



INFORMATION PAIA MANUAL OF EDOT WEB TECHNOLOGIES
A Registered Partnership in South Africa

Prepared in accordance with the Promotion of Access to Information Act, Number 2 of 2000
("the Act")

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1. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

- 1.1. The Promotion of Access to Information Act, No 2 of 2000 ("the Act") was enacted on 3 February 2000, giving effect to the constitutional right in terms section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 ("the Constitution") of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 1.2. In terms of Section 51 of the Act, all Private Bodies are required to compile an Information Manual ("PAIA Manual").
- 1.3. 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 or must not be released. The Act sets out the relevant procedure to be adopted when requesting information from a Public or a Private Body.

2. EDOT WEB TECHNOLOGIES T/A EDOT DIGITAL

- 2.1. Edot Web Technologies (Edot Web Technologies t/a Edot Digital) is a private company, established in accordance with the laws of South Africa and established as a Partnership (Consultants). This PAIA Manual is relevant and has application on Edot Web Technologies only, save where otherwise indicated.
- 2.2. This PAIA Manual of Edot Web Technologies is available to view at its premises: 53 Granite Road, Witkoppen Ext 6, Sandton, Gauteng.

3. PURPOSE OF THE PAIA MANUAL

- 3.1. This PAIA Manual is intended to ensure that Edot Web Technologies complies with the Act and to foster a culture of transparency and accountability within Edot Web Technologies by giving effect to 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 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 terms of the Act in order for them to exercise their rights in relation to public and private bodies.

3.2. 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:

3.2.1. Limitations aimed at the reasonable protection of privacy;

3.2.2. Commercial confidentiality; and

3.2.3. Effective, efficient and good governance;

3.2.4. a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

3.4. In addition, this PAIA Manual complies with the requirements of Section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its Regulations by Public and Private Bodies.

4. CONTACT DETAILS OF THE CHIEF EXECUTIVE OFFICER (SECTION 51(1)(A))

Partners: Steve Parsons and Retha Scholtz Castillo

Registered Address: 53 Granite Road, Witkoppen Ext 6, 2191

Telephone Number: 011 465 4780

Website: <https://edot.co.za/>

5. THE INFORMATION OFFICER

5.1. The Act prescribes the appointment of an Information Officer for Private Bodies where such Information Officer is responsible to, *inter alia*, assess requests for access to information. The Head of a Private Body fulfils such a function in terms of section 51. Edot Web Technologies has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.

5.2. The Information Officer appointed in terms of the Act also refers to the Information

Officer as referred to in the Protection of Personal Information Act 4 of 2013 (POPI Act). The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.

- 5.3.** The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Edot Web Technologies as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All requests for information in terms of the Act must be addressed to the Information Officer.

Contact Details of the Information Officer

Information Officer: Steve Parsons

Physical Address: 53 Granite Road, Witkoppen Ext6, 2191

Telephone: 011 465 4780

Email: steve@edot.co.za

6. THE LATEST NOTICE IN TERMS OF SECTION 52(2)

- 6.1.** At this stage no notice(s) has/have been published on the categories of records that are automatically available without a person having to request access in terms of the Act.

7. RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT

7.1. Records held by Edot Web Technologies

This clause serves as a reference to the categories of information that Edot Web Technologies holds. The information is classified and grouped according to records relating to the following subjects and categories:

7.1.1. Personnel Records

- 7.1.1.1. Personal records provided by personnel.
- 7.1.1.2. Records provided by a third party relating to personnel.
- 7.1.1.3. Conditions of employment and other personnel-related contractual and quasi-legal record
- 7.1.1.4. Internal evaluation records and other internal records.
- 7.1.1.5. Correspondence relating to personnel.
- 7.1.1.6. Training schedules and material.

"Personnel" refers to any person who works for, or provides services to or on behalf of Edot Web Technologies, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Edot Web Technologies. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.'

7.1.2. Customer Related Records

- 7.1.2.1. Records provided by a customer to a third party acting for or on behalf of Edot Web Technologies;
- 7.1.2.2. Records provided by a third party;
- 7.1.2.3. Records generated by or within Edot Web Technologies relating to its customers, including transactional records;

"Customer" refers to any natural or juristic entity that receives services and/or products from Edot Web Technologies.

7.1.3. Private Body Records

- 7.1.3.1. Financial records;
- 7.1.3.2. Operational records;
- 7.1.3.3. Databases;
- 7.1.3.4. Information Technology;
- 7.1.3.5. Marketing records (if applicable, which as Edot Web Technologies, we do not engage in direct marketing).

7.1.4. Internal Correspondence

- 7.1.4.1. Product records;
- 7.1.4.2. Statutory records
- 7.1.4.3. Internal Policies and Procedures;
- 7.1.4.4. Records held by the officials of the institution.

These records include, but are not limited to, the records which relates to Edot Web Technologies.

7.1.5. Other Party Records

- 7.1.5.1. Personnel, customer, or private body records which are held by another party, as opposed to the records held by Edot Web Technologies itself.
- 7.1.5.2. Records held by Edot Web Technologies pertaining to other parties, including without limitation, financial records,

correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers;

7.1.5.3. Edot Web Technologies may possess records pertaining to other parties, including without limitation; contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to Edot Web Technologies.

7.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned in terms of the POPI Act, in addition to normal requirements, before Edot Web Technologies will consider access. Edot Web Technologies will further consider and evaluate all matters on its merits afore any information is divulged.

8. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF THE ACT

8.1. Records of a public nature, typically those disclosed on the Edot Web Technologies.'s website, may be accessed without the need to submit a formal application;

8.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

9. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

9.1. Where applicable to its operations, Edot Web Technologies also retains

records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act; the below mentioned legislation, and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of the Act.

- 9.1.1. Attorneys Act No. 53 of 1979;
- 9.1.2. Basic Conditions of Employment Act No. 75 of 1997;
- 9.1.3. Business Act No. 71 of 1991;
- 9.1.4. Companies Act No. 71 of 2008;
- 9.1.5. Competition Act. No. 71 of 2008;
- 9.1.6. Constitution of the Republic of South Africa 2008;
- 9.1.7. Copyright Act No. 98 of 1978;
- 9.1.8. Designs Act No. 195 of 1993;
- 9.1.9. Electronic Communications Act No. 36 of 2005;
- 9.1.10. Electronic Communications and Transaction Act No. 25 of 2002;
- 9.1.11. Employment Equity Act No. 55 of 1998;
- 9.1.12. Identification Act No.68 of 1997;
- 9.1.13. Labour Relations Act No. 66 of 1995;
- 9.1.14. Long Term Insurance Act 52 of 1998;
- 9.1.15. Promotion of Access to Information Act No. 2 of 2000;
- 9.1.16. Protection of Personal Information Act No. 4 of 2013;
- 9.1.17. Taxation Laws Amendment Act No. 7 of 2010;
- 9.1.18. Value Added Tax Act 89 of 1991.

9.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

10. REQUEST PROCEDURE

10.1. Procedural Requirements

- 10.1.1. The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.
- 10.1.2. The requester must complete the prescribed form enclosed herewith and submit same as well as payment of a request fee and a deposit (if applicable) to the Information Officer or the Deputy Information Officer at the postal or physical address, fax number or electronic mail address as noted in clause 5 above.
- 10.1.3. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
 - 10.1.3.1. the record or records requested; and
 - 10.1.3.2. the identity of the requester.
- 10.1.4. The requester should indicate which form of access is required and specify a postal address or fax number of the requester in the Republic;
- 10.1.5. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (section 53(2)(d)).
- 10.1.6. Edot Web Technologies will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 10.1.7. The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 10.1.8. If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.

- 10.1.9. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 10.1.10. The requester must pay the prescribed fee before any further processing can take place.
- 10.1.11. All information as listed in clause 11 herein should be provided and failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all information.
- 10.1.12. the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclose.

11. REFUSAL OF ACCESS TO RECORDS

11.1. Grounds to Refuse Access

- 11.1.1. A Private Body such as Edot Web Technologies is entitled to refuse a request for information.
- 11.1.2. The main grounds for Edot Web Technologies to refuse a request for information relates to the:
 - 11.1.2.1. Mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
 - 11.1.2.2. Mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of the Protection of Personal Information

Act 4 of 2013;

- 11.1.2.3. Mandatory protection of the commercial information of a third party (section 64), if the record contains:
 - 11.1.2.4. Trade secrets of the third party;
 - 11.1.2.5. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - 11.1.2.6. Information disclosed in confidence by a third party to Edot Web Technologies, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - 11.1.2.7. Mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - 11.1.2.8. Mandatory protection of the safety of individuals and the protection of property (section 66);
 - 11.1.2.9. Mandatory protection of records which would be regarded as privileged in legal proceedings (section 67).
- 11.1.3. The commercial activities (section 68) of a Private Body, such as Edot Web Technologies, which may include:
 - 11.1.3.1. trade secrets of Edot Web Technologies;
 - 11.1.3.2. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Edot Web Technologies;
 - 11.1.3.3. information which, if disclosed could put Edot Web Technologies at a disadvantage in negotiations or commercial competition;
 - 11.1.3.4. a computer program which is owned by Edot Web

Technologies, and which is protected by copyright;

11.1.3.5. the research information (section 69) of Edot Web Technologies or a third party, if its disclosure would disclose the identity of Edot Web Technologies., the researcher or the subject matter of the research and would place the research at a serious disadvantage.

11.1.4. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

11.1.5. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

11.1.6. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

12. REMEDIES AVAILABLE WHEN EDOT WEB TECHNOLOGIES REFUSES A REQUEST

12.1. Internal Remedies

12.1.1. Edot Web Technologies does not have an internal appeal procedure. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

12.1.2. **External Remedies**

12.1.3. A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

12.1.4. A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

12.1.5. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which is presided over by a designated Magistrate.

13. ACCESS TO RECORDS HELD BY EDOT WEB TECHNOLOGIES

13.1. Prerequisites for Access by Personal/Other Requester

13.1.1. Records held by Edot Web Technologies may be accessed by requests only once the prerequisite requirements for access have been met.

13.1.2. A requester is any person making a request for access to a record of Edot Web Technologies. There are two types of requesters:

13.1.3. **Personal Requester**

13.1.3.1. A personal requester is a requester who is seeking access to a record containing personal information about the requester.

13.1.3.2. Edot Web Technologies will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

13.1.4. Other Requester

13.1.4.1. This requester (other than a personal requester) is entitled to request access to information on third parties.

13.1.4.2. In considering such a request, Edot Web Technologies will adhere to the provisions of the Act. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/ her that he /she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the Information. Edot Web Technologies is not obliged to voluntarily grant access to such records. The requester must fulfil the prerequisite requirements, in accordance with the requirements of the Act and as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

14. FEES

14.1. Fees Provided by the Act

14.1.1. The Act provides for two types of fees, namely:

14.1.1.1. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered. The request fee is not refundable; and

14.1.1.2. An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs

involved by the Private Body in obtaining and preparing a record for delivery to the requester.

- 14.1.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).
- 14.1.3. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay, as a deposit, the prescribed portion of the access fee which would be payable if the request is granted.
- 14.1.4. The Information Officer shall withhold a record until the requester has paid the fees as indicated below.
- 14.1.5. A requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- 14.1.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

15. REPRODUCTION FEES

- 15.1.** Where Edot Web Technologies has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

Reproduction of Information Fees	Fees to be Charged
Information in an A-4 size page photocopy or part thereof	R 1-10
A printed copy of an A4-size page or part thereof	R 0-75
A copy in computer-readable format, for example:	
Compact disc	R 70-00
A transcription of visual images, in an A4-size page or part thereof	R 40-00
A copy of visual images	R 60-00
A transcription of an audio record for an A4-size page or part thereof	R 20-00
A copy of an audio record	R 30-00

15.2. Request Fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable up-front before the institution will further process the request received.

15.3. Access Fees

15.3.1. An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act an exclusion is determined by the Minister in terms of Section 54(8).

15.3.2. The applicable access fees which will be payable are:

Access of Information Fees	Fees to be Charged
Information in an A-4 size page photocopy or part thereof	R1-10
A printed copy of an A4-size page or part thereof	R0-75
Access of Information	Fees to be charged

A copy in computer-readable format, for example: Compact disc	R70-00
A transcription of visual images, in an A4-size page or part thereof	R40-00
A copy of visual images	R60-00
A search for a record that must be disclosed *Per hour or part of an hour reasonably required for such search.	R30-00*

15.4. Deposits

- 15.4.1. Where the institution receives a request for access to information held on a person other than the requester himself/ herself and the information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester.
- 15.4.2. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.

15.5. Collection Fees

- 15.5.1. The initial "request fee" of R50,00 should be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence/documents, forwarded to the Information Officer via fax.
- 15.5.2. Edot Web Technologies will collect the initial "request fee" of applications received directly by the Information Officer via email.

- 15.6.** All fees are subject to change as allowed for in the Act and as a consequence such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

16. DECISION

16.1. Time Allowed to Institution

- 16.1.1. Edot Web Technologies will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 16.1.2. The 30 (thirty) day period within which Edot Web Technologies has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days if the request is for a large number of information, or the request requires a search for information held at another office of Edot Web Technologies and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- 16.1.3. Edot Web Technologies will notify the requester in writing should an extension be sought.

17. AVAILABILITY AND UPDATING OF THE PAIA MANUAL

17.1. Regulation Number R.187 of 15 February 2002

- 17.1.1. This PAIA Manual is made available in terms of Regulation Number R.187 of 15 February 2002. Edot Web Technologies will update this PAIA Manual at such intervals as may be deemed necessary.
- 17.1.2. This PAIA Manual of Edot Web Technologies is available to view at its premises: 53 Granite Road, Witkoppen Ext 6, 2191.