



PAIA MANUAL

OF

PROFECIA PTY LTD

Prepared and compiled on 25 June 2026 in accordance with Section 51 of the Promotion of Access to Information Act, No 2 of 2000 (as amended).

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1. List of Acronyms and Abbreviations

TERM	DEFINITION
“Data Subject”	means the person to whom Personal Information relates, as contemplated in terms of section 1 of the POPIA;
“Deputy Information Officer”	means a Deputy Information Officer designated in terms of section 56 of the POPIA;
“Information Officer”	means in the case of a juristic person, (i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or (ii) the person who is acting as such or any person duly authorised by such acting person as contemplated in section 1 of the Act;
“Information Regulator”	means the Information Regulator established in terms of section 39 of POPIA;
“Manual”	means this manual compiled by Profecia Pty Ltd in terms of PAIA and POPIA;
“PAIA”	means the Promotion of Access to Information Act, 2 of 2000, including the PAIA regulations, as amended from time to time;
“Personal Information”	means information relating to an identified, or identifiable, living natural person and, where applicable, an identifiable existing juristic person as contemplated in the POPIA;
“Personnel”	means all partners, directors, officers, employees, individual contractors and other personnel of Profecia Pty Ltd;
“POPIA”	means the Protection of Personal Information Act, 4 of 2013, including the POPIA regulations, as amended from time to time;
“Processing”	means any operation, activity or set of operations, whether or not by automated means, concerning Personal Information as contemplated in the POPIA;
“Private Body”	means any former or existing juristic person, as contemplated in the Act and POPIA;
“Record”	means a record as contemplated in PAIA and includes Personal Information;
“Requester”	means, in relation to a Private Body, i. any person, including, but not limited to, a public body or an official thereof, making a request for access to a Record of that Private Body; or ii. a person acting on behalf of such person as contemplated in the Act;
“Responsible Party”	means a public or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information as contemplated in the POPIA;
“Regulator”	Information Regulator

2. Purpose Of PAIA Manual

To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of PAIA, in order for them to exercise their rights in relation to public and private bodies.

Wherever reference is made to “Private Body” in this manual, it will refer to Profecia Pty Ltd.

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 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 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 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; and
- 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 the Private Body:

3.1. *Information Officer:*

Name: Ebenezer Kwamena Smith
Telephone No: 041 582 4582
Email: eben@profecia.co.za

3.2. *Deputy Information Officer*

Name: Kwasi Asare - Baah
Telephone No: 041 582 4582
Email: kwasi@profecia.co.za

3.3. *Access to information general contacts*

Email: eben@profecia.co.za

3.4. *Head Office*

Postal Address:	Building 7, Ascot Office Park, 6 Conyngham Road, Parsons Hill, Gqeberha, 6001
Physical Address:	Building 7, Ascot Office Park, 6 Conyngham Road, Parsons Hill, Gqeberha, 6001
Telephone No:	041 582 4582
E-mail:	eben@profecia.co.za
Website:	https://profecia.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, electronic mail address of –
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and 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-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;

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 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 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ 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.

- 4.3.4. the assistance available from the Information Officer 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;
 - 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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 14¹ and 51² requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.8. the provisions of sections 15³ and 52⁴ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9. the notices issued in terms of sections 22⁵ and 54⁶ regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92¹¹.
- 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.
- 4.5 The Guide can also be obtained-

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://info regulator.org.za/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours - In English and Afrikaans.

5. Categories Of Records Of The Private Body Which Are Available Without A Person Having To Request Access

The following categories of records are automatically available to the public without a request in terms of the Promotion of Access to Information Act:

- Private body contact details (telephone numbers, physical and postal address, email address).
- Information published on the private body's official website (if applicable).
- Business brochures, pamphlets or other information intended for public distribution.
- Information relating to the services offered by the private body.
- Newsletters, press statements, or public statements issued by the private body.
- Any other information that is publicly available in terms of legislation, regulations or as published voluntarily.

Access to the above records does not require completion of a formal request for access under PAIA.

¹¹ 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.

6. Description Of the Records of The Private Body Which Are Available In Accordance With Any Other Legislation

The private body is required, in terms of various pieces of legislation, to maintain records.

Such legislation includes, but is not limited to, the following:

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Unemployment Insurance Act 63 of 2001
- Occupational Health and Safety Act 85 of 1993
- Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA)
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Electronic Communications and Transactions Act 25 of 2002
- Broad-Based Black Economic Empowerment Act 53 of 2003

The records that must be retained in terms of the above legislation include statutory company records, financial and tax records, employment and personnel records and health and safety records.

7. Description Of The Subjects On Which The Body Holds Records And Categories Of Records Held On Each Subject By the Private Body

The private body holds records on the following subjects:

- Company / Business Records: Incorporation documents, statutory registers, shareholder information, and minutes of meetings.
- Financial Records: Annual financial statements, accounting records, invoices, tax returns, VAT records, and banking details.
- Human Resources / Employment Records: Employment contracts, employee files, leave records, payroll information, disciplinary records, and training records.
- Operational Records: Policies, procedures, correspondence, contracts with clients and suppliers, procurement records, and service delivery records.
- Marketing Records: Client databases, promotional materials, and communications.
- Health and Safety Records: Incident reports, risk assessments, and compliance documentation.
- Information Technology Records: System usage logs, access control records, and data security policies.

8. Processing Of Personal Information

8.1 Purpose of processing personal information

The private body processes personal information for the following purposes:

- To comply with legal and regulatory requirements.
- To manage its business operations and administration.
- To maintain employee records and fulfil employment obligations.
- To conclude and perform contracts with clients, service providers, and suppliers.
- For billing, invoicing, and debt recovery
- To communicate with stakeholders, including clients, suppliers, and employees.
- For marketing, promotions, and business development (where lawful).
- To ensure health, safety, and security within the workplace.
- To protect the legitimate interests of the business, employees, and clients.

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

The private body may process personal information relating to the following categories of data subjects:

- Employees: Personal details, employment history, performance records, remuneration details, and benefits information.
- Clients / Customers: Contact details, identification information, financial information, account details, and transaction history.
- Suppliers / Service Providers: Business and contact details, contractual information, and payment details.
- Shareholders / Directors: Personal details, identification numbers, and financial interest records.
- Visitors / Members of the Public: Identification and access control information, CCTV footage (where applicable).

8.3 The recipients or categories of recipients to whom the personal information may be supplied.

The private body may share personal information with the following categories of recipients, subject to applicable law and confidentiality obligations

- Statutory authorities and regulators (e.g., SARS, Department of Labour, CIPC).
- Auditors, accounting officers, and professional advisors.
- Banks, insurers, and medical aid providers.

- Service providers and contractors who process personal information on behalf of the private body.
- Clients, suppliers, and business partners where disclosure is necessary for contractual performance.
- Law enforcement agencies, courts, or tribunals where disclosure is required by law or in connection with legal proceedings.

8.4 Planned transborder flow of personal information. N/A

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

The private body has implemented appropriate, reasonable technical and organisational measures to protect personal information in its possession, including but not limited to:

- Access controls and role-based restrictions on information
- Password protection, authentication procedures and system monitoring
- Firewalls, anti-virus software, and encryption technologies
- Secure storage facilities and restricted physical access to records
- Regular data backups and secure off-site storage
- Policies and procedures addressing data protection, retention and destruction
- Training of employees on confidentiality, privacy, and information security obligations
- Binding contracts with third-party service providers to ensure compliance with POPIA

9. Availability Of The Manual

9.1 A copy of the manual is available at:

9.1.1 The manual of the Private Body is available on the website <https://www.profecia.co.za/> of the Private Body and at the premises of the Private body.

9.1.2 At the Head Office of Profecia Pty Ltd for public inspection during normal business hours

9.1.3 To any person upon request upon the payment of a reasonable prescribed fee.

9.1.4 To the Information Regulator upon request.

9.2 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.

10. Updating of the Manual

10.1. The head of Profecia Pty Ltd will on a regular basis update this manual.

Issued by: Ebenezer Kwamena Smith (Director / Information Officer)

ANNEXURE A:

The table below sets out the fees applicable to any request for a record of information held by Profecia Pty Ltd:

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every requester	R 140.00
2.	Photocopy/printed black & white copy of A4-size page	R 2.00 per page or part thereof
3.	Printed copy of A4-size page	R 2.00 per page or part thereof
4.	For a copy of computer-readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	For a copy of visual images	
7.	Transcription of an audio record, per A4-size page	R 24.00
8.	For a copy of audio recording on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00
9.	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. Not to exceed a total cost of	R 145.00 R 435.00
10.	Deposit: If search exceeds 6 hours	One third of the amount per request calculated in terms of items 2 to 8.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

ANNEXURE B: FORM 2

REQUEST FOR ACCESS TO RECORD [Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made(<i>if applicable</i>):				
Identity Number				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel.(B)		Facsimile:	
	Cellular			
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>				
Description of record or relevant part of the record:				
Reference number, if available				
Any further particulars of record				

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected

Explain why the record requested is required for the exercise or protection of the aforementioned right:

FEES

- a) *A request fee must be paid before the request will be considered.*
- b) *You will be notified of the amount of the access fee to be paid.*
- c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*

Reason

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (<i>Please specify</i>)

Signed at _____ this _____ day of _____ 20_____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name and Surname of Information</i>	
<i>Date received: Officer)</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

ANNEXURE B: FORM 3

OUTCOME OF REQUEST AND FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: The Information Officer

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure A.	
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OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	

4. Fees payable with regard to your request:

ITEM	DESCRIPTION	AMOUNT	NUMBER OF PAGES/ITEMS	TOTAL:
1.	The request fee payable by every requester	R 140.00		
2.	Photocopy/printed black & white copy of A4-size page	R 2.00 per page or part		
3.	Printed copy of A4-size page	thereof R 2.00 per page or part thereof		
4.	For a copy of computer readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: (iii) If provided by requester (iv) If provided to the requester	R 40.00 R 40.00 R 60.00		
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.		
6.	For a copy of visual images			
7.	Transcription of an audio record, per A4-size page	R 24.00		
8.	For a copy of audio recording on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: (iii) If provided by requester (iv) If provided to the requester	R 40.00 R 40.00 R 60.00		
9.	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. Not to exceed a total cost of	R 145.00 R 435.00		

10.	Deposit: If search exceeds 6 hours	One third of the amount per		
		request calculated in terms of items 2 to 8.		
11.	Postage, email or any other electronic transfer	Actual expense, if any.		
	TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes ☐ No

Hours of search		Amount of deposit (<i>calculated on one third of total amount per request</i>)	
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The amount must be paid into the following Bank account:

Name of Bank:

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference No.: _____

Submit proof of payment to: _____

Signed at _____ on this ____ day of _____ 20____

INFORMATION OFFICER