

Kandua PAIA Manual

PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000

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

Date of compilation : 02 October 2025

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 **Kandua** 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 **Kandua**, by providing a description of the subjects on which **Kandua** holds records and the categories of records held on each subject;
- 2.3 know the description of the records of **Kandua** which are available in accordance with any other legislation; PAIA Manual Template: Private Body
- 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 **Kandua** 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 **Kandua** 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 KANDUA

3.1. Chief Information Officer

Vinolan S Pillay, CEO, Kandua

Email: info@kandua.com

Telephone: +27 10 1421 480

3.2. Deputy Information Officer

Deputy Information Officer:

Shannon Mackrill, Head of Growth, Kandua

Email: info@kandua.com

Telephone: +27 10 1421 480

3.3 Access to information general contacts

Email: info@kandua.com

3.4 Head Office

Physical & Postal Address:

Head Office:

Kandua

9 Somerset Rd

Green Point

Cape Town

8001

Telephone: +27 10 142 1480

Email: info@kandua.com

Website: <https://kandua.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 objects 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-
- 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.
- 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.

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. 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. 7Section 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/>)

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

4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF KANDUA 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	x	
Corporate Information	Job categories	x	
Corporate Information	Service offerings	x	

Category of records	Types of the Record	Available on Website	Available upon request
Governance & Reporting	Public-facing reports		x
Governance & Reporting	Public financial statements		x
Governance & Reporting	Policies published on Kandua's		x

6. DESCRIPTION OF THE RECORDS OF KANDUA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Company incorporation and statutory records (e.g. Memorandum of Incorporation, shareholder records, director registers, annual returns)	Companies Act 71 of 2008
Employee contracts, leave records, working hours, remuneration, termination records	Basic Conditions of Employment Act 75 of 1997
Disciplinary records, grievance records, collective agreements, union-related correspondence	Labour Relations Act 66 of 1995
Tax returns, employee PAYE records, VAT submissions, corporate tax filings	Income Tax Act 58 of 1962
Data subject consent records, privacy notices, processing registers, information security policies	Protection of Personal Information Act 4 of 2013
Health and safety policies, incident logs, risk assessments, compliance certificates	Occupational Health and Safety Act 85 of 1993

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND

CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY KANDUA

Subjects on which the body holds records	Category of records
Human Resources	Employee contracts
Personnel files	
Policies and procedures	
Training and performance records	
Other Internal Records	Internal correspondence
Operational and administrative records	
Client-related Records	Client onboarding forms and compliance documents
Job request and claims-related data	
Contracts and payment information	
Kandua Company Records	Memorandum of Incorporation
Financial and statutory records	
Operational policies and procedures	
Risk, compliance, and governance records	
Technology and system documentation	
Other Parties	Records of suppliers, service providers, and partners
Contracts, correspondence, and due diligence records	

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information : Kandua processes personal information in order to:

8.1.1 Facilitate job connections between homeowners and service providers (Pros).

8.1.2 Verify, onboard, and manage service providers.

8.1.3 Process insurance and claims-related records.

8.1.4 Comply with regulatory and contractual obligations.

8.1.5 Improve customer service and product offerings.

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

Categories of Data Subjects	Personal Information that may be processed
Customers (Homeowners)	contact details, service requests, Clients name, address, registration numbers
Service Providers (Pros)	ID, qualifications, criminal checks, compliance documents, financial details.
Employees / Contractors	HR, payroll, benefits, and performance records. Employees address, qualifications, gender and race
Partners / Insurers / Vendors	company details, contracts, operational data.

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	Identity number and names, for criminal checks
Qualifications, for qualification verifications	South African Qualifications Authority, Regulatory Associations or Governing Bodies
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Some data may be stored or processed using international cloud service providers. Kandua ensures that adequate data protection safeguards are in place where information is transferred outside South Africa.

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

8.5.1 Kandua employs a layered information security framework, including:

8.5.1.1 Data encryption

8.5.1.2 Access controls and identity management

8.5.1.3 Firewalls and monitoring systems

8.5.1.4 Incident response protocols

8.5.1.5 Regular audits and compliance reviews

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.kandua-alpha.co.za, if any;

9.1.2 head office of the **Kandua** 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 **Kandua** will on a regular basis update this manual.

Issued by

Vinolan S Pillay

Chief Executive Officer
