



Optifin Consultants (Pty) Ltd
Reg Nr. 2024/273775/07
PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and in compliance with the requirements of the Protection of Personal Information Act, No.4 2013 (“POPIA”)

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TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS	3
2.	PURPOSE OF PAIA MANUAL	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF OPTIFIN.....	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	4
5.	DESCRIPTION OF THE RECORDS TO BE HELD BY OPTIFIN WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	6
6.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY OPTIFIN	12
7.	PROCESS FOR REQUESTS TO INFORMATION	14
8.	AVAILABILITY OF THE MANUAL	17
9.	UPDATING OF THE MANUAL	17

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer.
1.2	“DIO”	Deputy Information Officer
1.3	“IO “	Information Officer
1.4	“OPTIFIN”	Optifin Consultants (Pty)
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013
1.7	“Regulator”	Information Regulator

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied;
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF OPTIFIN

Chief Information Officer

Name: Maria Cornelia van der Merwe

Tel: 083 748 6033

Email: optifin@gmail.com

Address: 134 Elizabeth East
Port Owen
Velddrif
7356

Website: www.optifinconsultants.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 (https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf).
- 4.3 The aforesaid Guide contains the description of-
- 4.3.1 the objects of PAIA and POPIA;
- 4.3.2 the address and phone number and electronic mail address of-
- (a) the Information Officer of every private body and
- (b) every Deputy Information Officer of every private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA².
- 4.3.3 the manner and form of a request for access to a record of a private body contemplated in section 50³; (<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>),
- 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA,

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² 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.

³ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

a. that record is required for the exercise or protection of any rights;

b. that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c. access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

4.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

- (a) an internal appeal (<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form04-Reg9.pdf>);
- (b) a complaint to the Regulator (<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>);
- (c) an internal appeal (<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form04-Reg9.pdf>);
- (d) a complaint to the Regulator (<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>) and
- (e) an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.3.7 the provisions of sections 14⁴ and 51⁵ requiring a private body, to compile a manual, and how to obtain access to a manual;

4.3.8 The provisions of sections 15⁶ and 52⁷ provide for the voluntary disclosure of categories of records by a private body;

4.3.9 The notices issued in terms of sections 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access (<https://inforegulator.org.za/paia-fees-structure-2/>); and

4.3.10 The regulations made in terms of section 92¹⁰.

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 (<https://inforegulator.org.za/contact-us/>), during normal working hours.

⁴ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above

⁵ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above

⁶ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁷ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁸ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁹ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

- a. any matter which is required or permitted by this Act to be prescribed;
- b. any matter relating to the fees contemplated in sections 22 and 54;
- c. any notice required by this Act;
- d. uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- e. any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5 The Guide can also be obtained:

4.5.1 Upon request to the Information Officer.

4.5.2 From the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is available for public inspection during normal office hours.

5. DESCRIPTION OF THE RECORDS TO BE HELD BY OPTIFIN WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Legislations	Promotion of Access to Information Act 2 of 2000 (https://www.gov.za/documents/promotion-access-information-act)
	Promotion of Access to Information Amendment Act 54 of 2002 (https://www.gov.za/documents/promotion-access-information-amendment-act)
	Protection of Personal Information Act 4 of 2013 (https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf)
	Promotion of Access to Information Amendment Act 31 of 2019 (https://www.gov.za/documents/acts/promotion-access-information-amendment-act-31-2019-english-afrikaans-03-jun-2020)
	The Political Party Funding Act 6 of 2018 (https://www.gov.za/documents/acts/political-party-funding-act-6-2018-english-setswana-23-jan-2019)
	Cybercrimes Act 19 of 2020 (https://www.gov.za/sites/default/files/gcis_document/202106/44651gon324.pdf)
Regulations – PAIA	Regulations that prescribe the grounds under which a person is exempt from having to pay fees- Government Notice R.991 in GG 28107-14 October 2005 (https://www.justice.gov.za/legislation/notices/2000-2006/n2005/20051014_GG28107_NoticeR991_paia.pdf)
	Designation of Magistrate Courts as having the capacity to hear PAIA matters -Government Notice 1217 in GG 42717-19 September 2019 (https://www.justice.gov.za/legislation/notices/2019/20190)

Category of Records	Applicable Legislation
	919-gg42717gon1218-EQC.pdf)
Regulations – PAIA	Rules of procedure for application to court in terms of the Promotion of Access to Information Act 2 of 2000, Government Notice R. 1284 in GG 42740-4 October 2019 (Promotion of Access to Information Rules) https://www.justice.gov.za/legislation/notices/2019/20191004-gg42740rg10991gon1284-PAIA.pdf) Regulations relating to the Promotion of Access to Information, 2021-GG 45057, GoN 757 https://www.justice.gov.za/legislation/notices/2021/20210827-gg45057gon757-PAIAregulations.pdf) Draft rules of procedure relating to the matter in which PAIA Complaints and any PAIA Matter may be dealt with by the Enforcement Committee
Regulations – POPIA	Regulations relating to the Protection of Personal Information, 2018 (https://inforegulator.org.za/wp-content/uploads/2025/04/POPIA-2021-Regulations-FINAL-21-Jan-2025.pdf) Protection of Personal Information Act: Amendments to Regulations-GG 45120, GoN 829 https://www.justice.gov.za/legislation/notices/2025/20250417-gg52523gon6126-POPIA-Regulations-Amendment.pdf) Information Regulator's Rules of Procedure for Handling POPIA complaints https://inforegulator.org.za/wp-content/uploads/2020/07/20211012-InfoReg-RulesOfProcedure-HandlingPOPIAcomplaints-1.pdf) Draft rules of procedure relating to the matter in which POPIA Complaints and any POPIA Matter may be dealt with by the Enforcement Committee https://inforegulator.org.za/wp-content/uploads/2020/07/Government-Notice-POPIA-Rules-of-Procedure-for-the-EC-Signed.pdf)
Forms - PAIA	Form 01: Request for a Guide from the Regulator [Regulation 2] (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-

Category of Records	Applicable Legislation
	Reg2.pdf)
Forms - PAIA	Form 01: Request for a Copy of the Guide from an Information Officer [Regulations 3] https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg3.pdf)
	Form 02: Request for Access to Record [Regulation 7] https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf)
	Form 03: Outcome of request and of fees payable [Regulation 8] (https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf)
	Form 04: Internal Appeal Form [Regulation 9] https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form04-Reg9.pdf)
	Form 05: Complaint Form [Regulation 10] https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf)
	Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)] (https://info regulator.org.za/wp-content/uploads/2020/07/PAIA-Request-for-Compliance-Assessment-Form-13.pdf)
Forms - POPIA	Form 1: Objection to the Processing of Personal Information (https://info regulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf)
	Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information (https://info regulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf)

Category of Records	Applicable Legislation
Forms - POPIA	Form 3: Application for the Issue of a Code of Conduct (https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-3-APPLICATION-FOR-THE-ISSUE-OF-A-CODE-OF-CONDUCT.pdf) Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing (https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-4-APPLICATION-FOR-THE-CONSENT-OF-A-DATA-SUBJECT-FOR-THE-PROCESSING-OF.pdf)
	Form 5: Complaint Regarding Interference with the Protection of Personal Information/Complaint Regarding Determination of an Adjudicator (https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-5-COMPLAINT-REGARDING-INTERFERENCE-WITH-THE-PROTECTION-OF-AN-ADJUDICATOR.pdf)
	Form 20: Request for an Internal Review is in the rules of procedure relating to the manner in which a complaint must be submitted and handled by the Information Regulator (https://inforegulator.org.za/wp-content/uploads/2020/07/20211012-InfoReg-RulesOfProcedure-HandlingPOPIAcomplaints-1.pdf)
	Application Form for authorisation to process Special Personal Information (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-Form-Application-form-for-authorisation-to-process-Special-Personal-Information-eForm-2021-1.pdf)
	Application Form for authorisation to process Personal Information of Children (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-Form-Application-form-for-authorisation-to-process-Personal-Information-of-Children-eForm-2021-1.pdf)
	Exemption Application Form- section 37(1) (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-GuidanceNote-PPI-LawfulProcessing-ExemptionApplication-eForm-202106.pdf)

Category of Records	Applicable Legislation
Forms - POPIA	Application form for Registration of Information Officers (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-eForm-InformationOfficersRegistration-2021-1.pdf)
	Application Form for Prior Authorisation (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-eForm-PriorAuthorisation-20210311-1.pdf)
Enforcement Committee	Terms of Reference for Enforcement Committee (https://inforegulator.org.za/wp-content/uploads/2020/07/TERMS-OF-REFERENCE-FOR-THE-ENFORCEMENT-COMMITTEE.pdf)
Templates – POPIA	Notification of a security compromise in terms of Section 22 of Protection of Personal Information Act 4 of 2013 (https://popia.co.za/section-22-notification-of-security-compromises/)
Guidance Notes and Procedures – PAIA	Procedures for making information electronically available (Procedures for making information electronically available- Approved (16 March 2022).pdf)
	PAIA Guide- Guide on how to use the Promotion of Access to Information Act 2 of 2000 (English- Afrikaans – isiNdebele – isiXhosa – isiZulu – Siswati – Sepedi – Sesotho – Setswana – Tshivenda – Xitsonga -Braille (physical copy only) (PAIA Guidelines).
Guidance Notes and Procedures – POPIA	Guidance Note on the processing of Special Personal Information (InfoRegSA-GuidanceNote-Processing-SpecialPersonalInformation-20210628.pdf)
	Guidance Note on the processing of personal information of children (GuidanceNote-Processing-PersonalInformation-Children-20210628-1.pdf)
	Guidance Note on Processing of Personal Information of a Voter by a Political Party in terms of the Protection of Personal Information Act, 4 of 2013 (FINAL-GUIDANCE-NOTE-ON-THE-PROCESSING-OF-PERSONAL- INFORMATION-OF-VOTERS-AND-THE-COUNTERING-OF-MISINFORMATION-AND-DISINFORMATION-DURING-ELECTIONS.pdf)

Category of Records	Applicable Legislation
Guidance Notes and Procedures – POPIA	Guidelines on registration of Information Officers (InfoRegSA-GuidanceNote-IO-DIO-20210401.pdf)
	Guidance Note on applications for Prior Authorisation (InfoRegSA-GuidanceNote-PriorAuthorisation-20210311-1.pdf)
	Guidance Note on Exemptions (InfoRegSA-GuidanceNote-PPI-LawfulProcessing-202106.pdf)
	Guidelines on drafting Codes of Conduct (Codes of Conducts)
Policies	Code of Ethics and Conduct
	Policy on Disclosure of Interests
	Personal-Information-Impact-Assessments
Registers	Code of conduct
	Information Officer
	Complaints
	Assessments
	Prior Authorisation Applications
	Exemptions Applications
	Special Personal Information Applications
Notices	Personal Information of Children Applications
	Enforcement Notices

Category of Records	Applicable Legislation
Notices	Information Notices
	Infringement Notices
	Notice in terms of the commencement date of section 58(2) of POPIA, - GG 44782, Gen 395
Communications	Media statements
Human Resource	Job Advertisement
Education and Training	Training manual

6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY OPTIFIN

Subjects on which the body holds records	Categories of records
Human resources	Employee information including personal information, employment history and health records that Optifin may hold from time to time
	Disciplinary records
	Training and development information
	General files containing information on employee benefits and employee recruitment and selection information
	List of employees
	Employment contracts
	Tax records
	Training records

Subjects on which the body holds records	Categories of records
Human resources	Payroll
	Applicable internal policies and procedure
Client related records	FICA records
	Correspondence
Property	Lease agreements
	Insurance records
	Asset register
Operations	Work/Time sheets
	List of suppliers
	Supplier agreements
Information Technology	License agreements
	Records relating to systems
	Domain information
	Usage statistics
	Equipment details
	Costings of hardware and software
	Back-up's of data
Company information	Optifin secretarial records

Subjects on which the body holds records	Categories of records
Company information	Incorporation documents, including Memorandum of Incorporation (MOI) and/or Articles of Association
Finance/Accounts department	Accounting records
	Annual Financial Statements
	Tax returns
	Creditors and debtors
	Invoices
	Salary information
	Banking records
	Bank account details
	Fixed assets register
	Insurance related documents/contracts: Short Term Insurance PI Insurance
Marketing department	Optifin brochures and publications
	Optifin media releases

7. PROCESS FOR REQUESTS TO INFORMATION

7.1 Purpose of Processing Personal Information:

- 7.1.1 Optifin' is required, in the normal exercise of its functions and obligations as a business entity, to collect and process the personal information as defined by POPIA, Act 4 of 2013 (as amended). Optifin processes information for the purposes of.

- (a) Supporting and managing its employees.
- (b) Verifying information provided by service providers and potential service providers.
- (c) Assessing tender applications and bid documents.
- (d) Verifying information provided by employment applicants.
- (e) Complying with its legislative and regulatory obligations.

7.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Personal Information	Personal Information that may be processed
Customers / Clients	Names and surname; contact details (contact number(s), email address); Business address; Unique Identifier/Identity Number and confidential correspondence
Service Providers	Names, registration number, vat numbers, address and bank details
Employees	ID number; physical address; contact details (contact number(s), email address); educational information (qualifications); financial information; employment history; gender; age; nationality, language; marital status; information of the person and their relatives (family members)

7.3 The recipients or categories of recipients to whom the personal information may be supplied:

Category of Data Subjects	Recipients or Categories of Recipients to whom the personal information may be supplied
Gender, financial information	Statutory bodies Department of Labour (DOL) and the South African Revenue Service (SARS)
Names, financial information, ID numbers	Suppliers of benefits to employees (such as medical schemes, pension fund administrators and other financial institutions)
Employment history, names, ID number	Current, past, and prospective employers of data subjects based on request

Category of Data Subjects	Recipients or Categories of Recipients to whom the personal information may be supplied
Qualifications, for qualification verifications, identity number	Background verification companies and South African Qualifications Authority
Identity number and names, for criminal checks	The South African Police Service and courts, where required

7.4 Planned transborder flows of personal information:

7.4.1 Optifin may from time to time need to transfer personal information to companies, service providers, other third parties located in a country outside of South Africa for the purposes of rendering services to clients or for Optifin administration purposes (including employee administration).

7.4.2 Where personal information is transferred to or outside of South Africa, Optifin will take steps to ensure that such transfer is subject to laws, binding corporate rules or binding agreements that provide an adequate level of protection. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the -

- a. recipient country can offer such data at an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- b. data subjects' consent to the transfer of their personal information; or
- c. transfer is necessary for the performance of a contractual obligation between the data subject and the responsible party; or
- d. transfer is necessary for the performance of a contractual obligation between the responsible party and a third party, in the interests of the data subject; or
- e. the transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject, and if it were, the data subject, would likely provide such consent.

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

7.5.1 Optifin ensures the security of personal information in its possession and control through technical and organisational safeguards which are implemented with the purpose of maintaining the integrity and confidentiality of personal information in accordance with generally accepted information security practices and procedures. This may include:

- a. data encryption;
- b. anti-virus measures;

- c. firewalls;
- d. password control;
- e. training in Information security;
- f. access control;
- g. third parties non-disclosure agreement;
- h. secure hardware and software;
- i. policies in information security contain comprehensive coverage of Information Technology related issue;
- j. confidentiality and data privacy clauses in agreements with suppliers and service providers and
- k. audit of information security.

8. AVAILABILITY OF THE MANUAL

8.1 A copy of the Manual is available:

8.1.1 to any person upon request and upon the payment of a prescribed fee during normal business hours and

8.1.2 to the Information Regulator upon request.

8.2 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.

9. UPDATING OF THE MANUAL

The Information Officer of Optifin will update this manual on a regular basis.

Issued by MC van der Merwe, Director