

PAIA MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 ("PAIA")

(As amended by the Protection of Personal Information Act, 4 of 2013)

1. INTRODUCTION TO CLOUDGATE CONSULTING

CloudGate Consulting is a professional services company providing strategic, compliance, and operational consulting to clients across a range of industries. The company is committed to openness, transparency, and the responsible protection and processing of personal information.

2. CONTACT DETAILS – INFORMATION OFFICER

Name of Business CloudGate Consulting

Information Officer Thinus Nortje

Email Address thinus@cgnet.co.za

Physical Address 3245 Starling Avenue, Parys, 9585

Website www.cgnet.co.za

The Information Officer is appointed in accordance with the provisions of PAIA and POPIA and is responsible for ensuring compliance with the Acts.

3. THE ACT AND OBJECTIVES OF THE MANUAL


This manual is prepared in terms of **Section 51 of PAIA**, as amended, and includes references to the **Protection of Personal Information Act (POPIA)** where applicable.

The purpose of this manual is to promote the right of access to information, facilitate requests, and provide guidelines on how such requests should be made in line with the applicable legislation.

4. GUIDE ON HOW TO USE PAIA

The South African Human Rights Commission (SAHRC) previously compiled a guide to assist individuals on how to exercise their rights under PAIA. This function has now transferred to the **Information Regulator**, which publishes updated guidance on:

- What PAIA is
- How to make requests
- Assistance available to requesters

The guide is available on the Information Regulator's website:
 <https://www.inforegulator.org.za>

You may contact the Regulator for further guidance at:
PAIAComplaints@inforegulator.org.za / +27 (0)10 023 5207

5. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52)

At present, the following categories of records are automatically available and do not require a formal request:

- Company profile and background
- Marketing and promotional materials
- Published reports and general company information on website

6. RECORDS HELD BY CLOUDGATE CONSULTING

CloudGate Consulting holds the following categories of records, which may be requested in accordance with the Act:

6.1 Company Records

- Registration documents
- Financial statements
- Tax records
- Company resolutions
- Statutory registers

6.2 Personnel Records

- Employment contracts
- Payroll information
- Leave records
- Disciplinary proceedings
- Training records

6.3 Client-Related Records

- Client agreements
- Communication and correspondence
- FICA documentation
- Due diligence records

6.4 Operational Records

- Project documentation
- Compliance frameworks
- Reports and assessments

6.5 Information Technology

- System logs
- Security protocols
- User access records

6.6 POPIA Compliance Records

- PAIA Manual
- Consent forms
- Privacy policies
- Information sharing agreements
- Security safeguards documentation

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

CloudGate Consulting processes personal information for the following purposes:

- Client onboarding and service delivery
- Employment and HR administration
- Legal and regulatory compliance (e.g., FICA, PAIA, POPIA)
- Communication with clients, staff, and stakeholders
- Risk assessments and due diligence

8. DATA SUBJECT CATEGORIES AND PERSONAL INFORMATION TYPES

Data Subjects:

- Clients
- Employees
- Prospective clients and employees
- Suppliers and third parties

Types of Information Processed:

- Names, ID numbers, contact details
- Banking and financial details
- Employment history
- Compliance and KYC documents
- Email and communication records

9. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be shared with:

- Regulatory authorities (e.g., FIC, SARS, Information Regulator)
- Service providers subject to confidentiality
- Legal or compliance consultants
- Financial institutions (when relevant)

10. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

CloudGate Consulting implements appropriate technical and organisational measures to ensure the integrity and confidentiality of all personal information, including:

- Access control and authentication
- Data encryption
- Regular vulnerability assessments

- Information security policies and training

11. PROCEDURE TO REQUEST ACCESS TO INFORMATION

Requests must be made on the prescribed form (Form 2) available from the Information Regulator or our office. Please note:

- Requests must be in writing
- Must provide sufficient details to identify the records
- May require proof of identity

Requests must be addressed to:

Information Officer: thinus@cgnet.co.za

Fees may be charged in accordance with the prescribed PAIA fee structure.

12. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused on the following grounds, among others:

- Protection of personal information of a third party
- Protection of commercial information of CloudGate Consulting or third parties
- Legal privilege
- Ongoing investigations or legal proceedings

13. AVAILABILITY OF THIS MANUAL

This manual is available for inspection, free of charge, at CloudGate Consulting's office and electronically on request. It will also be made available to the Information Regulator.

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