



FULLSTREAM BUSINESS SERVICES (Pty) Ltd

PAIA MANUAL

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

TABLE OF CONTENTS

1.	List of Acronyms and Abbreviations
2.	Purpose of PAIA Manual
3.	Key Contact Details for Access to Information of Fullstream Business Services (Pty) Ltd
4.	Guide on How to Use PAIA and How to Obtain Access to the Guide
5.	Categories of Records of Fullstream Business Services Which Are Available Without a Person Having to Request Access
6.	Description of the Records of Fullstream Business Services Which Are Available in Accordance with Any Other Legislation
7.	Description of the Subjects on Which Fullstream Business Services Holds Records and Categories of Records Held on Each Subject by Fullstream Business Services
8.	Processing of Personal Information
9.	Availability of the Manual
10 .	Updating of the Manual

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer;
1.3	"IO"	Information Officer;
1.4	"Minister"	Minister of Justice and Correctional Services;
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.6	"POPIA"	Protection of Personal Information Act No. 4 of 2013;
1.7	"Regulator"	Information Regulator; and
1.8	"Republic"	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;



2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE (FULLSTREAM BUSINESS SERVICES (Pty) Ltd

3.1. Chief Information Officer

Name:	Andre Wayne February
Tel:	011 268 8899
Email:	andre.february@fbsconsult.com

3.2. Deputy Information Officer

Name:	Cindi Davids
Tel:	011 258 8899
Email:	cindi@fbsconsult.com

3.3 Access to information general contacts

Email: info@fbsconsult.com

3.4 National or Head Office

Postal Address:	13 Polo Crescent, Woodmead, Johannesburg, 2191
Physical Address:	13 Polo Crescent, Woodmead, Johannesburg, 2191
Telephone:	011 258 8899
Email:	info@fbsconsult.com
Website:	www.fbsconsult.com

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in



an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objectives of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92¹¹.

Fullstream Business Services (Pty) Ltd — PAIA Manual

1 Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

2 Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

3 Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

4 Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

a) that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

5 Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

7 Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

8 Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

9 Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

10 Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11 Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

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

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6A copy of the Guide is also available in the following languages, for public inspection during normal office hours-

4.6.1 (English)



5. CATEGORIES OF RECORDS OF FULLSTREAM BUSINESS SERVICES WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Corporate Information	Company profile, company registration details, BBBEE certificate, contact details	X	X
Marketing and Business Material	Service Offerings, capability statements, case studies	X	X
PAIA and POPIA	PAIA Manual and Privacy Notice	X	X
High Level Policies	Privacy, Information Security Summary, QMS,		X
General Operational Information	Address, Office Hours, Contact details	X	X

6. DESCRIPTION OF THE RECORDS OF FULLSTREAM BUSINESS SERVICES WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI)	Companies Act 71 of 2008
Company Registration Documents	Companies Act 71 of 2008
Directors' Records and Registers	Companies Act 71 of 2008
Annual Financial Statements	Companies Act 71 of 2008
Tax Records (VAT, PAYE, Income Tax)	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Employee Records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employment Contracts	Basic Conditions of Employment Act 75 of 1997
Payroll Records	Basic Conditions of Employment Act 75 of 1997; Income Tax Act 58 of 1962
Health and Safety Records	Occupational Health and Safety Act 85 of 1993

Category of Records	Applicable Legislation
B-BBEE Certificates and Supporting Records	Broad-Based Black Economic Empowerment Act 53 of 2003
Information Security Policies and Records	Protection of Personal Information Act 4 of 2013; Electronic Communications and Transactions Act 25 of 2002
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Privacy Documentation	Protection of Personal Information Act 4 of 2013
Contracts and Agreements	Common Law of Contract; Electronic Communications and Transactions Act 25 of 2002
Client and Supplier Agreements	Electronic Communications and Transactions Act 25 of 2002; Companies Act 71 of 2008
Audit Reports and Compliance Records	Companies Act 71 of 2008

7. DESCRIPTION OF THE SUBJECTS ON WHICH FULLSTREAM BUSINESS SERVICES HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY FULLSTREAM BUSINESS SERVICES

NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used.

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records
Finance	- Annual Financial Statements
Procurement and SCM	- Proposals - contracts - Purchases
Information Technology	- Policies - System logs
Quality Management	- Policies - Certifications



8.PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Fullstream Business Services (Pty) Ltd (“FBS”) processes personal information in a limited and controlled manner, aligned to its role as a professional services and cybersecurity consulting organisation.

Primary Purpose of Processing

FBS processes personal information primarily for the following internal operational purposes:

Employment and Human Resource Administration

- Recruitment and selection of employees
- Management of employee records (including personal details, qualifications, and employment history)
- Payroll administration and remuneration processing
- Management of employee benefits, leave, and performance records
- Compliance with labour and employment legislation

Contractual and Legal Obligations

- Execution and management of employment contracts
- Administration of confidentiality agreements (NDAs)
- Compliance with statutory and regulatory obligations (including tax, labour, and corporate governance requirements)
- Maintenance of records required for audit and legal purposes

Organisational Governance and Operations

- Internal administration and business operations
- Risk management, audit, and compliance activities
- Security management, including access control and monitoring
- Record-keeping to support accountability and governance

Processing of Client Information

FBS does not typically collect, store, or maintain client personal information within its own internal systems.

Where FBS personnel process client-related personal information:



- Such processing occurs within the client’s own systems, platforms, or managed environments
- FBS acts in a service provider / operator capacity, under the instruction and control of the client
- FBS does not assume ownership or independent control of such information

Accordingly, the purpose of such processing is limited to:

- Delivery of contracted services (e.g., cybersecurity, system support, and consulting)
- Execution of client-defined processes and technical activities
- Support of client security monitoring, incident response, and governance functions

Lawful Basis for Processing

FBS processes personal information in accordance with POPIA, based on:

- Contractual necessity (employment contracts and service agreements)
- Legal and regulatory obligations
- Legitimate organisational interests (such as security and governance)
- Consent, where applicable

Data Minimisation Principle

FBS adheres to the principle of data minimisation:

- Only personal information that is necessary for defined purposes is collected and processed
- Client personal information is not replicated or retained internally unless explicitly required and contractually authorised

Categories of data subjects and the description of the nature or categories of the personal information to be processed.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race



8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority

8.4 Planned transborder flows of personal information

Fullstream Business Services (Pty) Ltd (“FBS”) utilises Microsoft 365 (E5) as its primary cloud-based platform for the processing, storage, and management of organisational information, including personal information as defined under the Protection of Personal Information Act, 2013 (POPIA).

Data Hosting and Processing Model

Information processed by FBS within the Microsoft 365 environment is hosted and managed within Microsoft’s global cloud infrastructure. FBS does not independently host or maintain offshore data repositories. All data processing activities are conducted through Microsoft’s enterprise cloud platform, which provides:

- Regionally aligned data processing capabilities
- Encryption of data both in transit and at rest
- Role-based access control and identity protection mechanisms
- Configurable data retention and governance controls
- Comprehensive logging, monitoring, and audit capabilities

Transborder Information Flows

Due to the nature of cloud computing and the global architecture of Microsoft services, certain data processing activities may involve the transfer of information across national borders. These activities may include, but are not limited to:

- System resilience and redundancy mechanisms



- Security monitoring and telemetry processing
- Technical support and incident response activities

Such transborder processing is performed under Microsoft's globally governed compliance and security framework.

Compliance with POPIA

FBS ensures that all personal information processed through Microsoft 365 is handled in accordance with the conditions for lawful processing as set out in POPIA. In particular:

- Appropriate contractual arrangements are maintained with Microsoft as the cloud service provider (operator)
- Data protection safeguards, including encryption and access control, are enforced
- Processing activities remain auditable and are subject to governance oversight
- Personal information is only processed for lawful and authorised purposes

Where transborder data transfers occur, FBS relies on Microsoft's compliance mechanisms and contractual commitments to ensure that an adequate level of protection is maintained, consistent with the requirements of POPIA.

Data Subject and Request Context

In the context of requests for access to information under the Promotion of Access to Information Act, 2000 (PAIA):

- Records stored within Microsoft 365 remain under the control of FBS
- Access to such records is subject to the applicable internal access control policies and legal requirements
- The physical location of data within Microsoft's infrastructure does not affect the rights of data subjects or requesters to access information, subject to applicable legal limitations

FBS continuously reviews its cloud data governance practices to ensure alignment with applicable South African legislation, international best practices, and client-specific data sovereignty requirements.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Fullstream Business Services (Pty) Ltd ("FBS") implements a comprehensive information security framework designed to protect the confidentiality, integrity, and availability of information, including personal information, in accordance with applicable legislation such as the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA).



Governance and Compliance Framework

FBS maintains formal information security governance structures aligned to recognised standards and regulatory requirements. This includes:

- Alignment with ISO/IEC 27001 information security principles
- Adoption of risk-based security management practices
- Integration of POPIA requirements into data handling processes
- Ongoing monitoring, reporting, and review of security controls

Access Control and Identity Management

Access to information systems and data is restricted based on the principle of least privilege. Controls include:

- Role-based access control (RBAC)
- Multi-factor authentication (MFA) where applicable
- Identity and access governance through Microsoft 365 and Entra ID
- Periodic access reviews and audit logging

Data Protection and Encryption

FBS implements technical safeguards to protect sensitive and personal information throughout its lifecycle:

- Encryption of data at rest and in transit using Microsoft 365 security capabilities
- Data classification and labelling aligned to sensitivity levels
- Data Loss Prevention (DLP) policies to prevent unauthorised disclosure
- Secure storage within controlled cloud environments

Monitoring, Logging, and Incident Response

FBS maintains continuous monitoring and incident management processes to detect and respond to security events:

- Security event logging and audit trails across systems
- Continuous monitoring through Microsoft security and compliance capabilities
- Formal incident response procedures including escalation, containment, and reporting
- Post-incident review and remediation processes

Network and Infrastructure Security

FBS ensures that its infrastructure and cloud environments are secured through:

- Secure configuration baselines and hardened environments
- Integration with advanced threat protection and monitoring tools
- Segregation of environments and controlled access boundaries
- Regular vulnerability and patch management practices



Data Retention and Information Management

Information is managed in accordance with defined retention and disposal policies:

- Configurable data retention policies within Microsoft 365
- Controlled archival and secure deletion processes
- Alignment with legal, regulatory, and contractual requirements

Third-Party and Cloud Security

FBS utilises Microsoft as a cloud service provider and ensures that:

- Appropriate contractual and security controls are in place with Microsoft
- Microsoft's security, compliance, and regional processing capabilities are leveraged
- Data handling remains governed, monitored, and auditable within the cloud environment

User Awareness and Training

FBS promotes a culture of information security awareness through:

- Ongoing security awareness and training programmes
- Policies and procedures governing acceptable use and data protection
- Regular communication of emerging threats and best practices

FBS continuously reviews and enhances its information security measures to ensure alignment with evolving threats, regulatory requirements, and industry best practices, thereby ensuring the ongoing protection of information under its control.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.fbsconsult.com,

9.1.2 head office of Fullstream Business Services (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Fullstream Business Services (Pty) Ltd will on a regular basis update this manual.



Issued by

Andre Wayne February
CEO and Information Officer

