

**Prepared in terms of section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended) The Protection of
Personal information Act No 4 of 2013 Including amendment to
regulations relating to the Protection of Personal Information,
2018**

PAIA & POPIA MANUAL



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COMPANY NAME: INFINITY ACADEMY BENONI PTY LTD

REGISTRATION No: 2019/486180/07

COMPANY ADDRESS: 30, 4th AVENUE NORTHMEAD BENONI

DIRECTORS/MEMBERS:

NAME: FELICIA ANN ROELOFSE

NAME: NATASHA MOODLEY

PAIA & POPIA Manual

This PAIA & POPIA Manual outlines the Companies policies, procedures, objectives, processes for the promotion of access to information including what is shared freely and what records require the formal PAIA process as set out by the Act. The Protection of Personal Information on how information is stored, secured and outlines direct marketing processes as set out by The Protection of Personal Information Act (POPIA) This manual is reviewed annually and approved by the Executive Management of the Company.

PAIA & POPIA	Act No 2 of 2000 as amended, Act No4 of 2013 and amendment regulations of 2025
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Approvals

The signatures below certify that this manual has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Natasha Moodley		Director 1	26 September 2025
Reviewed by	Bianca Gwarubana		Administration	26 September 2025
Approved by	Felicia Roelofse		Director 2 and Training Manager	26 September 2025

Amendment Record

This PAIA & POPIA Manual is reviewed to ensure its continuing relevance to the systems and processes that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision #	Date
All	Pages revised for POPIA update 2025	2	26 Sept 2025

TABLE OF CONTENTS

Name of Company (Hereinafter called The Company)

LIST OF ACRONYMS AND ABBREVIATIONS	4
1. BACKGROUND OF PAIA AND POPIA	7
2. COMPANY INFORMATION AND INTRODUCTION TO PAIA & POPIA MANUAL	7
3. PURPOSE OF PAIA & POPIA MANUAL	8
4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION	10
5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE REGULATORS PAIA GUIDE	10
6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	12
7. DESCRIPTION OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	13
8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY	14
9. PROCESSING OF PERSONAL INFORMATION	15
10. OBJECTIONS TO THE PROCESSING OF PERSONAL INFORMATION	17
11. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTRUCTION OR DELETION OF RECORD OF PERSONAL INFORMATION	18
12. REQUEST FOR DATA SUBJECTS CONSENT TO PROCESS PERSONAL INFORMATION FOR DIRECT MARKETING THROUGH UNSOLICITED ELECTRONIC COMMUNICATION	18
13. FORMAL REQUEST TO ACCESS TO A RECORD	27
FORM 2	28
14. PRESCRIBED FEES	32
15. ACCESS TO INFORMATION PROCESS	32
16. INTERFERENCE OF DATA SUBJECTS PERSONAL INFORMATION	34
17. REPORTING AND ANNUAL AUDITS	34
18. REFERENCE TO POLICIES, PROCEDURES AND DOCUMENTED INFORMATION OF PAIA&POPIA (LIST OF DOCUMENTED INFORMATION PAIA & POPIA)	34
19. AVAILABILITY AND UPDATING OF THE COMPANIES PAIA & POPIA MANUAL	37

ACRONYMS, ABBREVIATIONS AND INTERPRETATION-PAIA & POPIA

Term	Definition
Access Fee	This Access fee is paid by the requester to the body from which you are requesting the information, to cover the costs of finding and copying the records you require. What can be charged is prescribed by regulation.
Administrator	Is an organ of state or any natural or juristic person taking administration action
Authorised Person	The authorised person is the person who is requesting on behalf of someone else and has been properly authorised in writing to do so.
Automatically available records	These are records that a public or private body will provide to a requester without them needing to file a request. These records are listed in a voluntary disclosure notice, which should be made public
Biometrics	This means a technique of personal identification that is based on physical, physiological or behavioural characterization including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.
CEO	Chief Executive Officer
Code of Conduct	This means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child
Consent	Means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information
Complaint	Means a matter reported to the Information Regulator in terms of section 74 (1) and (2) of the POPIA A complainant referred to in section 76 (1) (e) and 92)1) of the Act and a matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Complainant	
Data Subject	This means the person to whom the personal information relates
Day	Means a calendar day, unless the last day of a specified period happens to fall on a Sunday or on any Public holiday, in which case the time shall be calculated exclusive of that Sunday or public holding in accordance with section 4 of the Interpretation Act 1957 (Act 33 of 1957)
Deemed Refused	If no response is received to a request within the prescribed time, this is defined as a “deemed refusal”
De-Identify	Concerning personal information of a data subject, means to delete any information that; a. Identifies the data subject b. Can be used or manipulated by a reasonably foreseeable method to identify the data subject Can be linked by a reasonably foreseeable method to other information that identifies the data subject
DIO	Deputy Information Officer
Deputy Information Officer (DIO)	The person designated by the Information Officer to assist the requester with their information request and to whom the Information Officer delegates other PAIA & POPIA powers.
Direct Marketing	Means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of: a. Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or Requesting the data subject to donate any kind for any reason.
Electronic Communication	This means any text, voice, sound or image message sent over an electronic communications network is stored in the network or the recipient’s terminal equipment until it is collected by the recipient.
Filing System	This means any structured set of personal information, whether centralized, decentralized or dispersed on a functional or geographical basis, which is accessible according to specific criteria

Guide	Guides are made in pursuance of section 10 of PAIA as amended which seeks to assist a person who wished to exercise any right contemplated in PAIA and the Protection of Personal Information Act 2013.
Head	Of, or in relation to, a private body means: a) In the case of a natural person, that natural person or any person duly authorised by that natural person. b) In the case of a partnership, any partner of the partnership or any person duly authorised by the partnership. c) In the case of a juristic person- i) The chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or ii) The person who is acting as such or any person duly authorised by such acting person.
IO	Information Officer
Information Officer (IO)	The person authorised to handle PAIA requests. Of, or concerning a: a. Public body means an information officer or deputy information officer as contemplated in terms of Section 1 or 17 of the Act; or Private body means the head of a private body as contemplated in Section 1, of the Promotion of Access to Information Act. Juristic Person-Automatically the Chief Executive Officer or the Managing Director or equivalent officer of the juristic person or any person duly authorised by the leader, the CEO or equivalence officer may authorised any natural person as information officer of a private body A Natural person as a sole proprietor, a partner in a partnership or a leader of a political party
Information Regulator	The Office of the Information Regulator has been established, in terms of section 39 of POPIA to monitor and enforce compliance with both POPIA and PAIA.
Minister	Minister of Justice and Correctional Services
Office hours	In respect of offices of the Information Regulator, means the hours between 08:00 and 16:00 Monday to Friday, excluding public holidays and in respect of offices designated by the Information Regulator, means the hours during which the offices are operating
Operator	This means a person who processes personal information for a reasonable party in terms of a contract or mandate, without coming under the direct authority of that party
PAIA	The Promotion of Access to Information Act 2 od 2000 (as amended)
Personal Information	Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person; b. Information relating to the education or the medical, financial, criminal or employment history of a person; c. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignments to the person; d. The biometric information of the person; e. The personal opinions, views or preferences of the person; f. Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; g. The views or opinions of another person about the person, and; h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
Personal Requester	Means a requester seeking access to a record containing personal information about the requester.

POPIA	Protection of Personal Information Act No 4 of 2013
Private Body	A private body is a person, company or other kind of juristic entity that carries on trade, business or profession, including a political party
Private or Public Body	Now substituted with relevant body/bodies (not private is all companies in SA and Public is Governmental/Parastatals)
Record	Means any recorded information; a. Regardless of form or medium, including any of the following: i. Writing on any material ii. Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other devices, and any material subsequently derived from information so produced, recorded or stored; iii. Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; iv. Book, map, plan, graph or drawing; v. Photograph, film, negative, tape or other devices in which one or more visual images are embodied, audio, digital or video to be capable, with or without the aid of some other equipment, of being reproduced; b. In the possession or under the control of a responsible party; c. Whether or not it was created by a responsible party. d. In the possession or under the control of that public or private body, respectively e. Whether or not it was created by that public or private body, respectively Regardless of when it came into existence.
Regulator	Information Regulator
Regulations	PAIA and POPIA allows the Minister to issue regulations that supplement the Act, which must be published in the Government Gazette and covers issues like the forms to be used and fees that may be charged for certain processes.
Relevant body/bodies	Refers to any specified body or class of bodies, or any specified industry, profession, or vocation or class of industries, professional, or vocation that in the opinion of the Regulator which has sufficient representation
Republic	Republic of South Africa
Request for Access	A private body means a request for access to a record of a private body in terms of section 50 of The Act
Requester	a) Any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body or b) A person acting on behalf of the person contemplated in subparagraph
Responsible Party	Means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information
Signature	Signed by responsible party, means writing as referred to in section 12 of the Electronic Communication and Transaction Act, 2022 (Act No 25 of 2022)
Third-Party	In relation to a request for access to: A record of a private body means any person (including, but not limited to, a public body) other than the requester; but, for the purposes of sections 34 and 63 the reference to 'person' in paragraphs (a) and (b) must be construed as a reference to; natural person'.
Working Days	Means any days other than Saturdays, Sundays, or public holidays, as defined in section 1 of the Public Holidays Act, 1994 (Act 36 of 1994)
Writing	Means writing as referred to in section 12 of the Electronic Communication and Transaction Act, 2022 (Act No 25 of 2022)

1. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT AND PROTECTION OF PERSONAL INFORMATION ACT

The Promotion of Access to Information Act, No. 2 of 2000 (as amended) (“the Act”) was enacted on 3 February 2000, The Protection of Personal Information Act 4 of 2013 and amended regulation of 2025 giving effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information may or may not be released. The Act sets out the requisite procedural issues attached to such request. The Act is read in conjunction with the Protection of Personal Information Act 4 of 2013 and its regulations,

In terms of Section 51 of the Act, all Private Bodies are required to compile a PAIA Manual. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that the information may or must not be released, The Act sets out the relevant procedure to be adopted when requesting information from a Public or a Private Body. The Protection of Personal Information Act and its regulations set out the conditions under which personal information may be collected, processed, stored and shared for all Companies in South Africa

2. INFINITY ACADEMY BENONI INFORMATION AND INTRODUCTION TO THE PAIA & POPIA MANUAL

The Company specialises in accredited and non-accredited training (soft and essential skills). new simply love to empower you in education both onsite at our training academy in Benoni, offsite at clients’ offices and online through our IAcademy online portal.

The Company has developed this PAIA & POPIA manual as set out by section 51 of PAIA as the Act as well as our commitment to the protection of personal information as set out by the Protection of personal information act

PAIA grants:

- 2.1 A requesters access to records from our Company as set out by the Act as a private body, if the record is required for the exercise or protection of any rights, if a public body lodges a request, the public body must act in the public interest.
- 2.2 Requests are in terms of the Act shall be made under the prescribed procedures (access to information procedure) at the rates provided as set out by the Act. These forms, procedures, tariffs (where applicable) are set out in this manual on pages 16 and 20 as set out by PAIA.
- 2.3 The Company only shares personal information with the requester if personal information is held on behalf of that person, these records are kept in accordance with

regulatory requirements and our documented records matrix retention periods.

- 2.4 Third-party requests for any personal information will be subjected to the formal process as set out by the access to information procedure by the Company. All formal requests are to be made to The Information Officer of The Company.

POPIA:

The Company developed and implemented this manual to additionally adhere to the Protection of Personal Information Act, to support and promote the best practices to protect personal information in accordance with the qualifying legal guidelines of both Acts. It addresses the policies, procedures and documented information as evidence to comply with the applicable legislation requirements and of other non-legal requirements which it subscribes to as well.

This manual further recognises that section 14 of the Constitution of South Africa, 1996, provides that everyone has the right to privacy which includes the right to protection against the unlawful collection, retention, dissemination and use of said information and that the State must respect, protect, promote and fulfil the rights in the Bill of Rights and bearing in mind that consonant with the constitutional values of democracy and openness, the need for economic and social progress within the framework of the information society requires the removal of unnecessary impediments to the free flow of information, including personal information and to regulate, in harmony with international standards, the processing of personal information by public and private bodies in a manner that gives effect to the right to privacy subject to justifiable limitation that are aimed at protecting other rights and important interests. The objects of PAIA are not to replace the constitutional right, but to give effect to the right in section 32 subject to justifiable limitations

This manual is shared on our website and is also used to guide the Information and Deputy Information Officers through the various requirements to be met, as well as accessible on site in hard copy for any interested parties wanting to view our manual and processes. We ensure records are secure, customer satisfaction, continual improvement in reviewing the manual continuously at a minimum annually to ensure conformity of both PAIA and POPIA.

3. PURPOSE OF PAIA & POPIA MANUAL

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability in South Africa, and to encourage an open democracy where individuals from all walks of life are empowered to engage with the Government and participate in decisions which affect their lives.

This Manual is useful for the public too:

- 3.1 Establish the categories of records held by which are available without a person having to submit a formal PAIA request.
- 3.2 Ensures a sufficient understanding of how to make a request for access for a record held by the Company, by providing a description of the subjects on which the body

holds records and the categories of records held on each subject.

- 3.3 Know the description of the records of the Company which are available in accordance with any other legislation.
- 3.4 Access to the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 3.5 Ensure access n of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 3.6 Understand whether the company processes personal information, the purpose of the processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.8 Know the recipients or categories of recipients to whom the personal information may be supplied.
- 3.9 Understand if The Company plans to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied and.
- 3.10 Know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is processed.
- 3.11 The purpose of POPA is to give effect to the constitutional right to privacy by safeguarding individuals against the misuse of their personal information, while also balancing this right with the legitimate needs of organisation to lawfully use such information in the course of business. The Act established eight key conditions for lawful processing including accountability, purpose specification, information quality, security safeguards and data subject participation. The accompanying regulations further clarify the obligations of responsible parties, such as the appointment of an Information Officer, procedures for handling data subject request and requirements of security measures.
- 3.12 Our Company endeavours to protect the confidentiality and security of all its personal information. It ensures that any third party to the organisation adheres to this manual at all times and agreements will be signed accordingly including those of non-disclosure agreements where applicable.

We are committed to ethical business practice, fostering trust, transparency and the protection of stakeholder's rights

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF INFINITY ACADEMY BENONI PTY LTD

4.1 INFORMATION OFFICER

FELICIA ROELOFSE is the duly authorized person and is head of The Company therefore in terms of PAIA is the Information Officer:

NAME: Felicia Roelofse
TELEPHONE NUMBER: +27 11 425-1627
FAX NUMBER : 086 649 6337
EMAIL ADDRESS: lee@infinityacademy.co.za

4.2 DEPUTY INFORMATION OFFICER & ACCESS TO INFORMATION CONTACT

NATASHA MODDLEY has been appointed and duly authorised as The Deputy Information Officer.

NAME: Natasha Moodley
TELEPHONE NUMBER: +27 11 425-1627
FAX NUMBER : 086 649 6337
EMAIL ADDRESS: natasha@infinityacademy.co.za

The duly authorised responsibilities/duties of both Information Officer and Deputy Information Officer are documented in the required appointment letters.

4.3 HEAD OFFICE

PHYSICAL ADDRESS 30 4th Avenue
Northmead
Benoni
Gauteng
TELEPHONE NUMBER: +27 11 425-1627
FAX NUMBER : 086 649 6337
EMAIL: lee@infinityacademy.co.za/admin@iacademy.co.za
WEBSITE: www.infinityacademy.co.za/www.iacademy.co.za
SMS or WhatsApp: 0835343183

Both our Information Officer as well as our Deputy Information Officers are registered on the Information Regulators eServices site.

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE REGULATORS PAIA GUIDE

- 5.1 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 & POPIA. This guide will specifically assist a person in how to access his/her personal information in terms of s23 of POPIA.

- 5.2 The Guide is available in two official languages as required (English and Afrikaans) or interested parties may view them on the following links including that of isiZulu as set out by the Information regulator

English-https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

Afrikaans-https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-Afrikaans_20210905.pdf

Zulu-https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-isiZulu_20210905.pdf

- 5.3 The aforesaid Guide contains the description of-
The objects of PAIA and POPIA.

5.3.1 The objects of PAIA and POPIA

5.3.2 The postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1 The Information Officer of every public body, and

5.3.2.2 Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

5.3.3 The manner and form of a request for-

5.3.3.1 Access to a record of a public body contemplated in section 11³; and

5.3.3.2 Access to a record of a private body contemplated in section 50⁴;

5.3.4 The assistance available from the IO of a public body in terms of PAIA and POPIA.

5.3.5 The assistance available from the Regulator in terms of PAIA and POPIA.

5.3.6 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-

5.3.6.1 An internal appeal.

5.3.6.2 A complaint to the Regulator; and

5.3.6.3 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.

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.*

5.3.7 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.

5.3.8 The provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.

5.3.9 The notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

5.3.10 The regulations made in terms of section 92¹¹.

5.4 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.

5.5 The Guide can also be obtained-

5.5.1 Upon request to the Information Officer.

5.5.2 From the website of the Regulator as indicated above

5.5.3 The guide can also be requested in the language of your choice at <https://infoforegulator.org.za/paia-guidelines/>

5.6 A hard copy of this Guide is available in English and Afrikaans, for public inspection during office hours.

6. CATEGORIES OF RECORDS OF INFINITY ACADEMY BENONI PTY LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.

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.”

Category of records	Types of the Record	Available on Website	Available upon request
Marketing	Company Profile & Brochure	X	X
	Website	X	
	Business Plan		X
	Training information	X	X
	Public Relations and blogs	X	X
Sales	Training Price list		X
Financial	Tax Clearance		X
	Financial Statements		X
Industrial Relations	BEE Certificate		X
	Share Certificate		X

7. DESCRIPTION OF THE RECORDS OF INFINITY ACADEMY BENONI PTY LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION. (Section 51 (1) (c))

Category of Records	Applicable Legislation
PAIA & POPIA Manual	Promotion of Access to Information Act 2 of 2000 as amended and Protection of Personal Information Act 4 of 2013 and regulations relating to the protection of personal information 2021
POPIA Manual	Protection of Personal Information Act 4 of 2013
QMS	Skills Development Act 37 of 2008, National Qualifications Framework Act 67 of 2008.
BEE Certificate	Broad-Based Black Economic Empowerment Act, 2003 (as amended); Employment Equity Amendment Act (Act 47 of 2013)
Tax Clearance & Financial Statements	The Tax Administration Act 28 of 2011 ("the TAA")
Safety File	Occupational Health and Safety Act No 85 of 1993
Financial and Tax Clearance Certificate	Income Tax Act 95 of 1967
CIPC Registration Documents	Companies Act 71 of 2008
Service level agreements	Basic conditions of employment Act 75 of 1997
Public Liability Insurance	Insurance Act of 2017

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY INFINITY ACADEMY BENONI PTY LTD (Section 51 (1) (d))

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	- Business Plan - Company Brochure - Price list/s - Proposals
Human Resources	- HR Policies and Procedures - Advertised posts - CV'S - SLA'S - Skills Development and annual reports (as applicable by clients) - Training certificates
Customers/learner details	- Quality Management Systems - Learners personal information including identification numbers, CV's, Certified copies of qualifications - Telephone, emails and addresses - Sales Records - Credit Applications - Client correspondence and minutes of meetings - Quotations - Purchase Orders - Learners POE's - Learner Assessment and Moderator reports - Learners' certificates - Workplace agreements and MOU - RPL & CAT - Disability and special needs - Learners registration document - Learner code of conduct and agreement
Suppliers & External Service Providers	- Suppliers price - Contact information - SLA's as contract agreements - Suppliers Bank details - SETA/QCTO information and requirements
Financials	- Invoicing - Payments of contractors - Payments from learners and clients - Statements - Bank details - Credit applications (where applicable) - Financial Reports and budgets - Insurance and Assurance

Subjects on which the body holds records	Categories of records
Occupational Health and Safety	- Occupational Health and Safety File
Training	- Learner guides, attendance registers, facilitator evaluation reports, assessment feedback documents, assessment guides with memorandum, facilitator guide with memorandum, learner POE guide, Learner Workbooks, Practical Activities workbook, workplace components, Moderator guide, plan and report, program curriculum strategies, copy of curriculums and FISA for final qualifications; course evaluations, appeals, complaints and Learner workplace documentation and mentor agreements
Quality	- Quality Management System, Procedures/Policies and documentation
POPIA	- POPIA Manual & Procedure and documentation
PAIA	- PAIA Manual & Procedure and documentation

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

The following personal information is processed in our organization:

:

- Staff/contractor Records – to comply with Labour Relations Act, Basic Conditions of Employment Act, Skills Development Act, Employment Equity Act and also to establish contractual agreements and staff administration
- Learner information as required by SETA/QCTO and training requirements of SA, Client information- to establish transactional, sales and credit agreements, receiving and investigations into complaints and appeals procedures
- Suppliers and External Service Provides- to establish a contractual agreement through SLA's, or payments of products and services

Section 23 of POPIA provides the data subject with the right to access personal information held by the responsible party, including information about the identity of all third parties or categories of third parties who have or have had access to the information

9.2 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
Learners / Clients	Name of contact person, name of entity, telephone, fax and email addresses, name of directors/members/shareholders, identity numbers physical and postal address of entity, founding documents & registration numbers, vat related information, authorised signatories, credit status and job specific requirements. Learners ID, CV's, Certificates, contact details email, address and telephone details and all reports including POE's, Knowledge and Practical information including summative and formative assessments and reports from Assessors and Moderators.

Categories of Data Subjects	Personal Information that may be processed
	Issuing of certificates and database management through internal LMIS and capturing on SETA learner database. Workplace MOU and Mentorship agreements
Suppliers and External Service Providers	Contact person, names of directors/members/shareholders, registration number, tax clearance, Vat numbers, address, contact details including email address, bank details, black economic empowerment status (BBBEE), product information and qualifications CV's and certificates and SLA's.
Employees	Name, address, next of kin, identity numbers, age, race, gender, home address and contact details, driver's license, bank details, qualifications, medical certificates and well-being, criminal record, references and Curriculum Vitae (where applicable)

9.3 The recipients or categories of recipients to whom the personal information may be Supplied.

9.3.1 Personal information will be shared with the data subject of which relates to its own personal Information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied by Infinity Academy
Qualifications, for qualification verifications	South African Qualifications Authority
All personal information of learners including Assessments, Workplace components, Workplace MOUs and Mentor/Mentee agreements, POE's, CAT, RPL and Moderation all reports required by SETA and QCTO for qualifications and awarding of credits.	Various SETA's and QCTO
Credit and payment history, for credit information	Credit Bureau
BBBEE	Operator assisting the Company
Health and Safety Manuals and safety required certificates of Company and staff	Client on site/Department of Labour (DOL)
Employee Training- Workplace Skills Plans, Annual Training Reports, and employment equity	SETA, DOL
Financials	Auditing
Insurance and Public Liability	Insurance Company

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied by Infinity Academy
Sending emails	Client job requirements and correspondence
Website, storage and back-ups	ICT
Incident Reports	Department Of Labour

9.4 Planned transborder flows of personal information

We do not transfer any information through transborder flows of personal information.

9.5 Information Security Measures implemented by the responsible party to ensure the confidentiality, integrity and availability of the information held by The Company

All hard copies are kept in steel hanging cupboards with only Lee holding the key also all documents are back up by external hard drives, drop box, Google drive, VIT Learner System and also Microsoft 365 only Information Officer has access to this information.

10 OBJECTIONS TO THE PROCESSING OF PERSONAL INFORMATION

10.1 A data subject who wishes to object to the processing of personal information in terms of section 11 (3)(a) of POPIA must submit the objection to the responsible party at any time during Office hours of a responsible party and free of charge.

10.2 A data subject who wishes to object to the processing of personal information in terms of section 11 (3) (b) of the Act, must submit the objection to a responsible party or Information/Deputy information officer of the Company at any time during office hours of a party responsible and free of charge

10.3 A data subject who wishes to object to the processing of personal information must do so on the following form 1, as per below, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11 (3) (a) of POPIA.

10.4 The party responsible will, when collection personal in formation of a data subject notify the data subject, in terms of Section 18 (1)(h)(iv) of the Act, of their right to object as referred to in Section 11(3) of the Act

10.5 If an objection to the processing of personal information of a data subject is made telephonically, such an objection will be electronically recorded by the responsible party and upon request, is made available to the data subject in any manner, including the transcription thereof. It is advisable that the data subject or responsible party record such objection on the form 1 below for record purposes too.

11 REQUESTS FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTRUCTION OR DELETION OF RECORD OF PERSONAL INFORMATION

- 11.1 A data subject has the right, in terms of Section 24 of POPIA, to request where necessary the correction, destruction or deletion of his/her or his/her personal information.
- 11.2 A data subject, who wishes to request a correction or deletion of his/her or its personal information, as provided for in section 24 (1) (a) of the Act, has the right to request for correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 11.3 A data subject, who wishes to request the destruction or deletion of a record of his/her or its personal information, in terms of section 24 (1) (b) of POPIA, has the right to request the destruction or deletion of a record of his/her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain the information in terms of section 14 of POPIA.
- 11.4 A request for a correction or deletion of personal information, as referred to in sub regulation 3.2 or a request for the destruction or deletion of a record of personal information, as referred to subsection 3.3 must be submitted to the responsible party or Information/Deputy Information Officer of the Company on form 2 below free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- 11.5 A request for a correction or deletion of personal information by telephonic means will be recorded by the responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge. It is advisable that the data subject or responsible party record such correct or deletion on the form 2 below for record purposes too.
- 11.6 A responsible party must, within thirty (30) days of receipt of the outcome of the request referred to in sub regulation 3.2 and 3.3, notify the data subject in writing of the action taken as a result of the request and the Information Officer or Information Officer must keep record thereof.

12. REQUEST FOR DATA SUBJECTS CONSENT TO PROCESS PERSONAL INFORMATION FOR DIRECT MARKETING THROUGH UNSOLICITED ELECTRONIC COMMUNICATION

- 12.1 A responsible party wishes to process the personal information of a data subject for the purposes of direct marketing through unsolicited electronic communication must in terms of Section 69(2) of POPIA obtain written consent from a data subject on form 4 as per below or in any manner that may be expedient, free of charge and reasonably accessible to data subject, including:
- Email
 - Telephonically
 - SMS or WhatsApp

- Automated calling machine

It is advisable that the data subject or responsible party record the consent on form 4 for record purposes too.

12.2 A request for a data subjects consent to the processing of his/her or its personal information as referred to in sub-regulation 6.1 above by telephonic means must be electronically recorded by the responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which must be free of charge. It is advisable that the data subject or responsible party record the consent on form 4 for record purposes too.

12.3 A request for data subjects' consent to the processing of his/her or its personal data as referred to in sub regulation 6.1 by an automated calling machine must be electronically record by the responsible party and such recordings must, upon request, be made available to a data subject in any manner, including the transcription thereof which must be free of charge. It is advisable that the data subject or responsible party record the consent on form 3 for record purposes too

12.4 For the purposes of direct marketing through unsolicited electronic communication, opt-out shall not constitute consent as referred to in section 69 (2) of POPIA.

The responsible party shall supply all forms 1,2, & 4 that have been filled in by the relevant data subjects and these must be supplied to the Information Officer/Deputy Information Officer in order to document and record such requests, and ensure information held by the Company is always updated.

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, 2017 [Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must 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.*

Internal Reference Number _____

A	DETAILS OF DATA SUBJECT
Name and surname of data subject:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (if the responsible party is a natural):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body <i>(if the responsible party is not a natural person)</i> :	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject (applicant)

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 | ☐ |
| (b) Irrelevant | ☐ |
| (c) Excessive | ☐ |
| (d) Out of Date | ☐ |
| (e) Incomplete | ☐ |
| (f) Misleading | ☐ |
| (g) Obtained unlawfully | ☐ |

a) 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.

A	DETAILS OF THE 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	PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED
	<i>(Please specify the personal information required to be corrected / destroyed / deleted)</i>
D	EXPLANATION FOR THE SELECTED REASON FOR A REQUEST
	<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 of20.....

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

FORM 4

CONSENT TO PROCESS PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES- ELECTRONIC COMMUNICATION IN TERMS OF SECTION 69 (2) OF THE ACT

[Regulation 6]

PART A

TO:

(Name of data subject)

FROM:

Infinity Academy Benoni Pty Ltd
30 4th Avenue Northmead
Benoni
Gauteng

Contact number(s):

011425-1627/0835343183

Fax number:

086 649 6337

E-mail address:

lee@infinityacademy.co.za
(Name, address and contact details of responsible party)

Dear Sir/Madam

Infinity Academy is a professional skills development provider offering a range of accredited qualifications and soft skills training programs designed to empower learners and enhance workplace performance

At Infinity Academy, we value your privacy and want to communicate with you only in ways that are useful and relevant to you. By completing this form, you can choose how we may share our latest updates, promotions, and educational offerings with you.

Signed on behalf of Infinity Academy:

Full Name: Felicia Roelofse

Designation: Director

Signature: _____

Date: _____

PART B: DATA SUBJECTS CONSENT

I, _____, hereby confirm my choice regarding the processing of my personal information for direct marketing purposes.

☐ I give my consent to receive marketing communication about skills development, training opportunities and updated news on the training sectors of South Africa.

Please indicate your preferred method(s) of communication:

☐ E-mail ☐ SMS ☐ WhatsApp ☐ Telephone ☐ Other: _____

☐ I do not give my consent to receive marketing communication.

Signed at _____ on this _____ day of _____ 20_____

Signature of Data Subject: _____

Thank you for trusting Infinity Academy with your personal information. You may withdraw your consent at any time by contacting us at lee@infinityacademy.co.za.

13. FORMAL REQUEST FOR ACCESS TO A RECORD (Formal PAIA request for documentation)

Infinity Academy Benoni Pty Ltd has developed an access to information procedure to formalise the request for information and record process.

As prescribed by the Information Regulator form 2 is to be documented by the requester of the record and supplied to the private body (Roven Precision Engineering).

Form 2 – REQUEST FOR ACCESS TO RECORD is downloadable on:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

It is also available in this PAIA & POPIA Manual on below page 27.

Address your request to the Information Officer or Information Officer as indicated on page 10 of this PAIA & POPIA manual and Letters of Appointment [Doc No PAPOF009-1 & 2].

13.1 Provide sufficient details to enable the Company to identify:

- a) The record(s) requested.
- b) The requester (and if an agent is lodging the request, proof of capacity, etc.).
- c) The form of access required.
- d)
 - (i) The post address or fax number of the requester in the Republic;
 - (ii) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- e) The right in which the requester is seeking to exercise or protect with an explanation of the reason, the record is required to exercise or protect the right.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests are 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		
PARTICULARS OF RECORD REQUESTED <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>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes Roven Precision Engineering's photographs, 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			

FORM OF ACCESS <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 Roven Precision Engineering's photographs, 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	
MANNER OF ACCESS <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>	
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <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 is 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

14. PRESCRIBED FEES

The following applies to requests (other than personal requests) for both Public and Private Bodies, Roven Precision Engineering. Prescribed fees are set out by Private Body fees.

Fees in Respect of Public & Private Bodies

	Description	Amount
1.	The request fee payable by every requester	<i>R140.00</i>
	Your own personal information held by our Company	<i>R0</i>
2.	Photocopy of A4-size page (black and white per page)	<i>R2.00 per page or part thereof</i>
3.	Printed copy of A4-size page	<i>R2.00 per page or part thereof</i>
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requester) (ii) Compact disc • If provided by requester • If provided to the requester	<i>R40.00</i> <i>R40.00</i> <i>R60.00</i>
5.	For a transcription of visual images per A4-size page	<i>Service to be outsources. Will depend on</i>
6.	Copy of visual images	<i>quotation from Service provider</i>
7.	Transcription of an audio record, per A4-size page	<i>R24.00</i>
8.	Copy of an audio record on: (i) Flash drive (to be provided by requester) (ii) Compact disc • If provided by requester • If provided to the requester	<i>R40.00</i> <i>R40.00</i> <i>R60.00</i>
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	<i>R145.00</i> <i>R435.00</i>
10.	Deposit: If search exceeds 6 hours	<i>One third of amount per request</i> <i>calculated in terms of item 2 to 8</i>
11.	Postage, e-mail or any other electronic transfer	<i>Actual Expense, if any</i>

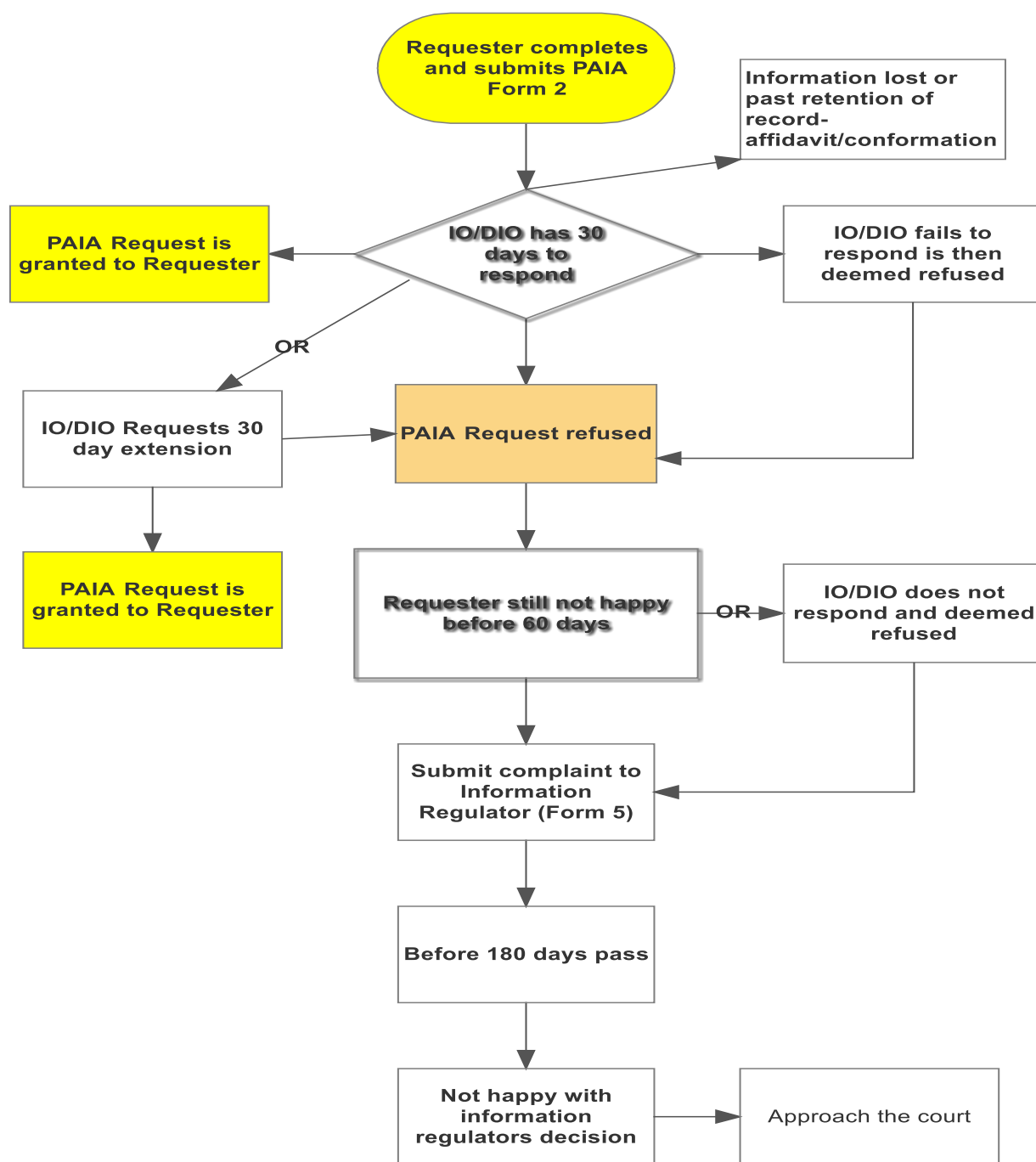
These prices are exclusive of Vat.

- 14.1 A requestor is required to pay the prescribed fee before a request is processed.
- 14.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid of not more than one-third of the access fee which would be payable if the request were granted.
- 14.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- 14.4 Records may be withheld until the fees have been paid.

15. ACCESS TO INFORMATION PROCESS

Once the form 2 requested information is received it is documented in the requested information register and a Board of Directors/Management meeting will be held which will include an agenda, date, time and place of meeting, minutes of the meeting is documented on the outcomes of the decision, based on the decision the requester is notified in writing of the decision (based on what grounds of refusal or grant the requested information), following the Companies access to information procedure.

Access to Information Flow chart



Form 3 will be documented by The Companies Information/Deputy Information Officer and correspondence will be sent to the requester indicating the outcomes and fees applicable to the requester <https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

16. INTERFERENCE OF DATA SUBJECTS PERSONAL INFORMATION

The following people may lodge a complaint:

- 16.1 A data subject whose personal information has been interfered with in terms of section 73 of POPIA
- 16.2 Any person acting on behalf of a data subject whose personal information has been interfered with, as referred to in section 73 of the Act.
- 16.3 Any person with a sufficient personal interest in the subject matter of the complaint referred to in section 73 of the Act
- 16.4 A responsible party or data subject who is aggrieved by the determination of an adjudicator in terms of section 63 (3) of the Act or
- 16.5 Any person acting in the public interest

Subject to Regulation 7.10 a complaint submitted to the Regulator must be in writing by completing

a) An online complaint Form 5 available on the following link <https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-5-COMPLAINT-REGARDING-INTERFERENCE-WITH-THE-PROTECTION-OF-AN-ADJUDICATOR.pdf>. The complaint form is also available at the offices of the Regulator during office hours, and any office designated by the Regulator. The regulator will assist any person who wishes to make a complaint, to reduce that complaint to writing. A complaint may be submitted at the office of the Regulator during office hours, or any other office designated by the Regulator as a place where complaint may be lodged, the office designated by the Regulator shall transfer the complaint to the regulator within 14 days of receipt of complaint. The complaint may also be submitted to the Regulator via fax, post, courier to Regulators' physical address or via email to a designated email address. As set out in regulation 10, should the Information Officer not respond, the requester may complain directly to the Regulator utilising form 5 <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>

At our Company we endeavor to respond to all requests in a timely manner

17. REPORTING AND ANNUAL AUDITS

Effective 17 April 2025, all Private bodies must report on the Regulators mandatory eportal site and report any security compromises online. <https://eservices.infoeregulator.org.za/>

In terms of section 83(4) of PAIA, Our Information/Deputy Information Officer, annual reports (financial year) on all requests of access to records received by our Company on this eportal/services too (financial year 01 April-31 March of each year)

<https://eservices.infoeregulator.org.za/reporting/default.aspx>

And the how to guide for ease of reference for IO/DIO

<https://eservices.infoeregulator.org.za/reporting/docs/PAIAAnnualReport.pdf>

18. LIST OF DOCUMENTED INFORMATION FOR PAIA & POPIA SYSTEM.

Master Document/Record Index

Date: 25 September 2025

Doc No: PAPO012

Version 0

Pages 1-2

Document Number	Document Title	Retention Period (yrs)	Controlled and owned by	Electronic stored copy	Hard copy Record Storage Location
PAPOM001	PAIA & POPIA Manual	10 years once amended	IO/DIO	Yes	Website and hard copy in office
PAPOF001	Form 1 regulation 2 -PAIA request for copy of the guide	10 years once amended	IO/DIO	Yes	Google drive
PAPOF002	Form 1 – POPIA- Regulation 2 Objection to the processing of personal information	10 years once amended	IO/DIO	Yes	Google drive and in manual
PAPOF003	Form 2-PAIA- Regulation 7- request for access to a record	10 years once amended	IO/DIO	Yes	Google drive and in manual
PAPOF004	Form 2 -POPIA- Regulation 3 Request for correction or deletion or destroying personal information	10 years once amended	IO/DIO	Yes	Google drive and in manual
PAPOF005	Form 4- Regulation 6- POPIA- Request for the consent of a data subject for the processing of personal information for the purpose of direct marketing	10 years once amended	IO/DIO	Yes	Google drive and in manual
PAPOF006	Form 3 Regulation 8- PAIA- Outcomes of request and of fees payable	10 years or once amended	IO/DIO	Yes	Google drive
PAPOF007	Form 5 Regulation 10 - PAIA Complaint form due to non-response directly to Information Regulator	10 years or once amended	IO/DIO	Yes	Google drive
PAPOF008	Form 5 Regulation 7- POPIA-Complaint regard interfering with the Protection of Personal Information	10 years or once amended	IO/DIO	Yes	Google drive
PAPOF009-1	Letter of Appointment IO	10 years or once amended	IO/DIO	Yes	In Access to information Procedure file and google drive
PAPOF009-2	Letter of Appointment DIO	10 years or once amended	IO/DIO	Yes	In Access to information Procedure file and google drive
PAPOF010	Requested Information Register	10 years or once amended	IO/DIO	No	Records file for PAIA locked up office with all files (key access)
PAPOF011	Minutes of Meeting	10 Years	IO/DIO	No	Records file for PAIA locked up office with all files (key access)
PAPOF012	Master Document/Record Index	10 years or once amended	IO/DIO	Yes	Google drive and also in access to information procedure
PAPOP001	Access to information procedure (PAIA)	10 years or once amended	IO/DIO	Yes	Google drive and procedure file

PAPOP002	POPIA Procedure Manual	10 years or once amended	IO/DIO	Yes	Google drive and procedure file
PAPOP003	Data Breach Policy & Procedure	10 years or once amended	IO/DIO	Yes	Google drive and procedure file
PAPOP004	Employee Information Procedure	10 years or once amended	IO/DIO	Yes	Google drive and procedure file
PAPOP005	Marketing and Advertising Procedure	10 years or once amended	IO/DIO	Yes	Google drive and procedure file
PAPOP006	Sales Procedure	10 years or once amended	IO/DIO	Yes	Google drive and procedure file
PAPOF013	External Operator Agreement processing personal information	10 years or once amended	IO/DIO	Yes	Google drive and records
PAPOF014	Responsible Party Register	10 years or once amended	IO/DIO	Yes	Google drive and records
PAPOF015	Procedure Register	10 years or once amended	IO/DIO	Yes	Google drive and records
PAPOF016	POPIA Procedure Template	10 Years	IO/DIO	Yes	Google drive and records
PAPOF017	Data Breach Report Form	Indefinite	IO/DIO	Yes	Google drive and records
PAPOF018	Data Breach Register	Indefinite	IO/DIO	Yes	Google drive and records
PAPOF019	Letter to client request consent to hold personal information	10 Years	IO/DIO	Yes	Google drive and records
PAPOF20	Acknowledgement of data subjects rights request	10 Years	IO/DIO	Yes	Google drive and records
PAPOF21	Attendance registers for training	10 Years	IO/DIO	Yes	Google drive and records
Staff records	Refer Human Resources				
Internal	General Company records, accounts, books, writing, records or other information that is required by Act	7 Years	IO/DIO	Yes	Google drive and records
External	Client accounts and records	7 Years	IO/DIO	Yes	Google drive and records
External	Notice of incorporation Registration certificates including that of clients	Indefinite	IO/DIO	Yes	Google drive and records
Internal by number order	Invoicing	Indefinite	IO/DIO	Yes	Google drive and records
External	Auditing and reports through Regulator	Indefinite	IO/DIO	Yes	Google drive and records
External	PAIA and Auditing guides	Indefinite	IO/DIO	Yes	Google drive and records
External	POPIA, PAIA and update of the ACT	10 Years	IO/DIO	No	Act file
External	Learners ID, CV and Certificates	10 Years	IO/DIO	Yes	Learner files and VIT system/google drive

19. AVAILABILITY OF INFINITY ACADEMY BENONI PTY LTD PAIA MANUAL

18.1 A copy of the Manual is available-

18.1.1 On the website at www.infinityacademy.co.za and www.iacademy.co.za

18.1.2 At offices of 30 4th Avenue. Northmead, Benoni for public inspection during normal business hours.

18.1.3 To any person upon request and upon the payment of a reasonable prescribed fee.
And

18.1.4 To the Information Regulator upon request.

18.2 A fee for a copy of the Manual, as contemplated by page 32 of this PAIA & POPIA Manual (Annexure B) of the Regulations/prescribed fees), shall be payable per each A4-size photocopy made.

UPDATING OF INFINITY ACADEMY BENONI PTY LTD PAIA & POPIA MANUAL

Executive Management of Infinity Academy Benoni PTY Ltd will regularly update this manual, at a minimum annually.

Issued by



Natasha Moodley
Director 1



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Director 2