



**Dappit (Pty) Ltd.**  
2012/116396/07

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# **PAIA MANUAL**

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

**DATE OF COMPILATION: 01/03/2026**

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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

## 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 Dappit (Pty) Ltd**

#### **3.1. Chief Information Officer**

Name: Cedric Sobey

Cell: 0833055187

Email: [cedric@dappit.org](mailto:cedric@dappit.org)

#### **3.2. Deputy Information Officer**

Name: Savannah Strauss

Email: [savannah@dappit.org](mailto:savannah@dappit.org)

#### **3.3 Access to information general contacts**

Email: [\*support@dappit.org\*](mailto:support@dappit.org)

#### **3.4 Offices**

Postal Address: 3 Vian Road, Winston Park, Gillitts, KZN, 3610

Physical Address: 3 Vian Road, Winston Park, Gillitts, KZN, 3610

Contact Number: 0833055187

Email: [support@dappit.org](mailto:support@dappit.org)

Website: <https://www.dappit.org/>

## 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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

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 11<sup>3</sup>; and

4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;

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

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 14<sup>5</sup> and 51<sup>6</sup> 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 15<sup>7</sup> and 52<sup>8</sup> 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 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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

4.6.1 English and Afrikaans

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup>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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

**5. CATEGORIES OF RECORDS OF Dappit (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

<b>Category of records</b>	<b>Types of the Record</b>	<b>Available on Website</b>	<b>Available upon request</b>
Product Information	Mentions, descriptions, and specifications of products developed by Dappit (Pty) Ltd	X	X
Product Portfolio	Publicly shared mentions of products developed for clients (where non-disclosure allows)	X	x
Partnership Information	Information regarding our status as partners with various technological platforms and providers	X	x
Social Media Content	Public posts, updates and media shared on various platforms (LinkedIn, Facebook, Instagram, etc)		X
Digital Marketing	Digital advertisements, promotional banners and newsletters	X	X
Public Corporate Records	The PAIA Manual, Privacy Policy and Terms of Service.	X	X

**6. DESCRIPTION OF THE RECORDS OF Dappit (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

<b>Category of Records</b>	<b>Applicable Legislation</b>
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000 Protection of Personal Information Act 4 of 2013
Tax Related	Income Tax Act 58 of 1962 Value Added Tax Act of 1991
Electronic Communications	Electronic Communications and Transactions Act 25 of 2002

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY Dappit (Pty) Ltd.**

<b>Subjects on which the body holds records</b>	<b>Categories of records</b>
Statutory and Incorporation	CIPC Registration (COR14.3); Memorandum of Incorporation; Share Register (showing the sole director/shareholder); Minutes of Director's Resolutions.
Financial and Tax	Annual Financial Statements; Tax Clearance Certificates; VAT/Income Tax records; Management Accounts; Bank Statements and Invoices.
Operations and Technology	Documentation relating to the development stack; Software Licenses; Internal development workflows and security protocols.
Client and Third Party	Service Level Agreements (SLAs); Contracts with clients; Non-Disclosure Agreements; Records of international partner agreements.
Intellectual Property	Proprietary source code; UI/UX Design assets owned by Dappit (Pty) Ltd; Trademark documentation (if any).
POPIA Data Privacy	Information Officer appointment; Privacy Impact Assessments; Record of processing activities (how you handle client/user data).

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

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

- Service Delivery & Product Development: To design, build, and maintain custom software products and database architectures for our clients.
- Client-Directed Data Collection: To develop and integrate systems that collect and process personal information as specifically instructed by our clients for their custom products (acting as an "Operator").
- International Technical Integration: To facilitate the transfer and storage of data with overseas technical partners required for product functionality.
- Client Relationship Management: To communicate regarding project scoping, technical updates, support, and administrative matters.
- Business Operations: To manage invoicing, financial accounting, and compliance with the South African Revenue Service (SARS).
- Marketing: To share digital marketing content, product mentions, and company updates via social media and newsletters (where consent is obtained).
- Legal Compliance: To comply with all statutory obligations including the Companies Act and POPIA.

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

Categories of Data Subjects	Personal Information that may be processed
Individual Clients	Names, address, registration numbers or identity numbers, employment status, contact details (email/phone), physical addresses, and financial/payment information.
Clients (Businesses)	Company name, registration number, VAT number, and authorized representative details.
Service Providers and Partners	Contact information and contractual agreements with international partners and local vendors, names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, identity numbers, physical address, bank details
End-Users of Client Products	Information collected on behalf of clients, including login credentials, profile data, and specific data points required by the custom software.

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

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
International Technology Partners	Cloud hosting, database providers, and front-end development platforms located outside of South Africa.
Regulatory Bodies	SARS or other legal authorities when required by law
Professional Advisors	Accountants, auditors, or legal counsel.
Third-Party Service Providers	Only those necessary for the operational performance of Dappit (Pty) Ltd's 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

Dappit (Pty) Ltd utilizes international cloud-based infrastructure to develop and host products. As a result, personal information (including client and end-user data) may be transferred to and stored on servers located outside of the Republic of South Africa. Dappit (Pty) Ltd ensures that these international partners maintain data protection standards that are either equivalent to POPIA or governed by binding corporate rules/agreements.

## **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**

1. Implementation of **Multi-Factor Authentication (MFA)** on all administrative and development platforms (e.g., Xano, WeWeb).
2. **Encryption** of data both at rest and in transit using industry-standard protocols.
3. Strict **Secure Access Controls** and identity management to ensure that client databases are only accessible by authorized personnel.
4. Regular software updates and security patches on all local and cloud-based systems.

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available

9.1.1 on <https://www.dappit.org/>, if any;

9.1.2 Office of Dappit (Pty) Ltd 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 Chief Information Officer of Dappit (Pty) Ltd will on a regular basis update this manual.

*Issued by*

A handwritten signature in black ink, appearing to read 'C. Sobey', written over a horizontal line.

**Cedric Sobey**

**Managing Director**