



## **PRAXIMA HOLDINGS (PTY) LTD PAIA/POPIA MANUAL**

This manual was prepared in accordance with Section 51 of the Promotion of Access to Information Act (PAIA), 2000 and to address requirements of the Protection of Personal Information Act (POPIA), 2013.

This manual applies to Praxima Holdings (Pty) Ltd, Ck. No. 2007/003285/07, and its subsidiaries.

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## 1. POPI Act

The purpose of the Protection of Personal Information Act<sup>1</sup> (POPIA) is to give effect to the constitutional right to privacy, by safeguarding personal information when processed by a responsible party, subject to justifiable limitations that are aimed at -

- 1.1. balancing the right to privacy against other rights, particularly the right of access to information; and
- 1.2. protecting important interests, including the free flow of information within the Republic and across international borders;
- 1.3. regulate the manner in which personal information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of personal information;
- 1.4. provide persons with rights and remedies to protect their personal information from processing that is not in accordance with the POPIA; and
- 1.5. establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by the POPIA.

## 2. PAI Act

- 2.1. The Promotion of Access to Information Act<sup>2</sup> (PAIA) 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 PAIA expressly states that the records containing such information may or must not be released.

## 3. Praxima

- 3.1. Praxima is an international payroll outsourcing and Software-as-a-Service (SaaS) solution, dedicated to simplifying the complexities of global payroll management. We empower businesses of all sizes to seamlessly navigate HR compliance, tax regulations, and payroll processing across multiple countries.

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<sup>1</sup> No. 4 of 2013

<sup>2</sup> No. 2 of 2000

#### 4. Purpose of the PAIA/POPIA Manual

- 4.1. The purpose of this manual is to promote the right of access to information, to foster a culture of transparency and accountability within Praxima by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which people have effective access to information to enable them to exercise and protect their rights.
- 4.2. Under the POPI Act, Praxima is required to be open and transparent about how Praxima manages personal information and allow individuals to access and correct their personal information.
- 4.3. This PAIA Manual complies with the requirements of guide mentioned in section 10 of the PAIA and recognizes that upon commencement of the POPI Act, that the appointed Information Regulator will be responsible to regulate compliance with the PAIA and its regulations by private and public bodies.

#### 5. Status and Scope

- 5.1. This manual (version 2) was last updated on 27 May 2025.
- 5.2. This Manual may be revised from time to time to reflect changes in laws and regulations, or changes in Praxima's business operations.

#### 6. Guide of the South African Human Rights Commission

- 6.1. A guide to the PAIA (as contemplated under section 10 of the Act) is available from the South African Human Rights Commission. The guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. Any enquiries regarding this guide and its contents should be directed to:
  - 6.1.1. The South African Human Rights Commission:
    - PAIA Unit (the Research and Documentation Department)
    - 6.1.1.1. Postal address: Private Bag 2700, Houghton, 2041
    - 6.1.1.2. Telephone: +27 11 484-8300
    - 6.1.1.3. Fax: +27 11 484-7146
    - 6.1.1.4. Website: <https://www.sahrc.org.za>

6.1.1.5. E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

7. Contact Details of the Head of the Private Body [Section 51(1)(a)]

Chief Executive Officer: Dion Bowden

Registered Address: 64 Pitzer Road, Glen Austin, Midrand, 1685

Postal Address: 64 Pitzer Road, Glen Austin, Midrand, 1685

Telephone Number: +44 74 282 78796

Email Address: [dionb@praxima.com](mailto:dionb@praxima.com)

Website: [www.praxima.com](http://www.praxima.com)

8. Information Officer

- 8.1. The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information. The head of a private body fulfils such a function in terms of section 51. Praxima has not opted to appoint an Information Officer to assist in assessing a request for access to information as well as to oversee its required functions in terms of the POPI Act.
- 8.2. The Information Officer appointed in terms of the PAI Act also refers to the Information Officer as referred to in the POPI Act. The Information Officer oversees the functions and responsibilities as required for in terms of both the PAI Act as well as the duties and responsibilities in terms of section 55 of the POPI Act.
- 8.3. 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 Praxima as accessible as reasonable 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 this Act must be addressed to the Information Officer.

**Information Officer Details:**

Name: Dion Bowden

Telephone Number: +44 74 282 78796

Email Address: dionb@praxima.com

**Deputy Information Officer Details:**

N/A

9. Availability of this manual [S 51(1)(b) – Promotion of Access to Information Act]

- 9.1. A copy of this manual is available to the public for inspection at our website/registered offices as listed herein or on request from the designated contact person.
- 9.2. Contact details for the designated person are set out above.

10. Who may request records held by Praxima

- 10.1. Records held by Praxima 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 Praxima and in this regard, the PAI Act distinguishes between two types of requesters:
- 10.1.1. 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 PAI Act and applicable law, Praxima will provide the requested information, or give access to any record of the requester's personal information. The prescribed fee, if any, for reproduction of the information requested will be charged by Praxima.
- 10.1.2. Other Requester: This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, Praxima is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the PAI Act. The prescribed fee, if any, for reproduction of the information requested will be charged by Praxima.

11. Applicable Legislation in accordance with section 51 (1) (c)

This is not an exhaustive list.

No.	Ref.	Act
1.	75 of 1997	Basic Conditions of Employment Act

2.	85 of 1993	Occupational Health and Safety Act
3.	130 of 1993	Compensation for Occupational Injuries and Diseases Act
4.	55 of 1998	Employment Equity Act
5.	58 of 1962	Income Tax Act
6.	66 of 1995	Labour Relations Act
7.	30 of 1966	Unemployment Insurance Act
8.	58 of 1962	Value Added Tax Act
9.	25 of 2002	Electronic Communications and Transactions Act
10.	9 of 1999	Skills Development Levies Act
11.	34 of 1997	South African Revenue Service Act
12.	71 Of 2008	Companies Act

12. Description of the records of the body which are available upon request in accordance with any other legislation [S 51(1)(d)]

12.1. Records are kept in accordance with the following legislation (this list is not exhaustive):

12.1.1. Basic Conditions of Employment Act 75 of 1997

12.1.1.1. Record containing the following information Section 31):

- 12.1.1.1.1. Data Subject name and occupation;
- 12.1.1.1.2. Data Subject time worked (attendance registers);
- 12.1.1.1.3. Data Subject remuneration information (wages register);
- 12.1.1.1.4. Data Subject date of birth;
- 12.1.1.1.5. Data Subject personal information such as ID number;
- 12.1.1.1.6. Data Subject bank account information;
- 12.1.1.1.7. Data Subject contract of employment;
- 12.1.1.1.8. Data Subject employment details;



- 12.1.1.1.1.9. Data Subject leave records;
      - 12.1.1.1.1.10. Data Subject payslips;
      - 12.1.1.1.1.11. Data Subject statutory payments and contributions;
      - 12.1.1.1.1.12. Data Subject training records;
      - 12.1.1.1.1.13. Data Subject screening or background checks.
    - 12.1.1.1.2. Internal company policies.
  - 12.1.1.2. Occupational Health and Safety Act 85 of 1993
    - 12.1.1.2.1. Copy of the Occupational Health and Safety Act 85 of 1993, as amended.
    - 12.1.1.2.2. Contractual undertakings between Data Subject and Praxima.
    - 12.1.1.2.3. Incident and Accident Records.
    - 12.1.1.2.4. Health and Safety Policy.
    - 12.1.1.2.5. Health and Safety Training Records.
    - 12.1.1.2.6. Health and Safety Representative and Committee Records.
    - 12.1.1.2.7. Workplace Inspection and Audit Records.
    - 12.1.1.2.8. Personal Protective Equipment (PPE) Records.
    - 12.1.1.2.9. First Aid Equipment and Training Records.
    - 12.1.1.2.10. All other records as may be required by the Occupational Health and Safety Act.
  - 12.1.1.3. Compensation for Occupational Injuries and Diseases Act 130 of 1993
    - 12.1.1.3.1. All records as may be required by the Compensation for Occupational Injuries and Diseases Act.
    - 12.1.1.3.2. Data Subject personal information.
    - 12.1.1.3.3. Payroll records.
    - 12.1.1.3.4. Annual Return of Earnings (ROE).
    - 12.1.1.3.5. Assessment payments records.
    - 12.1.1.3.6. Claims documentation.
    - 12.1.1.3.7. Incident and injury records.
  - 12.1.1.4. Employment Equity Act 55 of 1998

- 12.1.1.4.1. Summary of the Employment Equity Act, 55 of 1998, issued in terms of Section 25(1).
- 12.1.1.4.2. Employee demographic and employment data.
- 12.1.1.4.3. Payroll and remuneration records.
- 12.1.1.4.4. Compliance and audit records.
- 12.1.1.4.5. Employment Equity Plans (EEP).
- 12.1.1.4.6. Workforce profile and Employment Equity Reports including:
  - 12.1.1.4.6.1. Employment Equity Report (EEA2);
  - 12.1.1.4.6.2. Income Differential Statement (EEA4).
- 12.1.1.4.7. All records as may be required by the Employment Equity Act 55 of 1998.
- 12.1.1.5. Income Tax Act 58 of 1962
  - 12.1.1.5.1. All records as may be required by the Income Tax Act.
  - 12.1.1.5.2. Payroll and remuneration records.
  - 12.1.1.5.3. Compliance and audit records.
  - 12.1.1.5.4. PAYE records.
  - 12.1.1.5.5. Tax Certificate records (IRP5/IT3(a)).
  - 12.1.1.5.6. Employer reconciliation and tax reporting.
  - 12.1.1.5.7. Deductions and allowable expenses.
  - 12.1.1.5.8. Records of independent contractors.
  - 12.1.1.5.9. Company tax records.
- 12.1.1.6. Labour Relations Act 66 of 1995
  - 12.1.1.6.1. Records of disciplinary hearings (if any).
  - 12.1.1.6.2. Employee information.
  - 12.1.1.6.3. Payroll and remuneration records.
  - 12.1.1.6.4. Collective bargaining and union-related records.
  - 12.1.1.6.5. Dispute resolution records.
  - 12.1.1.6.6. Workplace policies and procedures.
  - 12.1.1.6.7. Consultation and representation records.
  - 12.1.1.6.8. Training and compliance records.

- 12.1.1.6.9. Time and attendance records.
- 12.1.1.6.10. All records as may be required by the Labour Relations Act 66 of 1995.
- 12.1.1.7. Unemployment Insurance Act 30 of 1966
  - 12.1.1.7.1. Records detailing the contributions by contributors employed by the employer in respect of:
    - 12.1.1.7.1.1. Earnings paid;
    - 12.1.1.7.1.2. Time worked;
    - 12.1.1.7.1.3. Payments made for piece work; and
    - 12.1.1.7.1.4. Overtime.
  - 12.1.1.7.2. All records as may be required by the Unemployment Insurance Act 30 of 1966.
- 12.1.1.8. Value Added Tax Act 58 of 1962
  - 12.1.1.8.1. VAT registration and vendor information.
  - 12.1.1.8.2. Tax invoices and related documents.
  - 12.1.1.8.3. VAT transaction records.
  - 12.1.1.8.4. VAT returns and payment records.
  - 12.1.1.8.5. General ledger and financial records.
  - 12.1.1.8.6. Payroll-Related VAT records.
  - 12.1.1.8.7. Compliance and audit records.
  - 12.1.1.8.8. Electronic and accounting system records.
  - 12.1.1.8.9. All records as may be required by the Value Added Tax Act 58 of 1962.
- 12.1.1.9. Electronic Communications and Transactions Act 25 of 2002
  - 12.1.1.9.1. Electronic employment and payroll records.
  - 12.1.1.9.2. Electronic tax and compliance records.
  - 12.1.1.9.3. Electronic communication records.
  - 12.1.1.9.4. Data security and access records.
  - 12.1.1.9.5. Electronic transaction records.
  - 12.1.1.9.6. Consumer protection records.

- 12.1.1.9.7. System and software documentation.
- 12.1.1.9.8. Compliance and audit records.
- 12.1.1.9.9. All records as may be required by the Electronic Communications and Transactions Act 25 of 2002.
- 12.1.1.10. Skills Development Levies Act 9 of 1999
  - 12.1.1.10.1. Payroll and remuneration records
  - 12.1.1.10.2. SDL payment and submission records.
  - 12.1.1.10.3. Employee information.
  - 12.1.1.10.4. Exemption records.
  - 12.1.1.10.5. Skills Development and Training records.
  - 12.1.1.10.6. SETA-related records.
  - 12.1.1.10.7. Financial and general ledger records.
  - 12.1.1.10.8. All records as may be required by the Skills Development Levies Act 9 of 1999.
- 12.1.1.11. South African Revenue Service Act 34 of 1997
  - 12.1.1.11.1. Tax Registration and entity information.
  - 12.1.1.11.2. Payroll and employee tax records.
  - 12.1.1.11.3. PAYE, SDL, and UIF submission records.
  - 12.1.1.11.4. VAT records.
  - 12.1.1.11.5. Financial and general ledger records.
  - 12.1.1.11.6. Compliance and audit records.
  - 12.1.1.11.7. Electronic records and systems.
  - 12.1.1.11.8. Independent contractor records.
  - 12.1.1.11.9. All records as may be required by the South African Revenue Service Act 34 of 1997.
- 12.1.1.12. Companies Act 71 Of 2008
  - 12.1.1.12.1. Company incorporation and registration records.
  - 12.1.1.12.2. Shareholder and director records.
  - 12.1.1.12.3. Financial and accounting records.
  - 12.1.1.12.4. Company resolutions and minutes.

- 12.1.1.12.5. Statutory records.
- 12.1.1.12.6. Payroll and employee-related records.
- 12.1.1.12.7. Compliance and reporting records.
- 12.1.1.12.8. Corporate governance records.
- 12.1.1.12.9. Records of significant transactions.
- 12.1.1.12.10. Electronic records.
- 12.1.1.12.11. All records as may be required by the Companies Act 71 Of 2008.

13. Records automatically available without a person having to request access in terms of this Act [S 51(1)(c)]

- 13.1. Inspection in terms of legislation other than this Act: None
- 13.2. Purchase or copying from us: None
- 13.3. From us free of charge: Marketing material available to the public
- 13.4. At this stage a notice on the categories of records that are automatically available without a person having to request access in terms of PAIA has not been published.

14. Records maintained by Praxima that can be requested

14.1. Client Records

- 14.1.1. Client Contracts
- 14.1.2. Client Correspondence
- 14.1.3. Billing Records
- 14.1.4. Electronic Data Backups
- 14.1.5. Third party contracts (such as Service Level Agreements etc.)
- 14.1.6. External company policies to third parties

14.2. Finance and Administration

- 14.2.1. Accounting Records
- 14.2.2. Annual Financial Statements
- 14.2.3. Banking Records
- 14.2.4. Correspondence

- 14.2.5. Invoices and Statements
- 14.2.6. Tax Records and Returns
- 14.2.7. SARS Returns
- 14.2.8. Paying-in slips
- 14.2.9. Cash Books and other Account Books
- 14.3. Systems, Solutions, and Information Technology
  - 14.3.1. Intellectual property pertaining to solutions and products developed.
  - 14.3.2. Usage of solutions and products
- 14.4. Human Resources
  - 14.4.1. Accounting and Payroll Records
  - 14.4.2. Letters of Employment
  - 14.4.3. Leave Records
  - 14.4.4. Returns to UIF
- 14.5. Company Details
  - 14.5.1. Company Incorporation Documents
  - 14.5.2. Names of Directors
- 14.6. Information Management and Technology
  - 14.6.1. Contracts and Agreements
  - 14.6.2. Licences
  - 14.6.3. Data bases
- 14.7. Employee Records
  - 14.7.1. Employee's name and occupation
  - 14.7.2. Time worked (attendance register)
  - 14.7.3. Remuneration paid (wages register)
  - 14.7.4. Date of birth
  - 14.7.5. Personal Information of employees such as ID's
  - 14.7.6. Banking account information
  - 14.7.7. Employee contracts of employment

15. Request Procedure in accordance with PAIA [S 53(1)]
- 15.1. A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requester must complete the request form enclosed herewith in Form 2 and submit it, as well as the payment of a request fee, if applicable, to the Information Officer at the physical address, or electronic mail address as stated herein.
- 15.2. The request form must be filled in with enough information to at least enable the information officer to identify:
- 15.2.1. The record or records requested.
  - 15.2.2. The identity of the requester.
  - 15.2.3. What form of access is required.
  - 15.2.4. The postal address or fax number of the requester.
- 15.3. 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.
- 15.4. Praxima 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.
- 15.5. If it turns out that it will take more than 30 days to process your request (e.g. due to the volume of records/personal information that must be processed, or difficulty in accessing the relevant record/personal information), Praxima may extend the aforementioned 30-day period in processing your request. Should this become necessary, Praxima will notify you.
- 15.6. 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.
- 15.7. 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.
- 15.8. 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.

- 15.9. Where your request was a request for confirmation as to whether or not Praxima handles your personal information (i.e. you make a request under POPI s23(1)(a)), Praxima will give you such confirmation.
- 15.10. If you are not satisfied about the way in which your request was handled by Praxima (including where you are not happy about the Access Fee charged by Praxima or the length of time Praxima is taking to process your request), you can make an application for relief to the Constitutional Court, the High Court or another court of similar status.
- 15.11. Please note that if you wish to make an application to the court, you will need to do so within 180 days of receiving the relevant decision made by Praxima.

## 16. Fees

- 16.1. The Act provides for two types of fees:
- 16.2. Fees can be found in Schedule 1. 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.
- 16.3. When a request is received by the Information Officer of Praxima, 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.
- 16.4. The Information Officer shall withhold information until the requester has paid the fee or fees indicated.
- 16.5. 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.



## 17. Grounds For Refusal of Access to Records in Terms of PAIA

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

- 17.1.1. 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.
- 17.1.2. Mandatory protection of the commercial information of a third party, if the Records contain:
  - 17.1.2.1. Trade secrets of that third party;
  - 17.1.2.2. 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
  - 17.1.2.3. Information disclosed in confidence by a third party to Praxima, 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.
- 17.1.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 17.1.4. Mandatory protection of the safety of individuals and the protection of property.
- 17.1.5. Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 17.1.6. Protection of the commercial information of Praxima, which may include:
  - 17.1.6.1. Trade secrets or proprietary information.
  - 17.1.6.2. Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Praxima.
  - 17.1.6.3. Information which, if disclosed, could put Praxima at a disadvantage in contractual or other negotiations or prejudice Praxima in commercial competition.

- 17.1.6.4. Computer programs, software or IP which are owned by Praxima, and which are protected by copyright and intellectual property laws.
- 17.1.7. Protection of Research Information - An Information Officer of a public or private body must refuse access to records which contain information relating to research which is or will be undertaken by the public or private body in question or a third party. This refusal of access to information is in circumstances where the disclosure of the record will expose the research of the third party or public or private body, the individual or institution carrying out the research, or the subject matter of the research to a serious disadvantage., and
- 17.1.8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

## 18. Protection of Personal Information That Is Processed by Praxima

- 18.1. Chapter 3 of POPI provides for the minimum conditions for lawful processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA. Below is a description of the eight Conditions for Lawful Processing as contained in POPIA:
  - 18.1.1. **Accountability** - the Responsible Party has an obligation to ensure that there is compliance with POPI in respect of the Processing of Personal Information.
  - 18.1.2. **Processing limitation** - Personal Information must be collected directly from a Data Subject to the extent applicable; must only be processed with the consent of the Data Subject and must only be used for the purposes for which it was obtained.
  - 18.1.3. **Purpose specification** - Personal Information must only be processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.

- 18.1.4. **Further processing limitation** - further processing of Personal Information must be compatible with the initial purpose for which the information was collected.
- 18.1.5. **Information quality** - the Responsible Party must ensure that Personal Information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures.
- 18.1.6. **Openness** - there must be transparency between the Data Subject and the Responsible Party.
- 18.1.7. **Security safeguards** - a Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being processed responsibly and is not unlawfully accessed.
- 18.1.8. **Data Subject participation** - the Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing.

## 19. Purpose of the Processing of Personal Information by Praxima

- 19.1. Personal Information may only be Processed for a specific purpose. The purposes for which Praxima processes or will process Personal Information, is set out in Schedule 2.

## 20. Cross-Border Flows Of Personal Information

- 20.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa:
  - 20.1.1. If the recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially like the Conditions for Lawful Processing as contained in POPIA; or
  - 20.1.2. If the Data Subject consents to the transfer of their Personal Information; or
  - 20.1.3. If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or

- 20.1.4. If the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- 20.1.5. If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

## 21. Objection to the Processing of Personal Information by a Data Subject

- 21.1. Section 11 (3) of POPIA and Regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as Form 1 subject to exceptions contained in POPIA.

## Schedule 1 – Outcome of Request and of Fees Payable

[Regulation 8]

Note:

1. *If your request is granted the—*
  - (a) *amount of the deposit, (if any), is payable before your request is processed; and*
  - (b) *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*
3. **GENERAL: VALUE-ADDED TAX** *Private bodies registered under the Value-Added Tax Act, 1991 (Act 89 of 1991, as vendors may add value-added tax to all fees prescribed in this annexure.*

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

1. **You requested:**

Personal inspection of information at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.

OR

2. **You requested:**

Printed copies of the information <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form )</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of information on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of information on compact disc drive <i>(including virtual images and soundtracks)</i>	

Copy of record saved on cloud storage server	
--	--

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(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)</i>	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

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**4. Fees payable with regards to your request:**

**(Exemptions: Fees do not apply to records automatically available; no fee is charged for a data subject requesting confirmation of whether the organization holds their personal information. However, a fee may apply for providing a record or description of personal information, as allowed under the Protection of Personal Information Act (POPIA).)**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Deposit (A deposit of up to one-third of the access fee may be required if search and preparation time exceeds six hours.)			
Request Fee			R50-00

Photocopy	R1.10 p.page		
Printed copy	R0.75 p.page		
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00  R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R40.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00  R40.00 R70.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

5. **Deposit payable (if search exceeds six hours):**

☐

Yes

☐

No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
-----------------	--	--	--

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch Code: \_\_\_\_\_

Reference Nr: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_

**Information Officer**



## Schedule 2 – Praxima Processing Purpose Specification

### Purpose of Processing

Category	Purpose
Payroll Calculation	Calculate and process salaries, deductions, and payslips.
Tax Compliance	Ensure accurate tax deductions and submit reports to SARS.
Benefits Management	Administer medical aid, pension funds, and other benefits.
Employee Records	Maintain employment details, contracts, and performance records.
Banking	Facilitate direct salary deposits into bank accounts.
Labor Law Compliance	Ensure compliance with BCEA, LRA, and other labor laws.
Reporting	Generate payroll reports for clients, such as cost analysis.
Audit and Verification	Conduct audits to ensure accuracy and compliance.
Communication	Notify employees of payroll matters, like payslip queries.
Data Security	Protect personal information from unauthorized access or loss.
Contractual Obligations	Fulfill client contracts for payroll services.
Legal Compliance	Comply with FICA, COIDA, and other regulations.
Onboarding/Offboarding	Process new hire data and final payments.
Time and Attendance	Process time tracking data for payroll calculations.

Leave Management	Manage leave balances and payouts.
Garnishment	Process court-ordered deductions.
PAIA Compliance	Process data to fulfil access requests under PAIA.
Access Requests	Manage employee requests for personal information access.
Record Keeping	Maintain records of access requests and responses.
Manual Updates	Update PAIA manual for compliance.
Training	Train staff on PAIA request handling.

### Categories of Data Subjects and their Personal Information

<b>Data Subject</b>	<b>Personal Information Processed</b>
Employees of Clients (Primary)	Including but not limited to, full name, ID number, date of birth, address, email, phone, job title, salary, tax details, bank details, leave records, benefits, legal deductions.
Clients (Employers, if individuals)	Including but not limited to, contact details, business information (e.g., tax registration), correspondence.
Third Parties (Contractors, Suppliers)	Including but not limited to, payment records, contact details, business-related information, correspondence.
Other Individuals (Dependents, etc.)	Including but not limited to, dependents' names, beneficiary details, legal documents for court orders.

## FORM 1

### OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

#### REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021 [Regulation 2]

Note:

1. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form.
2. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Postal or business address:	
	Code ( )
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Postal or business address:	
	Code ( )
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a) (Please provide detailed reasons for the objection)


Signed at ..... this ..... day of .....20.....  
.....

*Signature of data subject/designated person*

**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR  
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS  
OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013  
(ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION,  
2021  
[Regulation 3]**

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

**Request for:**

☐ a) Correction or deletion of personal ☐ information about the data subject which is in possession or under the control of the responsible party.

*Please select applicable reasons for the selected request:*

- |                         |                          |
|-------------------------|--------------------------|
| (a) Inaccurate          | <input type="checkbox"/> |
| (b) Irrelevant          | <input type="checkbox"/> |
| (c) Excessive           | <input type="checkbox"/> |
| (d) Out of Date         | <input type="checkbox"/> |
| (e) Incomplete          | <input type="checkbox"/> |
| (f) Misleading          | <input type="checkbox"/> |
| (g) Obtained unlawfully | <input type="checkbox"/> |

- b) Destruction ☐ or deletion ☐ of a record of personal information about the data subject which is in the possession or under the control of the responsible party who is no longer authorised to retain the record of information.

<b>A</b>	<b>DETAILS OF THE DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Postal or business address:	
	Code (      )
Contact number(s):	
Fax number/E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / registered name of responsible party:	
Postal or business address:	
	Code (      )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED</b>
	<i>(Please specify the personal information required to be corrected / destroyed / deleted)</i>
<b>D</b>	<b>EXPLANATION FOR THE SELECTED REASON FOR A REQUEST</b>
	<i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party)</i>


Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*

# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer


(Address)

E-mail address: 

--

Fax number: 

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				



Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>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 page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**

**FORM 4**

**REQUEST FOR THE CONSENT OF A DATA SUBJECT FOR THE PROCESSING OF  
PERSONAL INFORMATION FOR THE PURPOSE OF DIRECT MARKETING THROUGH  
UNSOLICITED ELECTRONIC COMMUNICATION IN TERMS OF SECTION 69 (2) OF  
THE ACT**

[Regulation 6]

**PART A**

TO:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
*(Name of data subject)*

FROM:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Contact number(s):

\_\_\_\_\_

Fax number:

\_\_\_\_\_

E-mail address:

\_\_\_\_\_

*(Name, address and contact details of responsible party)*

**Specify goods or services to be marketed:** \_\_\_\_\_

Full names and designation of person signing on behalf of responsible party:

\_\_\_\_\_

.....  
*Signature of designated person*

Date: \_\_\_\_\_

**PART B**

**DATA SUBJECT'S CONSENT**

I, \_\_\_\_\_ (*full names of data subject*) hereby:

☐

Give my consent.

To receive direct marketing by means of unsolicited electronic communication in respect of the goods or services to be marketed

**SPECIFY METHOD OF PREFERRED COMMUNICATION:**

FAX

☐

E - MAIL

☐

SMS

☐

OTHERS – Please specify: .....

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject*

## FORM 5

### COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

#### REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021 [Regulation 7]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

**Complaint regarding:**

☐

Alleged interference with the protection of personal information

☐

Determination of an adjudicator.

PART I	ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION IN TERMS OF SECTION 74(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (Act No. 4 of 2013)
A	PARTICULARS OF COMPLAINANT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number if required	
Address:	
	Code ( )
Contact number(s):	
Fax number/ E-mail address :	

<b>B</b>	<b>PARTICULARS OF RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION</b>
Name(s) and surname/ Registered name of responsible party:	
Address:	
	Code (      )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR COMPLAINT</b> <i>(Please provide detailed reasons for the complaint)</i>
<b>PART II</b>	<b>COMPLAINT REGARDING DETERMINATION OF ADJUDICATOR IN TERMS OF SECTION 74(2) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)</b>
<b>A</b>	<b>PARTICULARS OF COMPLAINANT</b>
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number if required :	
Address:	
	Code (      )
Contact number(s):	

Fax number/ E-mail address:	
<b>B</b>	<b>PARTICULARS OF ADJUDICATOR AND RESPONSIBLE PARTY</b>
Name(s) and surname of adjudicator:	
Name(s) and surname of responsible party /registered name:	
Address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR COMPLAINT</b> <i>(Please provide detailed reasons for the grievance)</i>

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*