



CUBIX PAIA MANUAL

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

DATE OF COMPILATION: 02/09/2025

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TABLE OF CONTENTS

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“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 records and 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 Regulator and 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 CUBIX

3.1. Chief Information Officer

Name: Richard Gerry
Tel: +27(0) 31 582 8366 / 0860 33 33 43
Email: POPIA_Complaints@cubix.co.za
Fax number: NA



- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Shaun Naidoo
Tel: 086 033 3343
Email: POPIA_Complaints@cubix.co.za
Fax Number: NA

- 3.3 Access to information general contacts

Email: POPIA_Complaints@cubix.co.za

3.4 National or Head Office

Postal Address: 62 Umhlanga Ridge Blvd, Umhlanga Ridge, uMhlanga, 4319
Physical Address: 62 Umhlanga Ridge Blvd, Umhlanga Ridge, uMhlanga, 4319
Telephone: 0860 333 343
Website: www.cubix.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-

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.*

- 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 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.

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.

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.”

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/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English / Zulu

5. CATEGORIES OF RECORDS OF THE INFORMATION OFFICER WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon Request
	Electronic Communications and Transactions Act, 2002		X
	Conversion of SASRIA Act, 1998		X
	Income Tax Act, 1962		X
	Insider Trading Act, 1998		X
	National Credit Act, 2005		X
	Short Term Insurance Act, 1998		X
	Stamp Duties Act, 1968 (repealed)		X
	Statistics Act, 1999		X
	Value-Added Tax Act, 1991		X
	Tobacco Products Control Act, 1993		X
	Basic Conditions of Employment Act, 1997		X
	Compensation for Occupational Injuries and Diseases Act		X
	Employment Equity Act, 1998		X
	Labour Relations Act, 1995		X
	Manpower Training Act, 1981 (repealed)		X
	Occupational Health and Safety Act, 1993		X
	Skills Development Act, 1998		X
	Skills Development Levies Act, 1999		X
	Unemployment Insurance Act, 2001		X
	Unemployment Insurance Contributions Act, 2002		X

	Regional Services Councils Act, 1985		X
	Broad Based Black Economic Empowerment Act, 2003		X
	Companies Act, 1973		X
	Companies Act, 2008		X
	Competition Act, 1998		X
	Consumer Affairs Act (Unfair Business Practices) Act, 1988		X
	Consumer Protection Act, 2008		X
	Consumer Affairs Reports		X
	Copyright Act, 1978		X
	Trade Marks Act, 1993		X
	Long Term Insurance Act, 1998		X
	Medical Schemes Act, 1998		X
	Financial Intelligence Centre Act, 2001		X
	Financial Advisory and Intermediary Services Act, 2002		X
	National Environmental Management: Waste Act, 2008		X
	Protection of Personal Information Act, 2013		X

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

Category of records	Types of the Record	Available on Website	Available upon Request
	Statutory company information I. Certificate of incorporation; II. Certificates of Change of Name (if any); III. Memorandum and Articles of Association; IV. Minute book, CM25 and CM26, as well as Resolutions passed at general meetings; V. Proxy forms; VI. Register of Shareholders; VII. Register of Director's shareholdings; VIII. Register of Directors and Certain Officers; IX. Annual Financial Statements including; a) Annual accounts b) Director's reports		X

	b) Auditors reports		X
	I. Books of account regarding information required by the Companies Acts 71, 2008;		
	II. Supporting schedules of books of account and ancillary books of accounts;		
	c) Accounting records		X
	I. Books of accounts including journals and ledgers		
	d) Taxation		X
	I. Copies of all Income Tax Returns and other tax returns and documents		
	e) Agreements and Contracts		X
	f) Acquisition or disposal documentation		X
	g) Contracts and agreements		X
	h) Customer information		X

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

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

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

According to POPIA, data processing must be done for a specific reason. The reason that Cubix processes data will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected by Cubix. Security and privacy requirements are outlined in Cubix's Privacy policy (available online).

A data subject may object, at any time, to the processing of personal information by Cubix, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.

The data subject must complete the prescribed form attached as Appendix 2 and submit it to the Information Officer at the postal, physical address or electronic mail address set out above.

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

Generally, personal information is processed during on boarding of suppliers, business partners and clients as well as for records management, service or product delivery, security, employment and related matters. This list is not exhaustive.

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Generally, personal information is may be supplied to service providers. suppliers, business partners and relevant regulatory authorities.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

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

Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Antivirus and Anti-malware Solutions.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.cubix.co.za , if any;

9.1.2 head office of Cubix 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.

10. UPDATING OF THE MANUAL

The head of Cubix will on a regular basis update this manual.

Issued by

RICHARD GERRY

CHIEF INFORMATION OFFICER