



the kid group of companies



# PAIA Manual

KID Group

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## 1. INTRODUCTION

As a business, Knowledge Integration Dynamics Pty (Ltd) and its subsidiaries (KID Group) provides data management solutions (products and services).

This PAIA Manual provides an outline of the type of records and personal information (PI) it holds of its employees, partners, clients and other relevant third-parties in its engagements. In terms of the Act, the manual explains how to submit requests for access, change, correction or object to, personal information held by KID Group, in terms of the POPIA.

The PAIA gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless the PAIA expressly states that the records containing such information may or must not be released.

This manual informs requestors of procedural and other requirements which a request must meet as prescribed by the PAIA.

PAIA and POPIA give effect to everyone's constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. Requests shall be made in accordance with the prescribed procedures, at the rates provided.

Availability of particulars and guidelines to the PAIA and POPIA is also available on the Internet (reference: Regulator website <https://inforegulator.org.za> - Section 10(1) of PAIA).

### **The "KID Group" is a group of companies that include:**

- Knowledge Integration Dynamics (PTY) Ltd (1999/007653/07)
- IT and Business Services (SA) (PTY) Ltd (2002/020436/07)
- InfoFlow (PTY) Ltd (2005/037547/07)
- KID Enterprise Information Management (PTY) Ltd (2014/162453/07)
- Information Dynamics (PTY) Ltd (2014/184236/07)
- Centerfield Software (PTY) Ltd (2002/011957/07)
- SaltTech (PTY) Ltd (2018/630289/07)
- Cubic Blue (PTY) Ltd (2010/000921/07)

IT and Business Services (SA) (PTY) Ltd has a majority shareholding in SaltTech (PTY) Ltd.

**This manual was prepared in accordance with Section 51 of the PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) 2000 and gives effect to the PROTECTION OF PERSONAL INFORMATION ACT (POPIA).**

**Note:** a copy of this manual is available for inspection at the KID premises or website ([www.kidgroup.co.za](http://www.kidgroup.co.za)).

## 2. COMPANY ADDRESS AND CONTACT DETAILS

Physical Address	Postal Address
Second Floor, Building A Knightsbridge 33 Sloane Street Bryanston, Sandton 2191 Gauteng, South Africa	Postnet Suite 559 Private Bag X1 Jukskei Park 2153 Gauteng South Africa
Tel: +27 11 462 1277	Fax: +27 11 462 1174
Website: <a href="http://www.kidgroup.co.za">www.kidgroup.co.za</a>	Email: <a href="mailto:kid.contact@kid.co.za">kid.contact@kid.co.za</a>

## 3. DULY AUTHORISED PERSONS – INFORMATION OFFICERS

KID Group’s Information Officers (IO) are as follows:

Company	Information Officer	E-mail
CFS	Michael Otto	<a href="mailto:michaelo@cfsgroup.co.za">michaelo@cfsgroup.co.za</a>
Deputy CFS	Tasneem Vaughan	<a href="mailto:tasneem@cfsgroup.co.za">tasneem@cfsgroup.co.za</a>
Cubic Blue / Information Dynamics	Chantal Neethling	<a href="mailto:chantaln@cubicblue.co.za">chantaln@cubicblue.co.za</a>
InfoFlow	Patricia Ramsey	<a href="mailto:patricia.ramsay@kidgroup.co.za">patricia.ramsay@kidgroup.co.za</a>
ITBusiness / SaltTech	Michelle Arpin	<a href="mailto:michelle.arpin@kidgroup.co.za">michelle.arpin@kidgroup.co.za</a>
KID EIM	Sandra Ferreira	<a href="mailto:sandra.ferreira@kidgroup.co.za">sandra.ferreira@kidgroup.co.za</a>
KID KPS	Michelle Arpin	<a href="mailto:michelle.arpin@kidgroup.co.za">michelle.arpin@kidgroup.co.za</a>
Deputy – All other Companies	Mervyn Mooi	<a href="mailto:mervyn.mooi@kidgroup.co.za">mervyn.mooi@kidgroup.co.za</a>

The Information Officers have duties / responsibilities across the group of companies. The Information Model depicted in Appendix B below has reference.

Information Officers duties / responsibilities:

- Encourage and ensure compliance with POPIA, PAIA and any other laws that regulate the processing and access of personal information in South Africa.
- Create, maintain and update a PAIA manual for the entity.
- Evaluate and approve requests for access to information in terms of the grounds set out in PAIA.
- Deal with requests and complaints made in respect of POPIA.
- Work and co-operate with the Information Regulator in relation to investigations and audits.
- Ensure that internal awareness sessions are conducted regarding the provisions of POPIA, codes of conduct, or information obtained from the Information Regulator.
- Conduct personal information impact assessments.
- Develop, implement and monitor a compliance framework, which is a structured set of guidelines to integrate all the compliance requirements that apply to your organisation.

Please contact the KID Group Information or Information Deputy Officer for any matter related to Data / Information Security Protection and Privacy at the afore-mentioned company address or contact number.

#### 4. CONFIDENTIALITY AND ACCESS TO DATA / INFORMATION

KID Group will protect the confidentiality of information provided to it by third parties, subject to KID Group's obligations to disclose information in terms of any applicable law or regulation or a court order requiring disclosure of information. If access is requested to a record that contains information about a third party, KID Group is obliged to attempt to contact such third party to inform him/her/it of the request. KID Group will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted to the requestor or not.

#### 5. CATEGORIES OF RECORDS HELD

The lists below name the records of information which are (or may be) available in terms of laws applicable to the Company and its Subsidiary companies:

##### **Corporate Secretariat, Governance and Business:**

- Applicable Statutory and Company Registration Documents
- Policies and Procedures
- Code of Conduct
- Regulatory (Applications; Registrations; Deeds; Licenses; Submissions)
- Records relating to the appointment of directors and auditor
- Health and Safety Records
- Share Register and Share Certificates
- Legal Compliance Records
- Memoranda of Incorporation
- Statutory Returns to Relevant Authorities
- Minutes and Resolutions
- Legal Agreement and Contracts
- Health and Safety Records
- Business Interactions with other entities (Agreements with third parties - Clients, Vendors and Suppliers)
- Licensing and Support Agreements
- Service Level Agreements

##### **Finance and Taxation:**

- Audited Financial Statements and Accounting Records / Management Accounts
- Leases
- PAYE Records
- Other Audit Reports
- Payment Terms
- Banking Records and Bank Statements
- Records of payments made to SARS on behalf of employees
- Business Plan and Budgets
- Tax Records and Returns (Company & Employees)

- Debtors and Creditors Statements and Invoices
- Transaction Records
- Documents issued to employees for income tax purposes
- Treasury / Business Deals
- Statutory compliances - Income Tax Returns; SDL Returns; UIF Returns; VAT Returns
- General Ledgers, Sub Ledgers and Reconciliations
- Workmen's Compensation Returns
- Insurance (Declarations; Claim Files; Policies)

**Human Resources / Employee Documents and Records:**

- CV's, application details and Job Profiles
- Disciplinary Procedures and Records and CCMA matters
- Recruitment Records, Letters of Appointment and Employment Contracts
- Employment Equity Submissions
- Organisational Structures
- Employment Contracts and Benefit Records
- Payroll Report, PAYE Returns, UIF Returns and Leave Records
- Employee Compliance Documents / IRP5s
- Employee Personal Information / Employee Relations / Psychometric Assessments / Qualifications
- Employee Termination documentation
- Employee Forms and Applications
- SDL Returns
- Performance Records
- Grievance Procedure
- Training and Development
- Group HR Policies and Procedures / Personnel Guidelines, Policies and Procedures
- Employee Medical Records / Employee Disability Insurance Records
- Employee Pension and Provident Fund Records
- In-and-Ex-patriates' Records

**Sales, Marketing and Communication:**

- Service / Product Sales and Performance Records
- Press releases / Communique / News and other Marketing Information
- Branding, Products and Services Brochures
- External Publications
- Proposals and Tenders
- Marketing Brochures / Media Releases and Advertising
- Satisfaction Surveys
- Corporate Affairs and Business Relations / Communications (Media Releases; Newsletters and Publications)

**Information Technology, Business and Infrastructure:**

- Product and Service Strategies and Value
- Disaster Recovery Policy and Plans / System Root Cause Analyses
- ICT Facilities and Resources

- Security and Access (physical and electronic)
- ICT Policies, Standards, Procedures and Templates
- Software / Hardware / Network / Server / Workstation Licences
- Intellectual Property pertaining to solutions and products developed
- Any documentation and information relating to the Company which is held by the Companies and Intellectual Properties Commission in accordance with the requirements set out in set out in the Companies Act
- Facilities Management (Physical Security Records - Visitors, Suppliers, Contractors, Employees)
- Property Lease / Rental Records
- Electronic Access and Identity Management Records (Employees, Contractors)
- Risk Complaints and Investigations Records
- Mail Register
- Environmental Policy and Records
- Health and Safety Policy and Records (Employees, Contractors)

**Industry Development / Solution Documents and Records:**

- Asset Register
- Supplier Records (including company register / VAT numbers or contractor identities etc...)
- Services, Compliance and Contract Documentation
- Solution Guidelines and Procedures
- Client / Owner Manuals
- Solution Development / Test / Performance Records
- Customer Information and Database
- Vendor / Partner Agreements and Documents / Vendor Records (Partners, Customers)
- Production / Services / Logistics - Specifications
- Solution Design Records
- Deployment Resource / Staff Records / Time and Attendance Records
- Test / Quality Records
- Customer Interaction Customer Records (Aftersales Warranties)

Note that the above lists may be incomplete. Whenever it comes to the Company’s attention that existing or new legislation allows a requester access on a basis other than that set out in the PAIA Act, we shall update the list accordingly.

## 6. PERSONAL INFORMATION

Please refer to the “KID POPI Policy” and “Security and Privacy” statement which regulates the management (acquisition purpose, consent, processing, protection etc...) of personal Information within the Company.

**Categories of Personal Information that may be processed:**

- Employee disability information / Employee Pension and Provident Fund Information
- Employee contracts / Employee performance records / Employment history
- Payroll records
- Electronic access records / Physical access records / Surveillance records
- Health and safety records

- Training records
- Time and attendance records
- Job applicants Curriculum vitae and application forms
- Criminal and Background checks
- Children Childs personal information acquired and processed for schooling and travelling
- Visitors Physical access records
- Electronic access records and scans
- In-patriates and ex-patriates personal information including children’s personal information

KID Group considers the privacy and protection of personal information as very important and will only process personal information in accordance with the current POPIA. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by KID Group.

**Personal information received from third parties** - When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the KID Security and Privacy statement (policy), and do not have any objection to our acquiring and processing their information in accordance with this policy. Appendix C (Categories of Data Subjects) has reference.

KID Group will send its data subjects notifications or communications if it is obliged by law, or in terms of contractual relationship/s with them. KID Group will only disclose personal information to government authorities if KID Group is required to do so by law. Our employees, authorised Partners / Vendors and their employees, are also required to adhere to data privacy and confidentiality principles and to attend data privacy training.

**KID Group may process personal information for various reasons, including but not limited to the following:**

- Communication purposes;
- For employment and payroll purposes;
- For general administration and operational functions;
- For legal, contractual, financial and/or tax purposes;
- Compliance with statutory, legal, regulatory and/or other obligations and requirements;
- To manage information, products and/or services requested by data subjects;
- Health and safety purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or satisfaction research or for statistical analysis;
- For audit and record keeping purposes.

The recipients or categories of recipients to whom the personal information may be supplied - Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks, cases	South African Police Service / Courts

Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Identifying Information and contact Information, for debt recovery	Any organisation or person uses to collect payments and recover debts or to provide a service on its behalf.

## 7. INFORMATION AVAILABILITY

Records Automatically Available To The Public - Category of records	Types of the Record	Availability
Product / Service information	Information relating to our service, service offering and products	Freely available
Public facing policies and notices	Privacy Notice, Terms and Conditions, PAIA Manual	Freely available
Company Records	Company Incorporation Documents, Account confirmation, BEE Affidavit, TAX Compliance verification, Company Profile, Letter of good standing	Available upon request

### Records of The Private Body

This clause serves as a reference to the records that KID Group holds in order to facilitate a request in terms of The Act. It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter.

Subjects on which the body holds records	Categories of records
<b>These include, but are not limited to the below:</b>	
Incorporation documents and records	<ul style="list-style-type: none"> <li>- Directors/Member/Shareholder information</li> <li>- Shareholders Agreement / Minutes of meetings</li> <li>- Records relating to the appointment of auditors, directors, prescribed officers, public officers, company secretary</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Employee and disciplinary records</li> </ul>
Operational documents and records	<ul style="list-style-type: none"> <li>- Policies regarding business plan or activities</li> <li>- Written service specification</li> <li>- Customer database and relevant information</li> <li>- Company profile;</li> <li>- Sales records</li> </ul>
Financial records	<p>General:</p> <ul style="list-style-type: none"> <li>- VAT records / Tax records / PAYE records / UIF / SDL records</li> <li>- Management accounts and audited financial statements</li> </ul> <p>Operating systems:</p> <ul style="list-style-type: none"> <li>- Tax invoices / Quotes</li> <li>- Statements - weekly/monthly/quarterly/annual</li> <li>- Debit notes / Credit notes</li> </ul> <p>Bank Account records:</p> <ul style="list-style-type: none"> <li>- Account numbers / Owners</li> </ul>

- Bank statements / confirmations / Proofs of Payments
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## 8. RECORDS REQUIRED IN TERMS OF LEGISLATION

Records are kept in accordance with legislation applicable to KID Group, which includes but is not limited to, the following:

- Basic Conditions of Employment Act No. 75 of 1997;
- Broad-Based Black Economic Empowerment Act No. 53 of 2003;
- Companies Act No. 71 of 2008;
- Compensation of Occupational Injuries and Diseases Act No. 130 of 1993;
- Consumer Protection Act, No. 68 of 2008;
- Copyright Act, No. 98 of 1978;
- Currency and Exchanges Act, No. 09 of 1933;
- Customs and Exercise Act No. 91 of 1964;
- Cybercrimes Act No. 19 of 2020;
- Disclosure of Protected Information Act No. 26 of 2000;
- Electronic Communications Act, No. 36 of 2005;
- Electronic Communications and Transaction Act No. 25 of 2002;
- Employment Equity Act No. 55 of 1998;
- Financial Intelligence Centre Act No 38 of 2001;
- Identification Act No. 68 of 1997;
- Income Tax Act No. 58 of 1962;
- Labour Relations Act No. 66 of 1995;
- National Credit Act No. 34 of 2005;
- National Minimum Wage Act, No. 09 of 2018;
- Nonprofit Organisations Act, No. 71 of 1997;
- Occupational Health and Safety Act No. 85 of 1993;
- Prevention of Organised Crime Act No. 121 of 1998;
- Promotion of Access to Information Act No. 2 of 2000;
- Protection of Personal Information Act No. 4 of 2013;
- Revenue laws Second Amendment Act. No. 61 of 2008;
- Skills Development Act, No. 97 of 1998;
- Skills Development Levies Act No. 9 of 1999;
- Tax Administration Act, No. 28 of 2011;
- Taxation Laws Amendment Act No. 7 of 2010;
- Unemployment Contributions Act No. 63 of 2001;
- Unemployment Insurance Act No. 30 of 1966;
- Value Added Tax Act No. 89 of 1991.

Although we have used our best endeavours to supply a list of applicable legislations, it is possible that this list may be incomplete. If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on.

Reference to the above-mentioned legislation shall include subsequent amendments and secondary legislation to such legislation.

## 9. RECORD REQUEST PROCEDURE

Records that are automatically or manually available at the registered office of KID Group on payment of the prescribed fee for reproduction. These must be requested in terms of the Record Request procedure set out here below, which may be subject to the restrictions and right of refusal to access as provided for in the PAIA.

### **Request Procedure:**

To facilitate the processing of a request, the requestor must:

1. Complete the prescribed form (in Appendix A below).
2. Send the request to the Information Officer at the KID Group registered address or email (above).
3. Provide on the form sufficient detail to enable KID Group to identify:
  - i. The record(s) requested.
  - ii. The requestor (and, if an agent is lodging the request, proof of capacity).
  - iii. The postal address, email address or fax number of the requestor.
  - iv. The form of access required.
  - v. The postal address, email address or fax number of the requestor.
  - vi. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
  - vii. The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

The following applies to requests (other than personal requests):

- i. A requestor is required to pay the prescribed fees (R100.00) before a request will be processed into the respective bank account of the KID company (which can be obtained from the Information Officer).
  - ii. 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).
  - iii. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
  - iv. Records may be withheld until the fees have been paid.
4. The prescribed form must be filled in with sufficient particulars to at least enable the Information Officer of the Company to identify:
  - a. record or records requested;
  - b. identity of the requester;
  - c. which form of access is required, if the request is granted;
  - d. postal address, telephone number and fax number of the requester.

5. The requester must state that he/she requires the information to exercise or protect her/his right and clearly state what the nature of the right is to be exercised or protected. In addition, the requester must clearly specify why the records are necessary to exercise or protect such a right.
6. Such request must be processed within 30 (thirty) days after the request has been received.
7. The requester shall be informed whether the access has been granted or denied within 30 (thirty) days of receipt of the request and give notice with reasons to that effect.
8. The 30 (thirty) day period within which the Company has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days if the request is for a vast amount of information, or the information cannot reasonably be obtained within the original thirty day period. The Information Officer will notify the requester in writing should an extension be sought.
9. If the request for access is granted, the Information Officer of the Company must advise the requestor: (a) the access fee (if any) to be paid upon access; (b) the form in which access will be given; and (c) that the requester may lodge an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging the application.
10. If the request for access is refused, the Information Officer of the Company must: (a) state adequate reasons for the refusal, as may be included in the provisions of the PAIA; (b) exclude, from any such reasons, any reference to the content of the record; and (c) state that the requester may lodge an application with a court against the refusal of the request, and the procedure (including the period) for lodging the application.
11. In terms of the PAIA, if all reasonable steps have been taken to find the record requested and there are reasonable grounds to believe that the record is in possession of the Company but cannot be found, and if it does not exist, then the Information Officer of the Company must notify (by way of a signed affirmation) the requester that it is not possible to give access to that record.
12. If after notice is given, the record in question is found, the requester must be given access thereto unless the ground for the refusal of access exists.
13. If the request is declined for any reason the notice must include adequate reasons for the decision, together with the relevant provisions of the PAIA Act relied upon and provide the procedure to be followed should the requester wish appeal the decision.
14. The PAIA provides that the Information Officer of the Company may serve a record and grant access only to that portion which the law does not prohibit access to.

**Third Parties:** If the request is for the record pertaining to the third party, the Information Officer of the Company must take all reasonable steps to inform the third party of the request. This must be done within 14 (fourteen) days of receipt of the request. The manner in which this is done must be by the fastest means reasonably possible, but if orally, the Information Officer of the Company must thereafter give the third party a written confirmation of the notification.

The third party may within fourteen days thereafter either make representation to the Company as to why the request should be refused; alternatively grant written consent to the disclosure of the record.

The third party must be advised of the decision taken by the Information Officer of the Company whether to grant or to decline the request. A third party who is dissatisfied with the Information Officer of the Company's decision to grant a request for information, may refuse access and notify KID Group accordingly as soonest possible.

## 10. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

KID Group does not share any personal information of our data subjects with any third parties, except if it:

- a. is obliged to provide such information for legal or regulatory purposes;
- b. is required to do so for purposes of existing or future legal proceedings,
- c. is selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you;
- d. is involved in the prevention of fraud, loss, bribery or corruption;
- e. has third-parties perform services and process personal information on our behalf;
- f. is required to provide or manage any information, products and/or services to data subjects;
- g. is to improve the quality of its products and services.

KID Group has the right to refuse access to information on one or more of the following grounds:

- a. Mandatory protection of the privacy of a third party who is a natural person, if such disclosure would involve the unreasonable disclosure of Personal Information about a third party, including a deceased individual.
- b. Mandatory protection of the commercial information of a third party, if the record contains: (a) Trade secrets of that party; (b) Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interest of that third party; (c) Information disclosed in confidence by a third party, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition; (d) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- c. Mandatory protection of certain confidential information of third party, where the head of a private body must refuse a request for access to a record of the body if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.
- d. Mandatory protection of the safety of individuals and the protection of property, where such disclosure could endanger the life or physical safety of an individual, or prejudice or impair the security of: (a) a building, structure or any system (b) a means of transport, or (c) any other property.
- e. Mandatory protection of records, which would be regarded as privileged from production in legal proceedings.
- f. Commercial information of private body, in that a request for access to a record may be refused if the record contains: (a) trade secrets, financial, commercial, scientific or technical information, which disclosure, could likely cause harm to the financial state, public safety or commercial interest of the Company, the subject and / or third-party; (b) Information which, if disclosed could prejudice or put the Company, and / or any third-party at a disadvantage in negotiations or commercial competition; and (c) A computer program which is owned by the Company and / or third-party and which is protected by copyright.
- g. Mandatory protection of research information of the institution. A request will be refused if this disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the researcher at a serious disadvantage.

- h. Mandatory disclosure in public interest. Despite any of the protections mentioned above, the Director of the Company shall grant a request for access to a record if: (a) the disclosure of the record would reveal evidence of or environmental risk; and (b) the public interest in the disclosure of the record clearly outweighs the harm contemplated in the provision in question.

## 11. CLASSIFICATIONS

KID Group may apply the following classifications (base on PAIA) for its records / information / data subjects:

1. May be Disclosed - Public Access Document
2. May not be Disclosed - Request after commencement of criminal or civil proceedings
3. May be Disclosed - Subject to copyright
4. Limited Disclosure - Personal Information (PI) of natural persons that belongs to the requester of that information, or PI of juristic persons represented by the requestor of that information
5. May not be Disclosed - Unreasonable disclosure of PI or of Natural person or Juristic Person
6. May not be Disclosed - Likely to harm the commercial or financial interests of third party
7. May not be Disclosed - Likely to harm KID Group or third party in contract or other negotiations
8. May not be Disclosed - Would breach a duty of confidence owed to a third party in terms of an Agreement
9. May not be Disclosed - Likely to compromise the safety of individuals or protection of property
10. May not be Disclosed - Legally privileged document
11. May not be Refused - Environmental testing / investigation which reveals public safety / environmental risks
12. May not be Disclosed - Commercial information of Private Body
13. May not be Disclosed - Likely to prejudice research and development information of KID Group or a third party
14. May not be Refused - Disclosure in public interest

## 12. APPEAL - REMEDIES

KID Group does not have internal appeal procedures regarding PAIA and POPIA requests. As such, the decision made by the duly authorised Information Officers, is final. If a request is denied, the requestor is entitled to apply for relief/action to a court with appropriate jurisdiction, or the Information Regulator.

## 13. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

The transfer of personal information across South African borders may be required however will only be effected if the transaction requires transborder processing. In such instance the personal information will only be transferred in accordance with the requirements of POPIA and/or other South African legislative requirements, and/or if the data subject consents to the transferring of personal information to a third party in a foreign country.

In the event of transborder transferring of personal information we will take the necessary steps to ensure the processing of personal information is done in accordance with the laws of the jurisdiction the information is transferred to and/or that binding corporate rules or binding agreements are in place that provide for levels of protection at an adequate level in accordance with the principles of POPIA.

## 14. SECURITY MEASURES

Information security measures to protect personal information Reasonable technical and organisational measures have been implemented for the protection of personal information processed by KID Group and its operators. In terms of the PoPI Act, operators are third parties that process personal information on behalf of KID Group. KID Group continuously implements and monitors technical and organisational security measures to protect the personal information it holds, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

Information Security Measures must be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information. Our security policies and procedures cover, amongst others, but not limited to:

- Physical security;
- Computer and network security;
- Access to personal information;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of personal information;
- Investigating and reacting to security incidents;
- When contracting with third parties, KID Group imposes appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure;
- KID Group ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

## 15. ENFORCEMENT

Violation of this policy will result in disciplinary action that may include termination for employees and temporaries, termination of employment relations in the case of contractors or consultants, or dismissal for interns and volunteers. Additionally, individuals may be subject to loss of the business's information resources access privileges and/or further civil and criminal prosecution.

## 16. DOCUMENT CONTROL

<b>Creation Date</b>	
<b>Publishing Date</b>	13 July 2021
<b>Frequency of review</b>	Annually or as Requested
<b>Policy Owner</b>	Information Officer and Deputy Information Officer/s
<b>Responsible business unit/s</b>	Compliance Department
<b>This Version</b>	3

**Latest version approved by Board of Directors of the KID Group**

## 17. CHANGE HISTORY

Date	Author	Version	Change Reference
13 July 2021	Information Officer	1	Original Draft
10 June 2025	Information Officer	2	Use new stationery
31 Oct 2025	Information Officer	3	Update IO list

## 18. PAIA MANUAL APPROVAL

Signed:  \_\_\_\_\_

Date: 31st October 2025 \_\_\_\_\_

## APPENDIX A – RECORD / INFORMATION REQUEST FORM - TEMPLATE

### FORM 2 - REQUEST FOR ACCESS TO RECORD OF SUBJECT (The Promotion of Access to Information Act 2 of 2000)

#### A. Particulars of Subject:

Name / Identification Number / Address:

\_\_\_\_\_/\_\_\_\_\_  
\_\_\_\_\_

#### B. Particulars of person requesting access to the record

- The particulars of the person who requests access to the record must be given below.
- The address and/or fax number in the Republic to which the information is to be sent must be given.
- Proof of the capacity in which the request is made, if applicable. Must be attached.

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_

Telephone number: ( ) \_\_\_\_\_ Fax number: ( ) \_\_\_\_\_

Email address: \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person: \_\_\_\_\_

#### C. Particulars of person on whose behalf request is made

This section must be completed **ONLY** if a request for information is made on behalf of another person.

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

#### D. Particulars of record

- 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 folio and attach it to this form.

The requester must sign all the additional folios.

Description of the record or relevant part of the record:

\_\_\_\_\_  
\_\_\_\_\_

Reference number, if available:

\_\_\_\_\_

Any further particulars of record:

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**E. Fees**

- a. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee had been paid.
- b. You will be notified of the amount required to be paid as the request fee.
- c. 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.
- d. If you qualify for exemption of the payment of any fee, please state the reason for exception.

Reason for exemption from payment of fees:

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.....

.....

**F. Record Access details**

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

**Disability description:** \_\_\_\_\_

**NOTES:**

- a. Compliance with your request for access in the specified form may depend on the form in which the record is available.
- b. Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- c. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

Mark the appropriate box with an X.

<b>1. If the record is in written or printed form:</b>			
<input type="checkbox"/>	Copy of record*	<input type="checkbox"/>	Inspection of record
<b>2. If record consists of visual images – (this includes photographs, slides, video recordings, computer generated images, sketches, etc.):</b>			
<input type="checkbox"/>	View the images	<input type="checkbox"/>	Copy of the images*
<input type="checkbox"/>		<input type="checkbox"/>	Transcription of the images
<b>3. If the record consists of recorded words or information which can be reproduced in sound:</b>			
<input type="checkbox"/>	Listen to the soundtrack (audio media)	<input type="checkbox"/>	Transcription of soundtrack* (written or printed document)

4. If record is held on computer or in an electronic or machine readable form:			
	Printed copy of record		Printed copy of information derived from the record*
			Copy in computer readable form (memory stick or compact disc)
* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES NO

**G. Particulars of right to be exercised or protected**

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

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**H. Notice of decision regarding request for access**

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

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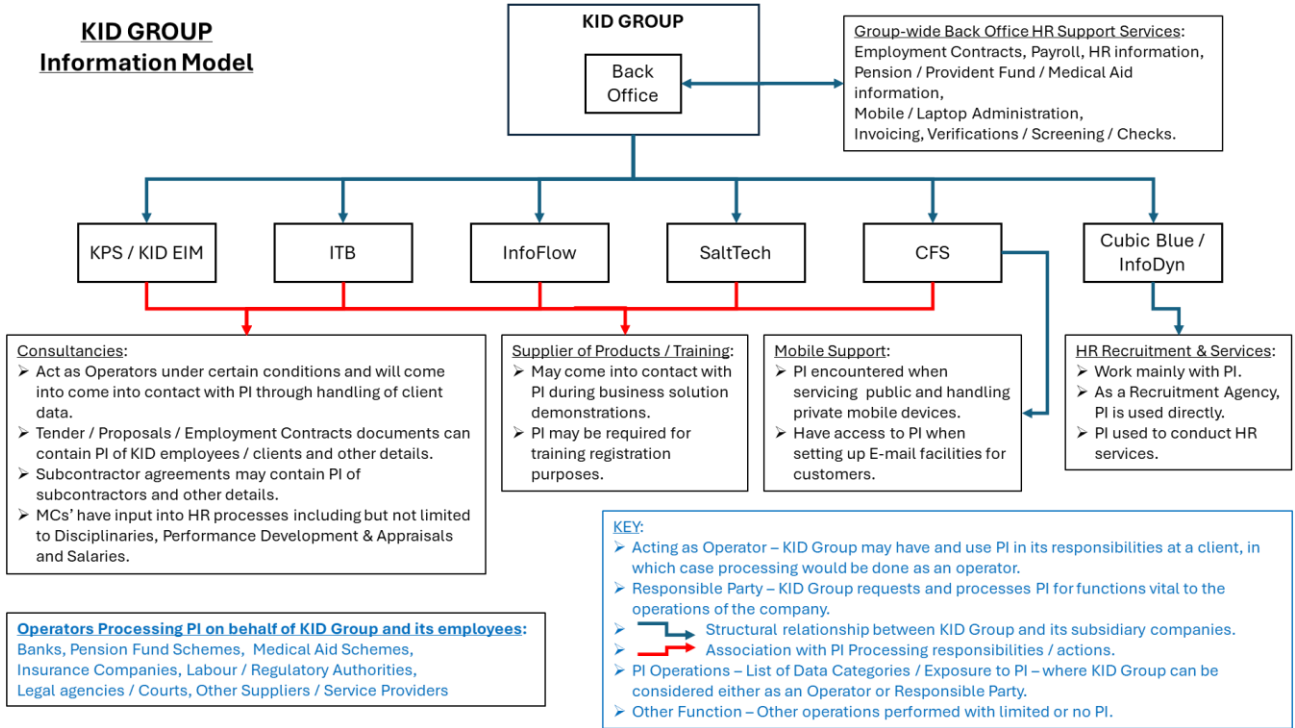
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Signed at \_\_\_\_\_ this \_\_\_ day of \_\_\_\_\_ year \_\_\_\_\_

Name and Signature of requester / Person on whose behalf request is made:

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

## APPENDIX B – KID GROUP INFORMATION MODEL



## APPENDIX C – CATEGORIES OF DATA SUBJECTS

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
<b><i>Suppliers / Service providers</i></b>	These include, but are not limited to the following: <ul style="list-style-type: none"> <li>- Entity name and registration information;</li> <li>- Entity VAT number;</li> <li>- Full name and Surname of entity representative;</li> <li>- Contact details of entity representative;</li> <li>- Physical, postal and e-mail address;</li> <li>- Banking details;</li> <li>- Income Tax details;</li> </ul>
<b><i>Employees</i></b>	These include, but are not limited to the following: <ul style="list-style-type: none"> <li>- Full Name and surname;</li> <li>- Identity number;</li> <li>- Physical, postal and e-mail address;</li> <li>- Contact Numbers (Home, Work, Mobile);</li> <li>- Driver’s license details;</li> <li>- Next of kin details;</li> <li>- Banking details;</li> <li>- Educational details;</li> <li>- PAYE Information;</li> <li>- UIF Information;</li> </ul>
<b><i>Clients</i></b>	These include, but are not limited to the following: <ul style="list-style-type: none"> <li>- Entity name and registration information</li> <li>- Entity VAT number;</li> <li>- Name, surname and contact details of entity representative;</li> <li>- Physical, postal and e-mail address;</li> <li>- Banking details and financial information</li> <li>- Director/Member information</li> <li>- Financial information.</li> <li>- Name, surname, ID number</li> </ul>
<b><i>Directors and Shareholders</i></b>	These include, but are not limited to the following: <ul style="list-style-type: none"> <li>- Full Name and Surname;</li> <li>- Identity Numbers;</li> <li>- Other information required for reporting purposes;</li> </ul>



**Impossible  
is nothing  
but a  
starting  
point.**

**INFOFLOW**<sup>+</sup>

**ITBUSINESS**



**CUBIC  
BLUE**


**ID INFORMATION  
DYNAMICS**

**CES  
GROUP**

**kid**  
Enterprise Information Management

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