

PAIA AND POPIA MANUAL

Manual of REDCLYPH (PTY) LTD, prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, and addressing the requirements of the Protection of Personal Information Act 4 of 2013.

Version 1.0 • Effective 28 August 2026 • Next review by 28 August 2027

1. Purpose of this manual

Section 32 of the Constitution gives everyone the right of access to any information held by another person that is required for the exercise or protection of any right. PAIA gives effect to that right, and section 51 requires every private body to compile a manual explaining how a request is made to it.

RedClyph Software Solutions is a private body for the purposes of PAIA. This manual explains what records the Company holds, how to ask for one, what a request costs, and on what grounds it may be refused. It also sets out how the Company processes personal information, as required by section 51 as amended by POPIA.

This manual describes the Company as it actually operates. Where a category of record or a class of data subject does not apply to the Company, it is left out rather than listed for the sake of completeness.

2. Particulars of the private body

Registered name	REDCLYPH (PTY) LTD
Registration number	2013/185696/07
Trading name	RedClyph Software Solutions
Nature of business	Custom software development, and the support of the systems it builds
Registered and physical address	41 Kruin Street, Ruwari, 7560, Western Cape, South Africa
Postal address	As above

Telephone	+27 82 417 0098
E-mail	info@redclyph.co.za
Website	https://redclyph.co.za

3. Information Officer

The head of the Company for the purposes of PAIA, and its Information Officer for the purposes of POPIA, is the director named below. All requests, objections and enquiries under either Act go to him.

Information Officer	Marius Visser, Director
E-mail	info@redclyph.co.za
Telephone	+27 82 417 0098
Postal and physical address	41 Kruin Street, Ruwari, 7560, Western Cape, South Africa
Deputy Information Officer	None appointed. Requests go to the Information Officer.

The Information Officer must be registered with the Information Regulator before taking up the duties of the office. Record the registration reference here once issued: [registration reference].

4. The Information Regulator, and the section 10 guide

PAIA is administered by the Information Regulator. Responsibility for it transferred from the South African Human Rights Commission to the Regulator on 30 June 2021, and any manual or guide still naming the Commission is out of date.

The Regulator has published the guide contemplated in section 10 of PAIA, which explains in plain language how to use the Act. It is available free of charge from the Regulator, in each official language, and is obtainable as follows.

The Information Regulator (South Africa)	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Website	https://info regulator.org.za

PAIA enquiries

PAIAComplaints@inforegulator.org.za

POPIA enquiries

POPIAComplaints@inforegulator.org.za

Confirm the Regulator's current addresses and e-mail addresses before publishing this manual, and again at each annual review. They have changed before.

5. Records held by the Company

The Company holds the following categories of record. Listing a category here does not mean the records in it are automatically available; it means the Company holds records of that kind, so that a requester can describe what is wanted.

Subject	Categories of record
Company secretarial	Memorandum of Incorporation, registers of directors and securities, minutes and written resolutions, CIPC filings and beneficial ownership records
Financial	Invoices issued and received, credit notes, bank statements, annual financial statements, and returns and assessments filed with SARS
Client engagements	Quotations, specifications, master services agreements, statements of work, change requests, project correspondence and support records
Technical	Source code, database schemas and migrations, build and deployment configuration, technical documentation, and operational runbooks
Client system data	Data held in systems the Company operates or supports on behalf of a client. This data belongs to that client, and the Company holds it as an operator only
Suppliers	Hosting, domain, e-mail and software subscription records, and correspondence with those suppliers
Marketing	Website content, published case studies, and the consents and references on which they rest

The Company holds no employment or payroll records.

6. Records available without a request

The following are published and may be had without any request or fee, from <https://redclyph.co.za> or by asking the Information Officer:

- this manual;
- the privacy notices published on the Company website;
- the description of services, published case studies and contact details on the website;
- the Company name, registration number and registered address.

No notice has been published under section 52(2) of PAIA, and no records are available in terms of any other statute in a manner that dispenses with a request under this manual.

7. Records held under other legislation

The Company keeps records because the following require it. This list is given to help a requester identify what exists; it is not a list of records that are available on demand.

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962 and the Tax Administration Act 28 of 2011
- Value-Added Tax Act 89 of 1991, to the extent it applies
- Protection of Personal Information Act 4 of 2013
- Electronic Communications and Transactions Act 25 of 2002
- Copyright Act 98 of 1978

8. How to request access to a record

- 8.1 A request must be made on the prescribed form published by the Information Regulator for a request to a private body. The current form is available from <https://infoeregulator.org.za>, and the Information Officer will send a copy on request at no charge.
- 8.2 The completed form must be delivered to the Information Officer at the address in section 3, and must:
 - 8.2.1 provide enough detail to identify the record and the requester;
 - 8.2.2 state the form of access required and the postal address, e-mail address or fax number of the requester;
 - 8.2.3 identify the right the requester is seeking to exercise or protect, and explain why the record is required to exercise or protect it - this is a requirement of section 50(1) and a request that omits it must be refused;
 - 8.2.4 state, if the requester is acting on behalf of another person, in what capacity, with proof of that capacity.
- 8.3 The Information Officer will decide the request within thirty days of receiving it, and will notify the requester in writing of the decision, the access fee payable, and the requester's right to complain or to apply to a court. That period may be extended by a further thirty days in the circumstances allowed by section 57.

8.4 If the request is granted, access is given once the access fee is paid, in the form requested where the Company is reasonably able to provide it.

9. Grounds on which a request must or may be refused

Chapter 4 of Part 3 of PAIA sets out the grounds. In summary, and without limiting the Act, the Information Officer must refuse a request where granting it would:

- unreasonably disclose personal information about a third party, including a deceased person (section 63);
- disclose commercial information of a third party, such as a trade secret, or information whose disclosure would harm that party commercially (section 64);
- breach a duty of confidence owed to a third party (section 65);
- endanger a person, or prejudice the security of property (section 66);
- prejudice legal proceedings, or disclose privileged material (sections 67 and 67A);
- disclose the Company's own trade secrets or commercial information, including its source code (section 68);
- disclose a research proposal or the identity of a research subject (section 69).

A request must nonetheless be granted where section 70 applies, being where disclosure would reveal a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm.

Where part of a record may be refused, section 28 requires that the remainder be disclosed.

10. Fees

PAIA provides for two fees. A request fee, payable when the request is lodged, and an access fee for the time and materials of producing the record. A personal requester - someone asking for a record about themselves - pays no request fee.

The request fee is R140.00. Search and preparation is charged at R145.00 for each hour after the first, and is capped at R435.00 in total however long the search takes. Reproduction is charged per page or per item. The full schedule is in Annexure B.

These are the amounts prescribed for a private body in Annexure B to the PAIA Regulations, 2021, published in Government Gazette 45057 of 27 August 2021. The Company charges no fee of its own beyond them, and adds no VAT because it is not a registered VAT vendor. Where the amounts are amended by regulation, the amended amounts apply and this manual is updated.

11. If a request is refused

There is no internal appeal against the decision of a private body. A requester who is dissatisfied may:

- complain to the Information Regulator on the prescribed form, at the addresses in section 4; or
- apply to a court for appropriate relief within 180 days of the decision.

The Information Officer will say in the decision which of these is open to the requester, and by when.

12. Processing of personal information

This section is given in terms of section 51(1)(c) of PAIA, as amended by POPIA.

Purpose of processing

The Company processes personal information in order to quote for and perform software development and support work, to invoice for it and collect payment, to keep the accounting and tax records the law requires, to correspond with clients, suppliers and enquirers, and to operate and support systems on behalf of clients.

Categories of data subjects, and the information held

Data subjects	Personal information processed
Client representatives	Name, job title, employer, business contact details, and correspondence with the Company
Enquirers	Name and contact details given voluntarily when contacting the Company
Suppliers	Contact and account details of the Company's own suppliers
Users of client systems, as operator	Only what the client system requires. In the case of the Sandton Fun Factory stock control system this is the name, role and section of members of staff, and their account credentials. No learner or child information is held
Directors and officers	Identity, tax and banking records held by the Company

The Company does not process the personal information of children, or special personal information as defined in section 26 of POPIA, except where a client system requires it and the client has instructed it in writing.

Recipients

Personal information is not sold, and is not shared for anyone else's marketing. It may be given to:

- the client on whose behalf it is processed, where the Company acts as operator;
- the Company's accountant, bank and professional advisers, in the ordinary course;
- hosting, domain, e-mail and source code hosting providers, as an unavoidable consequence of the service they provide;
- SARS, CIPC, the Information Regulator, a court, or any other body entitled by law to it.

Transborder flows

The Company's own web hosting, domain and e-mail are provided in South Africa. Source code is held in private repositories with a provider whose servers are outside the Republic, which is a transborder flow within the meaning of section 72 of POPIA. Repositories are private, and the Company does not place client personal information in them.

Systems built for clients are deployed to infrastructure the client chooses. Where the Company can influence that choice it recommends hosting within the Republic, and the Sandton Fun Factory system is hosted in South Africa. The Company does not transfer personal information out of the Republic on a client's behalf without that client's written consent.

Security safeguards

The Company secures the integrity and confidentiality of personal information by taking appropriate, reasonable technical and organisational measures as required by section 19 of POPIA. These include:

- encryption of traffic in transit, and HTTPS on all published services;
- access control by role in the systems the Company builds, so that a user sees only what the role requires;
- an append-only audit trail of changes in systems where the integrity of a record matters;
- credentials held encrypted at rest and never committed to source control;
- private source code repositories, with no public repository under the Company account;
- verification that backups can actually be restored, rather than only that they were taken;
- written operator terms with every client for whom the Company processes personal information.

Where the Company has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, it notifies the responsible party and, where the Company is itself the responsible party, the Information Regulator and the data subjects, as required by section 22.

13. Rights of data subjects

A data subject may ask the Information Officer, free of charge, whether the Company holds personal information about them, and may ask for a record or a description of it. A data subject may also require the Company to correct or delete information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, and may object to processing on the grounds allowed by section 11(3).

These requests are made on the forms prescribed under POPIA, available from the Information Regulator, or in writing to the Information Officer. Where the Company holds the information as an operator for a client, the request is passed to that client, who is the responsible party, and the Company assists them in answering it.

A data subject who is dissatisfied may complain to the Information Regulator at the addresses in section 4.

14. Availability of this manual

This manual is available free of charge on the Company website at <https://redclyph.co.za>, by e-mail from the Information Officer on request, and for inspection at the registered address during business hours. A copy is lodged with the Information Regulator.

This is version 1.0, effective 28 August 2026. It is reviewed at least once a year, and the next review is due by 28 August 2027. It is also reviewed whenever the Company's activities change in a way that affects it, and whenever the prescribed fees in Annexure B are amended by regulation.

Annexure A - Request checklist

Complete the prescribed form and make sure each of the following is covered. A request that omits the third item must be refused, and it is the one most often left out.

- Sufficient particulars to identify the record, and the requester.
- The form of access required, and an address or e-mail address for the reply.
- The right you are seeking to exercise or protect, and why this record is required in order to exercise or protect it.
- If you are acting for someone else, in what capacity, with proof.
- Proof of payment of the request fee, unless you are asking for a record about yourself.

Annexure B - Prescribed fees

These are the fees prescribed for a private body in Annexure B to the Regulations Relating to the Promotion of Access to Information, 2021, published in Government Gazette 45057 of 27 August 2021. The Company charges no fee of its own beyond them.

Item	Fee
Request fee, payable by every requester on lodging a request	R140.00
Photocopy, or printed black and white copy, of an A4 page or part of a page	R2.00
Printed copy of an A4 page or part of a page	R2.00
Copy in computer-readable form, on a flash drive supplied by the requester	R40.00
Copy in computer-readable form, on a compact disc supplied by the requester	R40.00
Copy in computer-readable form, on a compact disc supplied by the Company	R60.00
Transcription of visual images, per A4 page or part of a page	Outsourced
Copy of visual images	Outsourced
Transcription of an audio record, per A4 page or part of a page	R24.00
Copy of an audio record, on a flash drive supplied by the requester	R40.00

Item	Fee
Copy of an audio record, on a compact disc supplied by the requester	R40.00
Copy of an audio record, on a compact disc supplied by the Company	R60.00
Search for and preparation of the record for disclosure, for each hour or part of an hour after the first hour	R145.00
Maximum payable for search and preparation, however long it takes	R435.00
Postage, e-mail or other electronic transfer	Actual cost

Notes on the fees

- A personal requester - someone asking for a record about themselves - pays no request fee.
- The first hour of search and preparation is not charged.
- Search and preparation is capped at R435.00 in total, no matter how long the search actually takes. The cap is on the Company, not the requester.
- Where transcription or copying of visual images is required, the work is outsourced and the fee is the service provider's quotation, which is given to the requester before the work is commissioned.
- Where the search is likely to exceed six hours, a deposit of one third of the amount calculated under the first six items above may be required before the search begins. If the request is then refused, the deposit is refunded.
- RedClyph is not a registered VAT vendor, so no value-added tax is added to any of these amounts. Each is the full amount payable.
- This manual is supplied free of charge, although the Regulations would permit a fee for a copy of it.

Source	Annexure B, PAIA Regulations 2021, GG 45057 of 27 August 2021
Verified against	The fee structure published by the Information Regulator, and an independent reproduction of Annexure B
Date verified	2026-08-28

Next check

At each annual review of this manual, and on any amendment of the Regulations
