

Osidon

PAIA Manual

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

DATE OF COMPILATION: 06/2023



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Table of Contents

2	LIST OF ACRONYMS AND ABBREVIATIONS.....	3
3	PURPOSE OF PAIA MANUAL	4
4	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF OSIDON ADVISORY (PTY) LTD.....	6
5	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	7
6	CATEGORIES OF RECORDS OF OSIDON ADVISORY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	11
7	DESCRIPTION OF THE RECORDS OF OSIDON ADVISORY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	12
8	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY OSIDON ADVISORY	12
9	PROCESSING OF PERSONAL INFORMATION	13
10	AVAILABILITY OF THE MANUAL	20
11	UPDATING OF THE MANUAL	21



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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



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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;



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- 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.



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3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF OSIDON ADVISORY (PTY) LTD

3.1 Chief Information Officer

Name: Melissa Ferreira
Tel: (010) 500 0259
Email: melissa@osidon.com

3.2 Access to information general contacts

Email: melissa@osidon.com

3.3 National or Head Office

Physical Address: Unit H10 Co.Space Entrepreneur Village
11 Havelock Road
Willow Park Manor
Pretoria
0184

Telephone: (010) 549 1132

Email: info@osidon.com



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Website: www.osidon.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



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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;

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.



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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-

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;

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



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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.

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/inforeg/>).

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

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.”



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4.6.1 Afrikaans and English

5 CATEGORIES OF RECORDS OF OSIDON ADVISORY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Personal Information	Available on Website	Available upon Request
Name & Surname	X	X
Identification number	X	X
Date of birth	X	X
Company registration number	X	X
Address details	X	X
Contact number	X	X
Email address	X	X
Assets / Liabilities		X
Financial information e.g., bank details, financials etc.	X	X
Income tax number	X	X
Marital status		X
Signature		X
Special Personal Information		
Biometric information		X
Criminal behaviour		X
Medical information		X
Personal Information about Children with consent of parent or legal guardian		



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		X
Documents		
ID copy		X
Proof of address		X
Application forms		X
Proof of bank details		X
Proof of income tax		X
Astute report		X
Copy of insurance policy		X
CV		X
Qualification copies		X
Employment form		X
Authorised signatories		X
Payroll Records		X
Financial Records		X
Bank Statements		X
Credit record reports		X

6 DESCRIPTION OF THE RECORDS OF OSIDON ADVISORY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
FSCA Licence	Financial Advisory and Intermediary Services Act, 2022

7 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY OSIDON ADVISORY

Subjects on which records are held	Categories of records
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Human Resources	<ul style="list-style-type: none"> • HR Policies and Procedures • Employee Records • Labour Relations Documents • Performance Management Records • Training Records • Recruitment Records • Employment, Qualification, Criminal and Background verifications records. • Payroll Records
Finance	<ul style="list-style-type: none"> • Monthly Investor Reports • Tax Reports • Annual Financial Reports • Compliance Records • Staff equipment records • Budget sand forecasts
Administrative Services	<ul style="list-style-type: none"> • Vendor records • Contracts • Contact details internal and external
Operations	<ul style="list-style-type: none"> • Client communication • Client financial, payroll and compliance records • Team performance and growth reports • Operations Manuals and Policies
Sales	<ul style="list-style-type: none"> • Prospective client details • Sales analytics and data • Sales Manuals and Policies
Technical	<ul style="list-style-type: none"> • Company Information System Network access and control data • Software systems data and protocols • Cyber Security protocols
Strategic	<ul style="list-style-type: none"> • Performance Reports • Annual Performance Plans • Strategic Business Plans

8 PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information



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We use your personal information for:

- 8.1.1 providing services subscribed to which may include accounting, tax, compliance and financial advisory services;
- 8.1.2 to comply with our compulsory legal and regulatory obligations and requirements;
- 8.1.3 administering, managing and improving the Site, systems and mobile applications;
- 8.1.4 fraud prevention;
- 8.1.5 to improve our marketing conversion rates.
- 8.1.6 We may also in some limited cases use data to promote or introduce some of our own services to our clients. In the case of using personal information for promotional purposes clients have the option to opt-out of the communication.
- 8.1.7 Where we partner with other organisations that provide value add services we may share anonymised data with them for functionality purposes, but where personal information will be shared we always ask for permission.



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8.1.8 If we become involved in a proposed or actual merger, acquisition or any form of sale of any assets, we have the right to share Personal Information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to Personal Information. The terms of this Privacy Policy will continue to apply.

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

	Clients	Prospective clients	Employees or Independent Contractors	Suppliers/ Vendors / Service Providers -
Personal information				
Name & Surname	X	X	X	X
Identification number	X		X	
Date of birth	X		X	
Company registration number	X			X
Address details	X		X	X
Contact number	X	X	X	X
Email address	X	X	X	X



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Assets / Liabilities	X			
Education			X	
Employment	X		X	
Financial information e.g., bank details, financials etc.	X		X	X
Business Trade information	X		X	
Income tax number	X		X	
VAT Number	X		X	
Other Tax Details	X			
Language			X	
Marital status	X			
Signature	X		X	X
SPECIAL Personal information				
Biometric information			X	
Criminal behaviour*			X	
Medical information**	X		X	

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

Personal Information	Recipient to whom Personal Information may be supplied depending if client or staff
Name & Surname, ID Number, Date of Birth, Address, Contact Number, Email Address, Tax Number	<ul style="list-style-type: none"> • Verification Agency (MIE) • FSP's • Employee Benefit Providers • Operational Staff • Support Staff • Human Resources



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	<ul style="list-style-type: none"> • Technical Department • SARS • UIF • Relevant SETA • Debt collectors
Company registration number	<ul style="list-style-type: none"> • Operational Staff • Finance Department • SARS • UIF • Compensation Fund • Payroll and Accounting Software Providers • Debt Collectors
Assets / Liabilities	<ul style="list-style-type: none"> • FSP's • Operational Staff • Support Staff • SARS
Financial information e.g., bank details, financials etc.	<ul style="list-style-type: none"> • FSP's • Employee Benefit Providers • Operational Staff • HR Department • Finance Department • SARS • UIF • Compensation Fund • Payroll and Accounting Software Providers
Marital status	<ul style="list-style-type: none"> • Employee Benefit Providers • Operational Staff • Human Resources • SARS
Qualifications and Employment Information	<ul style="list-style-type: none"> • Operational Staff



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	<ul style="list-style-type: none"> • Human Resources • SARS • Employee Benefit Providers • Relevant SETA
Credit record and Payment History	<ul style="list-style-type: none"> • Verification Agency (MIE) • HR Department • Finance Department • Operational Advisory
Personal Information for Children	<ul style="list-style-type: none"> • HR Department • Employee Benefit Providers
Special Personal Information	
Biometric information and Criminal Behaviour	<ul style="list-style-type: none"> • Management • HR Department
Medical information	<ul style="list-style-type: none"> • Employee Benefit Provider • Insurance Providers

8.4 Planned transborder flows of personal information

8.4.1 Personal information are processed outside South Africa if the email address provided is hosted outside South Africa and or to administer certain services, for example, cloud storage services.

These information may include:

- Full Names;
- Unique identifiers such as your identity number, and contact details;
- Addresses;
- Tax information;



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- Financial information

8.4.2 Personal information is stored on servers that use cyber security industry best practices. The location of these servers are in the USA and may have GEO redundancy capabilities in other countries as well.

8.4.3 For development and or security purposes we may also move data to servers that one of our service providers manage in countries outside of the USA. Osidon do not own these servers and are using them through a service level agreement with AWS, Azure and Google Cloud.

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

8.5.1 Credit / Debit Card Details are not stored in any database online; PeachPayments and Payfast hosts and manages the payment page in its PCI compliant data centre.

8.5.2 Special personal information are never processed about you without your explicit consent.



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8.5.3 Access to personal information is not provided to employees or parties of outside of Osidon unless otherwise agreed and we do not sell data to any third parties.

8.5.4 We implement best practises and industry standard to protect all our systems and staff computers with:

8.5.4.1 Advanced firewalls and DDoS protection technology to secure our online assets and to protect all our users.

8.5.4.2 Securing our devices with next-generation endpoint protection using AI and machine learning technology. We also utilise advanced software to ensure all our devices are updated and secure.

8.5.4.3 Protecting our devices on both public and private networks. Whether in an office environment or work-from-home environment our military grade VPN software secures all communications no matter where they occur.

9 AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On www.osidon.com;



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9.1.2 head office of Osidon for on appointment 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.

9.1.5 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 Osidon Advisory will on a regular basis update this manual.

Issued by
MELISSA FERREIRA
Chief Operations Officer



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