

PAIA MANUAL

Prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000, for Inospace Services (Pty) Ltd ("Inospace").

1. APPLICABILITY AND AVAILABILITY OF THIS MANUAL ("Manual")

- 1.1. The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information in records held by public or private bodies where such information is required for the exercise or protection of any rights.
- 1.2. PAIA sets out the procedural requirements applicable to requests for information, the requirements with which such requests must comply, and the grounds on which requests may be refused.
- 1.3. PAIA also recognises that the right of access to information must be balanced with other rights and may be subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality, and the effective administration of justice.
- 1.4. This Manual is available for inspection, free of charge, at Inospace's offices and on its website, and will also be made available to any person on request upon payment of a reasonable charge, where applicable, and to the Information Regulator upon request.
- 1.5. This Manual has been updated to reflect the current PAIA framework, including the role of the Information Regulator and the additional disclosures required in relation to the Protection of Personal Information Act, 2013 ("POPIA").

2. INOSPACE'S CONTACT DETAILS

Information Officer

Name: Shameemah Adriaanse
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Email: sadriaanse@inospace.com

Deputy Information Officer (Johannesburg Office)

Name: Llewellyn Olivier
Tel: 087 625 0499
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Access to information general contacts

Tel: 021 180 5000
Email: compliance@inospace.com

This PAIA Manual is available at:

- 1st Floor, The Block, 51 Wale Street, Cape Town, 8001
- Website: www.inospace.com

- Email: compliance@inospace.com

Head Office

Postal Address: P O Box 15900, Vlaeberg 8018
Physical Address: 51 Wale Street, Cape Town, 8001
Telephone: 021 180 5000

3. GUIDE ON HOW TO USE PAIA

- 3.1. In terms of section 10 of PAIA, the Information Regulator must update and make available the guide on how to use PAIA.
- 3.2. The guide is available from the Information Regulator in each of the official languages and can be accessed on the Information Regulator's website.
- 3.3. Enquiries regarding the guide should be directed to the Information Regulator:
Information Regulator (South Africa)
Website: <https://info regulator.org.za>
PAIA portal and forms: <https://info regulator.org.za/paia/>
General PAIA forms: Form 2 (request for access to record) and Form 5 (complaint form) are available on the Information Regulator website.

4. VOLUNTARY DISCLOSURE AND AUTOMATIC AVAILABILITY OF CERTAIN RECORDS

- 4.1. The following categories of records are, to the extent that they are available and subject to ordinary business processes, generally available without a formal PAIA request:
 - 4.1.1. this PAIA Manual;
 - 4.1.2. Inospace's website content that is publicly available;
 - 4.1.3. general company profile information and publicly available marketing material;
 - 4.1.4. publicly available terms, notices, policies, and forms placed on Inospace's website from time to time;
 - 4.1.5. public contact details for Inospace and its offices.
- 4.2. Access to records listed above may still be subject to reproduction charges, website availability, ordinary business processes, and any lawful limitation applicable to the particular record.
- 4.3. Where a record is not automatically available, access must be requested in accordance with the request procedure set out in this Manual.

5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

- 5.1. Information is available in terms of the following legislation to the persons or entities specified therein:
 - 5.1.1. Companies Act, 71 of 2008;
 - 5.1.2. Value-Added Tax Act, 89 of 1991;
 - 5.1.3. Labour Relations Act, 66 of 1995;
 - 5.1.4. Basic Conditions of Employment Act, 75 of 1997;
 - 5.1.5. Skills Development Levies Act, 9 of 1999;
 - 5.1.6. Unemployment Insurance Act, 63 of 2001;
 - 5.1.7. Compensation for Occupational Injuries and Diseases Act, 130 of 1993;
 - 5.1.8. Occupational Health and Safety Act, 85 of 1993;
 - 5.1.9. Electronic Communications and Transactions Act, 25 of 2002;
 - 5.1.10. Protection of Personal Information Act, 4 of 2013; and
 - 5.1.11. any other legislation applicable to Inospace and the records created or held in terms thereof.
- 5.2. Access to such records may be subject to the grounds for refusal set out in PAIA and any confidentiality, privacy, or statutory restrictions that may apply.

6. DESCRIPTION OF THE SUBJECTS ON WHICH INOSPACE HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT

6.1. Inospace holds records on the following broad subjects. The categories below are intended to facilitate requests and are not exhaustive.

Subject	Categories of records
Corporate governance and legal	memorandum of incorporation; director records; statutory registers; board and committee records; legal opinions; litigation and dispute records; contracts; compliance records; licences and permits.
Finance and taxation	accounting records; annual financial statements; management accounts; tax records; invoices; banking records; budgets; insurance records; audit records.
Human resources	employee records; recruitment records; payroll records; leave records; disciplinary records; performance records; employment contracts; training records; health and safety records.
Operations and facilities	property and facilities records; maintenance records; service delivery records; access control records; incident registers; operational reports; procurement and asset records.
Customers and occupiers	customer onboarding records; agreements; service records; billing records; correspondence; complaints; support records; client due diligence documentation.
Suppliers and service providers	supplier onboarding records; agreements; procurement records; invoices; payment records; due diligence records; correspondence and service performance records.
Information technology and security	system access logs; user administration records; software and licence records; backup and disaster recovery records; cybersecurity and incident records; IT policies and procedures.
Marketing and communications	website content; marketing materials; event records; campaign records; media content; newsletters; social media records; public communications.
POPIA and privacy compliance	privacy notices; consent records where applicable; processing activities documentation; data subject requests; data breach/security compromise records; operator agreements; retention and destruction records.

7. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

7.1. Purpose of processing

Inospace processes personal information for lawful business and administrative purposes, including customer and supplier administration, human resources and payroll administration, property and facilities management, security and access control, finance and accounting, compliance, legal and contractual administration, information technology management, marketing and relationship management, and any purpose ancillary to the supply and management of its services.

7.2. Categories of data subjects and categories of personal information

Category of data subject	Categories of personal information
Customers, prospective customers and authorised representatives	identifying information; contact details; company information; agreements; billing information; communications; service history; correspondence; verification and compliance information.
Employees, directors, contractors and job applicants	identifying information; contact details; CVs; qualifications; employment history; payroll and tax information; banking details; leave and attendance information; performance and disciplinary records; emergency contact information.
Suppliers, service providers and their representatives	identifying information; contact details; registration and tax information; banking details; contracts; invoices; due diligence and compliance information; communications.
Visitors and persons accessing premises	name; contact details; access control information; CCTV or other security-related information where lawfully processed; vehicle details; incident-related information.
Website users and electronic communications users	electronic identifiers; website usage information; cookies or similar technologies where applicable; enquiries; communications and preferences.

7.3. Recipients or categories of recipients

Personal information may be supplied, where lawful and necessary, to employees and authorised internal users; operators and service providers; insurers; auditors; professional advisers; landlords, funders, and business partners; regulators and government authorities; financial institutions; credit bureaux or verification agencies where lawful; and any other recipient authorised by the data subject or permitted or required by law.

7.4. Planned transborder flows of personal information

Inospace may transfer personal information outside South Africa where this is required for the use of cloud-based systems, software platforms, data hosting, communications tools, service provider infrastructure, or cross-border business operations, provided that such transfer is done lawfully and subject to appropriate safeguards as required by POPIA.

7.5. General description of information security measures

Inospace implements reasonable technical and organisational measures designed to protect the confidentiality, integrity, and availability of personal information. These measures may include access control, password protection, role-based permissions, network and endpoint protection, encryption or secure transmission where appropriate, confidentiality undertakings, secure storage, backup procedures, incident management, service-provider oversight, and records retention and secure destruction controls.

8. GROUNDS FOR THE REFUSAL OF ACCESS TO RECORDS

- 8.1. The mandatory protection of the privacy of a third party who is a natural person, including a deceased individual, where disclosure would involve the unreasonable disclosure of personal information.
- 8.2. The mandatory protection of the commercial information of a third party, including trade secrets, financial, commercial, scientific, or technical information, the disclosure of which would likely cause harm to the

interests of that third party, or information supplied in confidence which could prejudice that third party in negotiations or competition.

- 8.3. The mandatory protection of confidential information of third parties where disclosure would constitute a breach of a duty of confidence owed in terms of an agreement.
- 8.4. The mandatory protection of the safety of individuals and the protection of property.
- 8.5. The mandatory protection of records privileged from production in legal proceedings, unless the privilege has been waived.
- 8.6. The protection of Inospace's own commercial information, including trade secrets, financial, commercial, scientific, or technical information, information that could place Inospace at a disadvantage in negotiations or prejudice it in competition, and certain computer programs owned by Inospace.
- 8.7. The protection of research information of a third party or of Inospace where disclosure would expose the researcher, the subject matter, or the relevant body to serious disadvantage.
- 8.8. Requests that are manifestly frivolous or vexatious, or that involve a substantial and unreasonable diversion of Inospace's resources.
- 8.9. Notwithstanding the above, Inospace will consider whether the mandatory public-interest override in PAIA requires disclosure.

9. **REQUEST PROCEDURE**

- 9.1. A requester requiring access to a record held by Inospace must make the request in the prescribed form and submit it to the Information Officer at the postal, physical, or email address set out in clause 2 above.
- 9.2. The prescribed form is Form 2 in terms of the PAIA Regulations. The current PAIA forms are available from the Information Regulator's website and may also be requested from Inospace.
- 9.3. The request must contain sufficient particulars to enable Inospace to identify:
 - 9.3.1. the record or records requested;
 - 9.3.2. the identity of the requester;
 - 9.3.3. the form of access required, if the request is granted;
 - 9.3.4. the postal address, fax number, or email address of the requester;
 - 9.3.5. the right that the requester seeks to exercise or protect; and
 - 9.3.6. an explanation of why the requested record is required for the exercise or protection of that right.
- 9.4. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made, to the reasonable satisfaction of Inospace.
- 9.5. If a person cannot complete the prescribed form because of illiteracy or disability, that person may make the request orally and Inospace must reduce the oral request to writing.
- 9.6. Inospace will decide the request within 30 (thirty) days of receipt, subject to any lawful extension permitted by PAIA.
- 9.7. Inospace may extend the 30 (thirty) day period once for a further period not exceeding 30 (thirty) days where this is permitted by PAIA, including where the request is for a large number of records, requires a search through a large volume of records, consultation is required, or more time is reasonably necessary to decide the request.
- 9.8. Inospace will notify the requester in writing of its decision and, if the request is refused or partially refused, will provide written reasons subject to PAIA.
- 9.9. The requester must pay the prescribed request fee and deposit, where applicable, before the request will be processed further.

10. **ACCESS TO RECORDS**

- 10.1. In terms of PAIA, a requester will be given access to a record held by Inospace if:

- 10.1.1. the record is required for the exercise or protection of a right;
- 10.1.2. the requester has complied with the procedural requirements in PAIA relating to the request; and
- 10.1.3. access to the record is not refused on any ground for refusal contemplated in PAIA.

11. REMEDIES AVAILABLE IF INOSPACE REFUSES A REQUEST OR FAILS TO RESPOND

11.1. Internal remedies

Inospace does not have an internal appeal procedure for PAIA requests.

11.2. Complaint to the Information Regulator

11.2.1. A requester or third party who is dissatisfied with the decision of Inospace, or with Inospace’s failure to respond within the period allowed by PAIA, may lodge a complaint with the Information Regulator using Form 5.

11.2.2. In the case of a private body, the complaint should generally be lodged within 180 (one hundred and eighty) days from the date of the decision, refusal, deemed refusal, or from the date on which the 30-day response period has expired, subject to the applicable legal requirements.

11.3. Court proceedings

11.3.1. A requester or third party may also apply to a court of competent jurisdiction for appropriate relief in accordance with PAIA.

12. FEES

12.1. The request and access fees payable in respect of requests made to private bodies are those prescribed from time to time in terms of PAIA and its Regulations.

12.2. Inospace will, where applicable, notify the requester of the prescribed request fee, access fee, and any deposit payable before proceeding further or before granting access.

12.3. As at the date of this revision, the prescribed fees commonly applied under the PAIA Regulations include the following:

Fee item	Amount
Request fee payable by every requester (other than a personal requester)	R100.00
Photocopy of an A4-size page	R1.50 per page or part thereof
Printed copy of an A4-size page	R1.50 per page or part thereof
Copy in computer-readable form on flash drive provided by requester	R40.00
Copy in computer-readable form on compact disc provided by requester	R40.00
Copy in computer-readable form on compact disc provided to requester	R60.00
Transcription of visual images, per A4-size page	Service to be outsourced; cost depends on service provider quotation
Copy of visual images	Service to be outsourced; cost depends on service provider quotation

Fee item	Amount
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on flash drive provided by requester	R40.00
Copy of an audio record on compact disc provided by requester	R40.00
Copy of an audio record on compact disc provided to requester	R60.00
Search and preparation for disclosure, for each hour or part of an hour, excluding the first hour	R100.00
Maximum search and preparation cost	R300.00
Deposit where search exceeds 6 hours	One third of the amount payable for items above
Postage, email, or any other electronic transfer	Actual expense, if any

- 12.4. Inospace will withhold a record until the requester has paid the prescribed fees and deposit, where applicable.
- 12.5. If a deposit has been paid in respect of a request that is refused, Inospace will refund the deposit to the requester.
- 12.6. Because fees may be amended by law from time to time, the applicable prescribed fee at the date of the request will prevail if it differs from the amounts recorded above.

Issued by



SHAMEEMAH ADRIAANSE

Director

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