

PAIA & POPIA Information Manual

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000) AND THE PROTECTION OF PERSONAL INFORMATION ACT (ACT 4 OF 2013)

Last updated 6 October 2026

1. Introduction

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA). It applies to AAA Consortium (Pty) Ltd and all associated or affiliated companies ("the Company"). The purpose of this Manual is to facilitate requests for access to records of the Company and to outline the Company's data processing practices.

2. Company details & information officer

- a. Company Name:** AAA Consortium (Pty) Ltd (and associated entities)
- b. Physical Address:** 9B Bridgeway Building, 6 Mascador Street, Mossel Bay, 6506
- c. Postal Address:** Same as above
- d. Telephone Number:** 021 300 0224 / 012 004 1115
- e. Website:** aaaconsortium.co.za
- f. Information Officer:** Ethan Keyter / Ruan Fourie
- g. Information Officer Email:** ethan@aaaconsortium.co.za / info@aaaconsortium.co.za

3. The South African Human Rights Commission (SAHRC) / Information Regulator guide

The Information Regulator has compiled a guide, as contemplated in Section 10 of PAIA, containing information to assist any person who wishes to exercise any right as contemplated in the Act. The guide is available from the Information Regulator:

- a. Website:** <https://inforegulator.org.za/>
- b. Email:** enquiries@inforegulator.org.za

4. Records automatically available to the public

Certain records are automatically available without a person having to request access in terms of PAIA. These include marketing information, company brochures, services offered, and general public corporate records freely available on our website.

5. Records held in terms of applicable legislation

The Company retains records in accordance with various South African statutes, including but not limited to:

- a. Companies Act No. 71 of 2008
- b. Financial Intelligence Centre Act No. 38 of 2001 (FICA)
- c. Financial Advisory and Intermediary Services Act No. 37 of 2002 (FAIS)
- d. Basic Conditions of Employment Act No. 75 of 1997 (BCEA)
- e. Labour Relations Act No. 66 of 1995 (LRA)
- f. Employment Equity Act No. 55 of 1998
- g. Value Added Tax Act No. 89 of 1991
- h. Income Tax Act No. 58 of 1962
- i. Protection of Personal Information Act No. 4 of 2013 (POPIA)

6. Schedule of records held by the company

The Company holds the following categories of records. *(Note: Access to these records is not automatic and is subject to the grounds of refusal set out in PAIA).*

- a. **Corporate & Legal:** Incorporation documents, Director details, Shareholder registers, Statutory returns, Commercial contracts, and funding agreements.
- b. **Financial:** Audited financial statements, Tax records, Management accounts, Banking records, Supplier invoices, Purchase Orders.
- c. **Human Resources:** Employment contracts, Disciplinary records, Payroll records, Leave records, Health and safety records (OHSA compliance).
- d. **Client/Operations:** Client FICA files, Client risk assessments, Purchase Order vetting documentation, Delivery notes, Track & Trace logs.

7. Processing of personal information (POPIA disclosures)

- a. **Purpose of Processing:** The Company processes personal information primarily to originate, vet, execute, and monitor Purchase Order (PO) funding deals; to conduct statutory FICA/AML screening; to manage personnel and payroll; and to comply with legal and tax obligations.
- b. **Categories of Data Subjects:** Clients (and their directors/beneficial owners), Suppliers, Government Department Officials, Employees, and Job Applicants.

- c. Categories of Personal Information:** Identity numbers, company registration numbers, financial/banking details, contact information, physical addresses, tax numbers, and credit histories.
- d. Recipients of Personal Information:** Information may be shared with credit bureaus, vetting agencies (e.g., ClientScanner, CPB), external funders, the Central Supplier Database (CSD), and regulatory authorities where required by law.
- e. Information Security Measures:** The Company employs strict access controls, 24/7 CCTV surveillance, encrypted cloud storage (Monday.com / secure servers), firewalls, strict passwords, and non-disclosure agreements to safeguard information.
- f. Transborder Data Flows:** Information may be securely stored in cloud services offered within South Africa and internationally via Google and Monday.com.

8. Procedure for requesting access to records

- a.** The Requester must use the prescribed form (Form C, accessible via the Information Regulator's website) to make the request for access to a record.
- b.** The request must be addressed to the Information Officer at the details provided in Section 2.
- c.** The Requester must provide sufficient detail on the form to enable the Information Officer to identify the record and the Requester.
- d.** The Requester must indicate which form of access is required and specify a postal address or email address.
- e.** The Requester must state the right they are seeking to exercise or protect and explain why the requested record is required for the exercise or protection of that right.

9. Grounds for refusal & prescribed fees

The Company may refuse a request for information based on mandatory protection of privacy of a third party, commercial/confidential information of a third party, protection of the Company's own intellectual property and trade secrets, or records privileged from production in legal proceedings. Requests for access to records are subject to the payment of prescribed statutory fees (a request fee and an access/reproduction fee) as gazetted by the Minister of Justice.