

PAIA Manual

1. Introduction

- 1.1. **About PAIA** | The [Promotion of Access to Information Act 2 of 2000 \(PAIA\)](#) is a South African law that gives effect to your constitutional right to access information held by public and private bodies.
- 1.2. **About us** | We are the Mobalyz Group, a group of private companies incorporated under South African law, operating at 179 15th Road, Randjespark, Midrand, 1685.
- 1.3. **PAIA applies to us** | PAIA classifies us as a “private body”, which means we are an organisation not part of government. Since we are a private body that operates in South Africa, we must comply with PAIA.
- 1.4. **About you** | If you were to rely on PAIA to access information we hold, you would be known as a “requester”, which means someone who requests access to any records. As a requester, PAIA gives you the right to request certain records from us, and it requires us to explain the process and conditions for accessing those records.
- 1.5. **Purpose of this manual** | With the above context in mind, this manual explains:
 - (a) what “records” are;
 - (b) what records we hold;
 - (c) which records we make automatically available without a PAIA request;
 - (d) which records require a PAIA request;
 - (e) which records we must not or may not share;
 - (f) who our Information Officer is and how they can help you; and
 - (g) how we handle personal information under POPIA (South Africa’s data protection law).

2. Structure and accessibility of this manual

- 2.1. **Structure** | This manual is divided into a main body and supporting schedules:

Part	What it covers
Main Body	<ol style="list-style-type: none"> 1. Introduction (about PAIA, purpose of manual, requester’s rights) 2. Structure and accessibility (how manual is organised, how to access it) 3. Categories of records (green = automatically available, amber = on request, red = not shared, with public interest override) 4. Request procedure (steps, Form 2, fees, timelines, extensions) 5. Grounds for refusal (privacy, commercial info, privilege, safety, statutory prohibitions) 6. Remedies if refused (complaint to Regulator, approach High Court) 7. Personal information (how we process and safeguard data under POPIA) 8. Information Officer (role and accountability, with reference to Schedule A) 9. The PAIA Guide (purpose, coverage, Regulator’s contact details) 10. Version control (annual review and update requirement)
Schedules	<ul style="list-style-type: none"> • Schedule A: Contact details (Information Officer & Deputies) • Schedule B: Definitions & glossary (legal and plain-language) • Schedule C: Legislative framework (laws that apply to the organisation) • Schedule D: Records we hold (examples across categories) • Schedule E: Request procedure (forms, steps, fees, assistance) • Schedule F: Grounds for refusal (expanded with PAIA section references) • Schedule G: Remedies (complaint and litigation pathways) • Schedule H: Personal information (processing and safeguards under POPIA) • Schedule I: Version control (log of updates and review dates)

- 2.2. **Accessibility** | This manual is available for free inspection on our website and at our offices during normal business hours. On request, the manual can be provided in large print or, where practicable, in accessible formats such as braille or audio. The official version is prepared in English, but we will attempt to provide translations into other official languages where reasonably possible.

3. Defining records and categories of records

- 3.1. **What is a record?** | A “record” is any recorded information, regardless of form or medium, that we possess or control, whether we create it or not.
- 3.2. **Record creation** | PAIA does not require us to create new records. We can only provide records that already exist.
- 3.3. **About the categories** | We keep different categories of records to operate effectively. Some records are automatically available, while others require a PAIA request, and some are legally protected and cannot be shared.
- 3.4. **Records automatically available** | These include: brochures, newsletters, press releases, website and social media content, and certain policies or notices that the law requires us to publish. These records are generally available for inspection at no charge, although a small fee may be applied for physical copies. In addition to listing our automatically available records in this manual, we may also submit this list to the Information Regulator. This submission to the Regulator would ensure it maintains a central register of records that can be accessed *without a formal PAIA request*.
- 3.5. **Records requiring a PAIA request** | These include internal records such as employment contracts, HR policies, financial statements, contracts with third parties, compliance files, and other operational records. To access these records, you must complete [Form 2](#) and submit it to our Information Officer. We will process your request and respond within 30 days, unless an extension is needed. We provide more information on the request procedure in part 4 of this manual.
- 3.6. **Records we must not or may not share** | PAIA contains mandatory and discretionary refusal grounds that function as exemptions from disclosure, meaning we must or may refuse access to records that include someone else's personal information, confidential or commercial information, information protected by other laws, anything that could endanger a person's safety, legally privileged documents, sensitive business information, or internal records that would harm our operations if released—with one exception: if the public interest clearly outweighs the harm, PAIA may require us to disclose the record anyway.
- 3.7. **Request refusal** | If we refuse access to records, we will provide written reasons and, where possible, a redacted version. See also ‘Why a request may be refused’ in part 5 below.

4. Request procedure

Making a PAIA request is a simple process. Here's what you need to do:

Step 1: Complete the request form

All requests must be made on the prescribed [Form 2 \(2021 version\)](#), as set out in the *Regulations Relating to the Promotion of Access to Information, 2021*. Older versions of PAIA forms may not be used. You can get the correct form from the Information Regulator's website (www.inforegulator.org.za), on our website, or directly from our Information Officer.

Step 2: Pay the request fee

When you submit a PAIA request, you might need to pay a request fee and, if access is granted, an access fee. These fees are prescribed in the PAIA Regulations and may be updated from time to time. The current fee schedule is published by the Information Regulator on its website (<https://www.inforegulator.org.za>) and is also available on request from our Information Officer.

Step 3: Send your request

Submit the completed [Form 2](#) and proof of payment (if required) to our Information Officer by hand, post, or email. Their contact details are listed in Schedule A of this manual.

Step 4: Receive a decision

We will send you a written response within **30 days**, with possible extensions if your request is complex or requires consultation with third parties. However, we will notify you if an extension is required.

- **If your request is granted**, you might need to pay an additional access fee to cover the cost of copies or delivery.
- **If your request is refused**, we will explain why and tell you how to appeal to the Information Regulator or approach a court.

5. Why a request may be refused

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Reason for refusal	Type	Plain-language explanation	Example
Someone else's personal information	Mandatory	We must refuse if the record contains private information about another person, unless they consent.	Their ID number, contact details, medical info.
Another company's confidential or commercial information	Mandatory	We must refuse if releasing the record would reveal trade secrets, confidential financial data, or other proprietary information.	A supplier's pricing model or proprietary process.

		or information supplied in confidence by another party.	
Information protected by another law	Mandatory	If another law prohibits disclosure, PAIA cannot override it.	Tax information protected by the Tax Administration Act.
Safety or security risks	Mandatory	We must refuse if releasing the record could endanger someone's physical safety or security.	Security protocols, passwords, risk assessments.
Signed legal advice or privileged documents	Discretionary	We may refuse if the record is covered by attorney-client privilege or prepared for litigation.	Legal opinions, litigation strategy memos.
Our confidential or commercially sensitive information	Discretionary	We may refuse if releasing the record would harm our business or competitive position.	Internal costing models, business strategy.
Internal operational records	Discretionary	We may refuse if disclosure would prejudice our operations, audits, investigations, or internal decision-making.	Internal investigation notes, audit working papers.
The request is too vague or cannot reasonably be processed	Procedural	We can ask the requester to clarify the request or narrow it down; if they don't, we may refuse.	"Send me everything about all customers."
Records that do not exist or cannot be found	Procedural	PAIA does not require us to create new records or provide information we do not have.	A report that was never produced.
Public interest override does NOT apply	Override test	Even if a refusal ground applies, we must check if the public interest outweighs the harm. If not, refusal stands.	No evidence of wrongdoing or public risk.

6. What happens if your request is refused

If we refuse your request or do not respond within the 30-day period, PAIA gives you the right to take the matter further.

Step 1: Complain to the Information Regulator

You can lodge a complaint with the Information Regulator, who oversees compliance with PAIA and POPIA. The Regulator can investigate and may order us to take corrective action. Their contact details are listed in part 9 of this manual.

Step 2: Approach a court

Alternatively, or if you are not satisfied with the Regulator's decision, you may apply to the High Court for relief.

Important to know

- Appeals to higher courts (the Supreme Court of Appeal or the Constitutional Court) are possible if the matter raises further legal issues.
- There is no "internal appeal" within our organisation, because PAIA allows internal appeals for public bodies only, not private bodies.

7. Personal information under POPIA

7.1. **Processing** | We collect and process personal information in order to carry out our business activities, comply with legal obligations, and fulfil contracts. Personal information may relate to clients, employees, suppliers, or other stakeholders. We implement reasonable safeguards to protect this information, and we respect your rights under POPIA to access, correct, or delete your personal information. Further details are set out in Schedule H.

7.2. **PAIA-POPIA interplay** | POPIA and PAIA serve different purposes. PAIA governs access-to-information requests, while POPIA governs personal-information rights. POPIA forms or processes do not replace or modify PAIA Form 2.

8. Information Officer

Details of our Information Officer (and any Deputy Information Officers) are provided in Schedule A, including contact information and office address. The Information Officer is responsible for ensuring compliance with PAIA and POPIA and for assisting requesters.

9. The Information Regulator's PAIA guide

9.1. **Availability of the Guide** | The Information Regulator has published a [Guide on how to use PAIA and exercise your rights](#). This Guide is intended to help anyone, especially members of the public who may not be legally trained, understand how to make a request for access to information and how to enforce their rights if access is refused.

9.2. **What the Guide covers** | The Guide explains:

- what PAIA is and how it works;
- who can make a request;
- how to complete the official request form;
- what fees may be charged;

- (e) what the grounds of refusal are; and
- (f) how to lodge an appeal or complaint.

9.3. **How to access the Guide** | The Guide is available in all official languages and in braille. It can be accessed free of charge from the Information Regulator's [website](#) or requested directly from their office:

Information Regulator (South Africa)	Details
Physical Address	Information Regulator, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Sandton, Johannesburg, 2191
Postal Address	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	PAIACComplaints@inforegulator.org.za
Website	https://www.inforegulator.org.za

10. Version control

This manual is reviewed annually and whenever significant changes occur in law or in our operations. The version control table in Schedule I records each update, the changes made, and the date of approval. The latest version is always available at our offices and, where applicable, on our website.

Schedule A: Our contact information

If you wish to make a PAIA request or have questions about this manual, please contact our Information Officer. Their details are below.

Company

Category	Details
Company Name	Mobalyz Mobility Holdings (Pty) Ltd
Registration Number	2024/746071/07
Physical Address	179 15th Road, Randjespark, Midrand, South Africa
Postal Address	P.O. Box 41888, Craighall, 2024
Telephone	011 550 9300
Website	https://www.mobalyz.com/

Information Officer

Role	Name	Position	Telephone	Email
Information Officer	Sean Doherty	CEO	011 550 9300	dpo@mobalyz.com
Deputy Information Officer	Kuhgen Govender	Legal and Compliance Counsel	011 550 9300	dpo@mobalyz.com
Deputy Information Officer	Nathan-Ross Adams (ITLawCo)	External DPO	011 550 9300	dpo@mobalyz.com

How they can help you

- Explaining how PAIA works and how to make a request.
- Guiding you to the right form ([Form 2](#)) and telling you about any fees.
- Receiving your completed requests and responding within the legal timeframes.
- Helping you understand our decisions and your rights to complain or appeal.

Schedule B: Definitions

This schedule explains some of the key terms used in this manual. The first column shows the legal meaning (mainly from PAIA and POPIA). The second column explains the term in plain language.

Term	Legal definition	Plain-language explanation
“private body”	A natural person who carries on a trade, business, or profession; a partnership; a company or close corporation; or a political party.	Any person, business, or organisation that is not part of government.
“public body”	Any department of state, administration in the national, provincial or local sphere of government, or other functionary or institution exercising a public power or performing a public function.	Any government department, municipality, or organisation that performs a public function.
“requester”	Any person who makes a request for access to a record under PAIA.	You — the person asking for information.
“Information Officer”	For private bodies: the head of the body (or their authorised deputy).	The person in our organisation responsible for PAIA compliance and helping with requests.
“Deputy Information Officer”	A person appointed by the Information Officer to help carry out their duties.	A support person who helps the Information Officer handle requests.
“personal information”	Information about an identifiable living natural person, or an identifiable juristic person (like a company), including but not limited to contact details, ID numbers, opinions, and correspondence.	Any details that identify a person or company — like names, addresses, ID numbers, phone numbers, or financial details.
“processing”	Any operation or activity concerning personal information, including collection, storage, use, and destruction.	What we do with personal information — collecting, keeping, using, or deleting it.
“Information Regulator”	The regulator established under section 39 of POPIA, responsible for monitoring and enforcing compliance with PAIA and POPIA.	The independent authority that makes sure organisations comply with PAIA and POPIA.

Schedule C: Legislative framework

This schedule lists the key South African laws that require us to create or retain records relevant to our operations, in accordance with PAIA section 51(1)(a)(iii).

Category	Legislation	Reference
Business operations	Consumer Protection Act	Act 68 of 2008
	Supreme Court Act	Act 59 of 1959
	National Credit Act	Act 34 of 2005
	Financial Advisory and Intermediary Services Act	Act 37 of 2002
	Second-Hand Goods Act	Act 6 of 2009
Finance & tax	Bills of Exchange Act	Act 34 of 1964
	Income Tax Act	Act 58 of 1962
	Insolvency Act	Act 24 of 1936
	Value-Added Tax Act	Act 89 of 1991
	Companies Act and Regulations	Act 71 of 2008
Corporate & competition	Competition Act	Act 89 of 1998
	Promotion of Access to Information Act	Act 2 of 2000
	Basic Conditions of Employment Act	Act 57 of 1997
Employment & labour	Broad-Based Black Economic Empowerment Act	Act 53 of 2003
	Compensation for Occupational Injuries and Diseases Act	Act 130 of 1993
	Employment Equity Act	Act 55 of 1998
	Labour Relations Act	Act 66 of 1995
	Occupational Health and Safety Act	Act 85 of 1993
	Promotion of Equality and Prevention of Unfair Discrimination Act	Act 4 of 2000
	Skills Development Act	Act 97 of 1998
	Skills Development Levies Act	Act 9 of 1999
	Tobacco Products Control Act	Act 83 of 1993
	Unemployment Insurance Act	Act 30 of 1966
	Unemployment Insurance Contributions Act	Act 4 of 2002
	Firearms Control Act	Act 60 of 2000
Immigration & identity	Identification Act	Act 68 of 1997
	Immigration Act	Act 13 of 2002
	Electronic Communications and Transactions Act	Act 25 of 2002
Information & communication	Regulation of Interception of Communications and Provision of Communication-Related Information Act	Act 70 of 2002
	Financial Intelligence Centre Act	Act 38 of 2001
Money laundering & anti-corruption	Prevention and Combating of Corrupt Activities Act	Act 12 of 2004
	Prevention of Organised Crime Act	Act 121 of 1998
	Protected Disclosures Act	Act 26 of 2000
Data protection & privacy	Protection of Personal Information Act (POPIA)	Act 4 of 2013

Schedule D: Records we hold

This schedule sets out the categories of records held by Mobalyz Group, indicating which are automatically available, which require a formal PAIA request, and which are protected from disclosure under law.

Records automatically available

These records can be accessed without submitting a PAIA request. They are available free of charge for inspection on our website or at our offices (a nominal fee may apply for printed copies).

Category	Examples
Public communications	Brochures, newsletters, press releases, marketing materials.
Website content	Information published on https://www.mobalyz.com/ .
Regulatory disclosures	Any records filed with statutory bodies that are publicly available.
Policies and notices	Certain policies required by law to be published (e.g., PAIA Manual, POPIA privacy notices).

Records requiring a PAIA request

These records are not automatically available and require submission of the prescribed Form 2 to the Information Officer. Access may be granted subject to PAIA conditions and applicable fees.

Category	Examples of records
Personnel records	<ul style="list-style-type: none"> Employee personal information (CVs, contracts, payroll, tax records, IRP5s, SETA submissions, leave records, disciplinary records) Employment policies (codes of conduct, HR manuals) Pension and provident fund records Records of salaries, remuneration, and benefits
Client records	<ul style="list-style-type: none"> Contracts and agreements Transactional records Client information under credit agreements Third-party information provided by or about clients
Statutory & corporate records	<ul style="list-style-type: none"> Memorandum of Incorporation and formation documents Share register and statutory registers Board and committee minutes Delegations of authority Records of director, auditor, and officer appointments
Operational & commercial records	<ul style="list-style-type: none"> Contracts and service agreements Intellectual property and trade mark applications Insurance policies Litigation files Marketing records and correspondence Disaster recovery and risk management plans
Other party records	<ul style="list-style-type: none"> Supplier and contractor agreements Joint venture documentation Subsidiary, holding, or sister company records

Records we must not or may not share

Certain records are restricted under PAIA and may not be disclosed unless required by law or overridden by the public interest test.

Ground of refusal	Examples
Protection of personal privacy	Personnel files, medical records, private correspondence
Commercial confidentiality	Supplier pricing, confidential contracts
Confidential information protected by agreement	NDA-covered records
Safety and security	Security system details, internal investigations
Legal privilege	Attorney-client correspondence, litigation strategy

Commercial activities of the company	Trade secrets, sensitive financial data, proprietary computer programs
Research information	Research results that would place company or subject at disadvantage
Frivolous/vexatious requests	Records where requests unreasonably divert resources

Schedule E: Procedure for access

This schedule explains how you can request access to records held by Mobalyz Group in terms of PAIA.

Step	What you must do
Step 1: Complete the prescribed form	All requests must be made using Form 2 (as set out in the PAIA Regulations, 2021). Older versions of PAIA forms may not be used.
Step 2: Submit your request	Send the completed form to the Information Officer by hand, post, fax, or email. Contact details are in Schedule A.
Step 3: Pay the request fee	A standard request fee is payable (unless the record relates to your own personal information). You might also need to pay an access fee if access is granted.
Step 4: Processing your request	The Information Officer will acknowledge receipt and may require a deposit if search time exceeds six hours.
Step 5: Decision within 30 days	We will notify you in writing within 30 days whether your request has been granted or refused. The period may be extended once for up to 30 additional days if: <ul style="list-style-type: none">• the request is for a large number of records;• the records are kept off-site;• consultation with third parties is required.
Step 6: Outcome	If granted , you will be asked to pay any access fee before records are released. If refused , we will explain the reasons in writing and inform you of your rights to complain to the Information Regulator or apply to court.

Fees

Item	Description	Amount
1	Request fee (payable upfront before processing)	R140.00
2	Photocopy / printed black-and-white A4 page	R2.00 per page
3	Printed copy of an A4 page	R2.00 per page
4(a)	Copy in computer-readable form: Flash drive (provided by requester)	R40.00
4(b)(i)	Copy in computer-readable form: Compact disc (provided by requester)	R40.00
4(b)(ii)	Copy in computer-readable form: Compact disc (supplied by private body)	R60.00
5	Transcription of visual images (per A4 page)	<i>Outsourced; dependent on service provider quote</i>
6	Copy of visual images	<i>Outsourced; dependent on service provider quote</i>
7	Transcription of audio record (per A4 page)	R24.00 per page
8(a)	Copy of audio record on flash drive (provided by requester)	R40.00
8(b)(i)	Copy of audio record on compact disc (provided by requester)	R40.00
8(b)(ii)	Copy of audio record on compact disc (supplied by private body)	R60.00
9	Search and preparation time (after first hour), per hour or part thereof	R145.00 per hour Maximum total: R435.00
10	Deposit (if search/preparation exceeds six hours)	One-third of estimated total amount
11	Postage, courier, email or electronic transfer	Actual cost

Assistance for requesters

If you cannot complete Form 2 due to illiteracy or disability, you may make the request **orally** to the Information Officer, who will assist you in reducing it to writing.

How to submit a request

Contact our Information Officer as per Schedule A.

Schedule F: Grounds for refusal

Under PAIA, we must or may refuse access to certain records if disclosure would infringe legally protected rights. The table below outlines the main grounds of refusal, their meanings and examples.

Ground of Refusal	Explanation	Examples
Protection of personal privacy	We may not release information that would unreasonably disclose personal details of a third party.	Employee medical records, HR files, private correspondence.
Commercial confidentiality (third parties)	We must protect confidential business information of third parties where disclosure could cause harm.	Supplier pricing structures, client trade secrets, sensitive contracts.
Confidential information under agreement	We cannot disclose information if it is contractually protected by a confidentiality agreement.	Records subject to a non-disclosure agreement (NDA).
Safety and security	Access may be refused if disclosure would endanger life, safety, or property.	Security system details, internal security investigations.
Legal privilege	Records protected by legal professional privilege may not be disclosed.	Legal opinions, litigation strategy documents, attorney-client correspondence.
Company's commercial activities	We may refuse access to protect our own commercially sensitive information.	Trade secrets, proprietary computer programs, research results, commercially sensitive financial records.
Research information	Information may be withheld if disclosure would disadvantage the company, the researcher, or the subject matter.	Market research results, product development research.
Frivolous or vexatious requests	Requests that are clearly unreasonable or would unreasonably divert company resources may be refused.	Mass or repetitive requests without legitimate purpose.

Balancing with public interest

Even where a refusal ground applies, PAIA allows access to be granted if the public interest override applies; for example, if the disclosure would reveal a serious public safety risk or evidence of a contravention of the law.

Schedule G: Remedies

If your PAIA request is refused, or if we fail to respond within the statutory time period, you have the right to challenge the decision. Because Mobalyz Group is a private body, there are **no internal appeals**. You must use the external remedies provided by law.

External remedies

Remedy	How it Works
Complain to the Information Regulator	You may lodge a complaint with the Information Regulator if you believe your request was wrongly refused, delayed, or improperly handled. The Regulator has powers to investigate and may order corrective action.
Apply to Court	You may apply to the High Court (or another court of similar status) for relief. The court can order us to release records if the refusal was unjustified.
Appeals to Higher Courts	If the matter involves further legal issues, appeals may be taken to the Supreme Court of Appeal or the Constitutional Court.

Timeframes

- A complaint to the **Information Regulator** should generally be lodged **within 180 days** of becoming aware of the issue.
- An application to the **High Court** must be lodged **within 30 days** of the decision or deemed refusal.

Contact details of the Information Regulator

Information Regulator (South Africa)	Details
Physical Address	Information Regulator, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Sandton, Johannesburg, 2191
Postal Address	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	PAIAComplaints@inforegulator.org.za
Website	https://www.inforegulator.org.za

Schedule H: Personal information processing under POPIA

This schedule explains what personal information we keep, why we keep it, who we may share it with, and how we protect it. It should be read together with section 6 of this manual.

1. Why we process personal information

We only collect and use personal information when it is necessary for our business, legal, or contractual purposes. Typical reasons include:

- (a) Managing our relationships with clients and suppliers.
- (b) Hiring and paying employees, handling leave and benefits.
- (c) Meeting legal and regulatory duties (such as tax or FICA requirements).
- (d) Running audits, risk assessments, and financial reporting.
- (e) Delivering products and services to our clients.

2. Whose information we keep and what it includes

Whose Information	Examples of What We Keep
Clients / Customers	Names, contact details, ID or registration numbers, service history, billing details.
Employees / Job Applicants	CVs, qualifications, contracts, payroll and tax information, performance records.
Suppliers / Service Providers	Company registration info, contact details, banking details, correspondence.
Business Partners / Stakeholders	Professional details, contractual information, correspondence.

3. Who we may share it with

We may share personal information where it is necessary for our operations, or where the law requires it. This includes:

- (a) Statutory and regulatory authorities.
- (b) Professional advisers such as auditors or attorneys.
- (c) Banks and payment providers.
- (d) Service providers who support us (like IT, HR, or cloud services), but only under strict confidentiality agreements.

4. Sending information across borders

Sometimes we may need to transfer information outside South Africa (for example, to a cloud server). When we do this, we make sure it is protected by strong safeguards, such as laws in the receiving country, or contracts that require the same level of protection as POPIA.

5. How we keep information safe

We take steps to keep personal information secure and to protect it from loss, misuse, or unauthorised access. This includes:

- (a) Limiting access to authorised people only.
- (b) Using secure systems and, where needed, encryption.
- (c) Backing up information and monitoring our systems.
- (d) Training staff to handle personal information responsibly.

6. Your rights under POPIA

You have the right to:

- (a) Ask us for access to your personal information.
- (b) Request that we correct or delete information that is wrong or no longer needed.
- (c) Object to certain types of processing.
- (d) Complain to the Information Regulator if you are unhappy with how we use your information.

Schedule I: Version control

We keep track of every update made to this manual so that you always know which version is current. This helps us stay accountable, and it shows when and why changes were made.

Version	Date Approved	Summary of Changes	Approved By	Next Review Date
v1.0	12 Oct 2023	First issue of PAIA Manual prepared in line with Section 51 of PAIA.	Mobalyz Group	12 Oct 2024
v2.0	17 Sep 2025	Full review and redraft: plain-language structure, inclusion of POPIA schedule, global benchmarks, accessibility commitments, and expanded record categories.	Mobalyz Group	17 Sep 2026
V2.1	11 Nov 2025	Updates to align with guidance issued by the Information Regulator	Mobalyz Group	11 Nov 2026

Note: This manual is reviewed at least once a year, or sooner if the law changes or if our operations change significantly. The latest version is always available at our offices and on our website (if applicable).