

PlusPlusMinus Design and Development CC

PAIA Manual

Project name: Section 51, Promotion of Access to Information Act

Prepared for: Members of the public and the Information Regulator

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Document control

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

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1. List of acronyms and abbreviations

1.1 "**CC**" - Close Corporation

1.2 "**DIO**" - Deputy Information Officer

1.3 "**IO**" - Information Officer

1.4 "**Minister**" - Minister of Justice and Constitutional Development

1.5 "**PAIA**" - Promotion of Access to Information Act 2 of 2000 (as amended)

1.6 "**POPIA**" - Protection of Personal Information Act 4 of 2013

1.7 "**PPM**" - PlusPlusMinus Design and Development CC (registration number 2009/160763/23), trading as PlusPlusMinus

1.8 "**Regulator**" - Information Regulator

1.9 "**Republic**" - Republic of South Africa

2. Purpose of this PAIA Manual

This manual helps a member of the public to:

2.1 check the categories of records PPM holds that are available without a formal PAIA request;



2.2 understand how to make a request for access to a record of PPM, through a description of the subjects on which PPM holds records and the categories of records held on each subject;

2.3 know which records PPM holds in accordance with other legislation;

2.4 find the contact details of the Information Officer and any Deputy Information Officer who will assist with requests;

2.5 know about the Regulator's Guide on how to use PAIA and how to obtain it;

2.6 know whether PPM processes personal information, why, and the categories of data subjects and information involved;

2.7 know the recipients or categories of recipients to whom personal information may be supplied;

2.8 know whether PPM transfers or processes personal information outside the Republic; and

2.9 know whether PPM has appropriate security measures to protect the confidentiality, integrity and availability of personal information.

3. Key contact details for access to information of PPM

3.1 Information Officer

Name	Adriaan E. van Niekerk
Title	Member
Email	iaan@plusplusminus.co.za

3.2 Deputy Information Officer

Name	Sergio L. Pellegrini
Title	Member



Email	sergio@plusplusminus.co.za
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3.3 Access to information general contact

Email	admin@plusplusminus.co.za
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3.4 Head office

Postal address	1289 Val de Vie, Paarl, 7646
Physical address	Workshop17 Tabakhuis. Cnr of Tabak and, Louws, Paarl, 7646
Email	admin@plusplusminus.co.za
Website	https://plusplusminus.co.za

4. Guide on how to use PAIA and how to obtain access to the Guide

4.1 The Regulator has, in terms of section 10(1) of PAIA, 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.

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

4.3 The Guide contains a description of:

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, email address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;



4.3.3 the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);

4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

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

4.3.6 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 an internal appeal, a complaint to the Regulator, and an application to court against a decision of the Information Officer of a public body, a decision on internal appeal, a decision of the Regulator or a decision of the head of a private body;

4.3.7 the provisions of sections 14 and 51 requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;

4.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained:

4.5.1 on request to the Information Officer; or

4.5.2 from the website of the Regulator (<https://infoeregulator.org.za>).

4.6 A copy of the Guide is available in English and Afrikaans for public inspection at PPM's head office during normal office hours.

5. How to request access to a record of PPM

5.1 A requester must use the prescribed form (Form 2 of the PAIA Regulations, 2021), available from the Regulator's website or from the Information Officer, and submit it to the Information Officer at the contact details in section 3.



5.2 The requester must provide enough detail to identify the record, state the form of access required, and identify the right they are seeking to exercise or protect and explain why the record is required for that purpose (section 53(2)(d) of PAIA).

5.3 A request fee and, where applicable, an access fee are payable as prescribed in the PAIA Regulations. PPM will notify the requester of any fee payable before processing the request.

5.4 PPM will decide on a request within 30 days of receipt. This period may be extended once by up to 30 days in the circumstances set out in section 57 of PAIA, in which case the requester will be notified.

5.5 PPM may refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, including protection of the privacy of third parties, commercial information of PPM or third parties (including PPM's clients), confidential information, and the safety of individuals and property.

5.6 PPM is a private body and has no internal appeal procedure. A requester dissatisfied with a decision may lodge a complaint with the Regulator within 180 days of the decision, or apply to court.

5.7 A data subject may also request access to, correction of or deletion of their own personal information under sections 23 and 24 of POPIA, and object to processing under section 11(3) of POPIA, using Forms 1 and 2 of the POPIA Regulations. Requests go to the Information Officer.

6. Categories of records of PPM available without a person having to request access

Category of records	Types of the record	Available on website	Available upon request
Company information	Trading name, contact details, services offered	X	X
PAIA Manual	This manual	X	X
Privacy notice	PPM's privacy notice, at www.plusplusminus.co.za/privacy	X	X
Marketing material	Case studies, capability presentations, published articles	X	X



7. Description of the records of PPM available in accordance with any other legislation

Category of records	Applicable legislation
Founding statement and amendments, member register, accounting records	Close Corporations Act 69 of 1984
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Personal information processing records	Protection of Personal Information Act 4 of 2013
Employee records, contracts, leave, remuneration and working-time records	Basic Conditions of Employment Act 75 of 1997
Workplace and employment records	Labour Relations Act 66 of 1995
Employment equity records (where applicable)	Employment Equity Act 55 of 1998
Skills development and levy records, learnership and internship records	Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999
UIF records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Compensation for injuries records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
Income tax and PAYE records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
VAT records	Value-Added Tax Act 89 of 1991
Electronic communications and transactions records	Electronic Communications and Transactions Act 25 of 2002
Consumer records	Consumer Protection Act 68 of 2008
Copyright and intellectual property records	Copyright Act 98 of 1978

This list is not exhaustive. Records held under any of these Acts are subject to the access provisions of PAIA and are not automatically available.

8. Subjects on which PPM holds records and categories of records held



Subject	Categories of records
Corporate and statutory	Founding statement, member records, statutory registrations, insurance policies, licences
Finance and tax	Financial statements, management accounts, budgets and forecasts, invoices, bank records, tax and VAT returns
Human resources	Employment contracts, personnel files, remuneration and payroll records, leave records, performance and development records, recruitment records, internship and SETA records, HR policies
Clients and contracts	Proposals, master services agreements, statements of work, service level agreements, billing schedules, client correspondence, meeting notes and recordings
Delivery and projects	Project plans, specifications, issue tracking records, design files, source code, deployment and hosting records, documentation produced for clients
Sales and marketing	Lead and pipeline records, prospect research based on publicly available information, marketing material
Suppliers and vendors	Supplier contracts, software subscriptions, data processing agreements, supplier invoices
Information technology	System and access logs, security records, tool usage and development-session records, backups
Legal and compliance	Legal opinions, compliance records, records of requests under PAIA and POPIA, incident records

9. Processing of personal information

9.1 Purpose of processing personal information

PPM is a software design and development agency. It processes personal information to:

9.1.1 deliver design, development, hosting, support and product-management services to its clients;

9.1.2 conclude and administer agreements with clients and suppliers, including billing and payment;

9.1.3 communicate with clients, prospective clients and suppliers, including by email, messaging and recorded meetings;



9.1.4 recruit, employ, pay and manage staff, contractors and interns, and meet its obligations as an employer;

9.1.5 plan, allocate, estimate and price work, and improve its delivery practices, including by analysing records of how work tools are used;

9.1.6 market its services to existing clients and to prospective clients;

9.1.7 secure its systems and information; and

9.1.8 comply with legal and regulatory obligations.

When PPM builds or operates systems for a client that process the client's customers' or users' personal information, PPM acts as an operator on the client's behalf. The client is the responsible party for that information and PPM processes it only for the purpose of the services agreed with the client.

9.2 Categories of data subjects and the personal information processed

Category of data subjects	Personal information that may be processed
Clients and their staff	Names, job titles, work contact details, company registration and VAT numbers, billing and payment details, correspondence, meeting notes, meeting recordings and transcripts
Prospective clients	Names, job titles, work contact details, publicly available company information, correspondence, meeting notes
End users of systems PPM builds or operates for clients (as operator)	Personal information as determined by the client and the system concerned, which may include names, contact details, account and usage data
Employees, contractors and interns	Names, identity numbers, contact details, addresses, qualifications, employment history, bank details, tax numbers, remuneration and cost rates, leave records, performance and development records, records of work-tool usage, race and gender for employment equity and skills reporting where required
Job applicants	Names, contact details, CVs, qualifications, employment history, interview notes
Suppliers and service providers	Names, contact persons, contact details, registration and VAT numbers, bank details, contract terms
Website visitors and viewers of documents PPM publishes	Contact details submitted through forms, technical and usage data such as IP address, browser type and viewing activity



9.3 Recipients or categories of recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients
Information needed to deliver services	Software and cloud service providers that host, store or process information for PPM (see 9.4)
Client information and work products	The client concerned, and subcontractors engaged on that client's work under confidentiality obligations
Employee remuneration, tax and statutory information	South African Revenue Service, the Unemployment Insurance Fund, the Compensation Fund, SETAs, payroll and accounting service providers
Financial and billing information	Banks, payment providers, auditors and accountants
Information required by law	Law enforcement agencies, courts, regulators and other authorities where PPM is legally obliged to disclose it
Information relevant to legal advice or claims	PPM's legal advisers and insurers

PPM does not sell personal information.

9.4 Planned transborder flows of personal information

PPM uses cloud-based software services, many of which store or process information outside the Republic. Personal information in all categories listed in 9.2 may therefore be stored or processed in the **United States of America** and the **European Union**, and in other countries where those providers operate.

These services include:

9.4.1 email, documents, file storage, messaging and calendar services;

9.4.2 project management, issue tracking, knowledge management and customer relationship management tools;

9.4.3 cloud hosting, databases, content management, email delivery, video hosting and analytics services used to build and run client systems;



9.4.4 meeting recording and transcription services;

9.4.5 artificial intelligence services used to assist with software development, analysis, drafting and meeting summaries, and services that record how staff use those tools; and

9.4.6 payroll, accounting, time-tracking and electronic signature services.

PPM transfers personal information outside the Republic only in accordance with section 72 of POPIA: where the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, where the data subject consents, or where the transfer is necessary for the performance of a contract with the data subject or for the data subject's benefit.

9.5 General description of information security measures

PPM implements the following measures to protect the confidentiality, integrity and availability of personal information, and keeps them under review:

9.5.1 access to systems and records is limited to people who need it for their role, and access to remuneration and other sensitive personnel information is restricted to designated persons;

9.5.2 multi-factor authentication on email and core business systems enforced across all core systems;

9.5.3 encryption of information in transit and at rest on cloud services, and full-disk encryption on all devices used to access personal information;

9.5.4 database access controls, including row-level security, on systems PPM builds and operates;

9.5.5 secrets and credentials kept out of source code, and rotated when exposure is suspected;

9.5.6 automatic removal of credentials and secrets from records of development-tool usage before they are stored;

9.5.7 written agreements with service providers that process personal information on PPM's behalf, requiring them to keep it confidential and secure;

9.5.8 confidentiality obligations in employment and contractor agreements;

9.5.9 backups of business-critical systems; and



9.5.10 a process for identifying, containing and assessing security compromises, and notifying the Regulator and affected data subjects as required by section 22 of POPIA.

10. Availability of the manual

10.1 A copy of this manual is available:

10.1.1 on PPM's website, www.plusplusminus.co.za, as a download linked from the site footer;

10.1.2 at PPM's head office for public inspection during normal business hours;

10.1.3 to any person on request, on payment of the reasonable fee prescribed; and

10.1.4 to the Regulator on request.

10.2 A fee for a copy of the manual, as contemplated in Annexure B of the PAIA Regulations, is payable for each A4-size photocopy made.

11. Updating of the manual

The Information Officer will review this manual at least once a year, and update it whenever PPM's contact details, records or processing of personal information change materially.

Issued by



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