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Integrity in the Storm

Registration: 2026/040838/07

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PAIA MANUAL

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Updating of the Manual 11

List of acronyms and abbreviations

| | |
|-----------|---|
| Guide | PAIA Guide |
| PAIA | Promotion of Access to Information Act No. 2 of 2000 (as amended) |
| POPIA | Protection of Personal Information Act No. 4 of 2013 |
| Regulator | Information Regulator |
| Republic | Republic of South Africa |

Purpose of PAIA Manual

This PAIA Manual is useful for the public to:

- Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.





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- Have sufficient understanding of how to make a request 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.
- Know the description of the records of the body which are available in accordance with any other legislation.
- Access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access.
- Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 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 hereto.
- Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- Know the recipients or categories of recipients to whom the personal information may be supplied.
- 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
- Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



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Key contact details

Chief Information Officer

Director: Lee O'Reilly
Cell: 081 776 7791
E-mail: lee@vcsgroup.co.za
Website: www.vcsgroup.co.za

PAIA use and access

- 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.
- The Guide is available in each of the official languages and in braille.
- The aforesaid Guide contains the description of:
 - The objects of PAIA and POPIA.
 - The postal and street, phone and electronic mail address of:
 - The Information Officer of every public body, and



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- Every Deputy Information Officer of every public body and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²,
- The manner and form of a request for:
 - Access to a record of a public body contemplated in section 11³, and
 - Access to a record of a private body contemplated in section 50⁴,
- The assistance available from the Information Officer of a public body in terms of PAIA and POPIA.
- The assistance available from the Regulator in terms of PAIA and POPIA.
- 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.
 - An internal appeal.
 - A complaint to the Regulator; and
 - 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.

¹ Section 17(1) of PAIA- For the purpose 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.

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 the above paragraph.

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

That record is required for the exercise of protection of any rights;

That person complies with 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 the above paragraph.



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- 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.
- The provisions of section 15⁷ and 52⁸ providing for voluntary disclosure of categories of records by a public body and private body, respectively.
- The notices issued in terms of section 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- The regulations made in terms of section 92¹¹.
- 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.
- The Guide can also be obtained:
 - Upon request to the Information Officer.
 - From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - Afrikaans

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 the paragraph 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 the paragraph 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."



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Available Records

The below table describes the categories of records which are available without a person having to request access.

| Category of records | Types of Record | Available on Website | Available upon request |
|----------------------------------|---------------------------|----------------------|------------------------|
| Administration | Privacy Policy | X | |
| | Terms of Service | X | |
| | Bank confirmation letter | | X |
| | PAIA Manual | X | |
| Legal | Public corporate records | | X |
| | B-BBEE Certificate | | X |
| Marketing | Company Profile | X | |
| Risk, collections, and insurance | Indemnity Insurance Cover | | X |
| | Risk Assessments | | X |

Legislation Records

Below table is a description of the records which are available in accordance with any other legislation.





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Category of records Applicable legislation

| | |
|------------------------------------|---|
| <i>Memorandum of Incorporation</i> | Companies Act 71 of 2008 |
| <i>PAIA Manual</i> | Promotion of access to information Act 2 of 2000 |
| <i>Terms of Service</i> | Consumer Protection Act 68 of 2008 |
| <i>Privacy Policy</i> | Protection of Personal Information Act 26 of 2013 |
| <i>B-BBEE Certificate</i> | Broad-based Black Economic Empowerment Act 53 of 2013 |

Subjects and Categories of Records

Below table describes the subjects where records and categories of records are held on each subject.

| Subjects of records | Categories of records |
|-------------------------------|--|
| Management | Strategic Business Plan General Contract Documentation B-BBEE Certificate Audited financial statements Customer information Asset register Indemnity insurance cover Nondisclosure agreements |
| Administration | Company guidelines Policies and Procedures Statutory and Environmental Records Safety files Company profile Supplier information |
| Information Technology | E-mails Data retention management systems Security and Encryption systems |





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Processing of Personal Information

Purpose of processing personal information

The purpose of processing personal information is to fulfil specific, lawful, and clearly defined objectives that support organizational, legal, and contractual obligations. This processing is governed by principles such as purpose specific, data minimisation, and security safeguards, ensuring that information is only collected and used for legitimate reasons, retained for as long as necessary, and protected against misuse. Individuals also have rights to access, correct, or request the deletion of their data, reinforcing transparency and accountability in how their information is handled.

Data Subject Categories

The below table describes the categories of data subjects and categories of information relating thereto.

| Category of Data Subjects | Personal Information that may be processed |
|---------------------------|---|
| Customers / Clients | Name, address, registration numbers or identity numbers, employment status and bank details |
| Service Providers | Names, registration number, VAT number, address, trade secrets and bank details |



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Recipients of Personal Information

The below table lists the recipients or categories of recipients to whom the personal information may be supplied.

| Category of Personal Information | Recipients |
|--|--|
| Identity number and names for criminal checks | South African Policy Services |
| Qualifications for qualification verifications | South African Qualifications Authority |

Transborder flow of personal information

The default data centre for global data residency is located in South Africa and the third-party contractors managing information technology services have Advanced Data Residency which includes prioritised tenant migration services within the local region geography, therefore no transborder flow of personal information takes place for Valiant Compliance Solutions.

Information security measures

Information security measures implemented by Valiant Compliance Solutions to ensure the confidentiality, integrity and availability of information include data encryption, ant-virus and anti-malware solutions as well as core security policies and frameworks.



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Availability of the manual

A copy of the Manual is available:

- on www.vcsgroup.co.za
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.
- 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.

Updating of the Manual

The Information Officer of Valiant Compliance Solutions will on a regular basis update this manual.