PAIA MANUAL

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Prepared in terms of section 51 of the

Promotion of Access to Information Act, 2 of 2000 ("PAIA") (as amended) & the Protection of Personal Information Act, 4 of 2013 ("POPIA")

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Document Control and Approval

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1. List of Acronyms and Abbreviations

- "CEO" Chief Executive Officer;
- "DIO" Deputy Information Officer;
- "IO" Information Officer;
- "Minister" Minister of Justice and Correctional Services;
- "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as amended);
- "POPIA" Protection of Personal Information Act No. 4 of 2013;
- "Regulator" Information Regulator; and
- "Republic" Republic of South Africa.

2. Purpose of PAIA Manual

2.1 This PAIA Manual contains the necessary information to request access to records held by Entelect Software (Pty) Ltd ("Entelect Software"). It is intended to assist the public to:

2.1.1. check the categories of records held by Entelect Software, which are available without a person having to submit a formal PAIA request;

2.1.2. have a sufficient understanding of how to make a request for access to a record of Entelect Software, by providing a description of the subjects on which Entelect Software holds records and the categories of records held on each subject;

2.1.3. know the description of the records of Entelect Software which are available in accordance with any other legislation;

2.1.4. 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;

2.1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.1.6. know if Entelect Software 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;

2.1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.1.8. know the recipients or categories of recipients to whom the personal information may be supplied;

2.1.9. know if Entelect Software 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

2.1.10. know whether Entelect Software has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Overview of Entelect Software (Pty) Ltd

Entelect Software is a software engineering firm specialising in technology services and solutions. We empower businesses across industries by delivering innovative, scalable, and secure digital products tailored to their unique needs. We support the constitutional right of access to information and are committed to providing access to our records in accordance with the provisions of the PAIA and POPIA, while respecting the confidentiality owed to third parties and adhering to the principles of the South African laws.

4. Key Contact details for Access to Information of Entelect Software

4.1 Information Officer

Name:	Shashi Hansjee
Tel:	+27 11 994 3300
Email:	shashi@entelect.co.za

4.2 Deputy Information Officer

Name:	Ryan Naudé
Tel:	+27 11 994 3300
Email:	ryan@entelect.co.za

4.3 National or Head Office

Postal Address:	P.O Box 239, Melrose Arch, 2076
Physical Address:	3 Melrose Boulevard, Melrose Arch, Johannesburg, 2196
Telephone:	+27 11 994 3300
Email:	dataprivacy@entelect.co.za
Website:	www.entelect.co.za

5. Guide on how to use PAIA and how to obtain access to the Regulator's Guide

5.1 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.

5.2 The Guide is available in all 11 official South African languages.

5.3 The aforesaid Guide contains the description of:

5.3.1. the objects of PAIA and POPIA;

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

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of Section 17(1) of PAIA and Section 56 of POPIA;

5.3.3 the manner and form of a request for:

5.3.3.1. access to a record of a public body contemplated in Section 11; and

5.3.3.2. access to a record of a private body contemplated in Section 50;

5.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

5.3.6 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:

5.3.6.1. an internal appeal;

5.3.6.2. a complaint to the Regulator; and

5.3.6.3. 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;

5.3.7 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;

5.3.8 the provisions of Sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.3.9 the notices issued in terms of Sections 22 and 54 regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 92.

5.4 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.

5.5 The Guide can also be obtained:

5.5.1. upon request to the Information Officer;

5.5.2. from the website of the Regulator (https://inforegulator.org.za/paia-guidelines/).

5.6 The Guide is also available for inspection at the office of the Information Regulator South Africa, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg;

5.7 Copies of the Guide are also available in English and Afrikaans at Entelect Software's offices, for public inspection during normal office hours.

6. Categories of records of Entelect Software which are available without a person having to request access

6.1 In terms of Section 52 of PAIA, the following categories of Entelect Software records are available without a person having to request access:

Category of records	Available on website	Available upon request
Memorandum of Incorporation		X
Internal Policies		X
Product information	X	X
Advertising pamphlets and brochures	X	
Newsletters	X	

7. Categories of records of Entelect Software which are available upon request

Entelect Software maintains records on the categories and subject matters listed below. Please note that the inclusion of a category or subject matter in this Manual does not imply that a request for access to such record will automatically be granted. All requests will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

Please note further that some records held by Entelect Software belong to third parties, such as clients and employees. Entelect Software takes the protection of third-party confidential information very seriously. In particular, where Entelect Software acts as service provider to clients, many of the records held are confidential and, others are the property of the clients and not Entelect Software.

Please note that a requester may be required to pay a prescribed fee for record requests as well as a prescribed fee for access to the relevant record. The list detailing the prescribed fees in respect of requests and access to records is attached as Annexure A.

Access to and participation in your own personal information is available free of charge.

If a fee is to be paid for services to access records, we will provide you with a written estimate of the fee before providing the services, including any deposits required.

If the Information Officers has the opinion that fulfilling a request will require more than six hours of effort, they must inform the requestor that a deposit will be required. The deposit must not exceed one-third of the amount payable.

Category of records	Records
Internal records	• Memorandum of Incorporation. • Financial records. • Operational records. • Intellectual property. • Marketing records. • Internal correspondence. • Service records. • Statutory records. • Internal policies and procedures. • Minutes of meetings.
Clients-related records	• Contracts with the clients.
Personnel Records For the purposes of this section, "personnel" means any person who works for or provides services on behalf of Entelect Software or is entitled to receive any renumeration. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.	• Any personal records provided to us by our personnel. • Any records a third party has provided to us about any of their personnel. • Conditions of employment and other personnel-related contractual and quasi legal records. • Employment policies and procedures. • Internal evaluation and disciplinary records. • Other internal records and correspondence.
Other records	• Information relating to Entelect Software. • Research information belonging to Entelect Software.

8. Description of the records of Entelect Software which are available in accordance with any other legislation

Category of records	Applicable Legislation
Memorandum of Incorporation. Shareholder records. Audit Records. Banking Records. Directors Details.	• Companies Act, 71 of 2008
PAIA Manual	• Promotion of Access to Information Act, 2 of 2000
The following information about Employees: i. The Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details); ii. Family Records (i.e. next of kin name and surname, contact number); iii. Medical details; iv. Professional History (Occupation, Qualifications); v. Demographic details (Age, Income, Gender, Location) vi. Financial Records (Salary, Banking Details, SARS-related information); and vii. Behavioural data (Criminal checks, performance, disciplinary).	• Employment Equity Act, 55 of 1998. • Basic Conditions of Employment Act, 75 of 1997. • Labour Relations Act, 66 of 1995. • Income Tax Act, 58 of 1962.
Record statistics and information regarding the occurrence and causes of accidents and occupational diseases. Employee identification details and documents employee to submit to medical examination.	• Compensation for Occupational Injuries and Diseases Act, 130 of 1993.

A register or other record of wages, time worked, payment for piece work, overtime and all other prescribed particulars. Any document that is seen as evidence: e.g., sworn statement, etc.	
Address of the Employer, and its branches. Names, identification numbers and monthly remuneration of employees and the address at which the employee is employed. Employee Identification details and documents, Financial Records (Salary, Banking Details, SARS details). Amount of benefits for purposes of section 13(3). Benefits the applicant is entitled to.	• Unemployment Insurance Act, 63 of 2001.

9. Description of the subjects on which Entelect Software holds records and categories of records held on each category

Subjects on which records are held	Categories of records held
Internal records. These records refer to Entelect Software's own affairs, as well as those of its divisions and associated companies.	• Constitutional Documents. • Financial records. • Annual financial statements. • Accounting records. • Asset registers. • Banking records. • Invoices. • Rental agreements. • Tax returns. • Operational records. • Licences.

	• Intellectual property. • Marketing records. • Statutory records. • Internal policies and procedures. • Documents of incorporation. • Minutes of meetings from the Board of Directors. • Records reflecting the appointment of directors, auditor, company secretary, prescribed office, or any other officer in as far as such records are applicable. • Register of shareholders and other statutory registers. • Any personal records provided by personnel. • Any record in relation to personnel provided by a third party. • Conditions of employment and contractual related records. • Internal evaluation records. • Disciplinary codes. • Disciplinary records. • Employment contracts. • Employment equity plans. • Medical Aid records. • Salary records. • Training manuals. • Training records.
Personnel records	• Any personal records provided by personnel. • Any record in relation to personnel provided by a third party. • Conditions of employment and contractual related records. • Internal evaluation records. • Disciplinary codes. • Disciplinary records. • Employment contracts. • Employment equity plans. • Medical Aid records.

	• Salary records. • Training manuals. • Training records.
Client's records	• Any records historically provided by a client or a third party acting for or on behalf of such client. • Contractual information. • Personal records of clients. • Client evaluation records. • Client profiling. • Records generated by us, pertaining to customers, including transactional records.
Other Parties	• Records held, pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, records provided by such other party and records about contractors, suppliers or customers, provided by third parties.

10. Processing of Personal Information

Subjects on which records are held	
Application for employment	Compliance assessment
Compliance with legislation	Provision of services
Credit reference checking	Record keeping
Identity verification	Social responsibility
Marketing	Operations

Categories of data subjects

- Employees
- Prospective employees/candidates
- Prospective employees' referees
- Social responsibility recipients
- Directors
- Suppliers and service providers

Category and type of Personal Information processed	
Personal information category	Personal information type
Identifier	Name Address Information/Details Contact Number Email Address Identifying Number Location Information/Data Online identifier Other Particular Assignment to Data Subject Symbol
Physiological/Physical	Age Date of Birth Gender Health information
Economic	Education Information Employment Information Financial Information

The recipient or categories of recipient to whom the personal information may be supplied	
Employment and recruitment agencies	Current employees
Credit reference agencies	Pension fund administrators
Healthcare, social and welfare organisations	Suppliers
Healthcare professionals	Medical Schemes
Operators	Tax authorities
Professional advisers and consultants	Statutory authorities
Financial institutions	

11. Detail on how to make a request for access

11.1 The requester must complete Form 02 available at https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf and submit this form together with a request fee, to the Information Officer of Entelect Software.

11.2 The completed form may be posted or emailed to the Information Officer at the addresses mentioned in Clause 4 above.

11.3 The Information Officer will process the request and inform the requester of the fees (if any) that he/she has to pay and of the further steps that will follow in the processing of the request.

12. Grounds for refusing a request

Entelect Software may refuse a request for access to information in any circumstances specified in Sections 62 – 70 of the PAIA Act, including for reasons of confidentiality, legal privilege, the protection of personal or commercial interest, or public interest consideration.

13. Availability of the Manual

13.1 A copy of the Manual is available:

13.1.1. on www.entelect.co.za

13.1.2. Head office of Entelect Software for public inspection during normal business hours;

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

13.1.4. to the Information Regulator upon request.

13.2 A schedule of applicable fees is available for inspection at Entelect Software's head office and on its website, as required by PAIA Regulations, and will be provided upon request.

14. Updating of the Manual

Any updates or amendments to this Manual shall be approved and signed by the Information Officer and, where appropriate, the Chief Executive Officer, with the effective date of each version clearly indicated.

15. Issued by

Shashi Hansjee

Chief Executive Officer

Annexure A: Prescribed Fees

Item	Description	Amount
1	Request fee, payable by every requester	R140.00
2	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3	Printed copy of an A4-size page	R2.00 per page or part of the page
4	For a copy in a computer-readable form on: • a flash drive (provided by the requester) • a compact disc (CD) if the requester provides the CD to us • a compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
5	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
7	For a transcription of an audio record, per A4-size page	R24.00
8	For a copy of an audio record on a flash drive (provided by the requester) For a copy of an audio record on compact disc (CD), if the requester provides the CD to us For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure: The search and preparation fee cannot exceed:	R145.00 R435.00
10	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11	Postage, email or any other electronic transfer	Actual expense, if any.