

# Entelect Software

Registration No.2007/001837/07

## PAIA MANUAL

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

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# 1. List of Acronyms and Abbreviations

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- "CEO" Chief Executive Officer
- "DIO" Deputy Information Officer;
- "IO" Information Officer;
- "Minister" Minister of Justice and Correctional Services;
- "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as amended);
- "POPIA" Protection of Personal Information Act No.4 of 2013;
- "Regulator" Information Regulator; and
- "Republic" Republic of South Africa

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# 2. Purpose of PAIA Manual

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This PAIA Manual is useful for the public to-

- A. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- B. 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;
- C. know the description of the records of the body which are available in accordance with any other legislation;
- D. 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;
- E. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- F. 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;
- G. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- H. know the recipients or categories of recipients to whom the personal information may be supplied;
- I. 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
- J. 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. Overview of Entelect Software (Pty) Ltd

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Entelect Software (Pty) Ltd is a private company conducting business under Enterprise web management and e-commerce applications, Broad based online solutions across all industry verticals and online retail, web, event and recruitment management products. It further supports the constitutional right of access to information and we are committed to provide

you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of South African law.

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## 4. Key contact details for access to information of Entelect Software

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### A. Information Officer

Name: Shashi Hansjee  
Tel: +27 11 994 3300  
Email: [shashi@entelect.co.za](mailto:shashi@entelect.co.za)

### B. Deputy Information Officer

Name: Ryan Naudé  
Telephone: +27 11 994 3300  
Email: [ryan@entelect.co.za](mailto:ryan@entelect.co.za)

### C. National or Head Office

Postal Address: P O Box 239, Melrose Arch, 2076  
Physical Address: Unit 13, 3 Melrose Blvd, Melrose, Johannesburg, 2196  
Telephone: +27 11 994 3300  
Email: [legal@entelect.co.za](mailto:legal@entelect.co.za)  
Website: [www.entelect.co.za](http://www.entelect.co.za)

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## 5. Guide on how to use PAIA and how to obtain access to this guide

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- A. 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.
- B. The Guide is available in each of the official languages and in braille.
- C. The aforesaid Guide contains the description of-
1. the objects of PAIA and POPIA;
  2. the postal and street address, phone and fax number and, if available, electronic mail address of-
    - the Information Officer of every public body, and
    - 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>;
  3. the manner and form of a request for-
    - access to a record of a public body contemplated in section 111; and
    - access to a record of a private body contemplated in section 502;
  4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
  5. the assistance available from the Regulator in terms of PAIA and POPIA;
  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-
    - an internal appeal;
    - a complaint to the Regulator; and
    - 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;

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<sup>1</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>2</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.

7. the provisions of sections 14<sup>3</sup> and 51<sup>4</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
8. the provisions of sections 15<sup>5</sup> and 52<sup>6</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - the notices issued in terms of sections 22<sup>7</sup> and 54<sup>8</sup> regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 92<sup>9</sup>.
9. 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.
10. The Guide can also be obtained-
  - upon request to the Information Officer;
  - from the website of the Regulator (<https://info regulator.org.za/>).
  - The Guide is also available for inspection at the office of the Information Regulator South Africa, JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
11. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-  
English and Afrikaans

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<sup>3</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>4</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>5</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>6</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>7</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>8</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>9</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

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## 6. Categories of records of Entelect Software which are available without a person having to request access

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Entelect Software (Pty) Ltd has not published a voluntary notice in terms of Section 52(2) of the Act. It should be noted that certain information in the form of marketing brochures, advertising material and other public communication could be made available from time to time.

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## 7. Description of the records of Entelect Software which are available in accordance with any other legislation

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Information is available in terms of the following legislation, to the persons and or entities specified in such legislation:

- Companies Act 71 of 2008.
- Compensation for Occupational Injuries and Diseases Act 130 of 1993.
- Income Tax Act 58 of 1962.
- Value Added Tax Act 89 of 1991.
- Labour Relations Act 66 of 1995.
- Basic Conditions of Employment Act 75 of 1997.
- Employment Equity Act 55 of 1998.
- Skills Development Levy Act 9 of 1999.
- Unemployment Insurance Act 63 of 2001.

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## 8. Description of subjects on which Entelect Software holds records and categories of records

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### A. Internal records

These records refer to Entelect Software (Pty) Ltd own affairs and that of its divisions, subsidiary and associated companies, if such exists:

- Constitutional Documents.
- Financial records.
- Annual financial statements.

- Accounting records.
- Asset registers.
- Banking records.
- Invoices.
- Rental agreements.
- Tax returns.
- Operational records.
- Licences.
- Intellectual property.
- Marketing records.
- Statutory records.
- Internal policies and procedures.

#### B. Personnel records:

Personnel refer to any person who works for or provides services to or on behalf of Entelect

Software (Pty) Ltd and receives or is entitled to receive any remuneration or assist in carrying out or conducting the business of Entelect Software (Pty) Ltd. This includes without limitation the directors, executive directors, non-executive directors, permanent, temporary or part-time staff, to include contract workers. The records include the following:

- Any personal records provided by personnel.
- Any record in relation to personnel provided by a third party.
- Conditions of employment and contractual related records.
- Internal evaluation records.
- Disciplinary codes.
- Disciplinary records.
- Employment contracts.
- Employment equity plans.
- Medical Aid records.
- Salary records.
- Training manuals.
- Training records.

#### C. Customer records:

We are dedicated to protect the confidential information of our customers. Should any of these records be requested you will be required to carefully motivate such request, having regard to Sections 63 and 67 of the Act, which deals with the protection of third-party information. These records include the following:

- Any records historically provided by a customer or a third party acting for or on behalf of such customer.



- Contractual information.
- Customer needs assessments.
- Personal records of customers.
- Credit information and other research relating to a customer.
- Customer evaluation records.
- Customer profiling.
- Performance research conducted on behalf of customers or about customers.
- Records generated by us, pertaining to customers, to include transactional records.

#### D. Other Parties:

Records are kept in respect of other parties, to include, without limitation contractors, suppliers, service providers and general market conditions. Such records which belong to Entelect Software (Pty) Ltd may be in the possession of other parties. These records include the following:

- Personnel or customer records which are held by another party.
- Records held, pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, records provided by such other party and records about contractors, suppliers or customers, provided by third parties.

#### E. Other Records:

These records include the following:

- Information relating to Entelect Software (Pty) Ltd own commercial activities.
- Research carried out on behalf of a client or commissioned by a customer.

#### F. Records in terms of the Companies Act 71 of 2008:

- Documents of incorporation.
- Minutes of meeting from the Board of Directors.
- Records reflecting the appointment of directors, auditor, company secretary, prescribed officer, or any other officer in as far as such records are applicable.
- Register of shareholders and other statutory registers.

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## 9. Processing of Personal Information

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#### A. Purpose of Processing Personal Information

- To support sales and marketing activities
- To support recruitment and management of staff
- To support engagement with suppliers

- To support engagement with the general public
  - To support engagement with investors and the media
- B. Description of the categories of Data Subjects and of the information or categories of information relating thereto
- Customers: record of customer life cycle
  - Employees: record of employee life cycle
  - Suppliers: record of supplier life cycle
  - General public: tracking general enquiries and web site visits
  - Investors: records as maintained by the Company Secretary
  - Media: records of media interactions
- C. The recipients or categories of recipients to whom the personal information may be supplied
- Statutory authorities
  - Law enforcement
  - Tax authorities
  - Financial institutions
  - Medical schemes
  - Employee pension and provident funds
  - Industry bodies
- D. Planned transborder flows of personal information
- Flows to service providers/operators
  - Flows to business partners
  - Flows to customers
  - Flows to suppliers
  - Flows through the use of social media
- E. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information
- Physical security measures
  - Cyber security measures
  - Training in information security
  - Policies in information security
  - Audits of information security
  - Any particular security framework implemented

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## 10. Detail on how to make a request for access

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The requester must complete Form o2 available at <https://inforegulator.org.za/paia-forms/> and submit this form together with a request fee, to the head of Entelect Software. The form must be submitted to the head of Entelect Software at his address or electronic mail address as stated earlier in this manual.

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## 11. Grounds for refusing a request

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Entelect Software has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

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## 12. Availability of the Manual

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A. A copy of the Manual is available-

- on [www.entelect.co.za](http://www.entelect.co.za)
- head office of Entelect Software for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

B. 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.

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## 13. Updating of the Manual

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The head of Entelect Software (Pty) Ltd will on a regular basis update this manual as required, at least on an annual basis.

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## 14. Issued by

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Shashi Hansjee

Chief Executive Officer