PAIA + POPIA + GDPR Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (as amended), the Protection of Personal Information Act (POPIA), and aligned with the EU General Data Protection Regulation (GDPR).

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1. Acronyms & Abbreviations

- **CEO** – Chief Executive Officer
- **IO** – Information Officer
- **DIO** – Deputy Information Officer
- **PAIA** – Promotion of Access to Information Act
- **POPIA** – Protection of Personal Information Act
- **GDPR** – General Data Protection Regulation
- **Regulator** – Information Regulator
- **Republic** – Republic of South Africa

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2. Purpose of this Manual

This manual aims to assist the public to:

- Know what records are held
- Know which records are automatically available
- Understand how to request access to records
- Identify contact persons (IO / DIO)
- Understand how personal information is processed
- Understand GDPR alignment where applicable
- Know how to appeal or lodge a complaint

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3. Contact Details for Access to Information

Company:
Leadify (Pty) Ltd
Republic of South Africa

Chief Information Officer

- **Name:** Grant Fleming

- **Email:** grant@leadify.biz

Company Address & Contacts

- **Physical Address:**
  32 Hilltop Street, Scarborough
- **Website:** www.leadify.biz

Requests for Access:
Requests must be made in writing on the prescribed **PAIA Request Form (Form 2)** and submitted to the IO or DIO at the addresses above. Requests must include sufficient detail to identify:

- The requested records
- The requester
- The right being exercised or protected

Prescribed fees may apply.

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4. Guide on How to Use PAIA & Obtain the Official Guide

The Information Regulator publishes a PAIA Guide in terms of Section 10 of the Act. The Guide explains:

- The objects of PAIA and POPIA
- The manner and form of requests
- Assistance available from the Information Regulator
- Legal remedies (appeals, complaints, court applications)
- Applicable fees
- Regulations under PAIA and POPIA

The Guide is available **free of charge** in all official languages and in braille from:

- **Website:** https://inforegulator.org.za

Email: enquiries@inforegulator.org.za

- **Post:** PO Box 31533, Braamfontein, 2017
- **Telephone:** +27 10 023 5200

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5. Records Available Without a Formal Request

- Personal information
- Record of all marketing

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6. Records Available Under Other Legislation

- **Companies Act 71 of 2008** – MOI, director/shareholder registers
- **Income Tax Act 58 of 1962** – Tax and related documents
- **Labour Relations Act 66 of 1995**
- **Basic Conditions of Employment Act 75 of 1997**
- **Employment Equity Act 55 of 1998**
- **Skills Development Act & UIF Act 63 of 2001** – Employment records
- **Occupational Health & Safety Act 85 of 1993**
- **COIDA Act 130 of 1993** – Health & safety records
- **FICA Act 38 of 2001** – Compliance documentation
- **Consumer Protection Act 68 of 2008** – Client records & complaints
- **Insurance Act 18 of 2017 (if applicable)** – Licensing & compliance

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7. Subjects & Categories of Records

Leadify holds records across the following areas:

7.1 Human Resources

Employee contracts, payroll, UIF, benefits, performance reviews, training, disciplinary records, leave, health & safety.

7.2 Finance & Corporate Governance

Budgets, financial statements, audits, tax records, B-BBEE certificates, board minutes, statutory registers.

7.3 Information Technology

IT policies, access logs, cybersecurity incidents, software licences, security controls.

7.4 Marketing & Communications

Brochures, advertising material, newsletters, client presentations, media publications.

7.5 Legal & Contracts

Commercial contracts, NDAs, litigation records, compliance reports.

7.6 Suppliers & Third Parties

Service level agreements, outsourcing agreements, supplier registers.

7.7 General Company Records

MOI, registrations, regulatory submissions, internal policies.

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8. Processing of Personal Information (POPIA)

8.1 Purpose of Processing

Personal information is processed for:

- Financial & insurance matching
- Risk, underwriting & claims
- FICA compliance
- Client communication & service delivery
- Contractual obligations
- Legal & regulatory compliance
- Data analytics & business development
- Recruitment & employment management
- Audit & governance

8.2 Categories of Data Subjects

- Employees (past & present)
- Suppliers & service providers
- Shareholders, directors & officers
- General public

8.3 Categories of Personal Information

- Identification data
- Contact details
- Employment data
- Supplier information
- IT system usage data

8.4 Recipients of Personal Information

- Financial institutions
- Regulators & auditors
- Business partners & service providers
- Legal representatives
- Group entities
- Lawfully authorised third parties

8.5 Cross-Border Transfers

Data may be transferred outside South Africa, including the EU, using:

- Adequacy decisions
- Standard contractual clauses
- Binding corporate rules
- Explicit consent

8.6 Security Measures

- ISO 27001-certified hosting
- Encryption (in transit and at rest)
- Multi-factor authentication
- Firewalls & intrusion detection
- Role-based access control
- Secure data disposal
- Staff training & audits

8.7 Data Subject Rights

Data subjects may:

- Access personal data
- Correct or delete information
- Restrict processing
- Request data portability
- Withdraw consent
- Lodge complaints with the Regulator

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9. GDPR Compliance Statement

Leadify aligns with GDPR principles when processing EU citizen data.

9.1 Lawful Basis for Processing

- Consent
- Contract
- Legal obligation
- Vital interests
- Legitimate interests

9.2 GDPR Data Subject Rights

- Access
- Rectification
- Erasure
- Restriction
- Data portability
- Objection
- Supervisory authority complaints

9.3 Data Transfers

Safeguards include adequacy decisions, contractual clauses, and consent.

9.4 Data Protection Measures

Encryption, access controls, audit logging.

9.5 Data Protection Officer

- **Name:** David Farrell
- **Email:** support@leadify.biz

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10. Availability of this Manual

This manual is available:

- On the company website
- At head office during office hours
- On request from the Information Officer

A fee may apply.

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11. Grounds for Refusal of Access to Records

11.1 Protection of Third Parties

Privacy, trade secrets, financial interests, confidential information.

11.2 Protection of Safety & Property

Where disclosure threatens life, safety, or security.

11.3 Privileged Records

Legally privileged materials.

11.4 Protection of Leadify's Commercial Interests

Trade secrets, competitive harm, negotiations, proprietary systems.

11.5 Research Information

Protection of researchers and methodologies.

11.6 Frivolous or Vexatious Requests

Unreasonable diversion of resources.

11.7 Overriding Public Interest

Disclosure required for serious legal contraventions or public safety.