

PAIA MANUAL

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

**DATE OF COMPILATION: 01/04/2026
DATE OF REVISION:**

1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **“CEO”** Chief Executive Officer;
- 1.2 **“DIO”** Deputy Information Officer;
- 1.3 **“IO”** Information Officer;
- 1.4 **“Minister”** Minister of Justice and Correctional Services;
- 1.5 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000(as Amended);
- 1.6 **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.7 **“Regulator”** Information Regulator; and
- 1.8 **“Republic”** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1. Chief Information Officer

Name: Jacob Kruger
Tel: 0822108294
Email: jakes.kruger@hellokindred.com

3.2. Deputy Information Officer

Name: Debra-Ann Thomas

Tel: 0845213956

Email: debbie.thomas@hellokindred.com

3.3 Access to information general contacts

Email: compliance@hellokindred.com

3.4 National or Head Office Physical and Postal Address:

Address: The Capacity Co (Pty) Ltd

Unit 9 The Straight Ave

Pine Slopes

Sandton

2194

Telephone: 0113002700

Website: www.capacity.co

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.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and physical address, phone and email address of

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access 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.

- 4.3.3. the manner and form of a request for
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

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

The Company does not make any records automatically available without a formal request for access. All requests for access to records must be submitted in accordance with the provisions of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"), using the prescribed request procedures outlined in this Manual.

Where information is published on the Company's website or otherwise made publicly available in the future, such information may be accessed without the need to submit a PAIA request.

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

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Tax-related records, including IRP5/IT3(a) certificates, are maintained in accordance with the Income Tax Act and are only disclosed where legally required.	Income Tax Act, 58 of 1962

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

Subjects on which the body holds records	Categories of records
Finance	Annual Financial Statements Tax Returns Accounting Records Banking Records Lease Agreements Insurance Contracts

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The Capacity Co (Pty) Ltd processes personal information to deliver contracted services, manage operations and relationships, ensure system security and continuity, and comply with legal and regulatory obligations, always under a defined lawful basis and with appropriate data protection safeguards in place.

These purposes include:

Delivery of Services and Business Operations

- *To provide staffing, recruitment, marketing, and related support services to clients*
- *To manage user access, service delivery, and operational support activities*

Contractual Obligations

- *To perform obligations under client, vendor, and employment contracts*
- *To manage client relationships, supplier engagements, and workforce administration*

Communication and Relationship Management

- *To maintain business contact records*
- *To facilitate communication, coordination, and service delivery across stakeholders*

Legal and Regulatory Compliance

- *To comply with applicable data protection laws and regulations, including GDPR, POPIA, CCPA, and others*
- *To meet statutory obligations such as tax, audit, and reporting requirements*

Security, Monitoring, and Risk Management

- *To ensure the security of systems, data, and platforms through monitoring, logging, and access controls*
- *To detect, prevent, and respond to security incidents and unauthorized activities*

IT Operations and Continuity

- *To manage IT systems, including backups, troubleshooting, and technical support*
- *To ensure business continuity, disaster recovery, and resilience of services*

Governance, Audit, and Accountability

- *To maintain records of processing activities and demonstrate compliance with regulatory frameworks*
- *To support internal audits, client due diligence, and third-party assessments*

Lawful Basis for Processing

All processing is carried out under a valid legal basis, including:

- *Consent (where required)*

- *Performance of a contract*
- *Compliance with legal obligations*
- *Legitimate business interests (balanced against data subject rights)*

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

Categories of Data Subjects	Personal Information that may be processed
Clients • Client authorized business users • Client-provided business contacts and professional leads	• Business contact details (email, phone, work address) • Communications and correspondence data • Service-related data
Suppliers • Vendor representatives and service provider contacts • Third-party contractors and professional contacts engaged by suppliers	• Identification data (name, designation) • Business contact details (email, phone) • Contractual and engagement-related information • Communications and interaction records

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Directors Emoluments	Registered Auditors
Directors loans	Registered Auditors

8.4 Planned transborder flows of personal information

We have directors from South Africa in our other Geographies (Canada, India, UK and USA), their personal details (ID and Address proofs) are shared with different authorities from those countries for KYC purposes.

When we apply for financing, the banks or financial institutions can ask for the directors personal information in different countries.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The Capacity Co (Pty) Ltd implements appropriate technical and organisational safeguards including role-based access control, multi-factor authentication, encryption of data in transit and at rest, endpoint protection, logging and monitoring, and incident response procedures to ensure confidentiality, integrity, and availability of personal information.

9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of the Manual is available from the Chief Information Officer or Deputy Information Officer.
- 9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Chief Information Officer and Deputy Information Officer of The Capacity Co (Pty) Ltd will on a regular basis update this manual.

Issued by

Jacob Kruger
Chief Information Officer