

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”)

Cintoblox (PTY) Ltd

Registration Number: 2012/005463/07

Physical & Postal Address: Lomac Business Park, 122 Richards, Midrand, 1686

1. INTRODUCTION AND PURPOSE OF THIS MANUAL

This PAIA Manual is prepared in accordance with **Section 51 of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”)**, read together with the **Protection of Personal Information Act, 4 of 2013 (“POPIA”)**. Its purpose is to provide a comprehensive framework for requesting access to records held by **Cintoblox (PTY) Ltd** (“the Company”), to outline the categories of information maintained by the Company, and to set out the statutory procedures governing such access.

This Manual gives effect to the constitutional right of access to information as contemplated in **Section 32 of the Constitution of the Republic of South Africa, 1996**, and promotes transparency, accountability, and lawful information governance. It applies to all records under the possession or control of the Company, whether created before or after the commencement of PAIA.

2. CONTACT DETAILS OF THE INFORMATION OFFICER

Information Officer

Name: Mr Travern Reddy

Position: Chief Executive Officer

Email: info@cintoblox.co.za

Telephone: 011 312 1011

Office Hours: 08:00 to 16:30, Monday to Friday (excluding public holidays)

Address: Lomac Business Park, 122 Richards, Midrand, 1686

Deputy Information Officer / Designated Contact Person

Name: Ms Shashmika Gopaul

Email: info@cintoblox.co.za **Telephone:** 011 312 1011

The Information Officer is responsible for ensuring compliance with PAIA and POPIA, processing and responding to access requests, and liaising with the Information Regulator.

3. GUIDE ON HOW TO USE PAIA (SECTION 10)

In terms of **Section 10 of PAIA**, the Information Regulator has published a Guide to assist individuals in understanding how to exercise their rights under PAIA. The Guide is available from the Information Regulator's website and may be requested directly from their offices.

4. RECORDS HELD BY Cintoblox (PTY) Ltd

The Company maintains various categories of records in accordance with statutory requirements and operational needs. These records may be automatically available, or they may require a formal PAIA request.

4.1 Records Automatically Available (Section 52(2))

Certain records are available without the need for a formal PAIA request. These include publicly accessible information such as the Company's profile, marketing material, and information published on the Company's website. These records are intended for general public consumption and do not contain confidential or restricted information.

4.2 Records Available Upon Request (Section 50)

In terms of **Section 50 of PAIA**, a requester may access records of a private body if the record is required for the exercise or protection of a right and the requester complies with the procedural requirements of PAIA. The following categories of records are held by the Company:

A. HUMAN RESOURCES RECORDS

The Company maintains a comprehensive suite of human resources records as required by labour legislation and internal governance practices. These include detailed documentation required under the **Basic Conditions of Employment Act**, such as employee working hours, overtime records, remuneration details, and written particulars of employment. These records ensure compliance with statutory employment obligations and provide a factual basis for employment-related decisions.

The Company also retains formal **employment contracts**, which define the terms and conditions of employment, including duties, remuneration, working hours,

confidentiality obligations, and termination provisions. These contracts serve as the legal foundation of the employment relationship.

In addition, the Company maintains **leave records**, documenting all forms of employee leave, including annual, sick, family responsibility, and unpaid leave. These records are essential for ensuring compliance with statutory leave entitlements and for managing workforce availability.

The Company further retains **disciplinary and grievance documentation**, which includes records of misconduct investigations, disciplinary hearings, warnings, and employee grievances. These records ensure fair labour practices and provide evidentiary support in the event of disputes.

Finally, the Company keeps **training and development records**, documenting employee participation in training programmes, skills development initiatives, competency assessments, and compliance-related training. These records demonstrate the Company's commitment to employee development and statutory skills development obligations.

B. HEALTH AND SAFETY RECORDS

The Company maintains extensive records relating to workplace health and safety in compliance with the **Occupational Health and Safety Act**. These include safety policies, risk assessments, safety audits, and minutes of health and safety committee meetings. These records demonstrate the Company's commitment to maintaining a safe working environment.

The Company also retains **incident and accident reports**, documenting workplace injuries, near-miss incidents, and the outcomes of accident investigations. These records are essential for identifying risks, preventing future incidents, and complying with statutory reporting obligations.

In addition, the Company maintains **COIDA compliance records**, including Return of Earnings submissions, injury claim documentation, and correspondence with the Compensation Fund. These records ensure that employees are adequately covered in the event of workplace injuries.

C. POPIA AND COMPLIANCE RECORDS

The Company maintains a comprehensive **POPIA compliance framework**, including privacy notices, data protection policies, and processing registers. These documents demonstrate the Company's adherence to POPIA's principles of lawful and responsible processing of personal information.

The Company also retains **data processing and retention procedures**, outlining how personal information is collected, stored, retained, and destroyed. These procedures ensure compliance with POPIA's accountability and retention requirements.

The Company maintains **security safeguard records**, documenting the technical and organisational measures implemented to protect personal information, including access control logs, encryption standards, and IT security policies.

The Company also retains its **PAIA Manual**, which outlines the procedures for requesting access to information and the categories of records held.

Finally, the Company maintains **records relating to data subject requests**, including requests for access, correction, objection, and deletion of personal information. These records demonstrate compliance with POPIA's data subject rights provisions.

D. POLICIES AND PROCEDURES

The Company maintains a range of internal governance policies regulating its operations, including codes of conduct, ethics policies, and delegation of authority frameworks. These policies ensure consistent and lawful internal governance.

The Company also maintains **standard operating procedures (SOPs)**, providing detailed instructions for performing operational tasks across various departments, including HR, IT, and operations. These procedures ensure consistency, efficiency, and compliance.

In addition, the Company retains **compliance and regulatory policies**, such as POPIA compliance policies, health and safety policies, and employment equity policies. These policies demonstrate the Company's commitment to meeting statutory and regulatory obligations.

E. FINANCIAL AND ADMINISTRATIVE RECORDS

The Company maintains detailed **supplier information**, including contracts, service agreements, and BEE certificates. These records support procurement processes and ensure compliance with financial and regulatory requirements.

The Company also retains **invoices and statements**, documenting financial transactions, payments made, payments received, and billing histories. These records are essential for financial reporting, auditing, and tax compliance.

Finally, the Company maintains **asset registers**, listing all Company assets, including IT equipment, furniture, and vehicles. These records support asset management, insurance, and financial reporting.

5. RECORDS HELD IN TERMS OF LEGISLATION (SECTION 51(1)(d))

The Company retains records required under various legislation, including but not limited to:

- Companies Act 71 of 2008
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Protection of Personal Information Act 4 of 2013
- Income Tax Act 58 of 1962
- Skills Development Act 97 of 1998

6. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

A requester seeking access to a record must complete **PAIA Form 2** and submit it to the Information Officer. Requests must be made in writing, provide sufficient detail to identify the record, include proof of identity, and specify the form of access required. Requests will only be processed **during office hours (08:00–16:30, weekdays only)**.

A request fee may be payable before the request is processed, and an access fee may be charged for reproduction, search time, or preparation. The requester will be notified of applicable fees in writing.

The Information Officer will respond within **30 calendar days**, unless an extension is required in terms of **Section 57**.

7. GROUNDS FOR REFUSAL OF ACCESS (INCLUDING FRAUD / SCAM PROTECTION)

The Company may refuse access to records in terms of the grounds set out in **Chapter 4 of PAIA**, including:

- Protection of personal information of third parties (Section 63)
- Protection of commercial information of third parties (Section 64)
- Protection of confidential information (Section 65)
- Protection of safety of individuals and property (Section 66)
- Privileged records (Section 67)
- Defence, security, and international relations (Section 68)
- Economic interests and financial welfare (Section 69)

7.1 Refusal Where Request Appears Fraudulent, Malicious, or Suspicious

The Company reserves the right to refuse access to any record where the requester fails to provide adequate proof of identity, where the request appears fraudulent, misleading, or made with malicious intent, or where disclosure may reasonably be expected to compromise the security, integrity, or lawful interests of the Company, its employees, clients, or third parties.

Where a request appears suspicious or inconsistent with legitimate access rights, the Company may require additional verification, including proof of identity, proof of authority, or supporting documentation. Failure to provide such verification may result in lawful refusal of access.

7.2 Protection Against Abuse of PAIA Rights

In accordance with **Section 70 of PAIA**, the Company may refuse access where the request is manifestly frivolous, vexatious, or constitutes an abuse of the right of access to information. This includes requests submitted using false identities, misleading information, or with the intention to harass, intimidate, or deceive.

8. AVAILABILITY AND UPDATING OF THIS MANUAL (SECTION 51(3))

This Manual is available at the Company's registered office, on request from the Information Officer, and electronically via email. The Company will update this Manual as required by legislative or operational changes.

9. EFFECTIVE DATE

This Manual is effective from the date of signature by the Information Officer and remains valid until amended or replaced.