



**SERVICE INDEX SA (PTY) LTD**

**Reg: CK 2024/454302/07**

**"Registered with PPRA"**

**FMA10115**

**FIC ID: 69893**

**ACCESS TO INFORMATION MANUAL  
(PRIVATE BODY)**

# **PAIA MANUAL**

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

**DATE OF COMPILATION: 30/10/2024**

**DATE OF REVISION: 29/10/2025**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |                    |  |
|-----|--------------------|--|
| 1.1 | <b>"MD"</b>        | Managing Director  |
| 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   |

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body 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;

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- 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.

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### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SERVICE INDEX SA

#### 3.1. Chief Information Officer

Name: Luanne Hall  
Tel: 021 300 8271  
Email: [info@serviceindex.co.za](mailto:info@serviceindex.co.za)

Deputy Information Officer (NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.

Name: No Deputy Information Officer  
Tel: N/A  
Email: N/A  
Fax Number: N/A

#### 3.3 Access to information general contacts

Email: [info@serviceindex.co.za](mailto:info@serviceindex.co.za)

#### 3.4 National or Head Office

Physical & Postal Address: 71 Viola Road, Blouberg Rise, 7441

Telephone: 021 300 8271  
Fax: N/A

Email: [info@serviceindex.co.za](mailto:info@serviceindex.co.za)

Website: [www.serviceindex.co.za](http://www.serviceindex.co.za)

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**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 English, Afrikaans and Xhosa

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 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-



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

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- 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> requiring 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 sections 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 sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
  - 4.3.10. the regulations made in terms of section 92<sup>11</sup>.



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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.”

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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 also available in the following two official languages, for public inspection during normal office hours-

4.6.1 The guides are available in English, Afrikaans and isiXhosa





## **5. CATEGORIES OF RECORDS OF SERVICE INDEX SA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

*Information which is available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.*

Records from the CIPC and those displayed on our website are automatically available for inspection or purchase or photocopying.  
In other words, you do not need to request this information in terms of the Promotion of Access to Information Act.

Request forms for these categories of information are also available from our information officer, whose contact details appear in Section 3 of this manual.

## **6. DESCRIPTION OF THE RECORDS OF SERVICE INDEX SA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

***Information available in terms of other legislation:***

Where applicable to our operations, information is also available in terms of certain provisions of the following legislation and statutes:

- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Debt Collectors' Act No. 114 of 1998
- Employment Equity Act No. 55 of 1998
- Estate Agency Affairs Act No. 112 of 1976
- Financial Intelligence Centre Act No. 38 of 2001
- Housing Development Schemes for Retired Persons Act No. 65 of 1988
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Rental Act No. 50 of 1999

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- Sectional Titles' Act No. 95 of 1986
- Sectional Titles Scheme Management Act 8 of 2011
- Community Scheme Ombud Service Act 9 of 2011
- Share Blocks Control Act No. 59 of 1980
- Skills Development Act No. 9 of 1999
- Stamp Duties Act No. 77 of 1968
- Transfer Duty Act No. 40 of 1949
- Unemployment Insurance Act No. 63 of 2001
- Value-added Tax Act No. 89 of 1991

## **7. DESCRIPTION OF THE SUBJECTS ON WHICH SERVICE INDEX SA HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SERVICE INDEX SA**

### **Procedure for requesting access to the above information**

If you wish to request access to any of the below categories of information, you are required to complete a request form. These forms are available from:  
our Information officer (refer contract details in section 3 of this manual);  
There is a prescribed fee (payable in advance) for requesting and accessing information in terms of the Act. Details of these fees are contained in the request form.

You may also be called upon to pay the additional fees prescribed by the regulation for searching for and compiling the information which you have requested, including copying charges.

It is important to note that access is not automatic – you must identify the right you are seeking to exercise or protect and explain why the record you requested is required for the exercise or protection of that right. You will be notified in the manner indicated by you on the request form whether your request has been approved.

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| Subjects on which the body holds records                       | Categories of records  |
|--|--|
| Strategic Documents, Pricing, Plans, Proposals, Financials etc | <ul style="list-style-type: none"> <li>• Annual Reports,</li> <li>• Strategic Plans,</li> <li>• Annual Performance Plans</li> </ul>  |
| Human Resources  | <ul style="list-style-type: none"> <li>• HR policies and procedures</li> <li>• Advertised posts</li> <li>• Employees records</li> </ul>  |
| Statutory Private Company information as follows               | <ul style="list-style-type: none"> <li>• CoR15.1 – Registration certificate</li> <li>• CoR18.3 – Registration certificate</li> <li>• CoR39 – Certificate of directors’ details / amendments</li> <li>• Minute books</li> <li>• Resolutions passed at meetings</li> <li>• Annual financial statements, including annual accounts and the report of the accounting officer</li> <li>• Accounting records, including supporting schedules to accounting records and ancillary accounting records</li> </ul> |
| Accounting Records   | <ul style="list-style-type: none"> <li>• Books of account including journals and ledgers</li> <li>• Invoices, statements, receipts, vouchers and other relevant documentation</li> </ul>   |
| Statutory employee records                                     | <ul style="list-style-type: none"> <li>• Employees’ names and occupations</li> <li>• Time worked by each employee</li> <li>• Remuneration paid to each employee</li> <li>• Date of birth of each employee</li> <li>• Salary and wages register</li> <li>• Staff records (after date of employment ceases)</li> <li>• Copies of Staff IRP5 certificates</li> <li>• Medical aid records</li> <li>• Leave records</li> <li>• PAYE, UIF and SDL records</li> </ul>   |



|  |  |
|--|--|
| Other employee records   | <ul style="list-style-type: none"> <li>• Employee contracts</li> <li>• Incentive schemes</li> <li>• Study assistance schemes</li> <li>• Maternity leave policy</li> <li>• Memorandum of conduct guidelines</li> </ul>  |
| Movable property:  | <ul style="list-style-type: none"> <li>• Asset register</li> <li>• Finance and lease agreements</li> </ul>   |
| Intellectual property:   | <ul style="list-style-type: none"> <li>• Logo and trading name</li> <li>• Templates drawn up specifically for company use</li> </ul>   |
| Agreements and contracts:  | <ul style="list-style-type: none"> <li>• Management agreements concerning provision of services</li> <li>• Rental lease</li> </ul>   |
| Taxation and other statutory compliances   | <ul style="list-style-type: none"> <li>• Copies of all income tax returns and other tax returns and documentation</li> <li>• VAT records</li> <li>• Regional Service levies records</li> </ul>   |
| Insurance (must be noted that we merely keep records and carry out acceptable administrative tasks – all other insurance handling will be carried out by brokers / insurers) | <ul style="list-style-type: none"> <li>• Insurance policies and details of cover, limits and insurers</li> <li>• Claims records where provided</li> </ul>  |
| Information technology   | <ul style="list-style-type: none"> <li>• Hardware</li> <li>• Operating systems</li> <li>• Telephone exchange equipment</li> <li>• Telephone lines, leased lines and data lines</li> <li>• Software packages</li> <li>• Disaster recovery</li> <li>• Internal systems support and programming / development</li> <li>• Capacity and utilization of current systems</li> </ul> |
| Sales and marketing:   | <ul style="list-style-type: none"> <li>• Clients – presentation of services documentation</li> </ul>   |



## 8. PROCESSING OF PERSONAL INFORMATION

Service Index SA processes personal information to facilitate its range of services and meet legal, regulatory, and business obligations. The primary purposes include:

1. **Property Management Agents**
  - **Body Corporates and HOA and Schemes Relationships:** To manage collection of levies, insurances, financial budgets, administration and communications of all members of schemes.
  - **Suppliers and Service Providers:** To manage supplier relationships
  - **Compliance:** To meet the legal requirements outlined by the **Property Practitioners Act** and other applicable regulations, ensuring transparency and due diligence.
2. **Facilities Management Services**
  - **Maintenance and Repairs:** To schedule and track proactive and reactive maintenance on client properties, including liaising with suppliers and service providers.
  - **Service Delivery Monitoring:** To evaluate and measure service quality, as outlined in specific contracts.
3. **Consulting and Business Services**
  - **Client Relationship Management:** To understand and address the needs of clients, facilitate referrals, and collaborate with our partners.
  - **Supplier Engagement:** To manage agreements, ensure compliance with legal terms.
4. **Human Resource and Staff Management**
  - **Training and Development:** To design, monitor, and assess staff development programs
  - **Compensation and Benefits:** To ensure accurate payroll processing and compliance with employment laws.
  - **Resource Supply:** To recruit, supply and manage outsourced skilled and semi-skilled resources
5. **Tours, Conferences, and Events**
  - **Event Planning and Coordination:** To organize and manage tours, conferences, and events tailored to client specifications.
  - **Participant Management:** To handle registration, communication, and logistics for attendees.
  - **Service Provider Coordination:** To engage with third-party vendors and venues to ensure seamless event execution.
6. **Legal Compliance and Risk Management**
  - To maintain confidentiality
  - To manage data protection as required under the **Protection of Personal Information Act (POPIA)** and other relevant privacy laws.
7. **Marketing and Communication**
  - To send service updates, market opportunities, and distribute promotional materials in alignment with client preferences and consent.

This data processing is conducted with strict adherence to confidentiality and privacy standards, ensuring all personal information is used lawfully, minimally, and transparently to enhance service delivery and maintain compliance with South African business and legal frameworks.



**8.1 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         | Name and beneficial ownership details, address, registration numbers or identity numbers, employment status and bank details                               |
| Service Providers           | names, registration number, vat numbers, address, trade secrets and bank details   |
| Employees                   | Name, address, email, contact details, bank details, work history, qualifications, gender and race<br>Employment information, contracts and communications |

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

*NB: Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.*

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| Category of personal information  | Recipients or Categories of Recipients to whom the personal information may be supplied |
|---|---|
| Identity number and names, for criminal checks  | South African Police Services   |
| Qualifications, for qualification verifications   | South African Qualifications Authority  |
| Credit and payment history, for credit information  | Credit Bureaus  |
| name, address, registration numbers or identity numbers, and bank details, contracts, communications and due diligence          | Property Practitioner Regulatory Authority (PPRA)                                       |
| name, address, registration numbers or identity numbers, and bank details, contracts, communications, reports and due diligence | Financial Intelligence Centre (FIC)   |
| name, address, registration numbers or identity numbers, and bank details, contracts, communications, reports and due diligence | Community Scheme Ombud Service Act 9 of 2011  |
| name, address, registration numbers or identity numbers, and bank details, contracts, communications, reports and due diligence | Debt Collectors' Act No. 114 of 1998  |

### 8.3 Service Index SA: Planned Transborder Flows of Personal Information

Service Index SA acknowledges that certain aspects of its services may involve the transborder flow of personal information to entities or individuals outside South Africa. These flows are conducted in compliance with the **Protection of Personal Information Act (POPIA)** and applicable international data protection laws. The planned transborder processing activities are as follows:

#### 8.3.1. Tours, Conferences, and Events

- **International Client Engagement:** Personal information of international clients, such as names, contact details, and travel preferences, may be shared with relevant service providers or partners (e.g., hotels, transport services, and event venues).



- **Visa and Travel Arrangements:** For international tours, personal data may be transferred to embassies, consulates, and international travel agencies to facilitate visa processing, accommodation, and travel logistics.
- **Cross-Border Communication:** Personal information may be shared with attendees, speakers, or sponsors based outside South Africa to coordinate event participation or provide necessary materials.

### 8.3.2. Property Management

- **International Property Owners:** In cases where international clients engage with Service Index SA for property their personal data may be shared with third parties such as legal advisors, notaries, or financial institutions in other countries.
- **Cloud-Based Systems:** Personal data may be stored or processed on cloud platforms with servers located outside South Africa.

### 8.3.3. Consulting and Business Services

- **Referrals to International Partners:** Where referrals involve partners or vendors outside South Africa, necessary personal information will be transferred for service delivery.

### 8.3.4. Data Protection Measures for Transborder Flows

Service Index SA ensures that all transborder data flows are conducted with adequate safeguards, including:

- **Contractual Protections:** Agreements with international third parties include data protection clauses to ensure compliance with POPIA and other relevant laws.
- **Consent and Transparency:** Explicit consent is obtained from data subjects for transborder transfers when required, and data subjects are informed about the purpose and destination of the data transfer.
- **Adequacy Standards:** Transfers are made to countries or entities with adequate data protection laws or mechanisms in place, in accordance with Section 72 of POPIA.
- **Technical Safeguards:** Data transferred electronically have access controls to prevent unauthorised access.

### 8.3.5. Accountability and Monitoring

Service Index SA continuously monitors its transborder data flows and ensures compliance through regular audits, staff training, and updates to its policies and agreements as required by evolving legal and business contexts.

By adhering to these measures, Service Index SA ensures that personal information remains secure, and clients are protected, even when their data is transferred across borders.

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

*NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.*

Service Index SA is committed to safeguarding the confidentiality, integrity, and availability of all personal information it processes. As a small business, the information security controls implemented are combination of manual and system based, practical, and aligned with the business's scale, ensuring compliance with the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA).

##### 8.4.1. Confidentiality Measures

- **Access Control:** Only authorised personnel have access to personal information.
- **Password Protection:** Devices and systems used to store personal information (e.g., computers, phones) are secured with passwords.
- **Physical Security:** Hard copies of sensitive documents are stored in a locked cabinet, and access is restricted to the owner.

##### 8.4.2. Integrity Measures

- **Data Validation:** All personal information is regularly reviewed for accuracy and completeness to ensure reliability.
- **Document Handling Procedures:** Sensitive information is handled carefully, and any errors or inconsistencies are promptly corrected.
- **Backup Protocols:** Essential data is manually backed up to an external hard drive on a regular schedule to protect against data loss or corruption.

##### 8.4.3. Availability Measures

- **Manual Record Keeping:** Critical records are kept in organised files to allow for quick retrieval when needed.
- **Digital Storage:** Personal information stored in files in hard copy and electronically is maintained on a secure and well-organised system, with a backup readily available.
- **Contingency Planning:** A basic contingency plan is in place to restore access to critical information in case of system failure or theft.



#### 8.4.4. Risk Mitigation and Monitoring

- **Security Awareness:** We maintain a vigilant approach to identifying potential security risks, such as phishing attempts or unauthorised access.
- **Regular Audits:** Manual checks of stored information are conducted periodically to ensure compliance with legal obligations and to identify potential security gaps.
- **Minimisation of Data Processing:** Personal information is collected, processed, and retained only when necessary, reducing exposure to risk.

#### 8.4.5. Manual Controls for Data Sharing

- **Third-Party Agreements:** When personal information is shared with third parties (e.g., service providers, vendors), manual contracts include confidentiality and data protection clauses.
- **Consent-Based Sharing:** Data subjects are explicitly informed, and their consent is obtained before their information is shared with any third parties.

### 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on SERVICE INDEX SA website at [www.serviceindex.co.za](http://www.serviceindex.co.za), if any;

9.1.2 head office of SERVICE INDEX SA 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 SERVICE INDEX SA will on a regular basis update this manual.

Anyone wishing to obtain more information should contact the information officer, via email to [info@serviceindex.co.za](mailto:info@serviceindex.co.za)



**POPIA**

This manual evinces compliance with the Promotion of Access to Information Act 2000 (Act No. 2 of 2000). Kindly note, however, that in dealing with requests formulated in accordance with the provisions of the Promotion of Access to Information Act (Act No. 2 of 2000) regard will also be given to the provisions of the Protection of Personal Information Act and any requests for information will be processed in accordance with the Promotion of Access to Information Act read with the Protection of Personal Information Act ensuring compliance with the provisions of the Promotion of Access to Information Act and provisions of the Protection of Personal Information Act.

***Issued by***

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**Luanne Hall**  
**Managing Director**

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