



DAISY BUSINESS SOLUTIONS PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to
Information Act2 of 2000 (as amended)

TABLE OF CONTENTS

Contents

1.	LIST OF ACRONYMS AND ABBREVIATIONS	3
2.	PURPOSE OF PAIA MANUAL.....	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DAISY.....	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	4
5.	CATEGORIES OF RECORDS OF DAISY WHICHARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	7
6.	DESCRIPTION OF THE RECORDS OF DAISY WHICHARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	7
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DAISY	8
8.	PROCESSING OF PERSONAL INFORMATION.....	8
8.2	Description of the categories of Data Subjects and of the information or categories of information relating thereto.....	9
8.3	The recipients or categories of recipients to whom the personal informationmay be supplied	9
8.4	Planned transborder flows of personal information.....	10
	Daisy does not transfer any personal information to parties outside the Republic of South Africa. All personal information processed by Daisy is stored and retained within South Africa, and no cross-border data transfers take place.....	10
8.5	General description of Information Security Measures to be implemented by the party responsible to ensure the confidentiality, integrity and availability ofthe information	10
9.	AVAILABILITY OF THE MANUAL	10
10.	UPDATING OF THE MANUAL.....	10

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 "CEO"	Chief Executive Officer
1.2 "DIO"	Deputy Information Officer;
1.3 "Daisy"	means Daisy Business Solutions
1.4 "IO"	Information Officer;
1.5 "Minister"	Minister of Justice and Correctional Services;
1.6 "PAIA"	Promotion of Access to Information Act No. 2 of 2000(asAmended;
1.7 "POPIA"	Protection of Personal Information Act No. 4 of 2013;
1.8 "Regulator"	Information Regulator; and
1.9 "Republic"	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 recordsand 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 Regulatorand 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.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DAISY

3.1. Managing Director:

Name: James Durand
Tel: 011 244 5000
Email: jamesd@daisy.co.za

3.2. Deputy Information Officer:

Name: Reinhardt Oborn
Tel: 011 244 5240
Email: reinhardt.oborn@daisy.co.za

3.3 Access to information general contacts:

Email: info@daisy.co.za

3.4 Head Office:

Postal Address: 16 Peter Place, Bryanston, Sandton, 2191.
Physical Address: 16 Peter Place, Bryanston, Sandton, 2191.
Telephone: 011 244 5000
Email: info@daisy.co.za
Website: www.daisysolutions.co.za

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 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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-
 - 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 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain

¹ 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*

² 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.*

³ 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.*

⁴ 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.*

⁵ 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.*

⁶ 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.*

access to a manual;

4.3.8. the provisions of sections 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

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
[\(https://www.justice.gov.za/inforeg/\)](https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available English and Afrikaans, for public inspection during normal office hours.

⁷ 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*

⁸ 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*

⁹ 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.*

¹⁰ 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.*

¹¹ 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.”*

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

In terms of section 51(1)(c) of PAIA, the following categories of records are automatically available from Daisy Group without the need to submit a formal PAIA request (Form C). These records may be accessed via the Daisy website or may be requested informally via email or telephone.

Category of Records	Types of the Record	Available on Website	Available upon request
Company Information	Company profile, overview, history, business divisions	X	X
Contact Information	Office locations, telephone numbers, email addresses	X	X

6. DESCRIPTION OF THE RECORDS OF DAISY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

In terms of section 51(1)(d) of PAIA, a private body is required to list the categories of records that are created and maintained in accordance with any other legislation that applies to it.

The inclusion of a record in this section does not imply that access to such record will be granted. Access remains subject to the applicable grounds for refusal under PAIA, POPIA, and any other relevant legislation.

The following records are created and retained by Daisy in accordance with the legislation listed below:

Category of Records	Applicable Legislation
Company Statutory Records	Companies Act 71 of 2008
Tax and Financial Records	Income Tax Act, Vat Act, Tax Administration Act
Employee and HR Records	BCEA, LRA, UIF
Occupational Health and Safety Records	OHS Act
PAPIA and PAIA compliance documents	POPIA, PAIA
B-BBEE Compliance Records	B-BBEE Act

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DAISY

Daisy maintains records on various subjects relating to the operation of the business. The categories of records listed below are held for operational, statutory, financial, human resources, compliance, and administrative purposes.

Listing a record category does not imply that access will be granted. Access remains subject to the applicable grounds for refusal in PAIA and POPIA.

Subjects on which the body holds records	Categories of records
Governance	Company Documents, policies and resolutions
Finance	Accounting records, invoices, tax records
HR	Employee Files, HR Policies, Contracts
Operations and Procurement	Service Records, projects Installs, Supplier Info
Sales	Sales Proposals and Marketing Documents
Legal	Contracts, Compliance, Litigious Records
IT	Asset Register, System Logs
H&S	OHAS Documentation

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Daisy processes personal information in the course of operating its business and fulfilling its statutory, contractual, and operational obligations. Personal information is processed for the following purposes:

- To onboard, verify and maintain customer and supplier relationships
- To provide services, installations, maintenance, and support
- To manage employee relations, payroll, recruitment, and HR administration
- To comply with legislative and regulatory requirements
- To process payments, invoices, billing, and credit control
- To manage contracts and service-level agreements
- For security, access control, and fraud prevention
- For business administration, reporting, analytics, and service improvement
- For communication with employees, customers, suppliers, and stakeholders

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categorie s of Data Subjects	Personal Information that may be processed
Customers /Clients	Names; contact details; company registration numbers; identity numbers; VAT details; physical addresses; billing information; bank details; service history; account information
Service Providers	Names; company details; registration and VAT numbers; contact details; bank details; B-BBEE information; contractual information
Employees	Names; identity numbers; contact details; residential address; employment history; qualifications; next-of-kin details; medical information (only where legally required); payroll and benefits information; disciplinary records
Job Applications	CVs; qualifications; employment history; references; identity numbers; contact details
Visitors to premises	Names; ID numbers; vehicle registration; CCTV footage; access control logs
Website and System Use	IP address; online identifiers; login details; user activity logs; device information

8.3 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 numbers, criminal checks	South African Police Service (SAPS), accredited background check providers
Qualifications	South African Qualifications Authority (SAQA); accredited verification agencies
Credit and payment history	Registered Credit Bureaus
Employee payroll information	SARS; UIF; Compensation Fund; Pension/Provident Fund Administrators; Medical Aid providers
Customer financial information	Banks; authorised payment processors
Supplier and customer details	Auditors; regulatory authorities (where required by law)
System usage data & access logs	IT service providers; cybersecurity providers; system administrators

8.4 Planned transborder flows of personal information

Daisy does not transfer any personal information to parties outside the Republic of South Africa. All personal information processed by Daisy is stored and retained within South Africa, and no cross-border data transfers take place.

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

Daisy implements appropriate, reasonable technical and organisational security measures to protect personal information, including:

- Firewalls, endpoint protection, anti-virus and anti-malware solutions
- Encryption of data at rest and in transit (where applicable)
- Multi-factor authentication (MFA) for system access
- Password protection and access control based on least privilege
- Regular data backups and secure offsite storage
- Physical security measures (access control, visitor sign-in, CCTV)
- Role-based access management for employees
- Secure destruction of records no longer required
- Employee training on POPIA and information security
- Data processing agreements with third-party operators
- Ongoing monitoring, audits, and vulnerability management

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on <https://daisysolutions.co.za/>, if any;
- 9.1.2 head office at 16 Peter Place, Bryanston, 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. The full Fees Schedule can be found under Annexure A of this Document

10. UPDATING OF THE MANUAL

The Information Officer of Daisy will update this manual on a regular basis.

Issued by



JAMES DURAND
MANAGING DIRECTOR DAISY BUSINESS SOLUTIONS

ANNEXURE A

Private Body Fees

Item	Description	Amount
1.	Request fee, payable by every requester	R140.00
2.	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3.	Printed copy of A4-size page	R2.00 per page or part of the page
4.	For a copy in a computer-readable form on: <ul style="list-style-type: none"> • a flash drive (provided by the requester) • a compact disc (CD) if the requester provides the CD to us • a compact disc (CD) if we give the CD to the requester 	R40.00 R40.00 R60.00
5.	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6.	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	For a copy of an audio record on a flash drive (provided by the requester) For a copy of an audio record on compact disc (CD) if the requester provides the CD to us For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9.	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure The search and preparation fee cannot exceed	R145.00 R435.00
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

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 page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD *(Mark the applicable box with an "X")*

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of record on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of record on compact disc drive(<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

Indicate which right is to be exercised or protected	

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

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer