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PAIA MANUAL



Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended (“PAIA”), read with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

Version: 1.1

Effective date: 12 October 2026

Last updated: 12 October 2026

1. Introduction and availability

This Manual describes Kagiso Online and explains how a person may request access to records held by Kagiso Online under PAIA. It also provides information about certain aspects of Kagiso Online's processing of personal information under POPIA.

This Manual is available:

- On Kagiso Online's website: <https://www.kagisoonline.com/>
- For inspection during normal business hours at Kagiso Online's principal place of business: 9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754.
- By requesting an electronic copy from the Information Officer at infosec@kagisoonline.com.

Electronic copies of this Manual available on Kagiso Online's website, or sent by email on request, are provided free of charge. A printed copy may be provided on request at the applicable prescribed reproduction fee. Any postage or courier charge will be limited to the actual cost.

2. Company details

Item	Details
Registered legal name	Kagiso Online (Pty) Ltd
Trading name	Kagiso Online
Company registration number	2012/130337/07
Physical address	9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754
Postal address	9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754
Telephone numbers	081 708 0005 / 074 072 9044
General email address	support@kagisoonline.com
Website	https://www.kagisoonline.com/
Nature of business	Full-service digital agency and IT consulting

3. Information Officer

The Information Officer is responsible for administering access-to-records requests and performing the duties assigned under applicable information-access and personal-information laws.

Item	Details
Name	Thabo Moses Makhele
Position	IT and Cyber Security Consultant
Email	thabs@kagisoonline.com

Item	Details
Telephone	074 072 9044
Physical address	9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754
Postal address	9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754

PAIA and POPIA requests must be sent to: infosec@kagisoonline.com

Postal submissions should be sent to: Information Officer, Kagiso Online, 9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754.

No Deputy Information Officer has been appointed.

4. Guide on how to use PAIA

The Information Regulator has published a Guide to assist people wishing to exercise their rights under PAIA. The Guide, the current PAIA Manual template and prescribed request and complaint forms are available from the Information Regulator.

The current prescribed form for requesting access to a record is **Form 02: Request for Access to Record**. A requester should obtain and use the latest version of the prescribed form.

Information Regulator contact details, checked on 12 October 2026:

- Email: enquiries@infoeregulator.org.za
- Telephone: 010 023 5200
- Website: Information Regulator of South Africa www.infoeregulator.org.za

The Regulator's PAIA page lists Form 02, Form 03 and Form 05, among other prescribed forms.

5. Records held by Kagiso Online

The following are categories of records that Kagiso Online may hold. A category is included only to the extent that the relevant records exist or are held by Kagiso Online. Listing a record category does not mean that access to a particular record will automatically be granted. Access is subject to PAIA and any applicable grounds for refusal.

Subject	Examples of records that may be held
Corporate and governance records	Company registration records, founding documents, ownership or shareholder records, management records, policies and procedures
Financial and tax records	Invoices, accounting records, payment records, tax records, budgets and financial statements
Human-resources records	Employment agreements, payroll, leave, recruitment, training and disciplinary records

Subject	Examples of records that may be held
Customer and client records	Contact details, account records, quotes, agreements, correspondence, complaints, support tickets, transaction records and service history
Supplier and service-provider records	Supplier details, agreements, purchase orders, invoices, due-diligence records and correspondence
Marketing records	Campaign materials, mailing lists, marketing preferences, consent or objection records, analytics and advertising records
Website and technology records	Website content, technical documentation, access logs, security records, software licences and system records
Legal and regulatory records	Contracts, legal correspondence, compliance records, complaints and regulatory correspondence
Operational and project records	Internal correspondence, procedures, project files, business plans, work orders, reports and service records
Personal-information records	Records relating to customers, prospective customers, employees, suppliers, contractors, website visitors and other people who communicate with Kagiso Online

5.1 Records available under other legislation

Kagiso Online may hold records created or kept to comply with legislation applicable to its business. Depending on its activities and obligations, these may include:

- Companies Act 71 of 2008: Company registration documents; memorandum of incorporation and amendments; director and securities records; resolutions and minutes; annual financial statements and accounting records.
- Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962 and Value-Added Tax Act 89 of 1991: Tax returns and supporting documents; invoices and receipts; accounting records, ledgers and bank statements; VAT records; payroll tax and employee tax records. Record-keeping requirements and periods may vary according to the records and circumstances, including audits or disputes.
- Protection of Personal Information Act 4 of 2013: Personal-information records; privacy notices; records of data-subject requests, consents and direct-marketing preferences; operator or data-processing agreements; and security-incident records.
- Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, Unemployment Insurance Act 63 of 2001 and Compensation for Occupational Injuries and Diseases Act 130 of 1993: Employment agreements; payroll, leave and working-time

records; disciplinary, grievance and termination records; UIF records; and workplace injury or compensation records.

- Consumer Protection Act 68 of 2008: Consumer-facing service terms, quotations and marketing material; complaints and related correspondence; and records of relevant marketing preferences or opt-outs.
- Electronic Communications and Transactions Act 25 of 2002: Electronic agreements and signatures; online terms and disclosures; and records of electronic transactions.
- Copyright Act 98 of 1978: Copyright assignments and licences; software or asset licences; and records relating to ownership or permitted use of websites, designs, copy, photographs, video, code and other creative work.

The existence of a law or record category does not mean that every related record is automatically available. Access remains subject to applicable law and any lawful restriction.

6. Records available without a formal PAIA request

The following information is intended to be publicly available without a formal PAIA request, to the extent it has been published:

- This PAIA Manual.
- Kagiso Online's Privacy Policy or Privacy Notice.
- Kagiso Online's Terms and Conditions.
- Kagiso Online's Cookie Policy.
- Public company and service information.
- Marketing materials and public publications.
- Job advertisements, if published.
- Public contact information.
- Information published on Kagiso Online's website and social-media pages.

Where published, these records may be accessed from the relevant public page on <https://www.kagisoonline.com/> or by contacting infosec@kagisoonline.com.

7. Requesting access to records

A requester seeking access to a record held by Kagiso Online should submit the current prescribed **Form 02: Request for Access to Record** to the Information Officer.

The requester should provide enough information for Kagiso Online to:

1. Identify the requester.
2. Identify the record or records requested with sufficient detail.
3. Understand the right the requester seeks to exercise or protect and why the requested record is required for that purpose.

4. Determine the preferred form of access, such as inspection, a copy or an electronic copy.
5. Provide its decision to the requester using the requested contact method.

Requests should be sent to:

Information Officer: Thabo Moses Makhele

Email: infosec@kagisoonline.com

Postal address: 9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754

Physical delivery address: 9139 Zwelitsha Street, Father Gerald Martin, Kagiso 2, Krugersdorp, 1754

A request for a person's own personal information should be identified clearly as such. Kagiso Online may request reasonable information to clarify a request or verify a requester's identity where necessary, particularly before disclosing personal information or acting on another person's behalf.

If a requester needs help completing the form, they may contact the Information Officer at the email or telephone number listed in Section 3. Requests will be handled in accordance with PAIA.

8. Fees

Fees may be payable in accordance with PAIA and the applicable PAIA Regulations. Depending on the request, an applicable fee may relate to:

- A request fee, where payable.
- Searching for and preparing records.
- Reproducing or copying records.
- Delivery of records.
- A deposit, where permitted by the applicable Regulations.

No request fee will be charged where the requester is requesting access to their own personal information, subject to the applicable law and Regulations.

Before an applicable fee or deposit is charged, Kagiso Online will provide the requester with the relevant information and amount. Fees will be determined using the prescribed amounts in force when the request is processed. A requester may ask the Information Officer for the applicable fee information.

9. Processing time and decision

Kagiso Online will make a decision on a valid request within the period prescribed by PAIA, generally within 30 days after receipt of the request or the required particulars.

Where PAIA permits an extension, Kagiso Online may extend the decision period once for up to a further 30 days. If an extension is required, Kagiso Online will notify the requester within the applicable period, explain the reason for the extension and state the extended period.

If access is granted, Kagiso Online will notify the requester of the form of access, any applicable access fee and the arrangements for providing access.

If access is refused in whole or in part, Kagiso Online will provide written reasons and information about the requester's available remedies. Where reasonably possible, Kagiso Online may provide access to the non-exempt portion of a record after removing information that may lawfully be withheld.

10. Grounds for refusing access

Kagiso Online may refuse access only where PAIA permits or requires refusal. Depending on the record and circumstances, relevant grounds may include protection of:

- The privacy of another person.
- Commercial information of a third party.
- Confidential information of a third party.
- The safety of individuals or protection of property.
- Records privileged from production in legal proceedings.
- Certain research information.
- Certain commercial activities or information of Kagiso Online.

The fact that a record falls within a general category does not automatically mean that access will be refused. Each request will be considered on its facts and under the applicable provisions of PAIA. Where reasonably possible, Kagiso Online will consider whether access can be provided to a separable part of a record after protected information has been removed.

11. Personal-information processing under POPIA

This section describes categories of personal information Kagiso Online may process. The actual information processed depends on a person's relationship with Kagiso Online and the services used.

11.1 Categories of data subjects

Kagiso Online may process personal information relating to:

- Customers and prospective customers.
- Website visitors and online users.
- Employees and job applicants.
- Suppliers, service providers, contractors and consultants.
- Business partners.
- People making enquiries or complaints.
- Newsletter subscribers or competition participants.
- Other people who communicate with Kagiso Online.

11.2 Categories of personal information

Depending on the relationship and the purpose of processing, Kagiso Online may process:

- Names and contact details.
- Identification or verification information, where required.
- Account, quote, service and transaction information.
- Employment and recruitment information.
- Payment or banking information.
- Correspondence, enquiries, complaints and support-ticket information.
- Website, device and usage information, where collected.
- Marketing preferences and records of consent or objections, where applicable.
- Images, audio, video or other content submitted to Kagiso Online, where applicable.
- Other information a person voluntarily provides or that is necessary for the relevant service.

People should avoid sending passwords, payment-card details or other sensitive information through ordinary enquiry forms or email. Where access credentials are needed to perform work, Kagiso Online should agree with the customer on an appropriate method for providing them.

11.3 Purposes of processing

Kagiso Online may process personal information, where lawful and necessary, to:

- Respond to enquiries and complaints.
- Provide quotes, products and services.
- Manage customer, supplier and service-provider relationships.
- Create and administer accounts, support tickets and project records.
- Process payments and maintain business records.
- Communicate about services, projects and customer support.
- Send direct marketing where permitted by law.
- Operate, maintain, secure and improve the website and systems.
- Recruit and manage employees.
- Detect, investigate or address fraud, security incidents or misuse.
- Comply with legal and regulatory obligations.
- Establish, exercise or defend legal rights.

11.4 Recipients of personal information

Kagiso Online may disclose or make personal information available, where lawful and necessary, to:

- Employees and authorised representatives who need the information for their work.
- Service providers that host, store, transmit or process information for Kagiso Online. These may include website-hosting and cloud-service providers (DIAMATRIX C.C., Host Africa, AWS and Azure); website or DNS services (Cloudflare); email and productivity services (Google and Microsoft); project-communication services (Slack); code-hosting services (GitHub); and payment-processing services (PayPal).
- The domain registrar and domain-management providers used by Kagiso Online, where information is needed to register or manage its domain.
- Professional advisers, auditors and insurers, where applicable.
- Delivery or support providers, where applicable.
- Regulators, government authorities or law-enforcement agencies where disclosure is required or permitted by law.
- Other recipients where the individual has consented or disclosure is otherwise permitted by law.

Where a service provider processes personal information on Kagiso Online's behalf, Kagiso Online requires appropriate written terms and safeguards, as applicable.

11.5 Cross-border transfers

Countries to which personal information may be transferred: the United States. Depending on the provider, service, account settings and subprocessors, personal information may also be stored, processed or accessed in other countries. Kagiso Online will update this section if it confirms additional countries relevant to the services it uses.

Kagiso Online will review the relevant providers' data-processing terms, subprocessor information and account settings, and update this section if those arrangements change.

11.6 Security safeguards

Kagiso Online takes appropriate, reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised destruction, unlawful access and unlawful processing. Safeguards are reviewed and updated as appropriate to the risks and the information handled.

Safeguards currently implemented include:

- Access restrictions and account permissions, with access limited to authorised personnel who need it for their work.
- Multi-factor authentication on work devices and operational accounts or applications where supported.

- Staff confidentiality obligations and mandatory cybersecurity awareness training. Relevant personnel hold cybersecurity certifications.
- Backups of relevant business information.
- Security and confidentiality requirements for service providers that process personal information on Kagiso Online's behalf.
- PGP/OpenPGP encryption for sensitive email communications where appropriate. Digitally signed messages, where used, can help recipients check message integrity and the associated signing key.
- SPF, DKIM and DMARC email-authentication controls to help receiving mail services identify unauthorised messages claiming to come from Kagiso Online's domain.
- HTTPS with TLS certificates issued by Let's Encrypt to help encrypt data exchanged between a visitor's browser and Kagiso Online's website.
- Procedures for responding to suspected security incidents, including assessing whether notification is required under applicable law.

11.7 Retention

Personal information is retained only for as long as reasonably necessary for the purpose for which it was collected, to meet applicable legal or business requirements, to resolve disputes or to establish, exercise or defend legal rights. The retention period depends on the record type and the circumstances.

12. Remedies available to requesters

A requester or affected third party who is dissatisfied with a decision, or who has not received a decision within the applicable period, may use the remedies available under PAIA.

For a private body, an internal appeal is generally not the applicable PAIA process. A requester or affected third party may lodge a complaint with the Information Regulator using **Form 05: Complaint Form**, subject to the requirements and time limits that apply. The Regulator's guidance states that a complaint in a private-body matter must generally be lodged within 180 days of the refusal, non-response or relevant elapsed period.

The Information Regulator's contact details are:

- Email: PAIAComplaints@inforegulator.org.za
- General enquiries: enquiries@inforegulator.org.za
- Telephone: 010 023 5200
- Toll-free telephone: 0800 017 160
- Website: Information Regulator of South Africa www.inforegulator.org.za

A requester may also seek relief from a court where permitted by law. Requesters should check the current PAIA requirements and the remedies described in Kagiso Online's written decision.

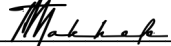
13. Updating this Manual

Kagiso Online will review and update this Manual when there are material changes to:

- Its legal or trading name, registration details or contact information.
- Its business activities or principal place of business.
- Its Information Officer or Deputy Information Officer.
- The subjects and categories of records it holds.
- The personal information it processes, the purposes of processing or the recipients of that information.
- Its cross-border information flows or security safeguards.
- Applicable legal requirements.

Approved by: Thabo Moses Makhele

Position: Information Officer

Signature: 

Date approved: 12 October 2026