information Act 2 of 2000
<ul style="list-style-type: none"> <li>• Employee Records</li> </ul>	Basic Conditions of Employment Act No. 53 of 2003
<ul style="list-style-type: none"> <li>• B-BBEE Records</li> </ul>	Broad-Based Black Economic Empowerment Act 53 of 2003
<ul style="list-style-type: none"> <li>• Accident Records</li> </ul>	Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
<ul style="list-style-type: none"> <li>• InfoBuild does not qualify as a designated employer and therefore does not require to submit an annual EE plan</li> </ul>	Employment Equity Act No. 55 of 1998
<ul style="list-style-type: none"> <li>• PAYE Records</li> </ul>	Income Tax Act No. 58 of 1962



<ul style="list-style-type: none"> <li>• Documents issued to employees for income tax purposes.</li> <li>• Records of payments made to SARS on behalf of employees.</li> <li>• All other statutory compliances: <ul style="list-style-type: none"> <li>○ VAT</li> <li>○ Regional Services Levies</li> <li>○ Skills Development Levies</li> <li>○ UIF</li> <li>○ Workmen's Compensation</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>• Disciplinary Code and Records.</li> <li>• Employee benefits arrangements rules and records.</li> <li>• Employment Contracts.</li> <li>• Employment Equity Plan.</li> <li>• Forms and Applications.</li> <li>• Grievance Procedures.</li> <li>• Leave Records.</li> <li>• Medical Aid Records.</li> <li>• Payroll reports/ Wage register.</li> <li>• Pension Fund Records.</li> <li>• Safety, Health and Environmental records.</li> <li>• Salary Records.</li> <li>• SETA records.</li> <li>• Standard letters and notices.</li> <li>• Training Manuals.</li> <li>• Training Records.</li> <li>• Workplace and Union agreements and records.</li> </ul>	Labour Relations Act No. 66 of 1995
<ul style="list-style-type: none"> <li>• Complete Safety, Health and Environment Risk Assessment.</li> <li>• Environmental Managements Plans.</li> <li>• Inquiries, inspections, examinations by environmental authorities.</li> </ul>	Occupational Health and Safety Act No. 85 of 1993
<ul style="list-style-type: none"> <li>• PAIA Manual and Guide</li> <li>• PAIA Reporting (where applicable)</li> <li>• Subject Access requests</li> </ul>	Promotion of Access to Information Act No. 2 of 2000
<ul style="list-style-type: none"> <li>• Whistle Blowing Policy</li> </ul>	Protected Disclosures Act No. 26 of 2000
<ul style="list-style-type: none"> <li>• POPIA Policy</li> <li>• PAIA Manual and Guide</li> </ul>	Protection of Personal Information Act No. 4 of 2013
<ul style="list-style-type: none"> <li>• Anti-Terrorism Compliance Policy</li> </ul>	Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
<ul style="list-style-type: none"> <li>• South African Reserve Bank Act Compliance Policy</li> </ul>	South African Reserve Bank Act No. 90 of 1989
<ul style="list-style-type: none"> <li>• Unemployment Insurance Act Compliance Policy</li> </ul>	Unemployment Insurance Act No. 63 of 2001

<ul style="list-style-type: none"> <li>Unemployment Insurance Act Compliance Policy</li> </ul>	Unemployment Insurance Contributions Act No 4 of 2002
<ul style="list-style-type: none"> <li>Value-Added Tax Act Compliance Policy</li> </ul>	Value Added Tax Act No 89 of 1991

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY INFOBUILD

Category of Records	Applicable Legislation
<ul style="list-style-type: none"> <li>Memorandum of Incorporation (MOI)</li> <li>Annual General Meeting Reports</li> <li>Annual financial statements</li> <li>Accounting Records</li> <li>Notice and minutes of all shareholder meetings</li> </ul>	Companies Act 71 of 2008 and other applicable legislation
<ul style="list-style-type: none"> <li>PAIA Manual</li> </ul>	Promotion of Access to Information Act 2 of 2000
<ul style="list-style-type: none"> <li>Employee Records</li> </ul>	Basic Conditions of Employment Act No. 53 of 2003
<ul style="list-style-type: none"> <li>B-BBEE Records</li> </ul>	Broad-Based Black Economic Empowerment Act 53 of 2003
<ul style="list-style-type: none"> <li>Accident Records</li> </ul>	Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
<ul style="list-style-type: none"> <li>InfoBuild does not qualify as a designated employer and therefore does not require to submit an annual EE plan</li> </ul>	Employment Equity Act No. 55 of 1998
<ul style="list-style-type: none"> <li>PAYE Records</li> <li>Documents issued to employees for income tax purposes.</li> <li>Records of payments made to SARS on behalf of employees.</li> <li>All other statutory compliances:               <ul style="list-style-type: none"> <li>VAT</li> <li>Regional Services Levies</li> <li>Skills Development Levies</li> <li>UIF</li> <li>Workmen's Compensation</li> </ul> </li> </ul>	Income Tax Act No. 58 of 1962
<ul style="list-style-type: none"> <li>Disciplinary Code and Records.</li> <li>Employee benefits arrangements rules and records.</li> <li>Employment Contracts.</li> <li>Employment Equity Plan.</li> <li>Forms and Applications.</li> <li>Grievance Procedures.</li> </ul>	Labour Relations Act No. 66 of 1995

<ul style="list-style-type: none"> <li>• Leave Records.</li> <li>• Medical Aid Records.</li> <li>• Payroll reports/ Wage register.</li> <li>• Pension Fund Records.</li> <li>• Safety, Health and Environmental records.</li> <li>• Salary Records.</li> <li>• SETA records.</li> <li>• Standard letters and notices.</li> <li>• Training Manuals.</li> <li>• Training Records.</li> <li>• Workplace and Union agreements and records.</li> </ul>	
<ul style="list-style-type: none"> <li>• Complete Safety, Health and Environment Risk Assessment.</li> <li>• Environmental Managements Plans.</li> <li>• Inquiries, inspections, examinations by environmental authorities.</li> </ul>	Occupational Health and Safety Act No. 85 of 1993
<ul style="list-style-type: none"> <li>• PAIA Manual and Guide</li> <li>• PAIA Reporting (where applicable)</li> <li>• Subject Access requests</li> </ul>	Promotion of Access to Information Act No. 2 of 2000
<ul style="list-style-type: none"> <li>• Whistle Blowing Policy</li> </ul>	Protected Disclosures Act No. 26 of 2000
<ul style="list-style-type: none"> <li>• POPIA Policy</li> <li>• PAIA Manual and Guide</li> </ul>	Protection of Personal Information Act No. 4 of 2013
<ul style="list-style-type: none"> <li>• Anti-Terrorism Compliance Policy</li> </ul>	Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
<ul style="list-style-type: none"> <li>• South African Reserve Bank Act Compliance Policy</li> </ul>	South African Reserve Bank Act No. 90 of 1989
<ul style="list-style-type: none"> <li>• Unemployment Insurance Act Compliance Policy</li> </ul>	Unemployment Insurance Act No. 63 of 2001
<ul style="list-style-type: none"> <li>• Unemployment Insurance Act Compliance Policy</li> </ul>	Unemployment Insurance Contributions Act No 4 of 2002
<ul style="list-style-type: none"> <li>• Value-Added Tax Act Compliance Policy</li> </ul>	Value Added Tax Act No 89 of 1991

## 8. PROCESSING OF PERSONAL INFORMATION

### The Purpose of Processing Personal Information

- To support sales and marketing activities.
- To support recruitment and management of employees.
- To support engagement with suppliers.
- To support engagement with the general public.
- To support engagement with investors and the media.

## Data Subjects Categories and their Personal Information

Categories of Data Subjects	Personal Information that may be processed
Customers	Record of customer life cycle
Employees	Record of employee life cycle
Suppliers	Record of employee life cycle
General public	Tracking general enquires and web site visits
Investors	Records as maintained by the Company Secretary
Media	Records of media interactions

## Recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Customer/member information, employee Information	Service Providers
Returns e.g. Employment Equity returns	Statutory Authorities
Income tax information	Tax Authorities
Financials information relating to InfoBuild's business	Financial institutions

## Planned Transborder Flows of Personal Information

Transborder flows of specific customer personal information, only where compliant with Section 72 of POPIA, including ensuring adequate levels of protection, obtaining data subject consent, or necessity for contractual performance

## Security Measures to Protect Personal Information

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

- Physical security measures
- Cyber security measures
- Policies in information security

## 9. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS

### PAIA Form 02: Request for Access to Record of Private Body

In terms of Section 53 (1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation (7), Form 02 should be used to request access to a record held by a Public or Private body in terms of PAIA. Form 02 can be downloaded from the Information Regulator website under Documents/Forms. It can also be downloaded using the link below.

#### Form 02: Request for Access to Record

**Please note:** Do not use Form 02 for personal information requests (Data Subject Requests). The appropriate form for these requests is described in the point below.

### POPIA Form 2: Request for Correction or Deletion of Personal Information or Destroying/Deletion of Record of Personal Information in terms of Section 24 (1) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

In terms of the Protection of Personal Information Act of 2013, Section 24 and the Regulations relating to the Protection of Personal information, 2017, [Regulation 3(2)] Form 2 should be used to raise requests for the correction or deletion of personal information, or destroying or deletion of record of personal information. Form 2 is available on the Information Regulator website under Documents/Forms. It can be downloaded using the link below:

#### Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information

## 10. AVAILABILITY OF THE MANUAL

This manual is available for inspection at the office of InfoBuild (Pty) Ltd for public inspection during normal business hours to

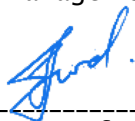
- (i) any person upon request and upon the payment of a reasonable prescribed fee; and
- (ii) to the Information Regulator upon request.

A copy of the Manual is also available at: <https://www.infobuild.co.za>

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.

## 11. UPDATING OF THE MANUAL

The management team of InfoBuild (Pty) Ltd will on a regular basis update this manual.



Johan N Jurd    Managing Director

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**Signature of Designated Head of the Private Body**

**Name of Designated Head of the Private Body:** Johan Nicolaas Jurd

**Date of Signature:** 26 September 2025

**Publication Date of this Manual Version Number:** 29 September 2025

**Next Revision Date of this Document:** 31 January 2026