

MANUAL

PAIA manual

REFERENCE	REVISION	DATE	APPROVED
RCL-P-2026-003	A	16 October 2026	Renier Cloete

1 Purpose

This is the manual of RCL Consulting (Pty) Ltd under section 51 of the Promotion of Access to Information Act, 2000 (PAIA). It tells you:

- which of our records you can have without a formal request;
- what subjects we hold records on, and which records we keep because a law requires them;
- how to ask for a record, what it costs, and what you can do if we refuse;
- what personal information we process, why, who receives it, and how we protect it, as the Protection of Personal Information Act, 2013 (POPIA) requires;
- where to find the Information Regulator's guide to using PAIA.

2 Contact details

Information Officer. Renier Cloete, director, registered with the Information Regulator. Telephone +27 82 454 2594; email info@rcl.co.za.

Deputy Information Officer. We have not designated one. Every request goes to the Information Officer.

Head office. RCL Consulting (Pty) Ltd, registration 2015/039468/07. Street and postal address: 321 Olivier Street, Brooklyn, Pretoria 0181, South Africa. Telephone +27 82 454 2594; email info@rcl.co.za; website rcl.co.za.

3 The Regulator's guide to PAIA

The Information Regulator has published a guide on how to use PAIA and POPIA, under section 10 of PAIA. It describes the objects of both Acts, how to ask a public or private body for a record, the help available from Information Officers and from the Regulator, the remedies available when a request is refused, and the fees.

You can get the guide:

- from the Regulator's website, inforegulator.org.za, in all official languages;
- from our Information Officer, on request;
- at our head office, where copies in English and Afrikaans are kept for inspection during office hours.

4 Records available without a request

You can have these records without a PAIA request.

CATEGORY	RECORDS	WHERE
About RCL	Company name, registration and contact details; the services and products we offer	Our website
Policies	Our privacy policy, our policy on the use of artificial intelligence, and this manual	Our website, or on request
Publications	Articles and news we have published	Our website

5 Records kept under other laws

We keep these records because the laws listed require them. Where the law makes them public, you can also get them from the body that holds them, such as the Companies and Intellectual Property Commission (CIPC).

RECORDS	LAW
Memorandum of incorporation, registers of directors and shareholders, resolutions and minutes	Companies Act 71 of 2008
Annual financial statements and accounting records	Companies Act 71 of 2008

RECORDS	LAW
Tax records, including income tax and VAT returns, tax invoices and supporting records	Tax Administration Act 28 of 2011; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Employees' employment records: contracts, remuneration, time worked and leave	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employees' tax deductions and certificates (PAYE)	Income Tax Act 58 of 1962
Unemployment insurance registrations and contributions	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Records of injuries on duty, and registration with the Compensation Fund	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
This manual	Promotion of Access to Information Act 2 of 2000
Records of the personal information we process	Protection of Personal Information Act 4 of 2013

6 Subjects on which we hold records

SUBJECT	RECORDS
Company	Statutory records, resolutions, agreements, and registrations with CIPC and SARS
Finance and tax	Financial statements, accounting records, invoices, bank statements, tax returns
Employees	Employment contracts, payroll, leave, tax and unemployment insurance records, qualifications
Clients and projects	Proposals, appointments, correspondence, calculations, drawings, reports and project files
Suppliers and subcontractors	Agreements, orders, invoices and correspondence
Software	Source code, releases, licences and verification manuals
Policies and quality	Our policies and their register entries, and records of checks and reviews
Website and enquiries	Enquiries made through our website or by email, and web server logs

7 Personal information we process

Our privacy policy describes this in full; this section is the summary PAIA requires.

Why we process it. To answer enquiries; to deliver and invoice our work; to employ and pay our staff; to pay our suppliers and subcontractors; to keep the records that the laws above require; and to keep our website and systems secure.

Whose information, and what.

PEOPLE	PERSONAL INFORMATION
Clients and the people we deal with at their organisations	Names, roles, contact details, invoicing details, correspondence
People named in project material	Names and contact details on drawings, reports and site records
Employees	Names, identity numbers, contact details, addresses, tax and bank details, qualifications, employment contracts, remuneration and leave
Suppliers and subcontractors	Names, contact details, VAT numbers, bank details
People who contact us or visit our website	Names, contact details and messages; IP addresses in web server logs and the contact form

Who receives it.

INFORMATION	RECIPIENTS
Employees' tax, unemployment insurance and injury-on-duty information	The South African Revenue Service, the Unemployment Insurance Fund and the Compensation Fund, as the law requires
Company and tax records	The South African Revenue Service, CIPC and our auditors, as the law requires
Project information	The client's other consultants, contractors and the authorities, as the project needs and the client agrees
Enquiries, correspondence and website logs	Our hosting providers, Cool Ideas and Diamatrix, in South Africa
A client's project information, with the client's written consent	Anthropic, which provides the AI tools we use (see below)

Information sent outside South Africa. We keep personal information in South Africa, with one exception: the project information of a client who has consented in writing to our using AI tools on the project goes to Anthropic in the United States, under

Anthropic's commercial terms and its data processing agreement. Before it goes, we remove the names and contact details of people that the work does not need. Employees' information never leaves South Africa.

How we protect it.

- Only the people who need it for their work have access to it.
- We protect our computers and accounts with passwords and keep their software up to date.
- We bind the suppliers who hold information for us to keep it confidential.
- If we believe someone has had unauthorised access to personal information, we tell the people affected and the Information Regulator as soon as reasonably possible.

8 How to ask for a record

Your own personal information. To ask whether we hold personal information about you, write to the Information Officer at info@rcl.co.za; that is free. We will ask you to prove who you are before we give you any information. A request for a copy of the information itself is a request under PAIA, as below.

Other records. Use Form 2 of the PAIA Regulations ("Request for access to record"), available from the Regulator's website or from us, and send it to the Information Officer. Say which records you want, the form in which you want them, and which of your rights the record is needed to exercise or protect. If you ask on behalf of someone else, include proof of your authority.

Fees. The fees are those prescribed for private bodies in Annexure B of the PAIA Regulations, 2021. At the time of writing:

ITEM	FEE
Request fee, payable with every request	R140.00
Printed or photocopied A4 page	R2.00 per page
Copy on a flash drive you provide	R40.00
Search and preparation, for each hour after the first	R145.00 per hour, at most R435.00 in total
Postage or electronic transfer	The actual cost, if any

If the search will take more than six hours, we may ask for a deposit of up to one third of the access fee. We do not release records until the fees are paid.

Our answer. We decide within 30 days and tell you in writing. We may extend that once, by up to 30 days, if the request covers many records or needs a long search, or if you agree; we will tell you why. If we do not answer in time, the request counts as refused.

Grounds on which we must or may refuse. Chapter 4 of Part 3 of PAIA sets them out. They include protecting the privacy of other people, the commercial and confidential information of third parties and of RCL, the safety of individuals and property, records privileged from production in legal proceedings, and research information. Where only part of a record is protected, we give you the rest.

Third parties. If a record contains a third party's personal, commercial or confidential information, we tell that third party and give them the chance to object before we decide.

If you are not satisfied. There is no internal appeal against a decision of a private body. You may complain to the Information Regulator within 180 days of our decision, using the Regulator's Form 5, or apply to a court.

9 Availability of this manual

This manual is available:

- on our website;
- at our head office, for inspection during office hours;
- from the Information Officer, on request, for the prescribed fee for copies;
- to the Information Regulator, on request.

10 Updating this manual

We review this manual every year and update it when our records, our processing of personal information, our contact details or the law change.