CODEHESION PTY LTD

REG: 2016/126390/07

PAIA MANUAL

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

DATE OF COMPILATION: 01/06/2023
DATE OF NEXT REVISION: 03/06/2027

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1. "CEO"	Chief Executive Officer.
1.2. "IO"	Information Officer.
1.3. "Minister"	Minister of Justice and Correctional Services.
1.4. "PAIA"	Promotion of Access to Information Act No. 2 of 2000.
1.5. "POPIA"	Protection of Personal Information Act No.4 of 2013.
1.6. "Regulator"	Information Regulator; and "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 that 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 CODEHESION PTY LTD

3.1. Chief Information Officer Name:

Name:	Hector Beyers
Tel:	+27 82 079 7755
Email:	hector@codehesion.com
Fax:	N/A

3.2. Deputy Information Officer:

Name:	Emma Punt
Tel:	+27 82 079 7755
Email:	emma@codehesion.com
Fax:	N/A

3.3. Access to information general contacts:

Email:	team@codehesion.com

3.4. Head Office Postal Address:

Physical Address:	Southdowns Office Park, 22 Karee St, Irene, Centurion, 1057.
Telephone:	+27 82 079 7755
Email:	team@codehesion.com
Website:	www.codehesion.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 aforesaid Guide contains the description of-

4.2.1. the objects of PAIA and POPIA;

4.2.2. the postal and street address, phone and fax number, and, if available, electronic mail address of-

4.2.2.1. the Information Officer of every public body, and

4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2] 2 ;

4.2.3. the manner and form of a request for-

4.2.3.1. access to a record of a public body contemplated in section 11[3] ; and

4.2.3.2. access to a record of a private body contemplated in section 50[4] ;

4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;

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[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.

4.2.6. 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-

4.2.6.1. an internal appeal;

4.2.6.2. a complaint to the Regulator; and

4.2.6.3. 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;

4.2.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.2.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.2.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.2.10. the regulations made in terms of section 92[11].

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[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."
f. 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.

4.3. The Guide can also be obtained-

4.3.1. upon request to the Information Officer;

4.3.2. from the website of the Regulator ((https://inforegulator.org.za).

5. CATEGORIES OF RECORDS OF CODEHESION PTY LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Types of The Record	Available one The Website	Available on Request
None.	N/A.	N/A.	N/A.

6. DESCRIPTION OF THE RECORDS OF CODEHESION PTY LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records
Protection of Personal Information Act, 4 of 2013.
Promotion of Access to Information Act 2 of 2000.
Companies Act 71 of 2008.
Compensation for Occupational Injuries and Diseases Act 130 of 1993.
Unemployment Insurance Act 63 of 2001.
Skills Development Levy Act 9 of 1999.
Employment Equity Act 55 of 1998.
Labour Relations Act 66 of 1995.
Basic Conditions of Employment Act 75 of 1997.
Value Added Tax Act 89 of 1991.
Income Tax Act 58 of 1962.

7. DESCRIPTION OF THE SUBJECTS ON WHICH CODEHESION HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CODDEHESION PTY LTD

Subjects On Which Codehesion Holds Records
• Constitutional Documents. • Financial records. • Annual financial statements. • Accounting records. • Asset registers. • Banking records. • Invoices. • Rental agreements. • Tax returns. • Operational records. • Licenses. • Intellectual property. • Marketing records. • Statutory records. • Internal policies and procedures.

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information;

Personnel encompasses individuals employed by or rendering services to Codehesion (Pty) Ltd, whether receiving compensation or assisting in the company's operations. This category encompasses directors, executive directors, non-executive directors, as well as permanent, temporary, and part-time employees, including contracted workers. The records comprise the following:

- Any personal records provided by personnel.
- Any record in relation to personnel provided by a third party.
- Conditions of employment and contractual related records.
- Internal evaluation records.
- Disciplinary codes.
- Disciplinary records.
- Employment contracts.
- Employment equity plans.
- Medical Aid records.
- Salary records.
- Training manuals.
- Training records.

8.1.1. Client records:

Our commitment lies in safeguarding the confidential information belonging to our customers. In the event of requesting access to any of these records, a thorough and justified motivation will be necessary, taking into consideration the provisions outlined in Sections 63 and 67 of the Act, which specifically address the protection of third-party information. The records in question encompass the following:

- Any records historically provided by a customer or a third party acting for or on behalf of such customer.
- Contractual information.
- Customer needs assessments.
- Personal records of customers.
- Credit information and other research relating to a customer.
- Customer evaluation records.
- Customer profiling.
- Performance research conducted on behalf of customers or about customers.
- Records generated by us, pertaining to customers, including transactional records.

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
Clients	Company name, address, registration numbers, client name, title and banking details.
Service Providers	Names, registration numbers, vat numbers, address and banking details.
Employees	Address, qualifications, age, identity numbers, gender and race and banking details.

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

Categories of Personal Information	Recipients/Categories of Recipients to whom the personal information may be supplied
Identify numbers and names for criminal checks.	MIE and South African Police Services.
Qualifications for qualification verifications.	South African Qualification Authority
Credit and payment history, for credit information.	Credit Bureaus

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

Codehesion has the following in place to ensure the confidentiality and integrity of personal information;

- All personal information processed by Codehesion is subject to appropriate safeguards, including access controls, encryption where applicable, and secure storage protocols. In accordance with the amended POPIA Regulations (effective 17 April 2025), Codehesion's compliance framework is continuously reviewed and improved.
- Physical security measures.
- Cyber security measures.
- Training in information security.
- Policies in information security.
- Audits of information security.
- And any particular security framework implemented.

9. DATA SUBJECT RIGHTS AND OBJECTION PROCEDURES (POPIA REGULATIONS 2025)

9.1. In terms of the amended POPIA Regulations (Government Notice No. 6126, effective 17 April 2025), Codehesion recognises and upholds the following data subject rights:

9.1.1. The right to object to the processing of personal information, at no charge, via any accessible channel including hand delivery, fax, post, email, SMS, WhatsApp, or any other manner expedient to the data subject in terms of section 11(3)(a) of POPIA;

9.1.2. The right to request correction or deletion of personal information using the same accessible channels;

9.1.3. Codehesion will inform data subjects of their right to object at the point of collecting personal information; and

9.1.4. Written consent will be obtained prior to processing personal information for direct marketing via unsolicited electronic communication.

9.2. Requests relating to data subject rights should be directed to the Information Officer at the contact details set out in section 3 of this Manual. Complaints may also be submitted to the Information Regulator at https://inforegulator.org.za using the prescribed complaint form, via email, fax, post, courier or hand delivery.

10. SECURITY COMPROMISE REPORTING

10.1. In terms of section 22 of POPIA, where Codehesion reasonably believes that the personal information of a data subject has been accessed or acquired by an unauthorised person, Codehesion will notify the Information Regulator and the affected data subject as soon as reasonably possible after discovering the security compromise.

10.2. Security compromise notifications must be submitted to the Information Regulator via the online reporting platform at https://inforegulator.org.za (eServices portal).

11. ANNUAL PAIA REPORTING OBLIGATION

11.1. In terms of sections 32 and 83(4) of PAIA, Codehesion (Pty) Ltd is required to submit an annual report to the Information Regulator detailing all access to information requests received and processed during the preceding financial year (1 April to 31 March).

11.2. The annual report submission window opens on 1 April and closes on 30 June each year. No extensions are granted. All reports must be submitted via the Information Regulator's eServices portal at https://eservices.inforegulator.org.za.

11.3. The Information Officer must be registered on the eServices portal prior to submitting a report. Failure to submit may result in a compliance assessment, enforcement proceedings, and the public flagging of non-compliance on the CIPC BizPortal.

12. AVAILABILITY OF THE MANUAL

12.1. A copy of the Manual is available-

12.1.1. on Codehesion www.codehesion.com , if any; of

12.1.2. head office of Codehesion for public inspection during normal business hours;

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

12.1.4. to the Information Regulator upon request.

12.2. A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

13. UPDATING OF THE MANUAL

The information officer of Codehesion will on a regular basis update this manual.

Issued by

Hector Beyers
CEO/Founder of Codehesion