



PAIA MANUAL

for

Webtonic Online Solutions (Pty) Ltd

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

AMENDMENT HISTORY

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LIST OF ACRONYMS AND DEFINITIONS

Term / Acronym	Definition
Data Subject	Any natural person or, where applicable, juristic person to whom personal information relates, including employees, clients, suppliers, contractors, job applicants and other individuals whose personal information is processed by the Company.
Deputy Information Officer (DIO)	A person designated by the Information Officer in accordance with PAIA and POPIA to assist with the administration of access to information requests and the protection of personal information.
Information Officer (IO)	The head of the private body or a duly authorised person appointed in terms of PAIA and POPIA who is responsible for ensuring compliance with access to information and data protection legislation, including responding to PAIA requests and overseeing the Company's privacy compliance programme.
Minister	The Minister of Justice and Constitutional Development of the Republic of South Africa, responsible for the administration of PAIA. <i>(Update from "Minister of Justice and Correctional Services" to the title used in the Act.)</i>
Operator	A person or organisation that processes personal information on behalf of the Responsible Party under a contract or mandate without coming under the direct authority of the Responsible Party, as defined in POPIA.
PAIA	The Promotion of Access to Information Act, No. 2 of 2000, as amended, which gives effect to the constitutional right of access to information held by public and private bodies.
Personal Information	Information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person, including but not limited to names, identity numbers, contact details, financial information, employment information, biometric information, online identifiers and any other information defined as personal information under POPIA.
POPIA	The Protection of Personal Information Act, No. 4 of 2013, which regulates the lawful processing, protection and security of personal information in South Africa.

Term / Acronym	Definition
Processing	Any operation or activity concerning personal information, whether by automated or non-automated means, including the collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, transmission, distribution, merging, restriction, deletion or destruction of personal information.
Regulator	The Information Regulator (South Africa) established in terms of POPIA, responsible for monitoring and enforcing compliance with PAIA and POPIA.
Republic	The Republic of South Africa.
Requester	Any person who submits a request for access to a record held by Webtonic Online Solutions (Pty) Ltd in accordance with PAIA.
Responsible Party	The public or private body that determines the purpose of and means for processing personal information. For the purposes of this Manual, Webtonic Online Solutions (Pty) Ltd is the Responsible Party for the personal information under its control.
Special Personal Information	A special category of personal information afforded additional protection under POPIA, including information relating to a person's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, and criminal behaviour where processing is authorised by law.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
Personal Information Breach	Any security compromise that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal information.
Third Party	Any person or organisation other than the data subject, the Responsible Party, an Operator or persons authorised to process information under the direct authority of the Responsible Party.
Record	Any recorded information, regardless of form or medium, held by or under the control of Webtonic Online Solutions (Pty) Ltd.

1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful to:

- check the categories of records held by the body, which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- 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
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF WEBTONIC ONLINE SOLUTIONS

Information Officer

Name: Craig Williams
Tel: 087-8217215
Email: craig@webtonic.co.za

Deputy Information Officer

Name: Alexia Pretorius
Tel: 087-8217215
Email: lexi@webtonic.co.za

Access to information general contacts

Email: paia@webtonic.co.za

Head Office

Postal Address: Webtonic Online Solutions (Pty) Ltd
The District
8 Kikuyu Road
Sunninghill

Gauteng
2196

Physical Address: Webtonic Online Solutions (Pty) Ltd
The District
8 Kikuyu Road
Sunninghill
Gauteng
2196

Telephone: JHB 087-8217215
PE 087-8217215

Email: paia@webtonic.co.za
Website: webtonic.co.za

3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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.

A summary of the objects of PAIA and POPIA, the manner of requesting access to records, available remedies, and the Regulator's prescribed forms is set out in the Guide.

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.

A copy of the Guide can be obtained from the Information Regulator at www.inforegulator.org.za, or from our Information Officer using the contact details in this Manual.

Contact Details:

The Information Regulator
JD House
27 Stiemens Street
Braamfontein
Johannesburg

Email:

PAIAComplaints@inforegulator.org.za
POPIAComplaints@inforegulator.org.za

Website:

www.inforegulator.org.za

3.1. How to request access to records

Requests for access to records held by Webtonic Online Solutions (Pty) Ltd must be submitted in writing using the prescribed PAIA Request for Access to Record Form and addressed to the Information Officer using the contact details provided in this Manual.

A requester is required to:

- Provide sufficient detail to enable the Company to identify the record being requested.
- Specify the preferred form of access to the record, where applicable.
- Clearly identify the right that is being exercised or protected by requesting access to the record.
- Pay the prescribed request fee, where applicable, before the request can be processed.
- Requests must be submitted on Form 2 as prescribed under the PAIA Regulations, 2021.

3.2. Processing of Requests

Upon receipt of a valid request, the Company will process the request in accordance with the Promotion of Access to Information Act (PAIA). This includes the following:

- Complete required form (Form 2)
- Send to information officer with proof of identity.
- Written acknowledgement of receipt of the request from the information officer
- A decision on the request within 30 calendar days of receipt.
- Where permitted by PAIA, an extension of up to 30 additional calendar days, in which case the requester will be notified in writing of the extension and the reasons for it.
- If access to the requested record is refused, the requester will be provided with written reasons for the refusal, subject to the provisions of PAIA.
- If dissatisfied with the outcome, the requester has the right to lodge a complaint with the Information Regulator or to pursue any other remedies available in terms of PAIA.

4. AUTOMATICALLY AVAILABLE RECORDS (NO PAIA REQUEST REQUIRED)

The following records are available without a formal PAIA request:

- Company profile
- Website information
- Basic service descriptions
- Public-facing policies or notices
- PAIA Manual
- POPIA/Privacy Notice

These will be uploaded to the Webtonic Online Solutions website and made available upon request via email.

DESCRIPTION OF THE RECORDS OF WEBTONIC ONLINE SOLUTIONS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation, Company Registration Documents and Statutory Registers	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000 (PAIA)
Privacy Policy, POPIA Compliance Documentation, Records of Processing Activities, Data Subject Request Records	Protection of Personal Information Act 4 of 2013 (POPIA)
Employment Contracts, Labour Manual, Disciplinary and Grievance Records	Labour Relations Act 66 of 1995
Conditions of Employment, Leave Records, Working Time Records and Employee Attendance	Basic Conditions of Employment Act 75 of 1997
Employment Equity Plans, Reports and Related Records	Employment Equity Act 55 of 1998
Skills Development and Training Records	Skills Development Act 97 of 1998
Income Tax, PAYE Records and Employee Tax Documentation	Income Tax Act 58 of 1962
VAT Returns and Taxation Records	Value-Added Tax Act 89 of 1991
Unemployment Insurance Records (UIF)	Unemployment Insurance Act 63 of 2001
Compensation for Occupational Injuries and Diseases (COIDA) Records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and Safety Policies, Incident Registers and Risk Assessments	Occupational Health and Safety Act 85 of 1993
Communications Manual, Electronic Communications, Electronic Records and Transaction Records (refer to the Webtonic Staff Legal Compliance Manual where applicable)	Electronic Communications and Transactions Act 25 of 2002
Information Security Policies, Cybersecurity Incident Records and Cybercrime Reporting (where applicable)	Cybercrimes Act 19 of 2020
Copyright, Software Development, Source Code Ownership, Intellectual Property and Licensing Records	Copyright Act 98 of 1978
Pension, Provident Fund and Retirement Benefit Records (where applicable)	Pension Funds Act 24 of 1956

Category of Records	Applicable Legislation
Financial Statements, Accounting Records and Audit Documentation	Companies Act 71 of 2008 and applicable financial reporting legislation
Customer Contracts, Supplier Agreements, Service Level Agreements and Commercial Contracts	Common Law of Contract and other applicable South African legislation

DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY WEBTONIC ONLINE SOLUTIONS.

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	• Business strategy documents • Management reports • Corporate planning records
Administration	• BEE certification • Travel policy and procedures • Insurance records/claims • Asset registration records • Compliance records • Contracts and agreements request in terms of PAIA • Health & safety records • Travel & expense records • Email communication records
Human Resources	• Remuneration records • Leave records • Employee records • Employment contract • RA / Pension fund records
Financial	• Annual financial statements • Financial and tax records (Company & Employees) • Asset register • Management accounts • PAYE, SDL & UIF returns • VAT returns • Bank records • Invoices • Customer records • Supplier records • Leases with landlords • Records of rental paid • Fixed asset register
Operations	• Project correspondence • Project timesheets

Subjects on which the body holds records	Categories of records
	• Service level agreements • Quality control processes
Marketing	• Market information • Product brochures • Marketing strategies
Sales	• Customer database • Public customer information

5. PROCESSING OF PERSONAL INFORMATION

5.1. Purpose of Processing Personal Information

Webtonic Online Solutions processes personal information primarily to deliver software development, maintenance, and related technology consulting services to its clients. This includes gathering, storing, and utilising client and end-user data to design, test, and deploy software solutions; managing contractual relationships; and providing technical support.

Personal information is also processed for the purposes of employee recruitment and administration, supplier management, billing and payment processing, security monitoring, compliance with applicable laws, and business continuity planning.

Where necessary, information may be used for research, product improvement, and quality assurance, ensuring that all processing is lawful, relevant, and limited to what is required for the intended business purpose.

Personal information is processed only where a lawful basis exists, including:

- contractual necessity
- compliance with legal obligations
- legitimate business interests
- consent where required
- protection of vital interests

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

Categories of Data Subjects	Personal Information that may be processed
Customers Clients	Name, address, registration numbers or identity numbers, vat number and bank details
Service Providers	Names, registration number, vat numbers, address and bank details
Employees	Address, qualifications, gender and race
Contractors	Name, address, registration numbers or identity numbers, vat number, employment status and bank details

Categories of Data Subjects	Personal Information that may be processed
Job Applicants	Email Address, qualifications, gender and race (Where applicable for Employment Equity purposes)
Directors	Email Address, qualifications, gender and race
Client Representatives	Email Address, Name and contact phone number
Website Visitors	Email Address, Name and contact phone number
Suppliers	Names, registration number, vat numbers, address and bank details
Marketing Contacts	Email Address, Name and contact phone number
Visitors to premises	Email Address, Name and contact phone number

5.3. 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 the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications including psychometric assessments	South African Qualifications Authority Approved qualified Psychometric provider
Credit and payment history, for credit information	Credit Bureaus

5.4. Planned transborder flows of personal information

The company makes use of reputable cloud service providers for hosting and storage purposes. This may result in personal information being stored outside of the Republic.

- **Amazon Web Services (AWS – London(eu-west-2)):**
Certain systems and applications are hosted on AWS infrastructure located in the United Kingdom. This may include personal information such as employee details, client contact information, and related operational data.
- **Microsoft SharePoint, Microsoft Teams, and Microsoft 365 Services (Data Centres located in the United States and Europe):**
Company documents, collaboration data, and communication records are stored and processed using Microsoft services. This may include personal information such as employee details, client details, meeting recordings, chats, shared files, and business correspondence.

5.5. Safeguards and Compliance

The company ensures that any transborder flow of personal information is done in accordance with Section 72 of POPIA. This includes:

- Making use of service providers that apply adequate data protection measures consistent with international best practice.

- Ensuring contractual Data Processing Agreements (DPAs) are in place with cloud providers.
- Applying encryption and access control safeguards to protect data in transit and at rest.
- Limiting the categories of personal information shared to only what is necessary for business and operational purposes.
- Standard Contractual Clauses (SCCs)
- UK International Data Transfer Addendum (if applicable)
- Adequacy decisions
- Binding Corporate Rules (where applicable)

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, qualifications and work experience	Customers Clients when applying for potential work contracts
Psychometric test results	Only shared with approved HR professionals and the candidate. Any further distribution would require the candidate's permission.

5.6. Information Security

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

The Company implements and maintains appropriate technical and organisational measures to protect personal information and other confidential records against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

These measures include:

- Access controls and user authentication mechanisms;
- Role-based access management;
- Data encryption and secure data handling practices where appropriate;
- Network, system, and application security controls;
- Vulnerability and risk management processes;
- Secure development and change management procedures; and
- Incident detection, response, recovery, and business continuity measures.

Security measures are implemented based on the nature of the information processed, the risks to data subjects, and applicable legal and regulatory requirements. The Company periodically reviews and updates its security controls to maintain the confidentiality, integrity, and availability of personal information.

5.7. Data Subject Rights

In accordance with the Protection of Personal Information Act, 2013 (POPIA), and where applicable the General Data Protection Regulation (GDPR), Webtonic Online Solutions (Pty) Ltd recognises the rights of data subjects in relation to their personal information.

Subject to the applicable legal requirements and limitations, data subjects have the:

- right of access to personal information.
- right to request correction or updating of inaccurate personal information.
- right to request deletion of personal information, where legally applicable.
- right to object to the processing of personal information.
- right to withdraw consent where processing is based on consent.
- right to lodge a complaint with the Information Regulator or other competent supervisory authority.
- right to data portability, where applicable under the GDPR.
- right to request restriction of processing, where applicable under the GDPR.

Requests relating to these rights may be submitted to the Information Officer using the contact details contained in this Manual. Further information regarding the exercise of these rights, including applicable procedures and limitations, is contained in the Company's Data Subject Rights Policy and Privacy Policy.

5.8. Record Retention and Secure Disposal

Webtonic Online Solutions (Pty) Ltd retains personal information only for as long as necessary to fulfil the purposes for which it was collected, to comply with applicable legislation, contractual obligations and legitimate business requirements. Once personal information is no longer required and all applicable retention periods have expired, records are securely destroyed, deleted or anonymised using approved methods that prevent unauthorised access, recovery or reconstruction. Physical records are securely shredded or destroyed, while electronic records are securely deleted or sanitised in accordance with the Company's Records Retention and Secure Disposal Policy.

5.9. Automated Decision-Making and Profiling

Webtonic Online Solutions does not make decisions based solely on automated processing that have legal or similarly significant effects on individuals.

6. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- online at www.webtonic.co.za
- head office of Webtonic Online Solutions (Pty) Ltd for public inspection during normal business hours;
- This manual is available electronically in PDF format
- to any person upon request and upon the payment of a reasonable prescribed fee; and

- to the Information Regulator upon request.

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.

7. UPDATING OF THE MANUAL

The Head of People at Webtonic Online Solutions (Pty) Ltd will on a regular basis update this manual.

Issued by



Alexia Pretorius
Head of People

Approval

Role	Signature	Date
Executive Management (CEO)	 Craig Williams (Aug 20, 2026 15:53:05 GMT+2)	Aug 20, 2026
Acting ISMS Manager (CFO)		Aug 20, 2026