

Reunyte

PAIA and POPIA Manual

Version 1
September 2025

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1. Introduction

The promotion of Access to Information Act, 2000 (the “Act”) gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless the Act expressly states that the records containing such information may or must not be released. This manual informs requestors of procedural and other requirements which a request must meet as prescribed by the Act.

2. Background & Function

Reunyte (Pty) Ltd (“Reunyte”)

Reunyte operates in the digital tracing and unclaimed benefits market providing a range of solutions to reunite beneficiaries with their lost assets. With solutions driven by data and delivered through sophisticated technologies, Reunyte is a leader in its industry.

3. PAIA Manual

Section 51 Manual for Private Bodies

This manual has been prepared in terms of section 51 of the Promotion of Access to Information Act 2/2000.

4. Contact Details

4.1 Section 51(1) A

Name of Business:	Reunyte (Pty) Ltd
Registration Number:	2006/015300/07
Contact Person:	Rowan Gordon
Physical Address:	35 Brickfield Road Salt River Cape Town 7925
Postal Address:	Private Bag X1 Woodstock Cape Town 7951

4.2 Section 51(1) B

Description of the Section 10 Guide:

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

The Guide is available for inspection at the Human Rights Commission at 29 Princess of Wales Terrace, cnr York and St. Andrews Street, Parktown 2193 and on its website at www.sahrc.org.za.

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION: SECTION 51(1)(D)

Where applicable to our operations, information is available in terms of certain provisions of the following statutes:

- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Companies Act No. 61 of 1973
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991
- Income Tax Act 58 of 1962
- Skills Development Act 9 of 1999

4.3 Section 52(2)

Records, which are available without a person having to request access in terms of PAIA:

At this stage, no notice(s) has been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

4.4 Section 51(1) D

Records available in terms of other legislation.

Information is available in terms of the following legislation, if and where applicable:

1. Basic Conditions of Employment Act No 75 of 1997
2. Companies Act No 71 of 2008
3. Compensation of Occupational Injuries and Diseases Act No 130 of 1993
4. Electronic Communications and Transactions Act No 25 of 2002
5. Employment Equity Act No 55 of 1998
6. Income Tax Act No 58 of 1962
7. Labor Relations Act No 66 of 1995
8. Occupational Health and Safety Act No 85 of 1993
9. Promotion of Access to Information Act No 2 of 2000
10. Skills development Levies Act No 9 of 1999
11. Unemployment Insurance Act No 30 of 1966
12. Value Added Tax Act No 89 of 1991

4.5 Accounting Records

1. Annual Financial Statements, including annual accounts and the report of the accounting officer.
2. Accounting records, including supporting schedules to accounting records and ancillary accounting records.
3. Books of Account including journals and ledgers.
4. Delivery notes, orders, invoices, statements, receipts, vouchers and bills of exchange.

4.6 Statutory Employee Records

- 4.6.1 Employees' Names and Occupations
- 4.6.2 Time Worked by Each Employee
- 4.6.3 Remuneration Paid to Each Employee
- 4.6.4 Date of Birth of Each Employee
- 4.6.5 Attendance Register
- 4.6.6 Salary and Wages Register
- 4.6.7 Industrial Training Records
- 4.6.8 Tax Returns of Employees

4.7 Other Employee Records

1. Employee Contracts
2. Maternity Leave Policy
3. Code of Conduct

4.8 Movable Property

1. Asset Register
2. Finance and Lease Agreements

4.9 Agreements and Contracts

1. Agreements with Shareholders, Officers, or Directors
2. Acquisition or Disposal Documentation
3. Agreements with Contractors and Suppliers
4. Agreements with Customers
5. Sale Agreements
6. Purchase or Lease Agreements

4.10 Taxation

Copies of All Income Tax Returns and Other Tax Returns and Documents

4.10 Insurance

1. Insurance Policies
2. Claim Records
3. Details of Insurance Coverage, Limits, and Insurers

4.11 Information Technology

1. Hardware
2. Operating Systems
3. Telephone Lines, Leased Lines and Data Lines
4. LAN Installations
5. Software Packages
6. Disaster Recovery
7. Licenses
8. Audits

4.12 Sales and Marketing

1. Products
2. Customers

5. Access to Records

Records held by Reunyte may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of Reunyte and in this regard, the Act distinguishes between two types of requesters:

5.1 Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, Reunyte will provide the requested information or give access to any record about the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by Reunyte.

5.2 Other Requester

This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, Reunyte is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by.

6. Request Procedure

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record.

The requester must use the prescribed form (*form available from the offices and/or website of the South African Human Rights Commission – www.sahrc.org.za*) to make the request for access to a record. This must be made to the head of the Firm.

This request must be made to the address, fax number or electronic mail address of the Firm.

A requester must state that he or she requires the information 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 also provide an explanation of why the requested record is required for the exercise or protection of that right. Reunyte will process a request within 30 days, unless the requestor has stated special reasons which would satisfy the information officer that circumstances dictate that this period not be complied with.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the way it is required.

If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the information officer.

7. Decision

Reunyte will decide whether to grant or decline a request and give notice with reasons (if required) to that effect.

The 30-day period within which Reunyte has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information that has been backup up and stored offsite and the information cannot reasonably be obtained within the original 30-day period.

The information officer will notify the requester in writing should an extension be necessary.

8. Grounds for Refusal of Access to Records in Terms of PAIA

The following are the grounds on which Reunyte may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA:

- 8.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable.
- 8.2 Mandatory protection of the commercial information of a third party, if the Records contain:
 - 8.3 Trade secrets of that third party.
 - 8.4 Financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 8.5 Information disclosed in confidence by a third party to Reunyte, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 8.6 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 8.7 Mandatory protection of the safety of individuals and the protection of property.
- 8.8 Mandatory protection of Records that would be regarded as privileged in legal proceedings.
- 8.9 Protection of the commercial information of Reunyte, which may include;

- Trade secrets.
 - Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Reunyte.
 - Information which, if disclosed, could put Reunyte at a disadvantage in contractual or other negotiations or prejudice Reunyte in commercial competition, and/or;
 - Computer programs which are owned by Reunyte, and which are protected by copyright and intellectual property laws.
- 8.10 Research information of Reunyte or a third party, if such disclosure would place the research or the researcher at a serious disadvantage, and;
- 8.11 Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.
- 8.12 Remedies Available To The Requester Upon Refusal Of A Request For Access Of PAIA.

9. Internal Remedies

Reunyte does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

10. External Remedies

In accordance with sections 56(3) (c) and 78 of PAIA, a Requestor may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

11. Fees

The Act provides for two types of fees:

A request fee, (which will be a standard fee) and an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs where applicable. When a request is received by the information officer of, the information officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, if any, before further processing of the request can take place.

If a search for the information is necessary and the preparation and disclosure of the information for disclosure, requires more time than prescribed in the regulations for this purpose, the information officer shall notify the requester to pay as a deposit if the request is granted.

The information officer shall withhold information until the requester has paid the fee or fees indicated. A requester whose request for access to information has been granted, must pay an access fee reproduction, for search, preparation, and for any time in excess of the prescribed hours to prepare the information for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is refused, then the information officer shall repay the deposit to the requester.

12. Protection of Personal Information Processed by Reunyte

The requester must:

- Provide sufficient particulars to enable Reunyte (Pty) Ltd to identify the record(s) requested and to identify the requester;
- Indicate which form of access is required;
- Specify a postal address or email address of the requester in the Republic; and
- Identify the right that the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.

If in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, the requester must state that manner and the necessary particulars to be informed in the other manner. If the request is made on behalf of another person, proof must be submitted of the capacity in which the requester is making the request, to the reasonable satisfaction of Reunyte (Pty) Ltd.

NOTE: All requests to access records must be done via the 'PAIA Request for access to Data Form' which can be found on the Reunyte (Pty) Limited websites: <https://robinhood.org.za/>

No correspondence will be entered into unless the PAIA request to access information form has been completed.

12.1 Fees in Respect of Request for Information

Fees in Respect of Private Bodies

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:
 - (a) For every photocopy of an A4-size page or part thereof R1,10.
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0,75.
 - (c) For a copy in a computer-readable form on -
 - (i) compact disc R70,00.
 - (d) (i) For a transcription of visual images, for an A4-size page or part thereof R40,00.
(ii) For a copy of visual images R60,00.
 - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00.
(ii) For a copy of an audio record R30,00.
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:
5.
 - (a) For every photocopy of an A4-size page or part thereof R1,10.
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in Electronic or machine-readable form R0,75.
 - (c) For a copy in a computer-readable form on:
 - (i) compact disc R70,00.

- (d)
 - (ii) For a transcription of visual images, for an A4-size page or part thereof R40,00.
 - (iii) For a copy of visual images R60,00
 - (e)
 - (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00.
 - (ii) For a copy of an audio record R30,00.
 - (f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
- 6. For purposes of section 54(2) of the Act, the following applies:
 - (a) Six hours, as the hours to be exceeded before a deposit is payable; and
 - (b) one third of the access fee is payable as a deposit by the requester.
- 7. The actual postage is payable when a copy of a record must be posted to a requester.

13. PAIA – Request Information Form

REQUEST FOR INFORMATION FORM

A. Particulars of Person Requesting to Access the Record

- The particulars of the person who requests to access the record must be given below.
- The address and/or fax number in the Republic to which the information is to be sent, must be given.
- Proof of the capacity in which the request is made, if applicable must be attached.

Full names and surname: _____

Identity number: _____

Postal Address: _____

Fax number: _____

Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person: _____

B. Particulars of Person on Whose Behalf Request is Made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full Names and Surname: _____

Identity Number: _____

C. Particulars of Record

- **Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.**
 - **If the provided space is inadequate, please continue on a separate folio and attach it to this form.**
- The requester must sign all the additional folios.**

1. Description of record or relevant part of the record: _____

2. Reference number, if available: _____

3. Any further particulars of record: _____

D. Fees

• A request for access to a record, other than a record containing personal information about yourself, will be processed only after A REQUEST FEE has been paid. • You will be notified of the amount required to be paid as the request fee. • The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. • If you qualify for exemption of the payment of any fee, please state the reason for exemption.
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Reason for exemption from payment of fees:

14. Fee Structure

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:
 - a) For every photocopy of an A4-size page or part thereof R1,10.
 - b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0,75.
 - c) For a copy in a computer-readable form on –
 - (i) compact disc R70,00.
 - d)
 - (i). For a transcription of visual images, for an A4-size page or part thereof R40,00.
 - (ii) For a copy of visual images R60,00.
 - e)
 - (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00.
 - (ii) For a copy of an audio record R30,00.
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in
 1. **Regulation 11(3) are as follows:**
 - a)
 - (i) For every photocopy of an A4-size page or part thereof R1,10.
 - (ii) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0,75.
 - b) For a copy in a computer-readable form on –
 - (i) Compact disc R70,00.
 - c)
 - (i) For a transcription of visual images, for an A4-size page or part thereof R40,00.
 - (ii) For a copy of visual images R60,00.
 - d)
 - (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00.
 - (ii) For a copy of an audio record R30,00.
 - e) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
 2. **For the purposes of Section 52(2) of the Act, the following applies:**
 - a) Six hours, as the hours to be exceeded before a deposit is payable; and
 - b) One third of the access fee is payable as a deposit by the requester.

3. The actual postage is payable when a copy of a record must be posted to a requester.

F. Form of Access to Record

If you are prevented by a disability to read, view, or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required. Disability:		Form in which record is required:	
Mark the Appropriate Box With an 'X'. Notes: a) Your indication as to the required form of access depends on the form in which the record is available. b) Access in the form requested may be refused in circumstances. In such case you will be informed if access will be granted in another form. c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.			
1. If the Record is in Written or Printed Form:			
	Copy of Record		Inspection of Record
2. If Record Exists of Visual Images (this includes photographs, slides, video recordings, computer-generated images, sketches etc.):			
	View the Images		Copy of the Images
			Transcription of the Images
3. If the Record Consists of Recorded Words or Information Which can be Reproduced in Sound:			
	Listen to the Soundtrack (CD Media)		Transcription of Soundtrack (written or printed document)
4. If Record is Held on Computer or in an Electronic or Machine-Readable Form			
	Printed Copy of Record		Printed Copy of Information Derived From the Record
			Copy in Computer-Readable Form* (USB Drive or Compact Disc)
* If you requested a copy or transcript of a record (above), do you wish the copy or transcription to be sent to you? A postal fee is payable.			YES
			NO
Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.			
In which language would you prefer the record?			

Signed at _____ this _____ day of _____ 20____

SIGNATURE OF REQUESTER/ PERSON ON WHO'S BEHALF REQUEST IS MADE	(sign here)
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