CONTRASERV



PAIA MANUAL

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

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1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction

Term	Definition
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the 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 IO and DIO who will assist the public with the records that 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 recipients or categories of recipients to whom the personal information may be supplied.

2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.

2.9 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 Contraserv

3.1 Chief Information Officer

Name	Leslie Venter
Contact number	0712627043
Email address	lesliev@contraserv.co.za

3.2 Deputy Information Officer

NB: If more than one DIO is designated, please provide the details of every DIO of the body designated in terms of section 17 (1) of PAIA.

Name	Naomie Blom
Contact number	0878086603
Email address	naomieb@contraserv.co.za

3.3 General contacts for access to information

Email address	info@contraserv.co.za

3.4 National or head office

Postal address	N/A
Physical address	69 Buckingham Road, Kloof, Durban, 3610
Contact number	0878086603
Email	info@contraserv.co.za
Website	https://contraserv.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, email address of:
  - 4.3.2.1 The IO of every public body, and

4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA[1];

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[2].

4.3.3.2 Access to a record of a private body contemplated in section 50[3].

4.3.3.3 An internal appeal.

4.3.3.4 A complaint to the Regulator.

4.3.3.5 An application with a court against a decision by the IO 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.

4.3.4 The provisions of sections 14[4] and 51[5] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.5 The provisions of sections 15[6] and 52[7] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.6 The notices issued in terms of sections 22[8] and 54[9] regarding fees to be paid in relation to requests for access;

4.3.7 The regulations made in terms of section 92[10];

4.3.8 The assistance available from the IO of a public body in terms of PAIA and POPIA;

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

4.3.10 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.

4.4 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.

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[1] 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

[2] Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[3] Section 50 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.

[4] Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

[5] Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

[6] Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

[7] Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

[8] Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

[9] Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

[10] Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

4.5 The guide can also be obtained:
- 4.5.1 Upon request to the IO.
- 4.5.2 From the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:
- 4.6.1 English.
- 4.6.2 Afrikaans.
- 4.6.3 Zulu.

5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

Postal address	P O Box 31533, Braamfontein, Johannesburg, 2017
Contact number	+27 (10) 023-5200
Website	www .inforegulator.org.za
Email	PAIACompliance.IR@justice.gov.za

6 Latest Notices in terms of Section 52(2) of PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of Contraserv which are available without a person having to request access:

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing the table below, types of the records and how the records can be accessed. These are mostly records that may be available on the website and a person may

download or request telephonically or by sending an email or a letter. Below is an example of the table that can be used.

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Company's current PAIA Manual	X	X
Company overview	Company profile, business activities, contact details	X	X
Policies (public-facing)	Privacy policy, website cookies policy	X	
Legal disclosures	Consumer protection notices, disclaimers, terms and conditions	X	X
News and announcements	Company newsletters, media releases, service updates		X
Public marketing materials	Brochures, product offerings, public service descriptions	X	
POPIA and PAIA awareness training certificates	Company's attendance registers on training of POPIA and PAIA		
Public tender or supplier information (if applicable)	Supplier registration forms, B-BBEE (Broad-Based Black Economic Empowerment) certificate (public documents)		X
Contact information for IO	Name, designation, email address, contact number	X	

7.2 Description of the records/subjects of Contraserv which are available in accordance with any other legislation:

NB: Please specify all the records which are created and available in accordance with any South African legislation. Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used in describing the records and applicable legislation.

Category of Records	Applicable Legislation	Department/ Subject Area
Memorandum of Incorporation, company registration documents, minutes of board meetings, share register	Companies Act, 71 of 2008	Admin
Employment contracts, employee attendance records, payroll information, leave records	Basic Conditions of Employment Act, 75 of 1997	Admin
Disciplinary records, grievance procedures, union agreements,	Labour Relations Act, 66 of 1995	Admin

Category of Records	Applicable Legislation	Department/ Subject Area
Commission for Conciliation, Mediation and Arbitration (CCMA) documentation		
Employment Equity (EE) plans, EE reports, committee meeting minutes	Employment Equity Act, 55 of 1998	Admin
Tax returns, IRP5 certificates, Pay-As-You-Earn (PAYE) records, employee tax submissions	Income Tax Act, 58 of 1962	Admin
Workplace Skills Plans (WSPs), annual training reports, learnership agreements	Skills Development Act, 97 of 1998	Admin
Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records	Unemployment Insurance Act, 63 of 2001	Admin
Health and safety audits, incident reports, risk assessments, safety committee records	Occupational Health and Safety Act, 85 of 1993	Admin
Value-Added Tax (VAT) returns, input/output tax records, SARS correspondence	Value-Added Tax Act, 89 of 1991	Admin
Workers Compensation Assistance (WCA) claims, injury-on-duty reports, compensation records	Compensation for Occupational Injuries and Diseases Act, 130 of 1993	Admin
B-BBEE certificates, ownership and supplier development records	Broad-Based Black Economic Empowerment Act, 53 of 2003	Admin
Client contracts, complaint records, marketing disclaimers, product/ service terms and conditions	Consumer Protection Act, 68 of 2008	Admin
Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records	Protection of Personal Information Act, 4 of 2013	Admin
PAIA Manual, access request logs, training records	Promotion of Access to Information Act, 2 of 2000	Admin
Know Your Customer (KYC) documents, client identification and verification records	Financial Intelligence Centre Act, 38 of 2001 (if applicable)	Admin
Electronic communications policies, e-signature consents, website terms and conditions	Electronic Communications and Transactions Act, 25 of 2002	Admin
Document retention and disposal schedules, archive logs	National Archives and Records Service Act, 43 of 1996	Admin

Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:

7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.

7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.

7.3.3 Further information which may be made available upon request.

7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.

8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.

8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:

8.4.1 The record(s) requested;

8.4.2 The identity of the requestor;

8.4.3 What form of access is required; and

8.4.4 The postal address or fax number of the requestor.

8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.

8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.

8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held

at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.

8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
- 8.8.2 Fees payable.

8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.

8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.

8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.

8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.

8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.

8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.

8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.

9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
- 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
- 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.

9.4 Mandatory protection of the safety of individuals and the protection of property.

9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.

9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;
- 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
- 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
- 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.

9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.

9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.

10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of Personal Information

12.1 Purpose of processing personal information:

12.1.1 Payroll Processing and Administration - To process, calculate and administer payroll services for clients, including remuneration, tax, benefits, deductions, and statutory reporting (PAYE, UIF, SDL, etc.).

12.1.2 Provision of Payroll Software and Support Services - To provide access to and manage payroll software solutions, user accounts, data backups, technical support, and software updates for clients.

12.1.3 Employment and Human Resource Management - To manage personal information of Contraserv employees, applicants, and contractors for recruitment, onboarding, payroll, and performance purposes.

12.1.4 Client Relationship Management - To communicate with clients and potential clients, respond to service enquiries, arrange demonstrations, provide quotations, issue invoices, and maintain business relationships.

12.1.5 Compliance with Legal and Regulatory Obligations - To fulfil Contraserv's and its clients' obligations under South African labour, tax, and data protection laws and to co-operate with lawful requests from authorities.

12.1.6 Service Improvement and Business Operations - To conduct internal administration, record-keeping, analytics, quality control, and staff training aimed at improving service delivery and efficiency.

12.1.7 Information Security and Risk Management - To ensure the confidentiality, integrity, and security of personal information through authentication, monitoring, access control, and data protection measures.

12.1.8 Marketing and Communication (with Consent) - To inform clients and interested parties of updates, new products, or compliance information relevant to payroll and HR services, in accordance with POPIA marketing provisions.

NB: Describe the purpose or reasons for processing personal information in your organisation.

12.2 Description of the categories of data subjects and of the information or categories of information relating thereto:

NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed. Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services.

Categories of Data Subjects	**Personal Information that may be Processed**
Client Employees (employees of client organisations using Contraserv's payroll services)	Full name, ID number, contact details, address, job title, employment details, remuneration, tax information (PAYE, UIF, SDL), bank account details, leave records, time & attendance data, benefits and deductions, medical aid and pension details, and any other payroll-related data necessary for processing.
Client Representatives / Authorised Users (individuals at client companies using Contraserv systems or liaising with consultants)	Full name, business contact details (telephone, email, designation), login credentials for payroll software, correspondence history, and client account information.

Contraserv Employees and Job Applicants	Full name, ID number, contact details, employment history, qualifications, next of kin, payroll and benefits data, performance records, and disciplinary or training records.
Suppliers and Service Providers	Name of contact person, business details, tax information, banking details, and correspondence relating to service delivery or invoicing.
Website Visitors and Prospective Clients	Name, email address, contact number, company name, and any other information voluntarily provided via online forms (e.g., "Request a Demo" or "Contact Us").

13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

NB: Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of Personal Information	**Recipients or Categories of Recipients to whom the Personal Information may be Supplied**
Employee Payroll and Tax Information	South African Revenue Service (SARS); Department of Employment and Labour; Unemployment Insurance Fund (UIF); Skills Development Levy (SDL) administrators; approved retirement fund administrators; medical aid providers; authorised payroll software operators.
Banking and Payment Information	Registered financial institutions and banks for salary payments and debit orders; authorised payment processors.
Employee and Client Contact Information	Authorised Contraserv employees and consultants for communication and service delivery; third-party IT or CRM system providers under operator agreements; external auditors if required for compliance verification.
Client Company Information and Contractual Data	Authorised Contraserv personnel for account administration; external auditors; legal representatives; system maintenance vendors under confidentiality and operator agreements.
System Access and Usage Information	IT service providers responsible for system hosting, data storage, cybersecurity monitoring, and system backups; authorised technical support teams.
Marketing and Communication Data (with consent)	Contraserv's marketing team and approved marketing service providers for the distribution of newsletters, compliance updates, or product information (in compliance with POPIA opt-in requirements).

Legal and Regulatory Requests	Government agencies, regulators, or law enforcement authorities when disclosure is required or permitted by law.

14 Planned Transborder Flows of Personal Information

NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside of the Republic. Please specify the country in which personal information will be stored and categories of personal information.

14.1 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information:

14.1.1 Access controls (who in the organisation can see what)
14.1.2 Encryption of data in transit / at rest
14.1.3 Secure servers and backups
14.1.4 Audit logs / tracking of data access
14.1.5 Staff training on confidentiality and data protection
14.1.6 Physical security for non-electronic records

14.2 In addition, the following technical security safeguards have been implemented to support these-objectives:

14.2.1 Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
14.2.2 Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
14.2.3 Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
14.2.4 Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
14.2.5 Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
14.2.6 Ongoing system monitoring and access logging to detect and respond to suspicious activity;
14.2.7 Physical security controls such as keycard access, secure storage, and visitor management procedures;
14.2.8 Employee training and awareness programmes to promote secure data handling and prevent human error;
14.2.9 Secure disposal of physical and electronic records when no longer needed or when required by law.
14.2.10 These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

Category of Personal Information	**Description of Transfer**
Cloud Storage and Backup Services	Personal information may be stored or backed up on secure cloud servers hosted by reputable service providers located outside South Africa (e.g.

	Microsoft Azure, Google Workspace, or similar platforms).
Email and Communication Systems	Information shared via corporate email, collaboration, or communication tools (e.g. Microsoft 365, Teams, or Zoom) may be routed through servers in foreign jurisdictions.
Specialised IT Support and System Maintenance	External IT service providers, including vendors or developers based outside South Africa, may remotely access systems for maintenance, troubleshooting, or upgrades under strict confidentiality and security controls.
International Suppliers and Manufacturers	Where products or services are sourced internationally, personal or company contact information may be shared with overseas partners, distributors, or logistics providers to facilitate delivery or service support.
Professional or Compliance Services	Where professional advisors or certification bodies are located abroad and require access to personal information to perform their services.

NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include data encryption, anti-virus and anti-malware solutions.

15 Availability of the Manual

15.1 A copy of the manual is available:

15.1.1 On https://contraserv.co.za, or at any head office of Contraserv for public inspection during normal business hours;

15.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and

15.1.3 To the Information Regulator upon request.

15.2 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.

16 Objection to the Processing of Personal Information by a Data Subject

16.1 A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.

16.2 A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.

16.3 A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.

16.4 If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

17 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

17.1 A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.

17.2 A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

17.3 A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.

17.4 A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.

17.5 A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.

17.6 A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

18 Updating of the Manual

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

Name of IO	Leslie Venter

Title of the head of the body	Director

APPLICABLE FORMS

PAIA Forms

Form 01: Request for a Copy of the Guide from an Information Officer [Regulation 3]
Form 02: Request for Access to Record [Regulation 7]
Form 03: Outcome of Request and of Fees Payable [Regulation 8]
Form 05: Complaint Form [Regulation 10]
Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)]

POPIA Forms

Form 1: Objection to the Processing of Personal Information
Form 2: Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information
Form 3: Application for the Issue of a Code of Conduct
Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing
Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing