

## **PAIA MANUAL**

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This manual applies to **DV8 TECHNOLOGY GROUP (PTY) LTD**  
Registration number 1998/025801/06

1 April 2021

Registered office address:

Masingita House  
41 West Street  
Houghton Estate  
Johannesburg  
2091

**Doc No: DV8-PAIA Manual**

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 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
 Masingita House, 41 West Street, Houghton Estate, Gauteng, South Africa, 2198

## 1. Introduction

- 1.1 The Promotion of Access to Information Act 2 of 2000 ('the Act') came into operation on 9 March 2001 and gives effect to the constitutional right of access to information that is enshrined in section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, No. 108 of 1996 ('the Constitution'). Section 32 of the Constitution provides that everyone has the right to access any information held by the state or by another person, where such information is required for the exercise or protection of any rights.
- 1.2 The Act accordingly requires that procedures be put in place by public and private bodies to enable persons to obtain access to records swiftly, inexpensively and effortlessly. In terms of the Act, a private body includes juristic entities such as companies.
- 1.3 In terms of section 51 of the Act, all private bodies are required to compile an information manual ('PAIA Manual') that provides information on the types and categories of records held by a public or private body and the process that must be followed when requesting information related to such records.
- 1.4 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that the information may be adopted when requesting information from a public or private body.
- 1.5 This document serves as the information manual of DV8 Technology Group as required in terms of the Act.

## 2. DV8 Technology Group

- 2.1 DV8 Technology Group specialism includes consulting, systems integration, and managed services and products targeted at the telecoms, utility, health, education finance, mining and transport sectors.

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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- 2.2 DV8 Technology Group was incorporated in 2006 and the company has grown rapidly over its 12 years of existence; however, it retains its entrepreneurial culture focused on building best of breed ventures and solution offerings across the ICT value chain. We have, and will continue to, incrementally build research capacity to enhance consumer insights that drive business strategy and help us grow our IP portfolio.
- 2.3 Over the years, we have grown our national footprint and are now exploring a range of opportunities beyond South African borders. While running a world-class, profitable and sustainable operation, we aspire to be a force for change in South Africa, the Southern African Development Community (SADC) and Africa at large. To this end, our approach to business is rooted in the marketing concept philosophy that advocates analysing consumer needs and finding ways to satisfy them better than the competition. We believe that the key to sustainability lies in proprietary solutions to real needs of our customers hence the emphasis on building an intellectual property (IP) portfolio that sets us apart from the competition.
- 2.4 This PAIA Manual of DV8 Tech Group is available at its premises: Masingita House, 41 West Street, Houghton Estate, Johannesburg, 2198, ZA as well as on its website: [www.dv8techgroup.com](http://www.dv8techgroup.com)

### 3. Contact details [Section 51(1)(a) of the Act]

Name of body: DV8 Technology Group (Pty) Ltd

Registration number: 2009/020262/07

Physical address: 41 West Street, Houghton Estate,  
Johannesburg, 2198

Postal address: PO Box 12819, Vorna Valley, Midrand,  
Gauteng, 1686

Telephone number: +27 11 312 5200

Website: <https://www.dv8techgroup.com>

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
 Masingita House, 41 West Street, Houghton Estate, Gauteng, South Africa, 2198

## 4. Purpose of the PAIA manual

- 4.1 The purpose of the Act is to promote the right of access to information, to foster a culture of transparency and accountability within DV8 Technology Group by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 4.2 In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.
- 4.3 Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
  - 4.3.1 Limitations aimed at the reasonable protection of privacy; and
  - 4.3.2 Commercial confidentiality; and Effective, efficient and good governance; and
  - 4.3.3 In a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
- 4.4 This PAIA Manual complies with the requirements of the guide mentioned in section 10 of the Act and recognises that on the application of the Protection of Personal Information Act, 4 of 2013 (POPI Act), that the Information Regulator is responsible to regulate compliance with the Act and its regulations by private and public bodies.

## 5. Information Officer

- 5.1 The head of a private body in terms of section 51 (1) and (2) of the Act, fulfils the function of compiling and updating the PAIA manual.

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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- 5.2 The Information Officer appointed in terms of the Act also refers to the information officer as referred to in the POPI Act. The information officer oversees the function and responsibilities as required in terms of both PAIA and section 55 of the POPI Act after registering with the information regulator.
- 5.3 The information regulator may where it is deemed necessary, appoint a deputy information officer, as allowed for in section 17 of the Act as well as section 56 of the POPI Act. All requests for access to information in terms of the Act must be addressed to the information officer.
- 5.4 The Chief Executive Officer of DV8 Technology group has appointed the following individual as the information officer who will be responsible for dealing with requests for records and information:

Information Officer: Mr Kgotlaetsogile Tiro

Physical address: 41 West Street, Houghton Estate,  
Johannesburg, 2198

Postal address: PO Box 12819, Vorna Valley, Midrand, Gauteng,  
1686

Telephone number: +27 11 312 5200

Email address: [io@dv8techgroup.com](mailto:io@dv8techgroup.com)

- 5.5 The following persons have been appointed as deputy information officers:

Information Officer: Mr Mokitimi Semousu

Physical address: 41 West Street, Houghton Estate,  
Johannesburg, 2198

Postal address: PO Box 12819, Vorna Valley, Midrand, Gauteng,  
1686

Telephone number: +27 11 312 5200

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## 6. Description of guide referred to in Section 10

6.1 A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

6.2 The Guide is available for inspection, inter alia, at the office of the offices of the

### **The Human Rights Commission**

Braampark Forum 3,  
33 Hoofd St,  
Braampark,  
Johannesburg, 2017,  
Gauteng,

Postal address:  
Private Bag 2700,  
Houghton,  
Gauteng,  
South Africa, 2041

Telephone: +27 (0)11 877 3600  
Website: [www.sahrc.org.za](http://www.sahrc.org.za)  
E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

6.3 From 1 July 2021 the contact details will be for :

### **The Information Regulator of South Africa**

JD House,  
27 Stiemens Street,  
Braamfontein,  
Johannesburg, 2001

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
 Masingita House, 41 West Street, Houghton Estate, Gauteng, South Africa, 2198

P.O Box 31533,  
Braamfontein,  
Johannesburg,  
2017

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## **7. Records available in accordance with other legislation [Section 51(1(c))]**

7.1 Records are kept in accordance with such other legislation and code of conducts as they are applicable to DV8 Technology Group which includes, but is not limited to the following legislation:

- 7.1.1 Administration of Estates Act 66 of 1965
- 7.1.2 Basic Conditions of Employment Act 75 of 1997
- 7.1.3 Companies Act 71 of 2008
- 7.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 7.1.5 Competition Act 89 of 1998
- 7.1.6 Financial Intelligence Centre Act 36 of 2000
- 7.1.7 Income Tax Act 95 of 1967
- 7.1.8 Insolvency Act 24 of 1936
- 7.1.9 Labour Relations Act 66 of 1995
- 7.1.10 National Credit Act 34 of 2005
- 7.1.11 Occupational Health and Safety Act 85 of 1993
- 7.1.12 Skills Development Act 97 of 1998
- 7.1.13 Trademarks Act 194 of 1993

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7.1.14 Unemployment Contributions Act 4 of 2002

7.1.15 Unemployment Insurance Act 63 of 2001

7.1.16 Value-Added Tax Act 89 of 1991

## **8. Subjects and categories of records held [Section 51(1)(d)]**

8.1 This serves as a reference to the categories of information that DV8 Technology Group holds. The information is classified and grouped according to records relating to the following subjects and categories:

8.1.1 Human resources records

8.1.1.1 Personal records provided by employees of DV8 Technology Group

8.1.1.2 Salary records

8.1.1.3 Conditions of employment and other personnel-related contractual and quasi-legal records

8.1.1.4 Internal evaluation records

8.1.1.5 UIF records

8.1.1.6 PAYE records

8.1.1.7 Leave records

8.1.1.8 Training records

8.1.1.9 Human Resources policies and procedures

8.1.2 Customer-related records

8.1.2.1 Records provided by a customer/client

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8.1.2.2 Records generated internally by or within Dv8 Technology Group relating to customer/clients including transactional records

8.1.2.3 Contractual records

8.1.3 Financial records

8.1.3.1 Annual reports

8.1.3.2 Management reports

8.1.3.3 VAT returns

8.1.3.4 Income tax returns and assessments

8.1.3.5 Invoices

8.1.3.6 Receipts

8.1.3.7 SETA returns

8.1.3.8 Asset records

8.1.3.9 Insurance policies and claims

8.1.4 Company information

8.1.4.1 Trademarks

8.1.4.2 Databases

8.1.4.3 Information Technology

8.1.4.4 Marketing records

8.1.4.5 Internal correspondence

8.1.4.6 Operational records

8.1.4.7 Product-related records

8.1.4.8 Internal policies and procedures

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- 8.1.4.9 Compliance records
- 8.1.4.10 Shareholder records
- 8.1.4.11 Records relating to board members
- 8.1.4.12 Minutes of meetings (including resolutions taken)
- 8.1.4.13 Company register and other statutory company records
- 8.1.4.14 Shareholding in subsidiaries
- 8.1.4.15 Contractual records and information relating to suppliers, service providers, contractors, professional advisors (such as attorneys and auditors) and financiers.

#### 8.1.5 Products and services

- 8.1.5.1 Product specifications
- 8.1.5.2 Product documentation (including application forms)

8.2 The accessibility of the records may be subject to the grounds of refusal set out in the Act. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before DV8 Technology Group will consider access.

## 9. Purpose for processing of personal information

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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9.1 DV8 Technology Group processes personal information for the following specific, explicitly define and lawful reasons:

- 9.1.1 to initiate client on boarding, recruitment of and the management of employees
- 9.1.2 comply with relevant legislation governing employees
- 9.1.3 to finalise recruitment and clients on-boarding
- 9.1.4 to monitor account payments of customers
- 9.1.5 to engage with stakeholders
- 9.1.6 to engage with contractors and service providers
- 9.1.7 to support marketing activities

## **10. Data subjects categories and their personal information**

10.1 The following categories of data subjects' personal information are processed by DV8 Technology Group:

- 10.1.1 Employees: record of employee life cycle
- 10.1.2 Employees: record of learner life cycle
- 10.1.3 Customer : record of customer life cycle
- 10.1.4 Service providers: record of service provider life cycle
- 10.1.5 General public: tracking general enquiries

## **11. Planned recipients of personal information**

11.1 Statutory authorities

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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- 11.2 Law enforcement
- 11.3 Tax authorities
- 11.4 Financial institutions
- 11.5 Medical schemes
- 11.6 Employee pension and provident funds
- 11.7 Industry bodies

## **12. Planned trans-border flows of personal information**

- 12.1 DV8 Technology Group may transfer data trans-border in order to store data with third party cloud storage providers.

## **13. Security measures to protect personal information**

- 13.1 DV8 Technology Group has implemented a number of security measures to protect personal information processed by Dv8 Technology Group as the Responsible Party in terms of the POPI Act, No 4 of 2013:
  - 13.1.1 Physical security measures
  - 13.1.2 Cyber security measures
  - 13.1.3 Training in information security
  - 13.1.4 Policies in information security
  - 13.1.5 Audits of information security

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## 14. Details on how to make a request for access [Section 51(e)]

- 14.1 The requester must complete Form C (Appendix 1) and submit this form together with a request fee, to the Information Officer of DV8 Technology Group.
- 14.2 The form must be submitted to the Information Officer of DV8 Technology at DV8 Technology Group's address, fax number, or electronic mail address as stated earlier in this manual.
- 14.3 Form of request:
  - 14.3.1 The requester must use the prescribed form, as attached in terms of Article 8 of this manual, to make the request for access to a record. This must be made to the information officer. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
  - 14.3.2 The requester must provide sufficient detail on the request form to enable the information officer to identify the record and the requester.
  - 14.3.3 The requester should indicate which form of access is required.
  - 14.3.4 The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
  - 14.3.5 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].
  - 14.3.6 If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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satisfaction of the designated head of the private body [s 53(2)(f)].

- 14.3.7 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 14.3.8 Every other requester, who is not a personal requester, must pay the fee.
- 14.3.9 The information officer of DV8 Technology Group must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- 14.3.10 The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)].
- 14.3.11 After the information officer of DV8 Technology Group has made a decision on the request, the requester must be notified in the required form.
- 14.3.12 If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

## 15. Availability of the manual

This manual is available for inspection at the office of DV8 Technology Group free of charge.

 +27 11 312 5200     [info@dv8techgroup.com](mailto:info@dv8techgroup.com)     [www.dv8techgroup.com](http://www.dv8techgroup.com)  
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## 16. Fees [Section 51(1(f))]

- 16.1 The requester is the person making the request for access to a record. There are two types of requesters:
- 16.1.1 **Personal requester:** A person who requests access to his/her own personal information.
  - 16.1.2 **Other requester:** A person requesting access to information of third parties.
- 16.2 The following fees are payable when making a request for information:
- 16.2.1 **Request fee:** Standard fee payable by other requesters, but not payable by personal requesters, payable at the time that the request is made.
  - 16.2.2 **Access fee:** Payable in all instances where a request for access is granted unless payment of the access fee is specifically excluded in terms of the Act or any regulations published pursuant to the Act. This fee is calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs.
- 16.3 The information officer may require that requesters pay a deposit in respect of the access fee at the time of making the request. If the request is subsequently declined, the deposit will be refunded.
- 16.4 If a request fee and/or a deposit is payable, the information officer will not process the request until payment thereof has been made.
- 16.5 If a request for information is granted, the information officer will advise the requester of the amount of the access fee payable before the record will be released.
- 16.6 Bank account details for purposes of making payments can be obtained from the information officer and may be made by

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 Masingita House, 41 West Street, Houghton Estate, Gauteng, South Africa, 2198

way of a direct deposit into the appropriate bank account or by way of a bank guaranteed cheque.

16.7 Appendix 2 hereto sets out the amounts payable in respect of the prescribed fees.

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 Masingita House, 41 West Street, Houghton Estate, Gauteng, South Africa, 2198

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