

# THIAN COMPUTER SOLUTIONS CC



## 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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## **LIST OF ACRONYMS AND ABBREVIATIONS**

- |     |                    |   |
|-----|--------------------|---|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer;  |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer;                                       |
| 1.3 | <b>“IO”</b>        | Information Officer;  |
| 1.4 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                    |
| 1.5 | <b>“PAIA”</b>      | Promotion of Access to Information Act No 2 of 2000 (as Amended); |
| 1.6 | <b>“POPIA”</b>     | Protection of Personal Information Act No 4 of 2013;              |
| 1.7 | <b>“Regulator”</b> | Information Regulator; and  |
| 1.8 | <b>“Republic”</b>  | Republic of South Africa  |

## **PURPOSE OF 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 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 and the recipients or categories of recipients to whom the personal information may be supplied;
- 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.

**KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THIAN COMPUTER SOLUTIONS CC.**

3.1 **Chief Information Officer**

Name: Gugulethu Phiri

Tel: 011-6168041

Email: gugu@thian.co.za

## **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 PAIA<sup>1</sup> and Section 56 of POPIA<sup>2</sup>;
  - 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 11<sup>3</sup>; and
    - 4.3.3.2 access to a record of a private body contemplated in Section 50<sup>4</sup>;
  - 4.3.4 The assistance available from 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 or lodging.

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**<sup>1</sup>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.

**<sup>2</sup>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.

**<sup>3</sup>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.

**<sup>4</sup>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;
- c) and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part

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 14<sup>5</sup> and 51<sup>6</sup> require a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 The provisions of Section 15<sup>7</sup> and 52<sup>8</sup> 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 Section 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to request for access; and

4.3.10 The regulations made in terms of Section 92<sup>11</sup>.

- 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/>
- 4.6 A copy of the Guide is available in English, for public inspection during normal office hours

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**<sup>5</sup>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.*

**<sup>6</sup>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.*

**<sup>7</sup>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.*

**<sup>8</sup>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.*

**<sup>9</sup>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.*

**<sup>10</sup>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.*

**<sup>11</sup>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.”

**CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.**

The following categories of records held by Thian Computer Solutions CC are available without the need to complete Form C.

<b>Category of Records</b>	<b>Types of the Record</b>	<b>Available on Website</b>	<b>Available Upon Request</b>
Company profile and Background Information	- Business Overview - Mission Statement - Services Offered	X	X
Marketing and Promotional Materials	- Product and Services - Completed Projects	X	X
Product and Services Information	- IT Support Services - Backup & Recovery - Hosted PBXs - Network Solutions	X	
Partnerships and Client Showcase	- Selected Client Collaborations (with consent) - Strategic Partnerships and Affiliations	X	X
Contact Information	- Physical and Postal Addresses - Telephone Numbers - Email Address	X	X

**DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE  
WITH ANY OTHER LEGISLATION**

<b>Record Type</b>	<b>Description</b>	<b>Applicable Legislation</b>	<b>Retention Period</b>	<b>Legislation Reference</b>
Employment and Labour Records	- Employment Contracts. - Employee Leave and Attendance Records.	Basic Conditions of Employment Act (BCEA)	3 years	BCEA, Section 31
Tax Records	- Income Tax Returns. - Payroll records and employee tax documents.	Income Tax Act, Tax Administration Act	5 years after the submission	Income Tax Act (Section 29), VAT Act (Section 55), Tax Administration Act (Section 29)
Financial Statements	- Annual financial statements - Accounting records	Companies Act, Income Tax Act	7 years	Companies Act (Section 24), Income Tax Act (Section 29)
VAT Records	- VAT invoices - Returns - Related documentation	VAT Act	5 years	VAT Act (Section 55)
UIF Records	- Remuneration - Deductions - Contributions	Unemployment Insurance Contributions Act	5 years	UI Contributions Act (Section 5)
Occupational Health & Safety Records	- Incident reports - Risk assessments - Health & safety plans	Occupational Health and Safety Act (OHSA)	Varies, generally 3-5 years	OHSA (Sections 8, 16 and General Administrative Regulations)
Employment Equity Reports	EE reports submitted to the Department of Labour	Employment Equity Act	5 years	Employment Equity Act (Section 21)
Skills Development Records	- Training plans - Reports - Grants received	Skills Development Act	5 years	Skills Development Act (Section 36)
SARS Correspondence	All correspondence with SARS	Tax Administration Act	5 years	Tax Administration Act (Section 29)

CIPC Documents	<ul style="list-style-type: none"> <li>- Memorandum of Incorporation</li> <li>- Share register</li> <li>- Resolutions</li> </ul>	Companies Act	Indefinitely for some; 7 years for others	Companies Act (Sections 24, 50, 73)
POPIA Compliance Records	<ul style="list-style-type: none"> <li>- Records of consent</li> <li>- Data subject access requests</li> <li>- Breach notifications</li> </ul>	Protection of Personal Information Act (POPIA)	As long as necessary for purpose	POPIA (Section 14 and 17)
B BBEE Certificates and Supporting Records	<ul style="list-style-type: none"> <li>- Verification certificates</li> <li>- Documentation</li> </ul>	Broad Based Black Economic Empowerment Act	1 year from date of issue	B BBEE Act (Section 13G)
COIDA Reports	<ul style="list-style-type: none"> <li>- Accident Reports</li> <li>- Wage returns</li> </ul>	Compensation for Occupational Injuries and Diseases Act (COIDA)	4 years	COIDA (Section 8, 39 and 82)
Labour Relations Records	<ul style="list-style-type: none"> <li>- Trade union Agreements</li> <li>- Strikes</li> <li>- Lockouts</li> <li>- Retrenchment procedures</li> </ul>	Labour Relations Act (LRA)	3 years	Labour Relations Act (Sections 98 and 99)

**DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT.**

Subject	Categories of Records
<b>Finance</b>	<ul style="list-style-type: none"> <li>- Annual Financial Statements</li> <li>- Budget Reports</li> <li>- Audit Reports</li> <li>- General Ledger Records</li> <li>- Payment Vouchers</li> <li>- Invoices and Receipts</li> <li>- Asset Register</li> <li>- Bank Reconciliation Statements</li> <li>- Tax Returns and SARS Correspondence</li> </ul>
<b>Supply Chain Management (SCM)</b>	<ul style="list-style-type: none"> <li>- Procurement Plans</li> <li>- Supplier Database</li> <li>- Bid Documents (RFPs, RFQs, Tender Awards)</li> <li>- Contracts and Service Level Agreements</li> </ul>

	<ul style="list-style-type: none"> <li>- Purchase Orders</li> <li>- Delivery Notes</li> <li>- Payment Schedules</li> <li>- Evaluation and Adjudication Reports</li> <li>- Compliance and Audit Reports</li> </ul>
<b>Human Resources (HR)</b>	<ul style="list-style-type: none"> <li>- Employee Personal Files</li> <li>- Leave Records</li> <li>- Payroll Records</li> <li>- Organisational Structure</li> <li>- Recruitment and Selection Documentation</li> <li>- Employment Equity and Skills Development Reports</li> </ul>
<b>Legal and Compliance</b>	<ul style="list-style-type: none"> <li>- Company Registration Documents</li> <li>- Compliance Reports</li> <li>- POPIA Consent and Access Logs</li> <li>- Labour Relations Documentation</li> </ul>
<b>ICT / Information Management</b>	<ul style="list-style-type: none"> <li>- ICT Policies and Standards</li> <li>- System Access Logs</li> <li>- Backup Schedules</li> <li>- Hardware and Software Asset Lists</li> <li>- Incident Logs</li> <li>- Data Protection Records</li> </ul>

## **PROCESSING OF PERSONAL INFORMATION**

### 8.1 Purpose of Processing Personal Information

#### **1. Service Delivery**

- To provide products or services requested by individuals.
- To manage customer relationships and communications.
- To personalize and improve user experience.

#### **2. Legal and Regulatory Compliance**

- To comply with applicable laws, regulations, or legal obligations (e.g., tax laws, data protection laws).
- To respond to legal requests from law enforcement or regulatory bodies.

#### **3. Employment and HR Management**

- To manage employee records, payroll, benefits, and performance.
- For recruitment, onboarding, and workforce planning.

#### **4. Security and Fraud Prevention**

- To protect systems, networks, and data from unauthorized access.
- To detect and prevent fraud or other illegal activities.

#### **5. Marketing and Communications**

- To send promotional content or updates (with proper consent).
- To analyze engagement and improve marketing strategies.

#### **6. Research and Development**

- To improve services or develop new features/products.
- To conduct internal analytics, surveys, or statistical reporting.

#### **7. Contractual Obligations**

- To fulfill contractual obligations with clients, vendors, or partners e.g. Regulatory Compliance obligations.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

Categories of Data Subjects	Personal Information that may be Processed
<b>Customers/Clients</b>	Name, address, email, phone number, registration numbers or ID numbers, employment status, financial information, transaction history, preferences, and bank details.
<b>Service Providers</b>	Company name, contact person's name, registration number, VAT number, physical and postal address, business contact details, service contracts, trade secrets, and bank details.
<b>Employees</b>	Full name, ID/passport number, contact details, residential address, qualifications, job title, employment history, race, gender, marital status, next of kin, bank account details, tax number.
<b>Recruitment</b>	Name, contact details, CV/resume, qualifications, employment history, references, background checks, and interview notes.
<b>Suppliers</b>	Supplier name, registration number, contact details, banking information, product or service descriptions, purchase orders, and contracts.
<b>Website Users/Visitors</b>	IP address, browser type, cookies, geolocation data, pages visited, time spent on site, preferences, and any information submitted via forms.
<b>Shareholders/Investors</b>	Name, contact information, investment records, shareholding details, dividend payments, and identification documents.
<b>Beneficiaries</b>	Full name, date of birth, ID number, contact details, relationship to policyholder or member, medical or insurance information (if applicable).
<b>Regulatory Bodies/Government Entities</b>	Correspondence, registration or licensing information, identification and contact details of relevant representatives.
<b>Consultants/Advisors</b>	Name, qualifications, contract terms, ID numbers, billing information, and professional credentials.

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

<b>Category of Personal Information</b>	<b>Recipient or Category of Recipients</b>
Contact Information	- Internal HR Department
Employment History	- Recruitment Agencies
Financial Information	- Financial Service Providers
Educational Records	- Accredited Educational Institutions
Identity Information	- Government and Regulatory Bodies
Medical Information	- Medical Aid Providers

8.4

<b>Destination Country</b>	<b>Purpose of Transfer / Processing</b>	<b>Categories of Personal Information</b>	<b>Data Subjects Affected</b>	<b>Safeguards in Place</b>
<b>United States</b>	Cloud storage and data backup via Microsoft Azure / Google Cloud	Names, email addresses, client records, employee information	Customers, Employees	Standard Contractual Clauses (SCCs), encryption at rest and in transit
<b>Ireland</b>	Hosting of CRM (e.g., Salesforce)	Client contact details, sales interactions	Customers/Clients	GDPR compliance by service provider
<b>Germany</b>	HR management and payroll system	Employee names, ID numbers, salary and banking details	Employees	Binding Corporate Rules, data access controls
<b>United Kingdom</b>	Outsourced IT support and analytics	Website usage data, system logs	Website Users	Data Processing Agreements, access controls
<b>India</b>	Software development and technical support	Limited access to pseudonymized customer data	Customers	NDA agreements, restricted access environments

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

Security Measure	Description
Data Encryption	Encryption of data at rest and in transit using industry standard protocols (e.g., AES 256).
Access Control	Role based access controls to limit access to authorized personnel only.
Antivirus and Anti malware Solutions	Installation and regular updates of antivirus and anti malware software to prevent malicious attacks.
Firewalls and Intrusion Detection Systems	Use of firewalls and IDS/IPS to monitor and protect against unauthorized access.
Regular Security Audits	Periodic internal and external security audits to assess vulnerabilities and compliance.
Secure Data Backup	Automated and encrypted backups stored offsite to ensure data recovery in case of loss.
Multi Factor Authentication (MFA)	Implementation of MFA to secure user access to systems and applications.
Employee Awareness and Training	Ongoing training programs to educate employees on data privacy and security best practices.
Data Masking and Redaction	Techniques to obscure or remove personal data from files or systems before sharing.
Secure Disposal of Information	Physical and digital secure deletion methods for disposing of obsolete or sensitive data.

### **AVAILABILITY OF THE MANUAL**

- 9.1 A copy of the Manual is available
- 9.1.1 on <https://thian.co.za/>
  - 9.1.2 PAIA Manual Template available at our offices 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.

**PRESCRIBED FEES**

Below are the prescribed for processing and requesting information in terms of the regulations above.

<b>Fee Type</b>	<b>Amount (ZAR)</b>	<b>Notes</b>
Request Fee	R140.00	Not payable by personal requesters
Reproduction Fee - Photocopy or printed copy (A4-size)	R2.00 per page	Black & white copies only
Reproduction Fee - Copy on flash drive (provided by requester)	R40.00	Flash drive must be supplied by requester
Reproduction Fee - Copy on CD (provided by requester)	R40.00	CD must be supplied by requester
Reproduction Fee - Copy on CD (provided by body)	R60.00	Includes cost of CD provided by body
Transcription of visual images	As per quotation	Depends on external service provider
Copy of visual images	As per quotation	Depends on external service provider
Transcription of audio record (A4-size page)	R24.00	For written transcription of audio
Copy of audio record - Flash drive (provided by requester)	R40.00	Flash drive must be supplied by requester
Copy of audio record - CD (provided by requester)	R40.00	CD must be supplied by requester
Copy of audio record - CD (provided by body)	R60.00	Includes cost of CD provided by body
Search and Preparation Fee (per hour after the first hour)	R145.00	Excludes the first hour
Maximum Search and Preparation Fee	R435.00	Cap on total search fee

Postage Fee	Actual cost	If record must be posted
Deposit (for searches exceeding 6 hours)	One-third of access fee	Applies if preparation time exceeds 6 hours

### **UPDATING OF THE MANUAL**

The head of Thian Computer Solutions CC will update this manual on a regular basis.

Issued by

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**JOSHUA PHIRI**  
(DIRECTOR)

## **FORMS LINKED TO THIS FORM:**

- Notice For Paia Annual Report 2025
- Form 1 Objection To The Processing Of Personal Information
- Form 2 Request For Correction Or Deletion Of Personal Information Or
- Form 3 Application For The Issue Of A Code Of Conduct
- Form 4 Application For The Consent Of A Data Subject For The Processing Of
- Form 5 Complaint Regarding Interference With The Protection Of An Adjudicator
- Application Form For Authorisation To Process Personal Information Of Children
- Guidance Note On Processing Of Personal Information Of Children
- Application Form For Authorisation To Process Special Personal Information
- Guidance Note On Processing Of Special Personal Information
- Application Form For Authorisation To Process Special Personal Information Eform
- Application Form For Prior Authorisation (Revised)
- How To Report Security Compromises
- Rules Of Procedure Relating To The Manner In Which A Complaint Must Be Submitted

# **THIAN COMPUTER SOLUTIONS CC**

CNR MULLINS & SOVEREIGN STREET  
BEDFORD GARDENS  
JOHANNESBURG  
2007