

Grocza (Pty) Ltd

(Registration number: 2026/200377/07)

PAIA MANUAL

PAIA MANUAL as prescribed by the provisions of THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 And THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

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1. **A. DEFINITION OF TERMS**

- Access – The right to inspect, copy, or receive information contained in a record of a private body in accordance with PAIA.
- Data Subject – An individual or entity to whom personal information relates.
- Personal Information – Any information relating to an identifiable, living natural person or existing juristic person, including but not limited to contact details, financial information, and identification numbers.
- Record – Any recorded information, regardless of form, in the possession or under the control of the private body, including written, electronic, visual, or audio records.
- Private Body – A body as defined in PAIA, which is not a public body, including companies and other private entities.
- Processing – Any operation or activity concerning personal information, including collection, storage, updating, retrieval, or dissemination.
- Requester – Any person who requests access to records of a private body under PAIA.
- Proprietary Information – Information owned by the company, including trade secrets, methodologies, commercial intelligence, and intellectual property.
- Regulator – The Information Regulator established under PAIA and POPIA

B. 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
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 recipients or categories of recipients to whom the personal information may be supplied;
- 2.8 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
- 2.9 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 GROCZA (PTY) LTD

3.1 Information Officer

Name: Pontsho Mokgomola

Tel: 078 832 4302

Email: info@grocza.com

3.2 Deputy Information Officer

No Deputy Information Officer has been designated. All requests must be submitted to the Information Officer.

3.3 Access to Information – General Contacts

Requests may be submitted via:

Email: privacy@grocza.com / info@grocza.com

WhatsApp: 061 845 5109 / 078 832 4302

3.4 Head Office

Postal Address: 1753 Phillips Avenue, Grasmere, Ennerdale, 1833

Physical Address: 1753 Phillips Avenue, Grasmere, Ennerdale, 1833

Telephone: 078 832 4302

Email: info@grocza.com
Website: <https://grocza.com>

4. GUIDE ON HOW TO USE PAIA

4.1 In terms of section 10 of PAIA, the Information Regulator has published a Guide to assist individuals in exercising their rights.

4.2 The Guide is available in English and may be accessed from the Information Regulator.

4.3 The Guide includes:

- How to request access to records
- Assistance available from the Information Officer
- Assistance available from the Information Regulator
- Remedies available, including:
 - Complaint to the Information Regulator
 - Application to a court
- Information on fees payable

4.4 The Guide may be obtained from:

- The Information Regulator website: <https://www.justice.gov.za/inforeg/>
- The Information Officer upon request

5. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

5.1 A requester must complete the prescribed Form 2.

5.2 Requests must be submitted via email to the contact details provided above. Requests submitted via other communication channels may be redirected to email to ensure proper record-keeping and compliance.

5.3 The requester must provide:

- Full name and contact details
- Description of the record requested
- The right to be exercised or protected
- Proof of identity

5.4 Supporting documents may be attached where necessary.

5.5 Requests will be processed in accordance with PAIA and, where applicable, POPIA.

5.5.1 Where a request relates to records containing information about a third party, Grocza (Pty) Ltd may be required to notify such third party in accordance with PAIA before a decision is made.

5.6 Requests will be processed within 30 days of receipt.

5.6.1 This period may be extended for a further period of up to 30 days where:

- The request is for a large volume of records
- The request requires a search through multiple records
- Consultation with third parties is required

5.6.2 The requester will be notified in writing if an extension is required, including the reasons for the extension.

5.7 **Outcome of Request**

5.7.1 The requester will be notified in writing whether access has been granted or denied.

5.7.2 If access is granted, the requester will be informed of any applicable access fees and the method of access.

5.7.3 If access is refused, the requester will be provided with written reasons for the refusal and informed of their right to lodge a complaint with the Information Regulator or apply to a court.

6. **APPLICABLE FEES**

6.1 Fees are charged in accordance with the Regulations under PAIA.

6.2 Fees may include:

- Request fees
- Access fees for reproduction or search time

6.3 A deposit may be required for extensive requests.

6.4 PAIA fees are separate from any commercial service fees.

6.5 A detailed fee schedule is provided in Annexure B of this manual.

7. **RECORDS AVAILABLE WITHOUT FORMAL REQUEST**

Certain records are available without formal request, including:

- Company information
- Contact details
- PAIA Manual
- Privacy Policy
- Service descriptions
- Public reports and general insights

These records are available on the company website.

8. **RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION**

Records are maintained in accordance with applicable legislation, including:

- **Companies Act 71 of 2008**

- Memorandum of Incorporation
- Annual Financial Statements
- Accounting Records
- Company Register

- **Promotion of Access to Information Act 2 of 2000**
 - PAIA Manual
 - Access Request Records

- **Protection of Personal Information Act 4 of 2013**
 - POPIA Compliance Register
 - Data Subject Consent Records
 - Privacy Notices
 - Data Breach Register
 - Employee Personal Information
 - Client Personal Information

- **Electronic Communications and Transactions Act 25 of 2002**
 - Electronic Transaction Records
 - Website Terms of Use
 - Data Processing Agreements

9. SUBJECTS AND CATEGORIES OF RECORDS HELD

Finance

- Payment records
- Invoices

IT Systems

- Platform logs
- Access logs

Client Data

- Client profiles
- Contracts
- Reports

Legal

- Agreements
- NDAs
- Compliance documents

Human Resources

- Employee records
- HR policies

10. GROUNDS FOR REFUSAL OF ACCESS

10.1 Access to records may be refused in accordance with Chapter 4 of PAIA.

10.2 Grounds for refusal include:

- Section 63 – Protection of personal information of third parties
- Section 64 – Protection of commercial information of a private body
- Section 65 – Protection of confidential information of third parties
- Section 66 – Protection of safety of individuals and property
- Section 67 – Protection of records privileged from production in legal proceedings
- Section 68 – Mandatory protection of certain confidential information of third parties
- Section 69 – Protection of security measures and systems
- Section 70 – Protection of research information of third parties (if applicable)

10.3 Requests will be assessed on a case-by-case basis in accordance with PAIA.

10.4 Protection of Intellectual Property and Proprietary Information

Grocza (Pty) Ltd holds proprietary information including, but not limited to:

- Commercialized intelligence reports
- Proprietary methodologies and analytical frameworks
- Trade secrets and business strategies
- Copyright-protected materials
- Trademarked content and brand assets

Such information constitutes commercial information as contemplated in section 64 of PAIA and may be refused where disclosure could harm the commercial or competitive position of the company.

Access to such records will be assessed in accordance with PAIA on a case-by-case basis.

10.5 Limitation of Use of Accessed Records

Access to records granted under PAIA does not confer any rights of ownership, reproduction, distribution, or commercial use of the information, which remains subject to applicable intellectual property laws.

10.6 Public Interest Override Limitation

While PAIA provides for disclosure in the public interest under certain circumstances, Grocza (Pty) Ltd will carefully assess whether such disclosure is justified against the potential harm to its commercial interests, intellectual property, and confidentiality obligations.

Disclosure will not be granted where the harm to the company's commercial position outweighs the public interest.

11. REMEDIES AVAILABLE TO REQUESTERS

If a requester is dissatisfied with a decision, they may:

- Lodge a complaint with the Information Regulator
- Apply to a court for appropriate relief

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose of Processing

Grocza (Pty) Ltd processes personal information for the following purposes:

- Client onboarding and account management
- Payment processing and billing
- Platform analytics and performance monitoring
- Communication with clients and service providers
- Compliance with legal and regulatory obligations

12.2 Data Subject Rights

In terms of POPIA, data subjects have the right to:

- Access their personal information
- Request correction or deletion of personal information
- Object to the processing of personal information
- Lodge a complaint with the Information Regulator

Requests relating to personal information may be directed to the Information Officer.

12.3 Recipients or Categories of Recipients

Personal information may be supplied to the following recipients or categories of recipients:

Category of Personal Information	Recipients or Categories of Recipients
Identity number and names (criminal checks)	South African Police Services (SAPS)
Qualifications (verification)	South African Qualifications Authority (SAQA)
Credit and payment history (credit checks)	Credit Bureaus
Banking details (payment processing)	Authorised payment gateways and financial institutions
Contact details (communication)	Service providers engaged for communication or support
Device information (IP address, browser, device type, location)	Hosting providers, analytics services, and security monitoring partners

13. DATA SUBJECTS AND INFORMATION PROCESSED

Categories of Data Subjects	Personal Information that may be processed
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Categories of Data Subjects	Personal Information that may be processed
Clients	Name, address, identity number, registration number, contact details, employment status, bank details, IP address, device info, location
Service Providers	Name, registration number, VAT number, address, trade secrets, bank details
Employees	Name, address, identity number, qualifications, banking details, employment history

14. TRANSBORDER DATA FLOWS AND SECURITY

14.1 Planned Transborder Flows of Personal Information

Personal information may be stored on servers located outside the Republic of South Africa. The following categories of recipients may receive personal information outside South Africa:

- Hosting service providers (e.g., Namecheap, with servers located in the United States) Grocza (Pty) Ltd ensures that appropriate safeguards are in place for such transfers, including:
- Binding contractual arrangements that impose data protection obligations equivalent to POPIA
- Use of standard contractual clauses where applicable
- Limiting the transfer to what is strictly necessary for the performance of services.

14.2 Security measures include:

- Industry-standard encryption protocols
- Access control mechanisms
- Monitoring and logging
- Data backup and recovery procedures

14.3 Data Retention and Destruction

Personal information and records are retained only for as long as necessary to fulfil the purpose for which they were collected or as required by law. Records are securely destroyed or deleted when no longer required.

15. AVAILABILITY OF THE MANUAL

This manual is available:

- On the website
- At the company office
- Upon request

16. UPDATING OF THE MANUAL

This manual will be updated periodically.

Issued by:

Pontsho Mokgomola

Director, Grocza (Pty) Ltd

17.1 Annexure A – form 2

ANNEXURE A – FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached.
2. If requests are made on behalf of another person, proof of such authorisation must be attached.

A. PARTICULARS OF PRIVATE BODY

Name of Private Body: Grocza (Pty) Ltd
Information Officer: Pontsho Mokgomola
Email: privacy@grocza.com

B. PARTICULARS OF REQUESTER

Full Names and Surname: _____
Identity Number: _____
Postal Address: _____
Telephone Number: _____
Email Address: _____

Capacity (if request made on behalf of another person): _____

C. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (if applicable)

Full Names and Surname: _____
Identity Number: _____
Postal Address: _____
Telephone Number: _____
Email Address: _____

D. PARTICULARS OF RECORD REQUESTED

Provide full description of the record:

Reference number (if known): _____

E. FORM OF ACCESS

Mark with an "X":

Inspection of record

Copy of record

Electronic copy

F. PARTICULAR RIGHT TO BE EXERCISED OR PROTECTED

Indicate which right is to be exercised or protected:

Explain why the record is required:

G. FEES

You will be notified if a request fee is payable.

H. SIGNATURE

Signed at _____ on this ____ day of _____ 20__

Signature: _____

17.2 Annexure B

ANNEXURE B – APPLICABLE FEE SCHEDULE **(PAIA Regulations)**

1. REQUEST FEE

- Request fee payable by requester: R140.00

2. ACCESS FEES

- Photocopy (per A4 page): R2.00
- Printed copy (per A4 page): R2.00
- Electronic copy (USB): R40.00
- Transcription of audio record: R24.00 per hour
- Search and preparation time: R145.00 per hour (first hour free)

3. DEPOSIT

- If the total estimated access fee exceeds R1,000.00, or if the search and preparation time exceeds six hours, a deposit of up to one-third of the estimated total fee may be required.

4. POSTAGE

- Actual postal or courier costs will be charged where applicable.

NOTE:

Fees are subject to change in accordance with PAIA Regulations.