

PAIA MANUAL



**CORPORATE
VOICE**

CREATING ENGAGED EMPLOYEES



Nth Dimension (Pty) Ltd
Reg: 2021/672437/07



Corporate LAN Advertising (Pty) Ltd
Reg: 2018/313763/07

PAIA MANUAL

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

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Table of Contents

Table of Contents	2
1. List of Acronyms and Abbreviations	2
2. Purpose of the PAIA Manual	3
3. Key Contact Details for Access to Information of the Company.....	3
4. Guide on how to use PAIA and how to obtain access to the Guide	4
5. Categories of records of the Company which are available without a person having to request access	6
6. Description of the records of the Company which are available in accordance with any other legislation	7
7. Description of the subjects on which the body holds records and categories of records held on each subject by the Company.....	7
8. Processing of Personal Information	9
9. Availability of the Manual	12
10. Updating of the Manual.....	12

1. List of Acronyms and Abbreviations

Term / Abbreviation / Acronym	Definition
Company or Organisation	The Nth Dimension and any associate Company, holding Company or subsidiary Company, including Corporate LAN Advertising (Pty) Ltd and The Nth Dimension (Pty) Ltd.
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa

2. Purpose of the PAIA Manual

This PAIA Manual is useful for the public to-

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

3. Key Contact Details for Access to Information of the Company

3.1 Chief Information Officer

Name: Federico Renato Tozzi
Tel: 0861 000 252
Email: federico@corporatevoice.co.za
Fax Number: 086 695 5502

3.2 Deputy Information Officer

Name: Sarveshan Naidoo
Tel: 0861 000 252
Email: sarveshan@corporatevoice.co.za
Fax Number: 086 695 5502

3.3 Access to information general contacts

Email: info@corporatevoice.co.za

3.4 National or Head Office

Postal Address: P.O.Box 137
Gallo Manor
052

Physical Address: Units G6-G8 Pinewood Office Park
33 Riley Street
Woodmead
2191

Telephone: 0861 000 252
Email: info@corporatevoice.co.za
Website: www.corporatevoice.co.za

4. Guide on how to use PAIA and how to obtain access to the Guide

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of-
- 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3 the manner and form of a request for-
 - 4.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;

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.*

- 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a annual, and how to obtain access to a manual;
 - 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.3.10 the regulations made in terms of section 92¹¹.
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies including the office of the Regulator, during normal working hours.
- 4.5 The Guide can also be obtained-
- 4.5.1 upon request to the Information Officer;
 - 4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

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

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

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

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

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

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

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

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

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

4.6.1 English and Afrikaans

5. Categories of records of the Company which are available without a person having to request access

Category of Records	Types of the Record	Available on Website	Available upon request
Company Registration and Organisational Documents	<ul style="list-style-type: none"> - Certificate of Incorporation and Memorandum of Incorporation (MOI) - Company's Founding documents (e.g. Shareholder agreements) - Board of directors details (names and contact details) 	No	Yes
Publicly Available Financial Records	<ul style="list-style-type: none"> - Annual Financial Statements - Audited Reports 	No	Yes
Business and Operational Information	<ul style="list-style-type: none"> - Product / service descriptions and specifications - Pricing lists or tariffs (for services provided to Customers) - Terms and conditions for the use of the Company's software and services 	No	Yes
General Corporate Policies	<ul style="list-style-type: none"> - Privacy Policy (for how customer data is handled, which is also required by law) - Terms of service and end-user license agreements 	No	Yes
Public Communication and Marketing	<ul style="list-style-type: none"> - Advertising and marketing material (brochures, websites, etc.) 	Yes	Yes
Customer Communications (Public or Pre-approved)	<ul style="list-style-type: none"> - Standard customer-facing documents, like FAQ's or user guides - Product manuals or help documentation - Public service announcements or notifications related to the software 	Yes	Yes
Employment and HR Documents (Publicly Available)	<ul style="list-style-type: none"> - Job descriptions for open positions - Employee benefits information (general, non-sensitive) - Public employee policies (e.g. code of conduct, dress code) 	No	Yes
Statutory Registers (as required by law)	<ul style="list-style-type: none"> - Register of company directors and shareholders (in the public domain in certain jurisdictions) - Register of interests of key company personnel (if required) 	No	Yes
Other Records as Required by Law	<ul style="list-style-type: none"> - Any other records explicitly required by applicable laws to be disclosed publicly or available for inspection 	No	Yes

6. Description of the records of the Company which are available in accordance with any other legislation

Category of Records	Applicable Legislation
Company and Corporate Governance Documents	Companies Act
Consumer Protection Documents	Consumer Protection Act
Personal Data and Privacy Records	Protection of Personal Information Act (POPIA)
Electronic Communication and Transaction Records	Electronic Communications and Transactions Act
Employment and Labour Records	Basic Conditions of Employment Act and Labour Relations Act
Taxation and Financial Records	Tax Administration Act and VAT Act
Intellectual Property and Copyright Records	Patents Act
Records of Agreements and Contracts	General Contract Law

7. Description of the subjects on which the body holds records and categories of records held on each subject by the Company

Subjects on which the body holds records	Categories of records
Corporate Governance	<ul style="list-style-type: none"> - Shareholder Agreements - Company Policies - Organisational Structure - Memorandum of incorporation - Company Registration Documents
Financial Records	<ul style="list-style-type: none"> - Financial Statements - Accounting Records - Tax Returns and Correspondence with Tax Authorities - Payroll Records - Banking Records - Budgets and Forecasts - Investment Records
Human Resources	<ul style="list-style-type: none"> - Employee Records - Salary and Benefit Information - Recruitment Records - Employee Leave Records - Training and Development Records - Disciplinary Actions - Performance Reviews and Scorecards
Product Development	<ul style="list-style-type: none"> - Software Design and Development Documentation - Source Code Repositories and Version Control Logs

	<ul style="list-style-type: none"> - Testing and Quality Assurance Records - Product Roadmaps and Planning Documents - User Manuals and Guides - Product Specifications - Bug Tracking Records - Release Notes
Customer Information	<ul style="list-style-type: none"> - Customer Contracts, Agreements and Addendums - Customer Communication Logs (emails, support tickets, phone records) - Billing and Payment Records - Subscription and Licensing Information - Customer Feedback - Customer data (as per data protection laws)
Sales and Marketing	<ul style="list-style-type: none"> - Sales Agreements and Contracts - Marketing Materials (brochures, advertisements, newsletters) - Campaign Performance Records - Market Research and Competitor Analysis - Lead and Customer Acquisition Data - Sales Reports and Forecasts - Pricing Models and Structures
Legal and Compliance	<ul style="list-style-type: none"> - Legal Contracts and Agreements - Licenses and Permits - Intellectual Property Records (e.g. patents, trademarks) - Litigation Records - Regulatory Compliance Records - Data Protection and Privacy Policies - Corporate Legal Correspondence
Information Technology (IT) and Systems	<ul style="list-style-type: none"> - System Architecture and Design Documentation - Security and Data Protection Policies - Network Infrastructure Records - Software Licenses and Usage Agreements - IT Maintenance and Support Records - Backup and Recovery Documentation - System Logs and Monitoring Data
Business Development and Partnerships	<ul style="list-style-type: none"> - Partnership and Collaboration Agreements - Strategic Planning Documents - Mergers and Acquisition Records - Partner Performance Evaluations - Vendor Contracts and Supplier Agreements - Joint Venture Documentation

Intellectual Property and Licensing	<ul style="list-style-type: none"> - Patent, trademarks, copyrights - Licensing Agreements and Contracts - IP Infringement Records - Licensing Fees and Royalties - Non-disclosure agreements (NDAs)
Operational and Administrative Records	<ul style="list-style-type: none"> - Office Management Records - Equipment Maintenance Logs - Supplier and Vendor Management Records - Internal Policies and Procedures - Travel and Expense Records
Customer Support and Service	<ul style="list-style-type: none"> - Customer Service Requests and Logs - Technical Support Tickets and Resolutions - Service Level Agreements (SLAs) and Addendums
Data Protection and Privacy	<ul style="list-style-type: none"> - Data Protection Policies - Data Subject Requests (access, correction, deletion requests) - Data Breach Reports - Encryption and Data Security measures - Third-party Data Sharing Agreements
Audit and Risk Management	<ul style="list-style-type: none"> - Internal Audit Reports - Risk Assessment and Mitigation Strategies - Compliance Audit Records - Fraud Detection and Prevention Records

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

The Company processes personal information for the following purposes:

8.1.1 Provision of Services:

To provide users with access to our internal communication software, facilitate user accounts and offer ongoing support, including troubleshooting, technical assistance and customer service

8.1.2 User Account Management:

To create, manage, and maintain user accounts and profiles, including authentication, access controls, and permissions for internal communication tool

8.1.3 Communication:

To communicate with users, employees, and contractors regarding updates, maintenance, new features, security alerts and any other relevant information related to the services we provide

8.1.4 Compliance and Legal Obligations:

To ensure compliance with applicable laws, regulations and industry standards, including but not limited to data protection laws, tax obligations, and corporate governance requirements

8.1.5 Security

To maintain the security and integrity of our systems, including preventing unauthorised access, monitoring for potential security breaches, and implementing necessary safeguards

8.1.6 Employee Management:

For the purpose of managing internal communications, HR processes, training, performance management, and other administrative tasks related to employees and contractors using the internal communication platform

8.1.7 Improvement and Development:

To analyse usage patterns, preferences, and feedback to improve the features, performance, and user experience of our internal communication platform

8.1.8 Marketing and Business Development:

To send communications regarding new products, services, or features that may be of interest to our users, partners, or customers, provided users have consented to such communication

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Full name, Contact details, Username and login credentials, Usage history and activity logs within the platform, Profile data, Support or service request records, Communication preferences
Service Providers	Contact details, Company or business affiliation details, service or product details provided, Contractual and billing information, Payment records, Communication history
Employees and Contractors	Full name, Contact Details, Job title, Employment history, National ID or other identification numbers, Salary and compensation details, Performance data, Time and attendance records, Security access information
Website Visitors and Prospective Users	Contact details provided through inquiry forms, newsletters or registration processes, Usage and interaction data, Demographic information provided voluntarily by individuals interested in our services
Regulatory Authorities and Compliance Bodies	Contact details for regulatory compliance, Information related to audits, investigations, and legal compliance, as required by law or regulation

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

Recipients or Categories of Recipients to whom the personal information may be supplied	Category of personal information
Internal Recipients (Within the Company) Departments: Personal information may be shared within the company to relevant departments for operational purposes	HR Department: For managing employment-related information, including performance data, attendance records and employee profiles IT Department: For maintaining user accounts, managing security

	<p>access, and addressing technical issues related to the software platform</p> <p>Customer Support / Service Department: For addressing customer inquiries, troubleshooting and managing support tickets</p> <p>Sales and Marketing: For communication regarding new features, updates and marketing initiatives, where applicable and with consent</p>
<p>External Service Providers (Processors)</p> <p>Third-Party Contractors: Service providers who assist in the operation, maintenance and support of the communication software platform</p>	<p>Cloud Service Providers: Hosting and data storage services</p> <p>Payment Processors: For processing payments related to subscriptions, if applicable</p> <p>IT Service Providers: Contractors who may be responsible for IT maintenance, cybersecurity, or infrastructure</p>
<p>Regulatory Bodies or Authorities</p> <p>Government and Legal Authorities: Personal information may be shared with regulatory bodies or legal authorities, as required by law or in response to legal obligations</p>	<p>Tax Authorities: For compliance with tax laws and regulations</p> <p>Data Protection Authorities: To ensure compliance with applicable data protection and privacy laws (e.g. the Protection of Personal Information Act in South Africa)</p> <p>Law Enforcement: When legally required to respond to law enforcement requests or court orders</p>
<p>Business Partners</p>	<p>Affiliate Companies or Partners: Personal information may be shared with business partners who are involved in providing additional services or products to the users of the platform, subject to appropriate data protection measure and agreements in place</p> <p>Marketing and Advertising Partners: If users have consented to marketing communications, personal information may be shared with third-party marketing or advertising platforms to provide relevant offers, promotions or updates</p>
<p>Auditors or Compliance Verification Entities</p>	<p>External Auditors: Personal data may be provided to external auditors for the purpose of auditing our systems, practices and compliance with relevant regulations</p> <p>Compliance Verification: Any personal information that is needed for verifying compliance with industry standards and regulations</p>
<p>Other Entities with Consent</p>	<p>With User Consent: In certain cases, personal information may be shared with other third parties where the data subject has explicitly provided consent. For example, sharing of personal data with partners for new product offerings or for user-specific promotions</p>

8.4 Planned transborder flows of personal information

International Data Transfers: If personal information is transferred to countries outside the jurisdiction in which the data was originally collected (e.g. if cloud servers or service providers are located in another country), such transfers will be made in compliance with applicable data protection laws and agreements ensuring adequate protection for personal information.

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

The Company is committed to safeguarding the personal information we collect and process. To ensure the

confidentiality, integrity, and availability of this information, we implement a comprehensive suite of technical organisational and procedural measures. These measure are designed to protect against unauthorised access, loss, damage, alteration or disclosure of personal information and is in accordance with the ISO 27001: 2002 framework.

These security measures are continuously reviewed and updated to adapt to emerging threats and regulatory requirements. Our Company strives to maintain the highest level of protection for personal information while ensuring the availability and functionality of our internal communication software platform.

9. Availability of the Manual

9.1 A copy of the Manual is available-

9.1.1 on the Company website (www.corporatevoice.co.za), if any;

9.1.2 head office of the Company for public inspection during normal business hours;

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

9.1.4 to the Information Regulator upon request.

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

10. Updating of the Manual

The head of the Company will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to read 'Federico Tozzi', written over a horizontal line.

(Federico Tozzi)
(Chief Executive Officer)