

HANOIS TECHNOLOGIES (PTY) LTD

PAIA Manual

Promotion of Access to Information Act 2 of 2000 — Section 51 Manual

Version	1.0
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Website	www.hanoistech.com
Entity	Hanois Technologies (Pty) Ltd
Registration no.	K2026435078
Contact	support@hanoistech.com

Foreword

This manual is published by Hanois Technologies (Pty) Ltd in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), read together with the regulations promulgated thereunder and the guidance published by the South African Human Rights Commission ("SAHRC") and the Information Regulator.

PAIA gives effect to the constitutional right of access to information held by private bodies, as enshrined in section 32 of the Constitution of the Republic of South Africa, 1996. This right is not absolute — it is balanced against other rights and legitimate interests, including the right to privacy, commercial confidentiality, and the protection of third-party information.

This manual sets out the categories of records held by Hanois Technologies, the procedures for submitting a request for access to records, the applicable fees, and the grounds on which access may be refused. It is intended to be read together with the Hanois Technologies Privacy Notice and POPIA compliance framework.

Part A — Contact Details of the Information Officer

In terms of PAIA, every private body must designate an Information Officer who is responsible for receiving and processing requests for access to information. The Information Officer of Hanois Technologies (Pty) Ltd is:

Name	Zamani Ngidi
Title	Managing Director and Information Officer

Organisation	Hanois Technologies (Pty) Ltd
Registration number	K2026435078
Registered address	2 Beech Avenue, Dowerglen, Edenvale, 1609, South Africa
Postal address	2 Beech Avenue, Dowerglen, Edenvale, 1609, South Africa
Email address	support@hanoistech.com
Telephone	Not applicable
Website	www.hanoistech.com

All requests for access to records, queries regarding this manual, and appeals against decisions must be directed to the Information Officer at the contact details above.

Part B — The South African Human Rights Commission and Information Regulator

Requestors who are dissatisfied with a refusal of access or the conduct of Hanois Technologies in processing a request may approach either of the following bodies:

B.1 Information Regulator of South Africa

The Information Regulator is the primary enforcement authority for both PAIA and POPIA.

Authority	Information Regulator (South Africa)
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Email	inforeg@justice.gov.za
Website	www.inforegulator.org.za

B.2 South African Human Rights Commission (SAHRC)

Authority	South African Human Rights Commission
Address	29 Princess of Wales Terrace, Parktown, Johannesburg, 2193
Email	PAIA@sahrc.org.za
Website	www.sahrc.org.za

Guide on how to use PAIA: The SAHRC has published a guide on how to use PAIA, which is available at www.sahrc.org.za. This guide is also available in all eleven official languages upon request from the SAHRC.

Part C — Records Available Without a Formal Request

The following information and records are publicly available through Hanois Technologies' website and do not require a formal PAIA request:

Privacy Notice	Accessible at www.hanoistech.com/privacy
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Cookie Policy	Accessible at www.hanoistech.com/cookies
Terms of Use	Accessible at www.hanoistech.com/terms
ECTA s.43 Disclosures	Accessible at www.hanoistech.com/legal
PAIA Manual (this document)	Accessible at www.hanoistech.com/paia
Service descriptions	Accessible at www.hanoistech.com

A formal request under PAIA is required only for records that are not publicly available and that fall within the scope of section 50 of PAIA.

Part D — Records Held by Hanois Technologies

Hanois Technologies holds records in the following categories. This is a functional description and does not constitute a representation that all requests for access to records within these categories will be granted.

D.1 Corporate and statutory records

- Memorandum of Incorporation (MOI) and any amendments thereto;
- Company registration documents and CIPC filings;
- Share register and shareholders' agreements;
- Board resolutions and minutes;
- Annual financial statements and management accounts;
- Tax registration and compliance records.

D.2 Personnel and human resources records

- Employment contracts and correspondence;
- Leave records and payroll records;
- Performance records and disciplinary records;
- Training and development records;
- POPIA compliance and data protection training records.

D.3 Client and service delivery records

- Client intake forms and supporting submissions;
- EVaR assessment reports (full and summary);
- Engagement letters and invoices;
- Readout session records and correspondence;
- Client communication records.

D.4 Distribution partner records

- Partner registration and onboarding records;
- Distribution agreements and terms of engagement;
- Partner communication and support records.

D.5 Information technology and security records

- IT infrastructure and system architecture records;
- Information security policies and procedures;
- Incident response records;
- Website analytics data (aggregated and anonymised).

D.6 Legal and compliance records

- Contracts with third-party service providers;
- Insurance policies;
- Regulatory correspondence;
- Legal opinions and advice (subject to attorney-client privilege).

Part E — Records Held by Other Bodies

The following South African legislation may require Hanois Technologies to hold or submit records to relevant public bodies. Requestors seeking access to records held by these bodies should direct their requests to the relevant authority:

Legislation	Regulator / Body	Nature of records
Companies Act 71 of 2008	Companies and Intellectual Property Commission (CIPC)	Registration and annual returns
Income Tax Act 58 of 1962	South African Revenue Service (SARS)	Tax filings and correspondence
POPIA	Information Regulator	Information Officer registration; complaint records
Unemployment Insurance Act 63 of 2001	Department of Employment and Labour (UIF)	UIF contributions and declarations

Part F — How to Request Access to Records

F.1 Who may submit a request

Any person — whether a natural person or a juristic person — may submit a request for access to records held by Hanois Technologies. The right of access is not limited to South African residents or citizens.

F.2 Form of request

A request for access to records must be made in writing using the prescribed PAIA request form (Form C as prescribed by the Information Regulator). The completed form must be submitted to the Information Officer at support@hanoistech.com.

The prescribed Form C is available from:

- The Information Regulator's website: www.inforegulator.org.za;
- The SAHRC's website: www.sahrc.org.za;
- On request from Hanois Technologies at support@hanoistech.com.

F.3 What the request must include

The request must include:

- The full name, contact details (postal or email address), and identity number of the requestor;
- If the requestor is acting on behalf of another person, proof of authority to do so;
- A description of the record(s) requested, with sufficient particularity to enable identification;
- The form in which access is preferred (e.g. inspection, copy, extract);
- Whether the requestor requires the record in a particular language;
- Payment of the prescribed request fee, where applicable.

F.4 Assistance with requests

If you require assistance in completing the request form or in formulating a request, please contact the Information Officer at support@hanoistech.com. Hanois Technologies will take reasonable steps to assist requestors with disabilities or those who experience difficulties with the process.

Part G — Fees

G.1 Request fee

A request fee is payable before Hanois Technologies is required to process the request. The request fee is the amount prescribed by the Information Regulator from time to time in terms of PAIA. As at the date of this Manual, the prescribed request fee is R50.00 (fifty rand).

Where the requestor is seeking access to records containing their own personal information, no request fee is payable.

G.2 Access fee

If access is granted, an access fee may be payable in respect of the reproduction and search time involved. The applicable access fees are those prescribed by the Information Regulator. Details of current prescribed fees are available from the Information Regulator's website.

G.3 Fee waiver

The Information Officer may, in their discretion, waive any fee where payment would impose an unreasonable financial burden on the requestor, or where granting access would be in the public interest.

Part H — Processing of Requests

H.1 Acknowledgement

Hanois Technologies will acknowledge receipt of a valid request within three (3) business days.

H.2 Decision period

The Information Officer will decide whether to grant or refuse access within thirty (30) days of receipt of the request, or within sixty (60) days if an extension is required in terms of section 57 of PAIA. If an extension is required, the requestor will be notified within the initial thirty-day period.

H.3 Grounds for refusal

Access to records may be refused on the grounds set out in Chapter 4 of PAIA, including but not limited to:

- Protection of personal information of third parties (sections 63-64);
- Protection of commercial information (sections 67-69), including trade secrets and confidential financial information;
- Protection of legally privileged information (section 67);
- Protection of research information (section 73);
- Mandatory refusal where disclosure is prohibited by law;
- Where the record does not exist or cannot be found after a reasonable search.

H.4 Notification of decision

The requestor will be notified in writing of the decision. If access is refused, the notice will set out:

- The adequate reason for refusal;
- The right of the requestor to apply for an internal appeal or approach the courts;
- The procedure for lodging an application with the Information Regulator.

Part I — Appeals and Remedies

If a requestor is aggrieved by a decision of the Information Officer (including a refusal of access or a failure to decide within the prescribed period), the following remedies are available:

- Internal appeal: A requestor may submit a written internal appeal to Hanois Technologies within sixty (60) days of the decision, addressed to the Information Officer at support@hanoistech.com. Hanois Technologies will consider the appeal and respond within thirty (30) days;
- Application to the Information Regulator: A requestor may approach the Information Regulator to investigate and make a determination;
- Court application: A requestor may bring an application to the High Court of South Africa for access to the records, on notice to Hanois Technologies.

Part J — Prescribed Legislation Applicable to Hanois Technologies

The following legislation governs the activities of Hanois Technologies and, where applicable, gives rise to record-keeping obligations:

Legislation	Application to Hanois Technologies	Regulator
Companies Act 71 of 2008	Corporate governance, registration, and statutory filings	CIPC
Income Tax Act 58 of 1962	Corporate income tax obligations	SARS
Value-Added Tax Act 89 of 1991	VAT registration and compliance (if applicable)	SARS
POPIA (Act 4 of 2013)	Processing of personal information; Information Officer obligations	Information Regulator
PAIA (Act 2 of 2000)	Access to information; this Manual	Information Regulator / SAHRC
ECTA (Act 25 of 2002)	Electronic transactions and website operator obligations	DTPS
Labour Relations Act 66 of 1995	Employment relations	CCMA / Labour Court

Basic Conditions of Employment Act 75 of 1997	Minimum employment standards	Dept of Employment and Labour
Unemployment Insurance Act 63 of 2001	UIF contributions	Dept of Employment and Labour
Copyright Act 98 of 1978	Intellectual property in reports and methodology	CIPRO / Courts

Part K — Availability and Review of This Manual

This Manual is available:

- On the Hanois Technologies website at www.hanoistech.com/paia;
- In printed form, free of charge, from the Information Officer upon request.

This Manual will be reviewed and updated at least annually, or whenever there are material changes to the entity's structure, record categories, or applicable legislation. The version number and effective date at the front of this Manual reflect the most recent update.

Hanois Technologies reserves the right to amend this Manual at any time. The current version will always be the version published on the Website.