



# PAIA MANUAL

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

V1.02.25

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## 1. LIST OF DEFINITIONS, ACRONYMS AND ABBREVIATIONS

- 1.1 "CEO" means the Chief Executive Officer;
- 1.2 "CTRL Group" means, collectively, Ctrl Investment Holdings Proprietary Limited, Ctrl Financial Intermediaries Proprietary Limited and Ctrl Technologies Proprietary Limited and their respective subsidiaries (to the extent applicable);
- 1.3 "IO" means the Information Officer of Ctrl Technologies Proprietary Limited;
- 1.4 "Minister" means the Minister of Justice and Correctional Services;
- 1.5 "PAIA" means the Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.6 "PAIA Manual" means this document, including all annexures attached thereto;
- 1.7 "POPIA" means the Protection of Personal Information Act No. 4 of 2013;
- 1.8 "Regulator" means the Information Regulator (South Africa); and
- 1.9 "Republic" means the Republic of South Africa.

## 2. PURPOSE OF PAIA MANUAL

Section 51 of PAIA requires all private bodies registered in the Republic to prepare and make available a manual to the public regarding access to records held by the private body. This PAIA Manual has been compiled for Ctrl Technologies Proprietary Limited ("CTRL" or "we") and is useful for the public to:

- 2.1 check the categories of records held by CTRL 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 and the categories of records held by CTRL;
- 2.3 know the description of the records held by CTRL which are available in accordance with any other applicable legislation;
- 2.4 access all the relevant contact details of CTRL's IO who will assist the public with the records they request access to;
- 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 the description of CTRL's processing activities in terms of POPIA, including information about the purpose of processing of personal information as well as the description of the categories of data subjects and of the information or categories of information relating thereto;

- 2.7 know the recipients or categories of recipients with whom CTRL may share personal information with;
- 2.8 know if CTRL has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be transferred to; and
- 2.9 know whether CTRL has implemented appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which CTRL processes.

### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CTRL

#### 3.1 Information Officer

Name: Pieter Jacobus Venter  
Tel: 27832870250  
Email: pieter@ctrltechnologies.co.za

#### 3.2 Access to information general contacts

Email: info@ctrltechnologies.co.za

#### 3.3 National or Head Office

CEO Pieter Jacobus Venter  
Registration number 2017/184385/07  
Postal Address: La Concorde / KWV Building, 57 Main Rd, Paarl, 7646  
Physical Address: La Concorde / KWV Building, 57 Main Rd, Paarl, 7646  
Telephone: 0600602875  
Email: info@ctrltechnologies.co.za  
Website: www.ctrltechnologies.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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 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 11<sup>3</sup>; and
  - 4.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;
- 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
  - 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;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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.*

- 4.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> 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 15<sup>7</sup> and 52<sup>8</sup> 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 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92<sup>11</sup>.
- 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 IO using the prescribed Form 1, attached hereto marked "Annexe B";
  - 4.5.2 from the website of the Regulator (<https://info regulator.org.za/>).

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

4.6 A copy of the Guide is also available in the following one official language, for public inspection at our registered address, during normal office hours: English.

4.7 The Guide can also be obtained at the Regulator's physical address below. Further, you can address any queries regarding the Guide, PAIA-related and POPIA-related complaints to the Regulator at:

Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191

P.O. Box 31533, Braamfontein, Johannesburg, 2017

email (POPIA complaints): POPIAComplaints@inforegulator.org.za

email (PAIA complaints): PAIAComplaints@inforegulator.org.za

email (general enquiries): enquiries@inforegulator.org.za

## 5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1 CTRL does not have a separate notice of records automatically available to requesters. The provisions of this paragraph 5 constitute the entire list of records automatically available for purposes of section 51(1)(b)(ii) of the Act; these records being:

| Category of records                                       | Available on Website |
|-----------------------------------------------------------|----------------------|
| Privacy Policy                                            | X                    |
| Terms of Use                                              | X                    |
| Newsletters and blog posts                                | X                    |
| All information displayed and/or available on our Website | X                    |

5.2 Records marked as available on website may be accessed at CTRL's website via the following link: <https://ctrltechnologies.co.za>. Copies of any of the above records may also be requested from our Information Officer using the contact details set out in paragraph 3 above. Please note that certain prescribed reproduction fees may apply for physical copies, as set out in the table attached to this Manual, marked "Annexe C".

## 6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1 We are required by law to keep certain records. These records are enumerated in various Acts of Parliament, as detailed below:

- Companies Act No. 71 of 2008
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No. 4 of 2013
- Employment Equity Act No. 55 of 1998
- Basic Conditions of Employment Act No. 75 of 1997
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Unemployment Insurance Act No. 63 of 2001
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Electronic Communications and Transactions Act No. 25 of 2002
- Competition Act No. 89 of 1998
- Patents Act No. 57 of 1978
- Trademarks Act No. 194 of 1993
- Designs Act No. 195 of 1993
- Consumer Protection Act No. 68 of 2008
- Tax Administration Act No. 28 of 2011
- Cybercrimes Act No. 19 of 2020

6.2 Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

6.3 It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.



**7. DESCRIPTION OF THE SUBJECTS ON WHICH CTRL HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT**

| Subjects on which the body holds records | Categories of records                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company documents and Legal Records      | <ul style="list-style-type: none"> <li>• Company policies</li> <li>• Company directives</li> <li>• Records of subsidiaries and related entities</li> <li>• Names of Directors</li> <li>• Operational records</li> <li>• Trademarks and patents</li> <li>• Registered designs</li> <li>• Legal records</li> <li>• Domain name registration</li> <li>• Insurance policies</li> </ul>                                                                                          |
| Strategic Positioning                    | Annual Reports, Strategic Plan, Compliance Reports                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Financial and accounting                 | <ul style="list-style-type: none"> <li>• Financial records and reports</li> <li>• Accounting records</li> <li>• Audit records and reports</li> <li>• Transactional records</li> <li>• Management accounts</li> <li>• Banking records</li> <li>• Bank facilities and account details</li> <li>• Investment details and statements</li> </ul>                                                                                                                                 |
| Human Resources/employment records       | <ul style="list-style-type: none"> <li>• Employment contract</li> <li>• Advertised posts</li> <li>• Employees records</li> <li>• Recruitment records</li> <li>• Service Agreements</li> <li>• Employment Conditions and Policies</li> <li>• Confidentiality Agreements</li> <li>• Restraints of Trade Agreements</li> <li>• Disciplinary records</li> <li>• CCMA records</li> <li>• Remuneration and benefits records</li> <li>• Training schedules and material</li> </ul> |
| Customer information                     | <ul style="list-style-type: none"> <li>• Customer records, including customer personal information provided</li> <li>• Customers records provided to third parties acting for and on behalf of CTRL</li> <li>• Software licensing records</li> <li>• User authentication data</li> <li>• Technical support history</li> <li>• Software usage and analytics data</li> <li>• All information relating to or held on behalf of clients</li> </ul>                              |
| Supplier information                     | <ul style="list-style-type: none"> <li>• Contracts with suppliers</li> <li>• Records generated by or within the company pertaining to suppliers including transactional record</li> </ul>                                                                                                                                                                                                                                                                                   |

| Subjects on which the body holds records    | Categories of records                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Information technology                      | <ul style="list-style-type: none"> <li>• Business and data information</li> <li>• IT Technology capabilities</li> <li>• Systems and user manuals</li> <li>• Cloud infrastructure</li> <li>• Cybersecurity and data processing information</li> <li>• Technical architecture</li> </ul>                                                                |
| Marketing                                   | Marketing and advertising records                                                                                                                                                                                                                                                                                                                     |
| Communication                               | <ul style="list-style-type: none"> <li>• Internal correspondence and memorandums</li> <li>• Correspondence to persons outside of the company</li> <li>• Minutes of meetings</li> </ul>                                                                                                                                                                |
| Regulatory and Compliance Records           | <ul style="list-style-type: none"> <li>• Cybersecurity compliance records</li> <li>• Data protection impact assessments</li> <li>• Software security audit reports</li> <li>• Penetration testing and vulnerability assessment records</li> <li>• POPIA compliance documentation specific to technology operations</li> </ul>                         |
| Software Development Records                | <ul style="list-style-type: none"> <li>• Source code repositories and version control records</li> <li>• Software development documentation and specifications</li> <li>• Testing records and quality assurance documentation</li> <li>• Software release notes and deployment records</li> <li>• API documentation and integration guides</li> </ul> |
| Intellectual Property and Technology Assets | <ul style="list-style-type: none"> <li>• Software licensing agreements and terms</li> <li>• Proprietary algorithms and technical documentation</li> <li>• Third-party software licenses and compliance records</li> <li>• Technology transfer agreements</li> </ul>                                                                                   |
| Customer/Client Technology Records          | <ul style="list-style-type: none"> <li>• Software service agreements and SLAs</li> <li>• User account management and access records</li> <li>• Technical support tickets and resolution logs</li> <li>• Customer usage analytics and performance data</li> <li>• Software customisation and configuration records</li> </ul>                          |
| Technology Infrastructure Records           | <ul style="list-style-type: none"> <li>• Server and hosting configuration records</li> <li>• Security incident reports and response logs</li> <li>• System backup and disaster recovery records</li> <li>• Network infrastructure documentation</li> </ul>                                                                                            |

| Subjects on which the body holds records | Categories of records                                                                                              |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
|                                          | <ul style="list-style-type: none"> <li>Cloud service provider agreements and data processing agreements</li> </ul> |

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

8.1.1 CTRL processes personal information in accordance with POPIA and for reasons set out in our privacy policy, which is available on our website at <https://www.ctrltechnologies.co.za> and is also attached hereto, marked "Annexe D"). In particular, CTRL processes personal information for the following purposes:

- 8.1.1.1 to provide software licensing and user account management services, including user authentication, access control, and software activation;
- 8.1.1.2 to provide technical support and customer service, such as handling inquiries, troubleshooting, bug reports, and technical assistance;
- 8.1.1.3 for our marketing and promotional activities;
- 8.1.1.4 for software development and improvement, including user analytics, performance monitoring, and feature enhancement;
- 8.1.1.5 for compliance with statutory obligations;
- 8.1.1.6 for recruitment and management of employee relationships;
- 8.1.1.7 for payroll processing, benefits administration, performance evaluations, and compliance with labor laws;
- 8.1.1.8 for system maintenance and security monitoring, including cybersecurity incident response and data protection;
- 8.1.1.9 for API access management and third-party integrations;
- 8.1.1.10 for customer relations;
- 8.1.1.11 for operational needs, including management of relationships with suppliers and vendors;
- 8.1.1.12 to ensure the security and safety of customers, employees, affiliates, service providers and property;

- 8.1.1.13 for administrative and legal purposes, including handling internal operations, complying with legal processes, and addressing any legal disputes or claims; and
- 8.1.1.14 for data and software usage analytics, and business intelligence and development activities, such as improving our technology services and developing new features.
- 8.1.1.15 Historical record keeping, research and recording statistics necessary for fulfilling CTRL's' business objectives.

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

| <b>Categories of Data Subjects</b>            | <b>Personal Information that may be processed</b>                                                                                                                                                    |
|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customers / Clients / Software Users          | name, address, registration numbers or identity numbers, email address, online identifier, employment status, user credentials, software licensing information, usage analytics.                     |
| Software End-Users                            | user account information, authentication credentials, software usage data, technical support history.                                                                                                |
| API Users and Developers                      | developer credentials, API access keys, integration documentation requests, technical contact information                                                                                            |
| Beta Testers and Trial Users                  | contact information, feedback data, software testing results, usage analytics during trial periods                                                                                                   |
| Service Providers / Technology Partners       | names, registration number, vat numbers, address, trade secrets, technical specifications, integration requirements, and bank details                                                                |
| Employees/prospective employees and directors | name, performance evaluations, health and financial information, employment history, payroll information, address, qualifications, gender and race, technical access credentials, system permissions |

| <b>Categories of Data Subjects</b>        | <b>Personal Information that may be processed</b>                                                                        |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
|                                           |                                                                                                                          |
| Industry bodies / Technology Associations | membership records, certification information, compliance documentation                                                  |
| General public / Website Visitors         | information from general inquiries and interactions on the CTRL website, IP addresses, browser information, session data |
| Media / Technical Publications            | interaction records with media personnel, technical documentation requests, product information inquiries                |

8.3

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

| <b>Category of personal information</b>                                  | <b>Recipients or Categories of Recipients to whom the personal information may be supplied</b> |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Identity number and names, for criminal and anti-money laundering checks | South African Police Services, Financial Intelligence Centre (FIC)                             |
| Qualifications, for qualification verifications                          | South African Qualifications Authority                                                         |
| Software licensing and usage data                                        | Cloud service providers and hosting platforms                                                  |
| Technical support and system data                                        | Third-party software vendors and integration partners                                          |

| Category of personal information               | Recipients or Categories of Recipients to whom the personal information may be supplied                             |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Employee details                               | Employee payroll details                                                                                            |
| Customer, employee and/or supplier information | Members of the CTRL Group, including employees, subsidiary companies, associates, assignees and successors in title |
| Customer, employee and/or supplier information | Statutory authorities                                                                                               |
| Customer, employee and/or supplier information | Courts of law and/or tribunals                                                                                      |
| API access and authentication data             | Authentication service providers                                                                                    |
| Software analytics and performance data        | Business intelligence and analytics platforms                                                                       |

## 8.4

**Planned transborder flows of personal information**

| Country      | Category of personal information                                                                                                                                                                                                                                            |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ireland (EU) | Name, surname, gender, marital status, age, language, identity number, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, including software usage analytics, technical support data |

We will only transfer personal information to third parties outside of the Republic (i) after we have made sure there are arrangements in place to adequately protect the personal information under the recipients' applicable country laws or in terms of an agreement with the recipient; (ii) where the transfer of the personal information is necessary for CTRL or any member of the CTRL Group to conclude, or perform,

under a contract with the data subject or a contract with a third party that is in the data subject's interest; (iii) where the data subject has consented to the transfer of the personal information; (iv) where it is not reasonably practical to obtain the data subject's consent but the transfer is for the data subject's benefit; and/or (v) where the transfer is necessary for the performance of software services, technical support, or system maintenance that the data subject has requested.

## 8.5 **Personal information received from third parties**

- 8.5.1 For personal information received from a third party on behalf of a data subject, CTRL shall require confirmation that they have written consent from the data subject, that they are aware of the contents of this PAIA manual and the CTRL Privacy Policy, and do not have any objection to CTRL processing their information in accordance with this manual and policy.

## 8.6 **General description of Information Security Measures to be implemented by CTRL to ensure the confidentiality, integrity and availability of the information**

- 8.6.1 CTRL is implementing an Information Security Management System (ISMS) based on the ISO/IEC 27001 framework to ensure the confidentiality, integrity, and availability of its information assets. This includes the establishment of risk-based security controls, policies, and procedures aligned with international best practices. Key measures include access control, data encryption, regular vulnerability assessments, incident response protocols, and continuous staff awareness training. These measures are designed to protect information from unauthorized access, alteration, and loss, while ensuring business continuity and regulatory compliance.
- 8.6.2 Where identifiable information is not needed, data is deleted or anonymised. Access to data is controlled based on staff roles and authorized on a need to access basis. Documents are encrypted and password protected and access is controlled by sessions. Employee computers are protected by passwords and backend systems are additionally protected by multi-factor authentication methods.

## 9. **MAKING A REQUEST IN TERMS OF PAIA**

- 9.1 Requests to access to records held by CTRL must be made using “**Request Form 2**”, attached hereto, marked “*Annexe A*”. Request Form 2 must be addressed to the IO and must be submitted with the prescribed fee, as set out in the table attached to this Manual, marked “*Annexe C*”.

- 9.2 You are also able to get the form together with a list of applicable fees from the CTRL registered head office or via the email address provided above.
- 9.3 The applicable fee, if any, must be paid before access to a record is allowed. You will be informed of the amount of your fees once you have submitted your request. The Minister may exempt certain persons from having to pay the fees referred to in PAIA. If the request is made orally as a result of illiteracy or a disability of a requester, the IO will assist you to complete the prescribed form.
- 9.4 The requester must provide enough detail on the request form to enable the IO to identify the record and the requester. The requester should also indicate which form (mode/method) of access is required. The requester should indicate if it requires notice of the decision of the IO in any manner, other than in writing.
- 9.5 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 9.6 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the IO.

## **10. ACCESS TO AUTOMATICALLY AVAILABLE RECORDS**

Information that is automatically available can be obtained from CTRL's website or requested via email. In certain instances, a reproduction fee may be charged as set out paragraph 12 below. Transcription and copying of records in other media will also attract reproduction fees.

## **11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS**

- 11.1 CTRL may deny access to certain records on the basis of the grounds set out in PAIA. These include:
- 11.1.1 mandatory protection of the privacy of a third party who is a natural person, including a deceased individual;
  - 11.1.2 mandatory protection of commercial information of a third party;
  - 11.1.3 mandatory protection of certain confidential information, special personal information and confidential information of a third party;
  - 11.1.4 mandatory protection of the safety of individuals and protection of property;
  - 11.1.5 mandatory protection of records privileged from production in legal proceedings; and/or



- 11.1.6 mandatory protection of research information of a third party.
- 11.2 CTRL may deny access to commercial information if the record:
  - 11.2.1 contains trade secrets of a third party;
  - 11.2.2 contains financial, commercial, scientific or technical information, the disclosure of which would be likely to harm the commercial or financial interests of a third party's company; or
  - 11.2.3 contains information, the disclosure of which would reasonably be expected to put a third party's company at a disadvantage in contractual or other negotiations, or to prejudice the company in commercial competition.
- 11.3 The head of a private body must refuse a request for access to a record of CTRL if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

## 12. FEES

- 12.1 A requester who seeks access to a record containing personal information must pay the required request fee.
- 12.2 The IO must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.
- 12.3 The requester may lodge an application to the high court relating to the payment of the request fee.
- 12.4 After the IO has decided on the request, the requester will be notified in the required form.
- 12.5 If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.
- 12.6 A fee for a copy of this Manual, shall be payable per each A4-size photocopy made. The prescribed fees as determined by the Information Regulator are set out in a table attached to this Manual, marked ""Annexe C". The prescribed fees are also available from the IO and from the Regulator, whose contact details are set out in paragraph 4.5 above.

## 13. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- 13.1 at the registered head office of CTRL for public inspection during normal business hours;
- 13.2 to any person upon request and upon the payment of a reasonable prescribed fee (if any); and
- 13.3 to the Regulator upon request.

#### 14. **UPDATING OF THE MANUAL**

The head of Ctrl Technologies (Pty) Ltd will on a regular basis update this manual.

***Issued by***

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**(Pieter Jacobus Venter)**

**(Chief Executive Officer)**

## 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  
 person.

☐ Request is made on behalf of another  
 person.

| PERSONAL INFORMATION                                                                |           |  |            |
|-------------------------------------------------------------------------------------|-----------|--|------------|
| Full Names                                                                          |           |  |            |
| Identity Number                                                                     |           |  |            |
| Capacity in which request is made<br><i>(when made on behalf of another person)</i> |           |  |            |
| 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 |  |           |
| <p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><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></p> |          |  |           |
| Description of record or relevant part of the record:                                                                                                                                                                                                                                                                                                                                  |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
| Reference number, if available                                                                                                                                                                                                                                                                                                                                                         |          |  |           |
| Any further particulars of record                                                                                                                                                                                                                                                                                                                                                      |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
| <p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>                                                                                                                                                                                                                                                                         |          |  |           |
| 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                                                                                                                                                                                                                                                                                                             |          |  |           |

| <b>FORM OF ACCESS</b><br><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                                                                                                                         |  |

| <b>MANNER OF ACCESS</b><br><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                                                                                                                                                                                                                             |  |
| Preferred language<br><i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>                                                                            |  |

| <b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b><br><i>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.</i> |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 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<br>(Please specify) |
|----------------|-----------|----------------------------------------------|
|                |           |                                              |

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

|                                                                               |  |
|-------------------------------------------------------------------------------|--|
| Reference number:                                                             |  |
| Request received by:<br>(State Rank, Name And Surname of Information Officer) |  |
| Date received:                                                                |  |
| Access fees:                                                                  |  |
| Deposit (if any):                                                             |  |

\_\_\_\_\_  
**Signature of Information Officer**

## Annexe B

## FORM 1

## REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

|  |
|--|
|  |
|  |
|  |
|  |

I,

|                                              |                     |  |           |  |
|----------------------------------------------|---------------------|--|-----------|--|
| Full names:                                  |                     |  |           |  |
| In my capacity as (mark with "x"):           | Information officer |  | Other     |  |
| Name of *public/private body (if applicable) |                     |  |           |  |
| Postal Address:                              |                     |  |           |  |
| Street Address:                              |                     |  |           |  |
| E-mail Address:                              |                     |  |           |  |
| Facsimile:                                   |                     |  |           |  |
| Contact numbers:                             | Tel.(B):            |  | Cellular: |  |

Hereby request the following copy (ies) of the Guide:

| Language (mark with "X") |            | No of copies | Language(mark with "X")  |          | No of copies |
|--------------------------|------------|--------------|--------------------------|----------|--------------|
| <input type="checkbox"/> | Sepedi     |              | <input type="checkbox"/> | Sesotho  |              |
| <input type="checkbox"/> | Setswana   |              | <input type="checkbox"/> | siSwati  |              |
| <input type="checkbox"/> | Tshivenda  |              | <input type="checkbox"/> | Xitsonga |              |
| <input type="checkbox"/> | Afrikaans  |              | <input type="checkbox"/> | English  |              |
| <input type="checkbox"/> | isiNdebele |              | <input type="checkbox"/> | isiXhosa |              |
| <input type="checkbox"/> | isiZulu    |              |                          |          |              |

Manner of collection (mark with "x"):

| Personal collection      | Postal address           | Facsimile                | Electronic communication (Please specify) |
|--------------------------|--------------------------|--------------------------|-------------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>                  |

Signed at \_\_\_\_ this \_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_

## Annexe C

**PRESCRIBED FEES FOR ACCESS TO INFORMATION IN TERMS OF PAIA<sup>12</sup>**

| Item | Description                                                                                                                                                                                           | Amount                                                                    |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| 1.   | The request fee payable by every requester                                                                                                                                                            | R140.00                                                                   |
| 2.   | Photocopy/printed black & white copy of A4-size page                                                                                                                                                  | R2.00 per page or part thereof.                                           |
| 3.   | Printed copy of A4-size page                                                                                                                                                                          | R2.00 per page or part thereof.                                           |
| 4.   | For a copy in a computer-readable form on:<br>(iii) Flash drive (to be provided by requestor)<br>(iv) Compact disc<br>• If provided by requestor<br>• If provided to the requestor                    | R40.00<br>R40.00<br>R60.00                                                |
| 5.   | For a transcription of visual images per A4-size page                                                                                                                                                 | Service to be outsourced. Will depend on quotation from Service provider. |
| 6.   | Copy of visual images                                                                                                                                                                                 |                                                                           |
| 7.   | Transcription of an audio record, per A4-size page                                                                                                                                                    | R24.00                                                                    |
| 8.   | Copy of an audio record on:<br>(v) Flash drive (to be provided by requestor)<br>(vi) Compact disc<br>• If provided by requestor<br>• If provided to the requestor                                     | R40.00<br>R40.00<br>R60.00                                                |
| 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.<br>To not exceed a total cost of | R145.00<br><br>R435.00                                                    |
| 10.  | Deposit: If search exceeds 6 hours                                                                                                                                                                    | One third of amount per request calculated in terms of items 2 to 8.      |
| 11.  | Postage, e-mail or any other electronic transfer                                                                                                                                                      | Actual expense, if any.                                                   |

<sup>12</sup> Applicable to Private Bodies. Last Updated November 2023.



## **Ctrl Technologies (Pty) Ltd Privacy Policy**

### **1. Introduction**

We respect your privacy and take it very seriously. We are Ctrl Technologies (Pty) Ltd (registration number 2017/184385/07), and this policy outlines our approach to protecting your Personal Information. It describes how we collect, use, disclose, and store your Personal Information in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**") and other applicable South African legislation.

This privacy policy forms part of and is incorporated by reference into our terms and conditions of service.

### **2. Application**

This policy applies when you visit our website, use our software, or engage with our services as a customer, contractor, employee, or any other person whose Personal Information we process.

### **3. Definitions**

In this policy:

- 3.1 "CTRL", "we", "us", or "our" refers to Ctrl Technologies (Pty) Ltd (registration number 2017/184385/07);
- 3.2 "Personal Information" means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA;
- 3.3 "Processing" includes any operation or activity concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation, use, dissemination, merging, linking, restriction, degradation, erasure or destruction;
- 3.4 "Data subject" or "You" means the person to whom Personal Information relates.

## 4. Personal Information

### 4.1 Scope

4.1.1 We may collect Personal Information:

4.1.1.1 Automatically when you visit our website and software platforms;

4.1.1.2 Through registration and submission of forms or applications;

4.1.1.3 Through service requests and technical support interactions;

4.1.1.4 When you voluntarily provide information to us; and

4.1.1.5 Through our business relationships with clients, suppliers, and partners.

4.1.2 This policy does not apply to anonymous, de-identified, statistical, and public information.

### 4.2 Your Obligations

4.2.1 You may only provide your own Personal Information, or that of another person if you have their permission to do so.

4.2.2 You warrant that all Personal Information provided to us is true and accurate to the best of your knowledge.

4.2.3 You must promptly notify us of any changes to your personal information.

### 4.3 Categories of Personal Information Processed

We may process the following categories of Personal Information:

4.3.1 Identity Data: name, surname, identity number, date of birth, gender, nationality;

4.3.2 Contact Data: email address, telephone numbers, physical address, postal address;

4.3.3 Professional Data: job title, employer details, professional qualifications, business contact information;

4.3.4 Financial Data: bank account details, payment information, billing address, transaction history;

- 4.3.5 Technical Data: IP address, browser type and version, device information, operating system, login data, usage analytics;
- 4.3.6 Software Usage Data: application performance metrics, feature usage statistics, error logs, system configuration data, API usage data;
- 4.3.7 Communication Data: correspondence records, support tickets, feedback, survey responses; and
- 4.3.8 Marketing Data: preferences for receiving marketing communications, communication history.

## 5. **Acceptance and Changes**

### 5.1 **Acceptance**

You may not use our services if you do not accept this policy. By using our services, you consent to the processing of your personal information as described in this policy.

### 5.2 **Changes**

We may update or amend this policy from time to time. We will notify you of material changes by posting the updated policy on our website and, where required by law, by direct communication. The updated policy will be effective from the date of posting unless otherwise specified. Continued use of our services after notification implies acceptance of the updated policy.

## 6. **Collection**

### 6.1 **Lawful basis for processing**

We process Personal Information on the following lawful grounds under POPIA:

- 6.1.1 Consent of the data subject;
- 6.1.2 Processing is necessary for the performance of a contract to which the data subject is party;
- 6.1.3 Processing is necessary for compliance with a legal obligation; and/or
- 6.1.4 Processing is necessary for pursuing the legitimate interests of ourselves or a third party.

## 6.2 Means of processing

We collect Personal Information in the following ways:

### 6.2.1 Automatically through our Website

We automatically collect internet usage data, including IP address, browser details, and usage information, to optimize your experience. This may include cookies, web beacons, and similar tracking technologies.

### 6.2.2 Automatically through Software

We collect usage analytics and performance data through software tools to improve our offerings. This includes software performance metrics, error logs, feature usage statistics, and system configuration data.

### 6.2.3 On Registration or Submission

We collect identifying information upon registration or submission, including but not limited to name, email address, contact details, company information, and authentication credentials.

### 6.2.4 Through Service Requests

We collect necessary information when you request services, including technical support requests, customisation requirements, and service specifications.

### 6.2.5 Voluntarily

We collect optional information that you provide voluntarily, such as feedback, survey responses, and additional contact preferences.

## 6.3 Consent to Collection

We obtain your consent to collect Personal Information when required by law. Where we rely on consent, you have the right to withdraw your consent at any time, though this may affect our ability to provide certain services.

## 6.4 Purpose for Collection

We process your data for the following specific purposes:

- 6.4.1 Software licensing and user account management;
- 6.4.2 Technical support and customer service;
- 6.4.3 Software development and improvement;
- 6.4.4 System maintenance and security monitoring;
- 6.4.5 Marketing and promotional activities (with consent);
- 6.4.6 Compliance with legal and regulatory obligations;
- 6.4.7 Employment and contractor management;
- 6.4.8 Financial administration and payment processing; and
- 6.4.9 Business analytics and performance monitoring.

## **7. Use**

### **7.1 Processing**

We process your Personal Information to fulfil our obligations to you, including service delivery, contract performance, and customer support.

### **7.2 Cookies**

We use cookies for personalization and analytics. You may disable cookies through your browser settings, but certain functionalities may be limited.

### **7.3 Messages**

We may send you administrative and update messages about our services, including service notifications, security alerts, and system updates.

### **7.4 Promotional Messages**

We may send promotional messages, but you may opt out at any time by following the unsubscribe instructions in the message or contacting us directly.

### **7.5 Targeted Content**

We may use automated processes to deliver targeted content and personalised user experiences based on your usage patterns and preferences.

## 7.6 Data Quality

We take reasonable steps to ensure that Personal Information is complete, accurate, not misleading, and updated where necessary.

## 8. Disclosure

### 8.1 Sharing

We may share your information with:

- 8.1.1 members of the CTRL Group, including our affiliates, divisions, subsidiaries, holding companies, and associated entities;
- 8.1.2 Service providers and contractors assisting in service delivery under appropriate confidentiality obligations;
- 8.1.3 Third parties as required by law;
- 8.1.4 Cloud service providers and hosting platforms;
- 8.1.5 Software vendors and integration partners;
- 8.1.6 Payment processors and financial institutions; and
- 8.1.7 Professional advisers including lawyers, auditors, and consultants.

### 8.2 Third Party Obligations

We require third parties who receive Personal Information from us to implement appropriate safeguards and use the information only for the purposes for which it was disclosed.

### 8.3 Mandatory Disclosure

We may disclose information for:

- 8.3.1 Regulatory compliance;
- 8.3.2 Law enforcement requirements; and
- 8.3.3 Legal proceedings.

#### 8.4 **Marketing Purposes**

We may disclose anonymized statistical data for business analysis, provided such data cannot be used to identify individuals.

#### 8.5 **Personnel**

Our personnel may access personal data when necessary for their duties and are bound by confidentiality obligations.

#### 8.6 **Change of Ownership**

If our ownership changes, we may transfer your personal data accordingly as part of the business transfer, subject to the same privacy protections.

### 9. **Storage**

#### 9.1 **Data Retention**

We store data securely for as long as necessary to fulfil our obligations, comply with laws, or as required by contractual agreements. We have implemented a data retention schedule that specifies retention periods for different categories of personal information.

#### 9.2 **Access and Your Rights**

Under POPIA, you have the right to:

- 9.2.1 request access to your Personal Information;
- 9.2.2 request correction or deletion of your Personal Information;
- 9.2.3 object to or withdraw consent to the processing of your Personal Information;
- 9.2.4 request restriction of processing of your Personal Information; and
- 9.2.5 lodge a complaint with the Information Regulator.

We will verify your identity before fulfilling such requests and respond within the timeframes required by law.

### 9.3 **Accuracy**

We strive to keep personal data accurate and up to date. You are responsible for ensuring that Personal Information you provide to us is accurate and current.

### 9.4 **Participation**

We may ask you to update your information to maintain accuracy. You may update your information through your user account or by contacting us directly.

### 9.5 **Transborder Flows**

9.5.1 We may transfer your Personal Information to countries outside South Africa for processing.

9.5.2 Such transfers will only occur where:

9.5.2.1 The country has been designated as providing adequate protection by the Information Regulator;

9.5.2.2 Appropriate safeguards are in place, such as standard contractual clauses;

9.5.2.3 You have provided explicit consent after being informed of the risks; or

9.5.2.4 The transfer is necessary for the performance of our contract with you.

9.5.3 Current transborder flows include transfers to Ireland (and the United States of America for limited services) for cloud services purposes.

### 9.6 **Security Measures**

We implement appropriate technical and organisational measures to secure personal information, including:

9.6.1 Access controls and authentication systems;

9.6.2 Encryption of data in transit and at rest;

9.6.3 Regular security assessments and monitoring;

9.6.4 Staff training on data protection; and

9.6.5 Incident response procedures.



## 10. General

### 10.1 Updating or Removing Data

You can update or remove your data via our website or by contacting us. Requests for data deletion will be processed in accordance with our legal obligations and may require verification of your identity.

### 10.2 Limitation

We are not responsible for third-party privacy practices. This policy does not apply to third-party websites, applications, or services that may be linked to or integrated with our services.

### 10.3 Enquiries

10.3.1 For any enquiries regarding this privacy policy or your Personal Information, please contact our Information Officer:

Name: Pieter Jacobus Venter

Tel: 27832870250

Email: [security@ctrltechnologies.co.za](mailto:security@ctrltechnologies.co.za)

10.3.2 For any general questions or queries, please contact us:  
[info@ctrltechnologies.co.za](mailto:info@ctrltechnologies.co.za)

10.3.3 If you are not satisfied with our response to your privacy concerns, you may lodge a complaint with the Information Regulator of South Africa:

Website: [www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Telephone: 012 406 4818

### 10.4 Governing Law

This privacy policy is governed by South African law, including POPIA and other applicable data protection legislation.