

## PAIA MANUAL

EFFECTIVE DATE: 18 MARCH 2026

VERSION: 3

### 1. General

This manual explains how SAVA Technologies (Pty) Ltd (SAVA) complies with the Promotion of Access to Information Act (PAIA), enabling transparent access to certain company records.

All requests for access to records in terms of PAIA must be in writing in terms of this PAIA Manual and must be addressed at the contact details below.

This PAIA Manual may be updated periodically, with amendments published on our website.

### 2. Contact Details

Information Officer: Kolawole Olajide

Deputy Information Officer: Oboikanyo Kekana

Postal address: 3 Alice Lane, 4th Floor, Sandton, Gauteng, South Africa, 2196

Physical address: 3 Alice Lane, 4th Floor, Sandton, Gauteng, South Africa

Email: hello@sava.africa

### 3. Guides

In terms of Section 10 of PAIA (as amended), the South African Human Rights Commission (SAHRC) initially published a guide to assist individuals in exercising their rights under PAIA. This guide has since been revised and updated by the Information Regulator. Its purpose is to provide the necessary information to any person wishing to exercise their right of access to records under PAIA.

Copies of PAIA and the relevant regulations and guides to this act, can be obtained from the SAHRC or the Information Regulator and queries should be directed to:

**The South African Human Rights Commission:**

Phone number: +27 (11) 877 3600

E-mail: [complaints@sahrc.org.za](mailto:complaints@sahrc.org.za)

Website: <http://www.sahrc.org.za>

**The Information Regulator (South Africa):**

Phone number: +27 (0)10 023 5200

E-mail: [POPIAComplaints@inforegulator.org.za/](mailto:POPIAComplaints@inforegulator.org.za/)

[PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)

Website: <https://inforegulator.org.za/>

#### **4. Records Availability**

4.1 These records are openly accessible and do not require a request:

- Promotional and marketing materials intended for public distribution.
- General information relating to SAVA products and services publicly available on our website.

4.2 These types of records require submission of a formal request before access can be granted, under PAIA:

- Customer records:-
  - I. Records submitted by customers or third parties acting on their behalf.
  - II. Records created by SAVA relating to customer transactions, account details, or service usage.
- Private records:-
  - I. Internal company policies and procedures.
  - II. Financial and operational documents.
  - III. Databases and IT system information.
  - IV. Internal and external correspondence.
  - V. Records maintained in compliance with statutory obligations.

## 5. Legislation Applicable to Records Retention

We retain records as required by relevant legislation, including but not limited to:

- Protection of Personal Information Act, 4 of 2013
- Basic Conditions of Employment Act, 75 of 1997
- Companies Act, 71 of 2008
- Financial Intelligence Centre Act, 38 of 2001
- Labour Relations Act, 66 of 1995
- Value-Added Tax Act, 58 of 1962

## 6. POPIA

SAVA complies with both the PAIA and the Protection of Personal Information Act (POPIA) in all its record-keeping and disclosure practices. While PAIA is designed to promote transparency and access to information, POPIA focuses on protecting personal information and preventing unauthorized disclosure. This integrated approach fosters both accountability and privacy protection in our operations.

In the course of business, personal information may be shared with certain authorized recipients or third parties, but always on a need-to-know basis and in line with POPIA's conditions for lawful processing. Such recipients might include service providers or contractors who assist in our operations, affiliated business partners, or regulators and authorities when we are legally compelled to do so. Importantly, any third party handling personal data on SAVA's behalf is contractually obligated to protect that information. We only disclose personal data to third parties under proper agreements that ensure confidentiality and compliance with data protection laws.

### 6.1 Information Security Measures

We maintain robust technical and organizational security measures to protect personal information under our control. SAVA has implemented measures such as two-factor authentication, access controls, encryption, secure data storage and regular monitoring of our systems to prevent loss, unauthorized access or misuse of personal data. In accordance with our policy, personal data is treated as confidential and safeguarded to ensure its integrity and availability. We continually assess and update our security practices to address new threats and to remain compliant with POPIA's requirement to keep personal information secure.

SAVA has implemented a comprehensive Privacy Policy that governs how we collect, use, store and share personal information. For more detailed information, the full SAVA Privacy Policy is available on our website at: <https://sava.africa/notice-of-privacy>

## 7. Access Request

There are two different types of requesters:

### 1. Personal requesters

Personal requester is a requester who is seeking access to a record that relates to their personal information.

### 2. Other requesters

Other requester is a requester who is seeking access to a record that relates to third parties.

The requester must fulfil the prerequisite requirements for access in terms of PAIA before SAVA will consider a request for access to records.

If a public body lodges a request, the public body must be acting in the public interest and provide details of the public interest that it is seeking to protect.

To obtain access to SAVA records under PAIA, a requester must follow these steps:

- **Submit a formal request:** Complete the prescribed PAIA request form and submit it to SAVA's Information Officer via email at [hello@sava.africa](mailto:hello@sava.africa). The request must be in writing and comply with PAIA's procedural requirements.
- **Provide required details:** Ensure the request form contains sufficient detail to identify the specific record(s) being requested, proof of the requester's identity, the preferred form of access (e.g. paper copy, electronic copy, or inspection), and the requester's postal or email address for correspondence.
- **State the purpose (Right exercised or protected):** Indicate which right you seek to exercise or protect by obtaining the information, and explain why the requested record is necessary for exercising or

protecting that right (PAIA requires this information for requests to private bodies).

- **If applicable – third-party or representative requests:** If you are making the request on behalf of someone else, clearly state this and provide proof of your authority or capacity to act for that person (for example, a power of attorney).
- **Pay the prescribed fee:** Pay the required request fee (if applicable) and any other applicable fees. SAVA will not begin processing the request until any prescribed fee is paid in full.

PAIA provides for two types of fees, namely:

1. a request fee, which will be a standard fee; and
2. an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs.

## 8. Decision

SAVA will, within 30 calendar days of receiving a valid PAIA request and any applicable fees, decide whether to grant or refuse access to the requested record. The requester will be notified of the outcome via email. Where applicable, reasons for the decision will be provided. This 30-day period may only be shortened in exceptional circumstances as permitted under the Act.

The 30-day period may also be extended by a further period not exceeding 30 calendar days in instances where:

- The request involves a large volume of information, or
- Consultation is required within different divisions of SAVA, or with another private body, and
- The information cannot reasonably be obtained within the original period.

Should an extension be necessary, SAVA will notify the requester using the contact method specified above.

## 9. Appeals Procedure

- **Internal procedure:** SAVA does not have internal appeal procedures. As such, the decision made by the information officer is final, and the requester will have to exercise external remedies at their disposal if the request for information is refused and the requester is not satisfied with the answer supplied by the information officer.
- **External appeal:** A requester who is dissatisfied with an information officer's refusal to disclose information may, within 180 days of notification of the decision, apply to the Information Regulator for relief. The requester may also submit a court application **within 30 days** of the notification of SAVA's refusal decision. The court may then review the matter and, if justified, order that the requested record be made available or grant other appropriate relief in accordance with PAIA.

All appeals should be initiated promptly. By following this procedure, requesters ensure compliance with PAIA and enable SAVA to handle access requests and any appeals in an efficient, lawful manner.

Where a requester submits a complaint to the SAVA and the requester is not satisfied with the outcome, or if the complaint is not resolved, the requester may lodge a complaint with the National Financial Ombud Scheme (NFO).

## 10. Third-party records

Where a requester has requested access to information of a third-party, the third-party concerned must be given 21 days:

- to make representations to refuse access; or
- to give written consent for the disclosure of the record to the requester.

## 11. Records not found

If all reasonable steps have been taken to find a record and such record cannot be found or the record does not exist, then SAVA will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

The affidavit or affirmation will provide a full account of all the steps taken to find the record or determine its existence, including details of all communications by us with every person who conducted the search. The above notice will be regarded as a decision to refuse a request for access.

**Appendix A: Request For Access To Record Form -FORM 2**

**REQUEST FOR ACCESS TO RECORDS [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.

Once completed, kindly email the form to: hello@sava.africa

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 ( <i>when made on behalf of another person</i> )				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel:		Tel (w)	
	Cell:			

Full names of person/entity on whose behalf request is made (if applicable):	
Identity Number/Registration Number	
Postal Address	
Street Address	
E-mail Address	
Contact Number(s)	

<b>PARTICULARS OF RECORD REQUESTED</b>	
<p><i>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.)</i></p>	
Description of record or relevant part of the record:	

Reference number, if available	
Any further particulars of record	

<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>	
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 is held on a computer or in an electronic, or machine-readable form	

<b>FORM OF ACCESS</b>	
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> )	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body ( <i>including listening to recorded words,</i>	

<i>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	
E-mail of information	
Cloud share/file transfer	
Preferred language: <i>(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)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>  <i>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.</i>	
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				
<p>a) A request fee must be paid before the request will be considered.                      b) You will be notified of the amount of the access fee to be paid.                      c) 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.                      d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</p>				
Reason	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> </table>			

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	Email address	Alternative electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 2025

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*Signature of Requester /*  
*Person on whose behalf request is made*