



POPI/PAIA Manual for AVINRA (Pty) Ltd

1. Introduction:

This manual is prepared in compliance with the **Promotion of Access to Information Act (PAIA), Act 2 of 2000**, and the **Protection of Personal Information Act (POPIA), Act 4 of 2013**.

- **PAIA** gives effect to Section 32 of the Constitution, ensuring access to information to exercise or protect rights.
- **POPIA** establishes eight data protection principles to safeguard personal information.

This manual is prepared in terms of **Section 51 of PAIA** and **Sections 14 & 56 of POPIA**, serving as a guide for requesters and ensuring lawful processing of personal data.

2. Company Details:

- **Name:** AVINRA (Pty) Ltd
- **Registration Number:** 2025/210013/07
- **Registered Address:** 11 Rodos Palace, Virgo Street, Benoni, Gauteng, 1501
- **Telephone:** 071 611 1044
- **Email:** admin@avinra.co.za

3. Information Officer:

- **Information Officer:** Tanya Van-Niekerk
- **Deputy Information Officer(s):** N/A
- **Contact Details:** 071 611 1044 / admin@avinra.co.za

Responsibilities:

- Ensure compliance with PAIA and POPIA.
- Develop and maintain internal policies.
- Handle requests for access to information.
- Liaise with the Information Regulator.



4. Applicable Legislation:

AVINRA (Pty) Ltd is subject to:

- POPIA (Act 4 of 2013);
- PAIA (Act 2 of 2000);
- Companies Act (Act 71 of 2008);
- Electronic Communications and Transactions Act (Act 25 of 2002);
- Labour Relations Act (Act 66 of 1995);
- Basic Conditions of Employment Act (Act 75 of 1997);
- Employment Equity Act (Act 55 of 1998);
- Income Tax Act (Act 58 of 1962);
- Value Added Tax Act (Act 89 of 1991).

5. Categories of Records Held:

- **Company Records:** Incorporation documents, shareholder registers, resolutions.
- **Financial Records:** Statements, tax returns, invoices.
- **Employee Records:** Contracts, payroll, disciplinary records, benefits.
- **Client Records:** Contracts, correspondence, billing, consent forms.
- **Supplier Records:** Agreements, invoices, correspondence.
- **Marketing Records:** Campaigns, opt-in/opt-out records, preferences.

6. Purpose of Processing Personal Information:

Personal information is processed for:

- Service delivery to clients.
- Employment and HR management.
- Legal and regulatory compliance.
- Marketing (with consent).
- Operational administration.

7. Data Subject Rights (POPIA):

Data subjects may:

- Access their personal information.
- Request correction/deletion of inaccurate or outdated information.
- Object to processing for direct marketing.



- Withdraw consent at any time.
- Lodge complaints with the Information Regulator.

8. Security Measures:

AVINRA (Pty) Ltd implements:

- Encryption and secure servers.
- Role-based access controls.
- Regular audits and vulnerability assessments.
- Employee training on data protection.
- Incident response procedures for data breaches.

9. PAIA Access Request Procedure:

Requests must be submitted in writing using **Form C** (available from the Information Regulator).

Requirements:

- Sufficient detail to identify the record.
- State the right being exercised/protected.
- Indicate preferred form of access.
- Payment of prescribed fees (if applicable).

10. Information Available Without Request:

- Company profile.
- Public financial statements.
- Marketing brochures.
- Information published on the company website.

11. Retention of Records:

Records are retained in line with statutory requirements (e.g., tax records for 5 years). Personal information is kept only as long as necessary for its purpose, after which it is securely destroyed or anonymised.



12. Complaints Procedure:

Complaints may be lodged with the Information Officer. If unresolved, they may be escalated to the Information Regulator of South Africa.

13. Information Regulator Contact Details:

- **Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg
- **Email:** complaints.IR@justice.gov.za
- **Website:** www.justice.gov.za/infoereg

14. Language & Accessibility:

In line with PAIA requirements, this manual will be made available in multiple languages and accessible formats to ensure inclusivity.

15. Updates:

This manual will be reviewed annually and updated as necessary to reflect legislative changes and company practices.

16. POPI/PAIA Compliance Checklist for AVINRA (Pty) Ltd:

16.1. Governance & Accountability:

- Appoint and register the **Information Officer** and any Deputy Information Officers with the Information Regulator.
- Ensure the Information Officer has direct access to senior management and board oversight.
- Review and approve the POPI/PAIA Manual annually.

16.2. Awareness & Training:

- Conduct **mandatory induction training** on POPIA and PAIA for all employees.
- Provide refresher training at least once a year.
- Maintain attendance records of training sessions.

16.3. Data Mapping & Inventory:

- Identify all categories of personal information processed (employees, clients, suppliers, etc.).



- Document the purpose of processing for each category.
- Record where data is stored (physical files, servers, cloud, etc.).
- Classify data sensitivity (e.g., financial, health, identity).

16.4. Consent & Lawful Processing:

- Obtain **written consent** for marketing communications.
- Ensure contracts include POPIA-compliant clauses.
- Verify that processing aligns with one of the lawful bases (consent, contract, legal obligation, legitimate interest).

16.5. Data Subject Rights:

- Establish a procedure for handling **access requests** under PAIA (Form C).
- Create a workflow for correcting or deleting personal information.
- Maintain a log of all requests and responses.
- Respond to requests within statutory timelines (30 days).

16.6. Security Safeguards:

- Implement encryption for sensitive data.
- Restrict access to personal information using role-based permissions.
- Conduct quarterly IT security audits.
- Establish a **data breach response plan** (notification to Information Regulator within 72 hours).

16.7. Record Retention & Disposal:

- Follow statutory retention periods (e.g., tax records: 5 years).
- Review retention schedules annually.
- Securely destroy or anonymise data once retention period expires.

16.8. Third-Party Management:

- Vet all service providers handling personal information.
- Ensure contracts include POPIA-compliant data processing clauses.
- Monitor compliance of third parties through audits or questionnaires.

16.9. Transparency & Communication:

- Publish the POPI/PAIA Manual on the company website.



- Make the manual available in **multiple languages**, where necessary.
- Provide clear privacy notices to clients and employees.

16.10. Monitoring & Review:

- Conduct annual compliance audits.
- Report findings to the board.
- Update policies and procedures based on audit results and legislative changes.

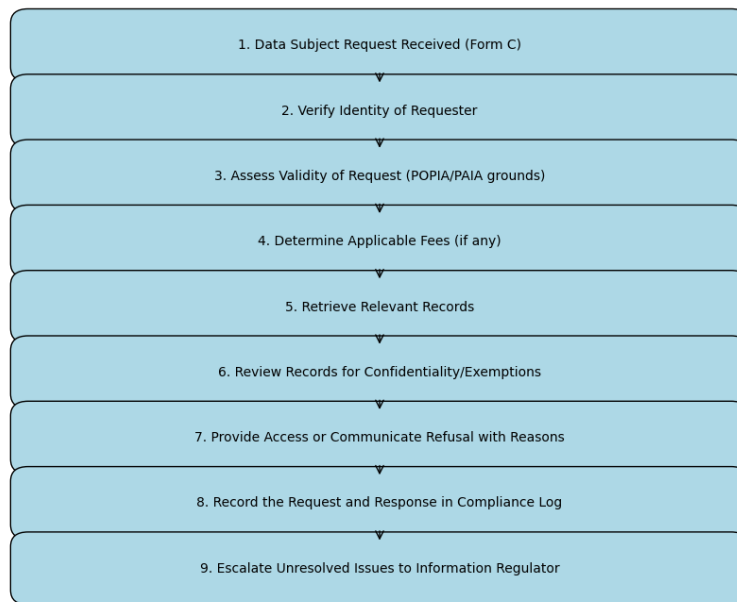
16.11. Complaints Handling:

- Establish an internal complaints procedure.
- Escalate unresolved complaints to the Information Regulator.
- Maintain a register of complaints and resolutions.

16.12. Key Contacts:

- **Information Officer:** Tanya-Lee Van Niekerk
- **Deputy Information Officer(s):** N/A
- **Information Regulator:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg

17. POPI/PAIA Compliance Process Flowchart:





****How to Use This Flowchart:***

- **Step 1–3:** Confirm the request is valid and the requester's identity is verified.
- **Step 4–6:** Handle fees, retrieve records, and check for confidentiality or exemptions.
- **Step 7–9:** Provide access or refusal, log the request, and escalate unresolved issues to the Information Regulator.

18. Approval:

Approved on this the 22nd day of January, 2026:

Tanya-Lee Van Niekerk
Information Officer / Director
AVINRA (Pty) Ltd