

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and addressing relevant provisions of the Protection of Personal Information Act, 2013 (POPIA)

1. INTRODUCTION

This manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”) as amended, and incorporates applicable requirements of the Protection of Personal Information Act, 2013 (“POPIA”), particularly Sections 23–25 relating to access to personal information.

The purpose of this manual is to facilitate access to records held by Khusela Data Pty Ltd and to outline the procedures to request access to such records.

2. COMPANY DETAILS

Company Name: Khusela Data Pty Ltd
Registration Number: 2020/926656/07
Physical Address: Ekurhuleni, Gauteng
Postal Address: P O Box 10606, Aston Manor, 1630
Telephone: 0.682.622 622
Email: dpo[at]khuseladata.co.za
Website: <https://khuseladata.co.za>

3. INFORMATION OFFICER

In terms of POPIA, the Information Officer is responsible for ensuring compliance with PAIA and POPIA.

Information Officer: [Name of CEO or appointed officer]
Email: dpo[at]khuseladata.co.za
Telephone: 0.682.622 622

4. GUIDE BY THE INFORMATION REGULATOR

A guide to PAIA is available from the Information Regulator:

Website: <https://info regulator.org.za/>

Email: enquiries@info regulator.org.za

5. RECORDS AVAILABLE WITHOUT A REQUEST

The following records may be available without a formal request:

- Company profile
 - Marketing materials
 - Public website information
-

6. RECORDS HELD BY THE COMPANY

6.1 Personnel Records

- Employment contracts
- Employee records
- Payroll records

6.2 Financial Records

- Financial statements
- Tax records
- Accounting records

6.3 Client and Customer Records

- Contracts
- Service agreements
- Support records

6.4 Technical and Operational Records

- Software development documentation
- System logs
- Product specifications

6.5 Marketing Records

- Campaign materials
 - Customer communications
-

7. PROCESSING OF PERSONAL INFORMATION (POPIA)

7.1 Purpose of Processing

Khusela Data Pty Ltd processes personal information for:

- Providing electronic and software services
- Customer support
- Billing and administration
- Compliance with legal obligations

7.2 Categories of Data Subjects

- Customers
- Employees
- Suppliers

7.3 Categories of Personal Information

- Contact details
- Identification information
- Financial information
- Usage and technical data

7.4 Recipients of Personal Information

- Service providers
- Regulatory authorities
- Payment processors

7.5 International Transfers

Personal information may be transferred outside South Africa where necessary, subject to appropriate safeguards.

8. DATA SUBJECT RIGHTS (POPIA SECTIONS 23-25)

Data subjects have the right to:

- Request access to their personal information
- Request correction or deletion of personal information
- Object to processing of personal information

Requests must be submitted in writing to the Information Officer.

9. REQUEST PROCEDURE (PAIA)

9.1 Submission of Requests

Requests must be made using the prescribed form and submitted to the Information Officer.

9.2 Required Information

- Identity of requester
- Description of records requested
- Contact details

9.3 Fees

Applicable request and access fees may be charged in accordance with PAIA.

10. GROUNDS FOR REFUSAL OF ACCESS

Access may be refused on grounds including:

- Protection of privacy of third parties
 - Commercial confidentiality
 - Protection of company operations
 - Legal privilege
-

11. REMEDIES AVAILABLE

If a request is denied, the requester may:

- Lodge a complaint with the Information Regulator
 - Apply to a court for relief
-

12. AVAILABILITY OF THE MANUAL

This manual is available:

- On the company website
 - Upon request from the Information Officer
-

13. SECURITY SAFEGUARDS (SECTION 51(1)(e) PAIA READ WITH POPIA SECTION 19)

Khusela Data Pty Ltd implements appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of personal information and unlawful access to or processing of personal information, including but not limited to:

- Access control measures (role-based access, least-privilege principles, authentication and credential management)
- Network and system security controls (firewalls, endpoint protection, intrusion detection/prevention where appropriate)
- Data protection measures (encryption in transit and at rest where appropriate, secure backups)
- Monitoring and incident response (logging, alerting, and incident management procedures)
- Physical security safeguards for premises and devices
- Vendor and operator due diligence and contractual confidentiality obligations

These measures are reviewed periodically and updated having regard to generally accepted information security practices and procedures which may apply to Khusela Data Pty Ltd.

Nothing in this Manual discloses specific security configurations, architectures, or vulnerabilities.

14. RECORD RETENTION AND DESTRUCTION

Khusela Data Pty Ltd retains records only for as long as is necessary to fulfil the purpose for which the information was collected, or as required or permitted by applicable law, including tax, company, and labour legislation.

14.1 Retention Principles

- Records are retained in accordance with internal retention schedules aligned to legal and operational requirements
- Personal information is not retained longer than necessary for lawful processing purposes
- Different categories of records may be subject to different retention periods

14.2 Destruction and De-identification

- Records are securely destroyed or de-identified when no longer required
- Destruction methods may include secure shredding, permanent deletion, or anonymisation techniques
- Backups are overwritten or securely disposed of in accordance with lifecycle policies

14.3 Legal Holds

Where required, Khusela Data Pty Ltd may suspend destruction of records subject to litigation, investigation, or regulatory requirements.

15. THIRD-PARTY NOTIFICATION PROCEDURES (PAIA SECTIONS 71-74)

Where a request for access is made to a record that contains information about a third party, Khusela Data Pty Ltd will:

15.1 Notification

- Take reasonable steps to inform the third party of the request as soon as reasonably possible, but within the timeframes prescribed by PAIA
- Provide sufficient details to enable the third party to make representations regarding the request

15.2 Representations by Third Party

- Allow the third party a reasonable opportunity to make written or oral representations as to why the request should be refused or granted

15.3 Decision

- Consider all representations received before making a decision
- Notify both the requester and the third party of the decision in writing

15.4 Refusal Grounds

Access may be refused where disclosure would involve:

- Unreasonable disclosure of personal information of a third party
- Disclosure of trade secrets or financial, commercial, scientific, or technical information of a third party
- Disclosure of information supplied in confidence by a third party

15.5 Urgent Requests

In cases of urgency, the Information Officer may apply expedited procedures in accordance with PAIA.

16. FEES (PAIA REGULATION 4 COMPLIANT)

The following fees are applicable to requests for access to records (subject to updates by regulation):

14.1 Request Fee

- A request fee of R140.00 (excluding VAT, if applicable) is payable for non-personal requests.

14.2 Access Fees

Access fees are payable for reproduction and search time, including:

- Photocopies: R2.00 per A4 page
- Printed copies: R2.00 per A4 page
- Electronic copies (USB): R40.00 per device
- Transcription of visual images: R60.00 per page
- Transcription of audio records: R20.00 per page
- Search and preparation time: R145.00 per hour or part thereof



KHUSELA

DATA (PTY) LTD

SMART HOME AUTOMATION
DATA PRIVACY & PROTECTION

14.3 Deposits

Where the search time exceeds 6 hours, a deposit of one-third of the estimated access fee may be required.

14.4 Exemptions

- No request fee is payable for requests for personal records.
 - The Information Officer may waive fees where appropriate.
-

17. ANNEXURE A – FORM 2: REQUEST FOR ACCESS TO RECORD

(As prescribed by the Minister in terms of PAIA)

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

FOR DEPARTMENT/ PUBLIC BODY/ PRIVATE BODY USE

Reference number: _____

PART A: PARTICULARS OF PRIVATE BODY

Name of private body: Khusela Data Pty Ltd

PART B: PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

Full names and surname: _____ Identity number: _____

Postal address: _____

Telephone number: _____ Email address: _____

Capacity in which request is made (if on behalf of another person):

PART C: PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE

(Complete only if request is made on behalf of another person)

Full names and surname: _____ Identity number: _____



KHUSELA

DATA (PTY) LTD

SMART HOME AUTOMATION
DATA PRIVACY & PROTECTION

PART D: PARTICULARS OF RECORD

Provide full particulars of the record to which access is requested:

1. Description of record or relevant part: _____
2. Reference number (if available): _____
3. Any further particulars: _____

PART E: FEES

- A request fee may be payable.
- You will be notified of the amount payable.

PART F: FORM OF ACCESS TO RECORD

Mark the appropriate box with an "X":

- Inspection of record
- Copy of record
- Electronic copy

PART G: PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

Indicate which right is to be exercised or protected:

Explain why the requested record is required: _____

PART H: NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified whether your request has been approved or denied.

Preferred manner of communication:

- Email
- Post

Signed at _____ on this _____ day of _____ 20__

Signature of requester

18. LEGAL DISCLAIMER AND PROTECTION OF PROPRIETARY INFORMATION

This Manual is compiled for compliance with applicable legislation. Nothing in this Manual should be construed as:

- A waiver of any rights to confidentiality or trade secrets
- An admission of availability of any specific record
- Consent to disclosure of proprietary methodologies, algorithms, system architecture, or security measures

Khusela Data Pty Ltd expressly reserves the right to:

- Refuse access to records containing commercially sensitive, confidential, or proprietary information
 - Refuse access where disclosure could reasonably be expected to compromise system security, data integrity, or client confidentiality
 - Require strict verification of identity and authority prior to disclosure
-

Date of Compilation: 04/2026

Last Updated: 04/2026