



PAIA MANUAL

Version 2.0

Elnatan Technologies (Pty) Ltd

Registration Number: 2010/001229607

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), read with the Regulations relating to the Promotion of Access to Information, 2021

incorporating the additional requirements of the Protection of Personal Information Act 4 of 2013

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Authorised By:	Pierre Köster

Version History

Version	Date	Author	Brief Description of Changes
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2.0	05/08/2026	Elnatan	Second version

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1. LIST OF ACRONYMS AND ABBREVIATIONS

Term	Meaning
MD	Managing Director
IO	Information Officer
DIO	Deputy Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	The Information Regulator (South Africa)
Republic	Republic of South Africa

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual is intended to assist members of the public to –

- check the categories of records held by the body which are available without a person having to submit a formal PAIA request;
- understand 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- access the relevant contact details of the Information Officer and Deputy 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 whether the body processes personal information, the purpose of such processing, and the categories of data subjects and information concerned;
- know the recipients or categories of recipients to whom personal information may be supplied;
- know whether the body has planned to transfer personal information outside the Republic and to whom; and
- know whether the body has appropriate security measures in place to protect the confidentiality, integrity and availability of personal information processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ELNATAN TECHNOLOGIES (PTY) LTD

3.1 Information Officer

Name	Pierre Koster
Title	Managing Director (Information Officer)
Tel	086 144 7777
Email	hr@elnatanit.co.za

Fax	086 680 7777
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3.2 Deputy Information Officer

Designated in terms of section 17(1) of PAIA and section 56 of POPIA:

Name	Annerike Meiring
Tel	086 144 7777
Email	hr@elnatanit.co.za
Fax	086 680 7777

3.3 General Access-to-Information Contact

Email	accounts@elnatanit.co.za
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3.4 Registered / Head Office

Postal Address	Postnet Suite #0009, Private Bag X025, Lynnwood Ridge, 0040
Physical Address	34 Bouvardia Avenue, Lynnwood Ridge, Pretoria, 0040
Telephone	086 144 7777
Email	accounts@elnatanit.co.za
Website	www.elnatanit.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Information Regulator has, in terms of section 10(1) of PAIA, compiled and made available a 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 or POPIA. Since 1 September 2021 the Information Regulator, and not the South African Human Rights Commission, is responsible for this Guide and for the promotion of compliance with PAIA.

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

4.3 The Guide contains a description of, among other things: the objects of PAIA and POPIA; the contact details of information officers and deputy information officers; the manner and form of a request for access to a record of a public or private body; the assistance available from an information officer and from the Regulator; the remedies available in law, including internal appeal, complaint to the Regulator, and application to court; the requirement for public and private bodies to compile a manual; the voluntary disclosure of categories of records; notices regarding fees payable; and the regulations made under section 92 of PAIA.

4.4 Members of the public may inspect or obtain copies of the Guide from the offices of the Regulator during normal working hours, or obtain it upon request to the Information Officer.

4.5 Contact details of the Information Regulator

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0)10 023 5200

General enquiries	enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
Website	www.infoeregulator.org.za

4.6 A copy of the Guide is available, for public inspection during normal office hours at the Regulator's offices, in English.

5. CATEGORIES OF RECORDS OF ELNATAN TECHNOLOGIES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Record	Type of Record	Available on Website	Available on Request
Company profile and general information	General corporate information	Yes	–
This PAIA Manual	Section 51 Manual	Yes	Yes
Privacy / POPIA notice	Data subject notices relating to processing of personal information	Yes	Yes
General product / service information	Marketing and product brochures	Yes	–

6. DESCRIPTION OF RECORDS OF ELNATAN TECHNOLOGIES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of Records	Applicable Legislation
Documents of incorporation, statutory registers	Companies Act 71 of 2008
Employment contracts, leave and disciplinary records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employment equity records	Employment Equity Act 55 of 1998
Financial statements, tax returns, PAYE records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Skills development levy records	Skills Development Levies Act 9 of 1999
Compensation and injury records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Medical aid / scheme records	Medical Schemes Act 131 of 1998
Insurance records	Long-Term Insurance Act 52 of 1998; Short-Term Insurance Act 53 of 1998
FICA / client due-diligence records	Financial Intelligence Centre Act 38 of 2001
Records of personal information processing	Protection of Personal Information Act 4 of 2013
This manual	Promotion of Access to Information Act 2 of 2000

7. SUBJECTS ON WHICH ELNATAN TECHNOLOGIES (PTY) LTD HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Please note that a requester is not automatically entitled to access to these records; access may be refused on the grounds set out in Chapter 4 (sections 62 to 70) of PAIA.

Subject	Categories of Records
Companies Act Records	Founding documents (Memorandum of Incorporation); minutes of board meetings; records relating to appointment of directors, auditor, secretary and other officers; share register and other statutory registers.
Financial Records	Annual financial statements; tax returns; accounting records; banking records and statements; asset register; rental agreements; invoices.
Income Tax / Statutory Compliance Records	PAYE records; documents issued to employees for income tax purposes; records of payments to SARS; VAT; regional services levies; skills development levies; UIF; compensation for occupational injuries records.
Personnel Documents and Records	Employment contracts; medical aid information; disciplinary records and code; salary records; SETA records; leave records; training records and manuals; performance appraisals; personnel policies and procedures; remuneration records and policies.
Sales and Customer Records	Customer details; information provided by third parties; contracts; work-in-progress information; sales records; supplier register; purchase and order information; stock records.
Marketing Records	Advertising and promotional material.
Safety, Health and Environment Records	Safety, health and environment risk assessments; environmental management plans; records of inquiries, inspections and examinations by environmental authorities.
IT Department Records	Information technology systems and user manuals; IT security policies.

Categories of Personal Records Held

Subject	Categories of Records
Clients / FICA Records	Identity numbers; dates of birth; telephone numbers; email addresses; physical and postal addresses; banking details and account numbers; registration numbers; B-BBEE certificates; contractual agreements; invoices.
Employee Records	Full names and surnames; dates of birth; telephone numbers; email addresses; physical addresses; identity numbers; driver's licences; tax numbers; next-of-kin details; banking details; background records (including criminal and credit records, where lawfully obtained); medical aid fund details; emergency contact details.

Customer personal information shared with third parties by Elnatan Technologies (Pty) Ltd: none, save as set out in paragraph 8.3 below.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

- to provide our goods and/or services;
- to better understand our data subjects' needs;
- to keep our data subject records up to date;
- to manage employees generally;
- to manage supplier and dealer contracts and relationships;
- to manage customers and customer credit;

- to market goods and services to customers and prospects in various countries;
- to enforce debts;
- to engage with investors and the media;
- to process customer requests or complaints; and
- to process personal information of employees for forensic purposes, where necessary.

8.2 Categories of Data Subjects and Related Categories of Personal Information

Category of Data Subject	Personal Information Processed
Customers / clients	Contact details, personal details, demographic details, account and banking details, credit information, contract information
Prospects / leads	Contact details, market intelligence information
Employees	Contact and personal details, demographic details, health information, biometric information, background information, banking details
Recruiters and medical practitioners providing services to employees	Contact details, contract information
Contractors, vendors and suppliers	Contact details, contract information, banking details
Children and their guardians	Contact and personal details (where applicable and lawfully processed)
Debtors and creditors	Contact details, account numbers, debt and debtor information
Directors and shareholders	Contact and personal details, background information

8.3 Recipients or Categories of Recipients to Whom Personal Information May Be Supplied

- statutory authorities;
- law enforcement agencies;
- tax authorities (e.g. SARS);
- financial institutions;
- medical schemes and employee funeral funds;
- industry bodies;
- contractors, vendors or suppliers;
- agents, distributors or other resellers;
- operators, other responsible parties or co-responsible parties; and
- third-party service providers (such as software developers) engaged to help us maintain our services.

8.4 Planned Transborder Flows of Personal Information

We may transfer personal information outside of South Africa. Where this occurs, we will only transfer personal information to countries that have adequate data protection laws substantially similar to those of South Africa, or to recipients who can otherwise guarantee an equivalent standard of protection, in accordance with section 72 of POPIA.

8.5 Information Security Measures

We maintain reasonable technical and organisational measures to protect personal information against loss, misuse, and unauthorised access, disclosure, alteration and destruction, including access controls, network and password security, malware protection, regular software updates, and disaster recovery and back-up

procedures. We also take reasonable steps to keep personal information accurate, complete, current and reliable for its intended use.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available:

- on www.elnatanit.co.za;
- at the head office of Elnatan Technologies (Pty) Ltd for public inspection during normal business hours;
- to any person, upon request and upon payment of the reasonable prescribed fee; and
- to the Information Regulator, upon request.

9.2 A fee for a copy of this Manual is payable per A4-size photocopy made, as prescribed in Annexure B to the PAIA Regulations, 2021 (see Annexure A to this Manual).

10. UPDATING OF THE MANUAL

The Information Officer of Elnatan Technologies (Pty) Ltd will review and update this Manual on a regular basis, and whenever there is a material change to the information it contains.

Issued by:

05 August 2026

Pierre Koster

Managing Director (Information Officer)

ANNEXURE A: FEES PAYABLE IN RESPECT OF A PRIVATE BODY

The following fees are prescribed in Annexure B to the Regulations Relating to the Promotion of Access to Information, 2021 (published under GN R757 in Government Gazette No. 45057 of 27 August 2021), which repealed and replaced the fee schedule previously published in 2002:

Item	Fee	Basis
Request fee (payable by every requester other than a personal requester)	R 140,00	Once-off, per request
Photocopy or printed copy of an A4-size page or part thereof	R 2,00	Per page
Copy in computer-readable form on flash drive (provided by requester)	R 40,00	Per item
Copy on compact disc, provided by requester	R 40,00	Per item
Copy on compact disc, provided to requester	R 60,00	Per item
Search for and preparation of a record for disclosure	R 145,00 per hour (first hour free), capped at R 435,00	Per request
Deposit where search and preparation exceeds 6 hours	One third of the applicable access fee	Per request
Postage or electronic transmission	Actual cost incurred	Per request

A personal requester (a person requesting access to a record containing their own personal information, or their authorised representative) is not liable for the request fee, but may still be liable for applicable access/reproduction fees.

ANNEXURE B: FORM 2 – REQUEST FOR ACCESS TO RECORD

In terms of section 53(1) of the Promotion of Access to Information Act, 2000, read with regulation 7 of the Regulations Relating to the Promotion of Access to Information, 2021 (the combined public/private body request form). The current version of Form 2 is available from the Information Officer or from the Information Regulator's website (www.inforegulator.org.za).

A. Particulars of the Body

The Head: Elnatan Technologies (Pty) Ltd:

B. Particulars of Person Requesting Access

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made (if on behalf of another person):

C. Particulars of Person on Whose Behalf Request Is Made (if applicable)

Full names and surname:

Identity number:

D. Particulars of Record

Description of record or relevant part of the record:

Reference number, if available:

Further particulars of record:

E. Fees

A request for access to a record, other than a record containing personal information about yourself, will be processed only once the request fee has been paid. You will be notified of the amount payable. If you believe you qualify for an exemption from the payment of fees, state your reason below.

Reason for exemption from payment of fees:

F. Form of Access Required

Mark the appropriate box with an X. Access in the form requested may be refused in certain circumstances, in which case you will be informed if access will be granted in another form.

Written or printed record: copy of record ☐ inspection of record ☐

Visual images: view the images ☐ copy of the images ☐ transcription of the images ☐

Recorded words / sound: listen to the soundtrack ☐ transcription of soundtrack ☐

Record held electronically: printed copy of record ☐ printed copy of information derived from record ☐
copy in computer-readable form ☐

If disability prevents access in the form above, state the disability and the form required

Do you wish the copy/transcription to be posted to you? (postage payable) YES ☐ NO ☐:

G. Particulars of Right to Be Exercised or Protected

Right to be exercised or protected:

Explanation of why the record is required for the exercise or protection of that right:

H. Notice of Decision

Preferred manner of notification of the decision on this request:

Signed at _____ on this _____ day of _____ 20____

1. *Signature of requester / person on whose behalf reque*