



## **PAIA MANUAL**

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

In respect of

CyberIAM South Africa (Pty) Ltd

(CyberIAM SA)

Registration No.: 2019/078756/07

**Updated: June 2025**

## 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. OVERVIEW OF CYBERIAM SA

CyberIAM is a company headquartered in the United Kingdom made up of subsidiary entities incorporated in England and Wales, Australia, Netherlands, American and South Africa. This PAIA Manual only applies to CyberIAM SA. For the avoidance of doubt this PAIA Manual does not apply to any other CyberIAM subsidiary or affiliate.

## 3. 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.

#### 4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

<b>Name of Private Body</b>	CyberIAM SA (Pty) Ltd.
<b>Physical and Postal Address</b>	Unit F3, Century Square, 4 Heron Crescent, Century City, Cape Town, 7441
<b>Information Officer</b>	CEO of CyberIAM SA
<b>Telephone Number</b>	021 834 0858
<b>Email Contact</b>	legal@cyberiam.com

#### 5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. 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.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and

5.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;

5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

- 5.3.6. 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-
  - 5.3.6.1. an internal appeal;
  - 5.3.6.2. a complaint to the Regulator; and
  - 5.3.6.3. 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;
- 5.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 5.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 5.4. 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.
- 5.5. The Guide can also be obtained-
  - 5.5.1. upon request to the Information Officer;
  - 5.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours-
  - 4.6.1 [English](#);
  - 4.6.2 [Sesotho](#);
  - 4.6.3 [Afrikaans](#).

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

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

Category of records	Types of the Record	Available on Website	Available upon request
Website	All information freely available on CyberIAM’s website.	X	X

**6. RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Applicable Legislation	
1	Companies Act 71 of 2008
2	Promotion of Access to Information Act 2 of 2000
3	Compensation of Occupational Injuries and Diseases Act No. 130 of 1993
4	Competition Act No.98 of 1978
5	Constitution of the Republic of South Africa 2008
6	Consumer Protection Act No. 68 of 2008
7	Electronic Communications Act No.36 of 2005
8	Employment Equity Act No. 55 of 1998
9	Income Tax Act No. 58 of 1962
10	Labour Relations Act no.66 of 1995
11	Occupational Health and Safety Act No.85 of 1993
12	Promotion of Access to Information Act No. 2 of 2000
13	Protection of Personal Information Act No. 4 of 2013
14	Skills Development Act No. 97 of 1998
15	Unemployment Contributions Act 63 of 2001
16	Unemployment Insurance Act No. 30 of 1996
17	Value Added Tax Act 89 of 1991

**7. DESCRIPTION OF THE RECORDS HELD**

Subjects on which the body holds records	Categories of records
<b>Statutory records</b>	<ul style="list-style-type: none"> <li>• Company incorporation documents</li> <li>• Share register</li> <li>• Memorandum of Incorporation</li> <li>• Minutes of meetings of the board of directors</li> <li>• Records relating to the appointment of directors, auditors, and other officers</li> </ul>
<b>Income tax</b>	<ul style="list-style-type: none"> <li>• Pay-as-you-earn (PAYE) records</li> <li>• Documents issued to employees for income tax purposes</li> <li>• Records of payments made to South African Revenue Services on behalf of employees</li> <li>• All or any statutory compliance</li> <li>• Value Added</li> </ul>

Subjects on which the body holds records	Categories of records
	Tax • Skills development levies • Unemployment Insurance Fund
<b>Labour relations records</b>	<ul style="list-style-type: none"> <li>• Personnel documents and records • Employment contracts</li> <li>• Medical aid records • Pension Fund records • Disciplinary records • Salary records • Disciplinary code and/or procedures</li> <li>• Leave records • Training records • Training manuals • Address lists • Internal telephone lists</li> </ul>
<b>Finance</b>	<ul style="list-style-type: none"> <li>• Receipts and payments • Bank statements • A list of the company's debtors and creditors • Budgets • Management accounts • Asset registers • Invoices • Salaries • Minutes of meetings • Correspondence</li> </ul>
<b>Risk and compliance</b>	<ul style="list-style-type: none"> <li>• Contracts • Policies and procedures • Risk assessment • Compliance records</li> </ul>
<b>Others</b>	<ul style="list-style-type: none"> <li>• IT usage statistics and equipment details • Supplier lists • Secretarial records • Media releases and public relation events records</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

8.1 CyberIAM adheres to internationally recognized standards of data processing with a head office in England. Accordingly, CyberIAM adheres to the standards set by the Information Commissioner's Office (ICO) which is a regulator equivalent to the Informational Regulator. CyberIAM processes personal information in accordance with POPIA. In terms of our privacy policy, CyberIAM will ensure that all processing conditions of POPIA are complied with at the time of processing of personal information. CyberIAM processes personal information of both living and juristic persons.

8.2 A copy of CyberIAM's Privacy Policy can be found on our website, <https://cyberiam.com/privacy-policy/> and provides full details regarding the lawful processing of personal information by CyberIAM SA.

### 8.3 Purpose of Processing Personal Information

8.3.1 CyberIAM will process your information in the ordinary course of the business of providing our services.

8.3.2 CyberIAM processes personal information for a number of reasons, including –

- 6.1.1.1. Providing services requested;
- 6.1.1.2. Managing commercial relationships with clients and customers;
- 6.1.1.3. Creating and managing supplier relationships;
- 6.1.1.4. Managing contracts, order, deliveries, invoices and accounts;
- 6.1.1.5. Sending estimates and invoices;

- 6.1.1.6. General human resource and finance functions including those obligations imposed by legislation;
- 6.1.1.7. Recruitment;
- 6.1.1.8. Procurement and vendor processes;
- 6.1.1.9. Analysis, evaluation, reviewing and collation of customer information in order to provide advice, consultations and render implementation services as it relates to identity and access management generally;
- 6.1.1.10. To allow for proper functioning of CyberIAM website which includes, amongst others, proper display of content, interface personalisation and ensuring that the website is safe and secure to protect against misuse.

**8.4 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
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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

- 8.5.1 CyberIAM may disclose your personal information to third parties for legitimate business purposes in accordance with applicable law and subject to the applicable professional and regulatory requirements regarding confidentiality.
- 8.5.2 Third parties are obliged to use that personal information for the reason and the purpose the information was disclosed. Agreement are in place with those third parties to ensure that an adequate level of security and confidentiality is adopted by the third parties to which personal information may be transferred.

**8.6 Planned transborder flows of personal information**

- 8.6.1 CyberIAM may transfer your personal information to recipients outside of the Republic of South Africa. We will ensure compliance with POPIA in relation to any cross-border transfers of personal information. For example, we will ensure that the third party who is the recipient of the information is subject to a law or binding agreement which provides for an adequate level of protection similar to POPIA.
- 8.6.2 CyberIAM South Africa is wholly owned by holding company incorporated in England and Wales, and processes data where required. That entity is governed by laws

which are equal to or more stringent than POPIA and provides for an adequate level of protection.

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

8.7.1 CyberIAM takes reasonable, appropriate and adequate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or unauthorised access. We contractually mandate any third parties to which your personal information is transferred to do the same.

8.7.2 CyberIAM regularly reviews our security controls and related processes to ensure that your personal information is secure. However, where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the Regulator and you, unless the Regulator or a public body responsible for detection, prevention or investigation of offences, informs us that notifying you will impede a criminal investigation.

**9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on our website;

9.1.2 head office of CyberIAM South Africa for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

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**

This manual will be reviewed and updated, if necessary, on a periodic basis.