

PAIA MANUAL

Intercyte Consulting CC / SafeCyte

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

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Revision	02	Supersedes	Revision 01
Original issue	June 2021	Review / issue date	September 2026
Approving Officer	Emile van Zyl	Designation	Managing Director
Website	www.safecyte.co.za	Company registration	2007/196642/23

Revision history

Section / paragraph	Rev.	Amendment	Date	Name
New document	0	Initial issue	May 2021	L. Hanekom
1.10 & 1.12	1	Added data safeguards, privacy, breach response and information security references; updated data management and control table.	June 2021	L. Hanekom
Entire manual	2	Reviewed and recreated for 2026; updated PAIA/POPIA terminology, Information Regulator references, current request forms/process, eServices references and presentation.	September 2026	Emile van Zyl

1. PAIA Manual of Intercyte Consulting CC

1.1 Company information

Item	Details
Physical address	Suite 3, The Gallery, Mosaic Market, Paul Kruger Street, The Island, Sedgfield, 6573
Postal address	PO Box 494, Sedgfield, 6573
Telephone	086 111 5678
Company registration number	2007/196642/23
Website	www.safecyte.co.za
Information Officer	Emile van Zyl
Information Officer email	emile@intercyte.co.za
Deputy Information Officer	Helia van Zyl

Deputy Information Officer email	helia@intercyte.co.za
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Business type: Software development and consulting.

1.2 Definitions

- PAIA means the Promotion of Access to Information Act 2 of 2000, as amended.
- POPIA means the Protection of Personal Information Act 4 of 2013.
- Information Regulator means the independent regulator established in terms of section 39 of POPIA and responsible for monitoring and enforcing compliance with PAIA and POPIA.
- Private body has the meaning assigned to it in PAIA and includes a natural person, partnership or juristic person carrying on a trade, business or profession, excluding a public body.
- Information Officer means the head of a private body for PAIA purposes and the person responsible for the duties prescribed under POPIA, subject to registration requirements.
- Deputy Information Officer means a person formally designated or delegated to assist the Information Officer.
- Requester means a person making a request for access to a record of the organisation, or a person acting on that person's behalf.
- Personal requester means a requester seeking access to a record containing personal information about that requester.
- Personal information, data subject, processing and record have the meanings assigned to them under POPIA and PAIA, as applicable.
- Third party means a person other than the requester in relation to a request for access to a record.

1.3 Purpose of this manual

PAIA gives effect to the constitutional right of access to information. For a private body, access may be requested where a record is required for the exercise or protection of a right. This manual explains the records held by Intercyte Consulting CC, how to request access, who is responsible for dealing with requests, and the applicable privacy and information-security framework.

The organisation is committed to transparency and accountability while protecting personal information, confidential information, commercial interests and other rights recognised by PAIA and POPIA.

1.4 Duties of the Information Officer

- Maintain, publish and review this PAIA Manual and promote awareness of access-to-information procedures.
- Facilitate requests for access to records and provide appropriate notices and feedback.
- Determine whether access should be granted in full, granted in part, or refused in accordance with PAIA.
- Ensure granted access is provided timeously and in an appropriate form.
- Oversee PAIA and POPIA compliance responsibilities, including registration and relevant reporting to the Information Regulator.
- Maintain appropriate records of PAIA requests and outcomes.

Right of access and grounds for refusal

A request to a private body must satisfy PAIA's procedural requirements and the requested record must be required for the exercise or protection of a right. Access remains subject to the grounds for refusal and other provisions of PAIA.

- Protection of the privacy of a third party who is a natural person.
- Protection of commercial information of a third party.
- Protection of confidential information supplied by a third party.
- Protection of the safety of individuals and protection of property.
- Protection of records privileged from production in legal proceedings.
- Protection of the organisation's commercial information, including trade secrets and certain computer programs.
- Protection of research information of a third party or the organisation.

Where a record contains information that may lawfully be severed from information that must be refused, the accessible portion may be disclosed in accordance with PAIA. Public-interest overrides apply where the statutory requirements are met.

1.5 PAIA Guide and prescribed forms

The Information Regulator publishes the PAIA Guide contemplated in section 10 of PAIA. The Guide explains how to exercise rights under PAIA and is available in South Africa's official languages.

Requests for access to records are made using the prescribed Form 2 and submitted to the Information Officer, Deputy Information Officer or head of the private body, as applicable. The Information Regulator also publishes the prescribed outcome, complaint and related forms.

Information Regulator	Details
Information Regulator website	www.inforegulator.org.za
eServices portal	eservices.inforegulator.org.za
Telephone	010 023 5200
Toll free	0800 017 160
General enquiries	enquiries@inforegulator.org.za
Office	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal	PO Box 31533, Braamfontein, Johannesburg, 2017

1.6 Statutory records

The organisation may maintain records under legislation applicable to its operations. The following list is based on the 2021 manual and should be reviewed periodically for continuing applicability:

- Basic Conditions of Employment Act
- Closed Corporations Act
- Companies Act
- Compensation for Occupational Injuries and Diseases Act
- Constitution of the Republic of South Africa
- Consumer Protection Act
- Copyright Act
- Electronic Communications and Transactions Act
- Employment Equity Act
- Income Tax Act
- Labour Relations Act
- National Building Regulations and Building Standards Act
- National Road Traffic Act
- Occupational Health and Safety Act and applicable regulations
- Promotion of Access to Information Act
- Promotion of Equality and Prevention of Unfair Discrimination Act
- Protected Disclosures Act
- Protection of Personal Information Act
- Skills Development Act
- Trade Marks Act
- Unemployment Insurance Act
- Value-Added Tax Act

1.7 Categories of records held

The table below summarises the principal categories of records identified in the 2021 manual. 'PAIA request' means that access is not automatic and must be considered in accordance with PAIA.

Category	Examples of records	Availability	Data subject
Public affairs	Public corporate records; media releases; published newsletters; magazine articles	Generally freely available	Organisation
Regulatory & administrative	Permits, licences or authorisations; policies; corporate governance records; board/director records; internal correspondence	Freely available or PAIA request depending on record	Organisation / employees
Human resources	Applications; employment contracts; employee personal information; Employment Equity Plan; medical, pension, disciplinary, performance, salary, benefits, PAYE, SETA, leave and training records	PAIA request	Employees / organisation
Financial	Financial statements; financial and tax records; asset register; management accounts; vouchers, cash books and ledgers; banking and electronic banking records; market information	PAIA request	Organisation
Marketing & sales	Product/service brochures; advertisements; performance records; service sales records; marketing strategies; customer/client database	PAIA request unless already public	Organisation / customers
Clients / customers / external providers	Customer details and files; instructions; correspondence; client agreements	PAIA request	Customers / third parties
Third parties	Supplier/contractor agreements; non-disclosure agreements; letters of intent	PAIA request	Third parties

1.8 Information request procedure

A requester should complete the prescribed Form 2 and provide sufficient information to identify the requester, the record requested, the form of access required and the right the requester seeks to exercise or protect, together with an explanation of why the record is required for that purpose.

The request should be submitted to the Information Officer or Deputy Information Officer using the contact details in section 1.1. Any prescribed request or access fee will be dealt with in accordance with PAIA and the applicable regulations.

The organisation will decide the request as soon as reasonably possible and ordinarily within 30 days of receipt, subject to any extension permitted by PAIA. The requester will be notified of the decision and any applicable fees. A refusal will state adequate reasons and identify the applicable PAIA provision, without disclosing protected content.

A requester dissatisfied with a decision of a private body may use the complaint process available through the Information Regulator and/or approach a competent court, subject to PAIA's requirements and time periods.

1.9 Privacy policy

The organisation's Privacy Policy describes how Intercyte Consulting CC / SafeCyte collects, uses, discloses, stores and protects personal information and explains data-subject rights. Refer to Privacy Policy document WIPP01, as updated.

1.10 Data safeguards

Intercyte Consulting CC will take appropriate, reasonable technical and organisational measures to protect personal information and other confidential records against loss, damage, unauthorised destruction, unlawful access or unlawful processing.

The 2021 manual identified controls including database integrity checks, password-controlled system access, firewalls and restricted network access, backups, anti-virus protection, database/system updates, continuity measures and disaster recovery. These controls and the service providers named in the 2021 manual must be verified against the current 2026 technology environment before this manual is formally approved.

Where operators or other service providers process personal information on behalf of the organisation, appropriate contractual and security safeguards should be maintained.

1.11 Security compromises / data breach response

The organisation maintains a process for responding to suspected or confirmed security compromises. Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, the organisation will assess the incident and make notifications to the Information Regulator and affected data subjects where required by POPIA, subject to lawful restrictions or directions.

Refer to the organisation's Data Breach Response Policy and related incident-response procedures.

1.12 Information security

The organisation maintains information-security policies and procedures intended to protect confidentiality, integrity and availability. The 2021 manual referenced policies covering acceptable use, clean desk practices, disaster recovery, password protection, technology equipment disposal, software installation, social networking, email and ethics. These policy references should be confirmed against the current controlled-document register.

1.13 Availability and publication of this manual

- This manual should be made available on the organisation's website.
- A copy should be available at the organisation's principal place of business during normal business hours, subject to applicable PAIA requirements.
- The organisation should maintain the manual so that it is accessible to the Information Regulator and relevant staff.
- The current manual may also be uploaded and maintained through the Information Regulator's eServices facilities.
- PAIA request and annual-reporting records should be maintained to support applicable reporting obligations.

2. Approval and review

This manual should be reviewed when there are material changes to the organisation, its records, Information Officer details, processing activities, legislation, regulations or guidance, and otherwise at appropriate intervals.

Approving Officer	Emile van Zyl
Designation	Managing Director
Approval date	21/09/2026
Signature	