

MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT NO. 2 OF 2000)

For

Diggi Technologies (Pty) Ltd

(Registration Number: 2021/001073/07)

"the Company"

Last Updated: October 26, 2023

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1. Introduction

This Manual is published in compliance with Section 51 of the Promotion of Access to Information Act (PAIA), Act 2 of 2000.

The aim of PAIA is to give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights.

This Manual is intended to assist potential Requesters in understanding the functions and records of Diggi Technologies (Pty) Ltd and the procedure to be followed when requesting access to such information.

2. Contact Details

Head of the Company: Diggi Technologies (Pty) Ltd

Information Officer:

- **Name:** Jonathan Theron
- **Email:** info@webapps.solutions
- **Physical Address:** 12 Andries Bruyn Street, Horizon, Roodepoort, 1724

Deputy Information Officer: [To be appointed if applicable, otherwise state "None"]

3. The South African Human Rights Commission (SAHRC)

The SAHRC has compiled a comprehensive guide containing all the information a Requester would need to understand PAIA and how to exercise their rights under the Act. For details on the prescribed fees and the forms to be used when making a request, please refer to the SAHRC's guide.

Any queries regarding this guide should be directed to the SAHRC.

Contact the SAHRC:

- **PAIA Unit:** The South African Human Rights Commission
- **Physical Address:** 33 Hoofd Street, Braampark, Forum 3, Braamfontein, Johannesburg, 2001
- **Postal Address:** Private Bag 2700, Houghton, 2041
- **Telephone:** +27 11 877 3600
- **Fax:** +27 11 403 0625
- **Website:** www.sahrc.org.za
- **Email:** paia@sahrc.org.za

4. A Guide on How to Use PAIA

A comprehensive guide on how to use PAIA is available from the SAHRC, as noted in Section 3 above. The guide details the procedure, prescribed fees, and forms for submitting a request.

5. Records Available in Accordance with Other Legislation

As applicable, and subject to the provisions of PAIA, Diggi Technologies (Pty) Ltd may hold records in accordance with the following legislation (this is not an exhaustive list):

- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Employment Equity Act, No. 55 of 1998
- Basic Conditions of Employment Act, No. 75 of 1997
- Labour Relations Act, No. 66 of 1995

- Skills Development Act, No. 97 of 1998
- Skills Development Levies Act, No. 9 of 1999
- Unemployment Insurance Act, No. 63 of 2001
- Income Tax Act, No. 58 of 1962
- Value-Added Tax Act, No. 89 of 1991
- Electronic Communications and Transactions Act, No. 25 of 2002
- Protection of Personal Information Act, No. 4 of 2013

6. Subjects and Categories of Records Held by the Company

Diggi Technologies (Pty) Ltd holds records pertaining to its business operations. The following is a non-exhaustive list of record categories. Please note that access to many of these records may be subject to specified grounds for refusal as outlined in PAIA.

Subject / Category	Description of Records
Corporate Records	Memorandum of Incorporation (MOI); Minutes of Board and Shareholder Meetings; Share Register; Company Statutory Forms; Company Policies.
Financial Records	Annual Financial Statements; Invoices; Tax Returns (Income Tax, VAT); Bank Account Details; Asset Register; Auditors' Reports.
Human Resources	Employment Contracts; Policies & Procedures (Disciplinary, Grievance, etc.); Employee Personal Records; Payroll Information; Leave Records; Training Records; UIF & COIDA Documentation.
Client & Project Records	Client Contracts and Agreements; Proposals and Quotations; Project Specifications and Documentation; Communication Records; Invoices and Payment Records.

Subject / Category	Description of Records
IT and Systems	System Logs; Data Backup Records; Software Licenses; IT Security Policies; Network Infrastructure Details; Website and Application Data.
Internal Communication	Internal Memos, Reports, and Emails related to company operations and decision-making.
Marketing	Marketing Strategies; Branding Material; Advertising Records.
Legal & Compliance	Insurance Policies; Service Level Agreements (SLAs); License Agreements; Compliance Reports.

7. Request Procedure

A Requester must complete the prescribed Form C (for public bodies) or a written request containing sufficient detail to enable the Information Officer to identify the record(s) and the Requester.

The request must be submitted to the Information Officer at the contact details provided in Section 2 and must include:

1. The Requester's full name, contact details, and ID number.
2. Proof of capacity, if applicable (e.g., proof of guardianship if requesting on behalf of another person).
3. A clear description of the record(s) requested, providing sufficient detail to enable the Information Officer to identify the record(s).
4. The form of access required (e.g., copy, inspection).
5. The preferred language for the response, if applicable.
6. The Requester's right to be exercised and the reason the record is required to exercise that right.

The Information Officer will respond to the request within 30 days of receipt, notifying the Requester of:

- The decision on the request.
- The fees payable (if any).
- The right to lodge an internal appeal or external application with a court, as applicable.

8. Fees

A Requester other than a personal requester (a person requesting information about themselves) is liable for the payment of a request fee and a deposit (if applicable), as well as for the reproduction and search fees prescribed by the Regulations under PAIA.

The current prescribed fee structure is available from the SAHRC. The Information Officer will provide the Requester with a fees notice detailing the applicable fees. The request will be processed only upon payment of the request fee and any required deposit.

9. Grounds for Refusal of Access

Access to a record may be refused under certain circumstances as outlined in Chapter 4 of PAIA. These grounds include, but are not limited to:

- Protecting personal information of a third party from unreasonable disclosure.
- Protecting commercial information of a third party (e.g., trade secrets, financial, or commercial information).
- Protecting confidential information of a third party supplied under a duty of confidence.
- Protecting the safety of individuals and the security of property and methods.
- Privileged information from legal proceedings.
- Frivolous or vexatious requests, or requests which would involve an unreasonable diversion of resources.

The Information Officer will provide the Requester with adequate reasons for any refusal.

10. Remedies Available upon Refusal of a Request

If a request is refused, the Requester has the right to:

1. **Internal Appeal:** Submit an internal appeal to the relevant authority within the Company, if applicable. The decision letter will outline this process.

2. **Application to Court:** Apply to a competent court for relief within 180 days of becoming aware of the decision.
3. **Complaint to the SAHRC:** Lodge a complaint with the SAHRC.

Disclaimer: This Manual is intended as a guide and does not constitute legal advice. The procedures and obligations under PAIA are subject to change, and Diggi Technologies (Pty) Ltd reserves the right to amend this manual as necessary to ensure compliance with the Act.

End of Manual