# PAIA MANUAL

# Grandcom (Pty) Ltd

Prepared in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (PAIA) and the Protection of Personal Information Act No. 4 of 2013 (POPIA)

**Date of compilation: 18/08/2025**

**Date of revision: .**

**Confidentiality Notice**

This document is intended for public access in accordance with PAIA and POPIA.

Unauthorized alterations or misrepresentation of its contents are prohibited.

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## 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 | "Minister" | Minister of Justice and Correctional Services; |
| 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; and |
| 1.8 | "Republic" | Republic of South Africa |

## 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 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.

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## 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

| | |
|---|---|
| Company Name | Grandcom (Pty) Ltd |
| Registration no. | 2021/906367/07 |
| Physical & Postal Address | 2nd Floor, Corporate Park, 4-6 Skeen Boulevard, Bedfordview 2007 |
| Phone | 087 098 0900 |
| Website | www.grandcom.co.za |
| Email | info@grandcom.co.za |

3.1. Chief Information Officer

| | |
|---|---|
| Name | Carel Martin |
| Designation | CEO |
| Telephone | 087 098 0900 |
| Email | cmartin@grandcom.co.za |

3.2. Deputy Information Officer

| | |
|---|---|
| Name | Brett Tod |
| Designation | CIO |
| Telephone | 087 098 0900 |
| Email | brett@grandcom.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 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;

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;

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

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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 145 and 516 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 157 and 528 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 229 and 5410 regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92

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-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://www. inforegulator.org.za).

## 5. CATEGORIES OF RECORDS AVAILABLE

| Types of Record | Available on Website | Available on Request |
|---|---|---|
| Company Information:<br>Contact details, Services, Company History, Terms & Conditions, Privacy Policy, Acceptable Use Policy, Information Regulator Certificate | X | |
| Company Records:<br>Incorporation documents, shareholder information | | X |
| Financial Records:<br>Tax returns, invoices, audit reports | | X |
| HR Records:<br>Employment contracts, leave records, performance reviews | | X |
| Client Records:<br>Contracts, correspondence, billing information | | X |
| Marketing Records:<br>Campaign data, analytics, social media content | | X |
| IT Records:<br>System logs, access controls, cybersecurity protocols | | X |

## 6. PROCESSING OF PERSONAL INFORMATION

6.1 Purpose of Processing Personal Information

6.1.1 Employment and HR purposes

6.1.2 Client service delivery

6.1.3 Marketing and communication

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6.1.4 Legal and regulatory compliance

6.2 Categories of data subjects and of the information or categories of information relating thereto:

| **Categories of Data Subjects** | **Personal Information that may be processed** |
|---|---|
| Customers / Clients | Name, address, registration numbers or identity number, VAT number, contact details |
| Service Providers | Names, registration number, address, trade secrets and bank details, VAT number, contact details |
| Employees | Date of birth, address, gender and race, citizenship, language, email address, marital status & number of dependents, ID number, tax number, contact details, qualifications, bank details. |

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

| **Category of personal information** | **Recipients or Categories of Recipients to whom the personal information may be supplied** |
|---|---|
| Identity number and names, for criminal checks | South African Police Services |
| Credit and payment history | Credit Bureaux |

6.4 Planned transborder flows of personal information:

Grandcom does not store any personal information in the cloud outside South Africa.

## 7. AVAILABILITY OF THE MANUAL

7.1 A copy of the Manual is available:

7.1.1 on our website www.grandcom.co.za;
7.1.2 Head Office, for public inspection during normal business hours;
7.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
7.1.4 to the Information Regulator upon request.

7.2 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.

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## 8. REQUEST PROCEDURE

To access records:

8.1 Complete **Form C**, which can be found on the Information Regulator's website. Specifically, it is available through the eServices portal.
8.2 Submit to the Information Officer via email or post
8.3 Pay applicable fees (if any)

## 9. UPDATING OF THE MANUAL

The CEO of Grandcom (Pty) Ltd will ensure that this manual is updated on a regular basis.

*Issued by:*

**CAREL MARTIN**
**CEO**

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