

12 PAIA Manual

TECBOT (PTY) LTD

(Registration number 2017/154167/07)

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Private body	Tecbot (Pty) Ltd
Registration number	2017/154167/07
Date of compilation	20 October 2026
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1. Introduction

1.1 Section 32(1)(b) of the Constitution of the Republic of South Africa, 1996 gives everyone the right of access to any information held by another person that is required for the exercise or protection of any rights. The Promotion of Access to Information Act 2 of 2000 (**PAIA**) gives effect to that right, subject to justifiable limitations such as the protection of privacy, commercial confidentiality and effective governance.

1.2 The Protection of Personal Information Act 4 of 2013 (**POPIA**) gives effect to the constitutional right to privacy and amended PAIA to balance access to information against the protection of personal information. The Information Regulator now oversees both Acts.

1.3 This manual is published by Tecbot (Pty) Ltd (**Tecbot**) to help requesters obtain access to records Tecbot holds. It describes the records Tecbot holds, how to request access, the fees payable, the grounds on which access may be refused and the remedies available. It also contains the information about Tecbot's processing of personal information that section 51 of PAIA requires.

2. Abbreviations and definitions

Term	Meaning
Tecbot or the Company	Tecbot (Pty) Ltd, a private company with registration number 2017/154167/07, with its principal place of business at 71A 10th Avenue, Edenvale, Johannesburg, Gauteng, South Africa.
Data subject	The natural or juristic person to whom personal information relates.

Term	Meaning
Information Officer (IO)	The person designated by Tecbot to perform the functions of an information officer under PAIA and POPIA, and includes any Deputy Information Officer (DIO).
Personal requester	A requester seeking access to a record containing personal information about the requester.
Requester	Any person, including a public body, requesting access to a record of Tecbot, or a person acting on their behalf.
Record	Any recorded information, regardless of form or medium, in Tecbot's possession or under its control, whether or not Tecbot created it.
Regulator	The Information Regulator established under section 39 of POPIA.
Third party	Any natural or juristic person other than the requester or Tecbot.

3. About Tecbot

Tecbot is a South African technology and digital marketing company. It provides software, website and application development (build services), digital marketing, design and campaign management services, and support, maintenance and hosting services to business clients.

4. Contact details

Head of private body	George Georgiades, Director
Information Officer	George Georgiades
Deputy Information Officer	Lucas Reno Mouskides
Physical address	71A 10th Avenue, Edenvale, Johannesburg, Gauteng, South Africa
Telephone	+27 87 701 4004
Email	admin@tecbot.co.za
Website	www.tecbot.co.za

5. Guide on how to use PAIA

5.1 The Regulator has published a guide in each official language on how to use PAIA and how to exercise the rights in POPIA (**Guide**), as section 10 of PAIA requires. The Guide explains, among other things, how

to make a request, the assistance available from information officers, the fees payable and the remedies available.

5.2 The Guide is available on the Regulator's website and may be inspected or copied at the Regulator's offices during normal working hours:

The Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Tel: 010 023 5200 | Toll-free: 0800 017 160

Website: <https://inforegulator.org.za>

5.3 A copy of the Guide is also available from Tecbot's Information Officer on request.

6. Records available without a request

6.1 The following records are publicly available and may be obtained without a formal PAIA request:

(a) information published on Tecbot's website, including this manual and its Privacy and Cookie Policy; and

(b) Tecbot's registration details, directors and registered address, which are available from the Companies and Intellectual Property Commission.

6.2 Tecbot has not published a notice under section 52(2) of PAIA.

7. Records held under other legislation

Tecbot keeps records under the following legislation, where applicable. Some of these records may be available to specified persons under the relevant Act. The list is not exhaustive.

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Cybercrimes Act 19 of 2020
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002

- Value-Added Tax Act 89 of 1991

8. Categories of records held

Tecbot holds records in the following categories. Listing a category does not mean that access will be granted. Each request is assessed on its merits under PAIA.

Category	Records
Company secretarial	Memorandum of Incorporation; registration documents; share register; minutes and resolutions of directors and shareholders; statutory returns
Financial and tax	Annual financial statements; accounting records; management accounts; tax and VAT returns and records; banking records; invoices and statements
Human resources	Employment contracts; personnel files; payroll and benefits records; leave records; performance and disciplinary records; recruitment records; policies and handbook; statutory employment records
Clients	Master services agreements, orders, statements of work and change requests; client contact details; project records and correspondence; invoices and payment records
Operations and technology	Project plans, specifications and deliverables; source code and repositories; hosting and support records; service level reports; IT security and disaster recovery records; system logs
Marketing	Marketing material; campaign records; website and analytics data; mailing lists and consent records
Suppliers and contractors	Supplier and contractor agreements; data processing agreements; contact and payment details
Compliance and legal	POPIA and PAIA records; Breach Register; policies; legal opinions and correspondence (which may be privileged); insurance records

9. Processing of personal information

9.1 Purposes of processing

Tecbot processes personal information to:

- conclude and perform agreements with clients, suppliers and contractors;
- provide build, digital marketing, support, maintenance and hosting services;
- manage client relationships, invoicing and collections;

- recruit, employ and manage personnel and meet employment and tax obligations;
- market its services, subject to consent where POPIA requires it;
- secure its systems, premises and information and prevent fraud and crime;
- comply with legal and regulatory obligations; and
- establish, exercise or defend legal claims.

9.2 Categories of data subjects and personal information

Data subjects	Personal information processed
Employees, job applicants and interns	Names; identity numbers; contact details; addresses; date of birth; nationality; race, gender and disability information (for employment equity purposes); qualifications and employment history; background checks where lawful and necessary; banking details; tax numbers; remuneration and benefits; performance and disciplinary records; leave records
Contractors and freelancers	Names; contact details; identity or registration numbers; tax and VAT details; banking details; engagement and performance records
Clients and their contact persons	Company names and registration details; VAT numbers; names, job titles and contact details of contact persons; billing and payment records; correspondence; project and service records
Customers and users of clients' platforms (processed as operator)	Information held on websites, applications, databases, email and marketing systems that Tecbot builds, hosts, maintains or manages for clients, as determined by each client
Suppliers and service providers	Company details; contact persons; banking details; contractual records
Website visitors and prospects	Names and contact details submitted through forms; IP addresses; device and browser information; cookie and analytics data; marketing preferences
Directors and shareholders	Names; identity numbers; contact details; shareholding information; statutory records

9.3 Recipients of personal information

Tecbot may share personal information, where necessary and lawful, with:

- service providers who process information on its behalf, including hosting and cloud providers, email and productivity platforms, payroll and accounting providers, and marketing platforms;

- clients, where Tecbot processes their data as operator or where their contact persons need to be identified;
- professional advisers, auditors and insurers;
- banks and payment service providers;
- pension or provident funds, medical schemes and benefit providers for employees, where applicable;
- the South African Revenue Service, the Department of Employment and Labour, the Companies and Intellectual Property Commission and other regulators; and
- law enforcement agencies and courts, where the law requires.

9.4 Planned cross-border transfers

Tecbot uses cloud-based services and platforms, some of which store or process information outside South Africa, mainly in the United Kingdom, the Netherlands and the United States. Tecbot transfers personal information across borders only where section 72 of POPIA permits: where the recipient is subject to a law or a binding agreement providing an adequate level of protection (the UK and the Netherlands have data protection laws substantially similar to POPIA, and Tecbot's US providers are bound by data processing terms), or where the transfer is necessary for the performance of a contract with the data subject.

9.5 Security measures

Tecbot implements reasonable technical and organisational measures to protect personal information, including access control, two-factor sign-in and tested backups.

10. Before submitting a request

Step 1: Is it your own personal information?

A data subject may ask Tecbot whether it holds personal information about them, and for a record or description of it, under section 23 of POPIA. Contact the Information Officer. Confirmation of whether Tecbot holds personal information is free of charge. A fee may apply for a copy of the record.

Step 2: Does PAIA apply?

PAIA does not apply to a record requested for the purpose of criminal or civil proceedings after those proceedings have started, if access to the record is provided for in another law (section 7). In that case the court rules on discovery apply instead.

Step 3: Does the record exist?

PAIA applies only to records that exist when the request is received. Tecbot is not obliged to create a record, for example to provide reasons for a decision that were never recorded.

Step 4: Does Tecbot hold the record?

The record must be in Tecbot's possession or under its control. Where Tecbot processed information as operator for a client, the client is usually the appropriate body to approach, and Tecbot may refer the request to it.

11. How to request access

11.1 A requester must be given access to a record of Tecbot if the record is required for the exercise or protection of any right, the requester complies with the procedural requirements of PAIA, and no ground for refusal applies (section 50).

11.2 The request must be made on **Form 2** prescribed by the Regulations relating to the Promotion of Access to Information, 2021 (available on the Regulator's website and from the Information Officer), and submitted to the Information Officer by email or at the physical address in clause 4.

11.3 The requester must provide enough detail to enable the Information Officer to identify:

(a) the record or records requested;

(b) the identity of the requester;

(c) the form of access required;

(d) the requester's email or postal address; and

(e) the right the requester seeks to exercise or protect, and why the record is required to exercise or protect it.

11.4 The requester must state if they want to be informed of the decision in any manner other than in writing, and give the necessary particulars.

11.5 A person requesting on behalf of another must submit proof of the capacity in which they are acting, to the Information Officer's reasonable satisfaction.

11.6 A requester who cannot complete the form because of illiteracy or disability may make the request orally. The Information Officer will reduce it to writing and give the requester a copy.

11.7 The courts have held that the record must be reasonably required, and not merely useful, for the exercise or protection of the right. Tecbot may refuse a request that does not identify a right, or that relies on something that is not a right.

12. Fees

12.1 PAIA provides for a request fee and an access fee, in the amounts prescribed in Annexure B to the Regulations relating to the Promotion of Access to Information, 2021. The current request fee payable by a requester other than a personal requester is R140.00.

12.2 The Information Officer will notify the requester if the request fee is payable. The request will not be processed until it is paid.

12.3 If the search for and preparation of the record will take more than the hours prescribed in the Regulations, the Information Officer may require a deposit of the prescribed portion of the access fee.

12.4 If access is granted, the requester must pay the access fee for reproduction, search and preparation, and postage where applicable, before access is given. Tecbot may withhold the record until the fee is paid.

12.5 If a request is refused, any deposit paid will be refunded.

12.6 Tecbot's banking details for payment are available from the Information Officer.

13. Decision

13.1 Tecbot will decide whether to grant a request within 30 days of receiving a request that complies with PAIA and notify the requester on Form 3.

13.2 Tecbot may extend this period once, by no more than 30 days, if the request is for a large number of records, requires a search through a large number of records, requires consultation with a third party or another office, or the requester consents. The requester will be notified of the extension, the reasons for it, and the right to complain to the Regulator or apply to court against it.

13.3 If a record cannot be found or does not exist, the Information Officer will notify the requester by affidavit or affirmation, describing the steps taken to find it. This is treated as a refusal. If the record is later found, access will be given unless a ground for refusal applies.

13.4 If access is granted, the notice will state the access fee, the form of access and the requester's right to complain to the Regulator or apply to court against the fee or form of access.

13.5 If access is refused, the notice will give adequate reasons, identify the provisions of PAIA relied on and state the requester's right to complain to the Regulator or apply to court.

13.6 Failure to decide a request within the 30-day period (or extended period) is a deemed refusal.

13.7 Where part of a record may be disclosed and part may not, Tecbot will sever the protected part and give access to the rest (section 59).

14. Grounds for refusal

14.1 Tecbot may or, where PAIA requires, must refuse access on the grounds in Chapter 4 of Part 3 of PAIA, including where access would involve:

(a) the unreasonable disclosure of personal information about a third party who is a natural person (section 63);

(b) the disclosure of a third party's trade secrets, or financial, commercial, scientific or technical information that would likely cause it harm, or information supplied in confidence whose disclosure would prejudice it in negotiations or competition (section 64);

(c) an action for breach of a duty of confidence owed to a third party under an agreement (section 65);

(d) endangering the life or physical safety of an individual, or prejudicing the security of property or systems (section 66);

(e) records privileged from production in legal proceedings (section 67);

(f) Tecbot's own trade secrets, or financial, commercial, scientific or technical information whose disclosure would likely cause it harm, or information that would prejudice it in negotiations or competition, including computer programs owned by Tecbot (section 68); or

(g) research information of Tecbot or a third party whose disclosure would seriously disadvantage the research (section 69).

14.2 Tecbot may refuse a request that is manifestly frivolous or vexatious, or that would involve a substantial and unreasonable diversion of its resources.

14.3 Despite these grounds, Tecbot must grant access if disclosure would reveal evidence of a substantial contravention of or failure to comply with the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70).

14.4 Where a request concerns a third party's information, Tecbot will take reasonable steps to inform the third party and allow it to make representations within 21 days before deciding.

15. Remedies

15.1 Tecbot does not have an internal appeal procedure. The Information Officer's decision is final within Tecbot.

15.2 A requester or third party who is dissatisfied with a decision may, within 180 days of being notified of it:

(a) lodge a complaint with the Regulator on Form 5 prescribed by the Regulations; or

(b) apply to a court with jurisdiction for appropriate relief.

16. Availability of this manual

This manual is available on Tecbot's website at www.tecbot.co.za, and free of charge for inspection at Tecbot's offices at 71A 10th Avenue, Edenvale, Johannesburg, Gauteng, South Africa. Copies may also be requested from the Information Officer, subject to the prescribed fee for copies. A copy will be provided to the Regulator on request.

17. Updating

The Information Officer will review this manual at least annually and update it when Tecbot's details, records or processing change.

Manual owner	Information Officer (George Georgiades)
Effective date	20 October 2026
Last approved	20 October 2026
Next review	By 20 October 2027

18. Disclaimer

This manual does not deal with every procedure in PAIA and POPIA. Requesters should familiarise themselves with both Acts. The Information Officer will give reasonable assistance, free of charge, to a requester who needs help to make a request.

Signed at Text on 20 / Oct / 2026

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George Georgiades

Information Officer, Tecbot (Pty) Ltd