Simplict (Pty) Ltd
Phone +27 21 201 6824
Email info@simplict.it
Web www.simplict.it

SIMPLICT (PTY) LTD
PAIA MANUAL

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

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Date of revision: 17 November 2026

Document control

Field	Details
Document owner	Information Officer
Approved by	Director / Head of private body
Review frequency	At least annually and whenever material information changes
Public access	Simplict website, head office during normal business hours, and upon request
Related documents	POPIA privacy notices, information-security policies, retention schedules, incident-response procedures and PAIA prescribed forms

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1. Acronyms and interpretation

Term	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa
Simplict	Simplict (Pty) Ltd, registration number 2015/315500/07

In this Manual, words importing one gender include the others, and the singular includes the plural where the context permits. References to legislation include amendments, regulations and replacement legislation.

2. Purpose and scope

This Manual explains what records Simplict holds, how a person may request access to those records, and how Simplict processes and protects personal information. It applies to Simplict as a private body and is intended to assist members of the public to:

- identify records that may be available without a formal PAIA request;
- understand the subjects and categories of records held by Simplict;
- identify records maintained in accordance with other legislation;
- contact the Information Officer or Deputy Information Officer;
- obtain the Regulator's guide on using PAIA and POPIA;
- understand the procedure, prescribed form and possible fees for a request;
- understand the purposes for which Simplict processes personal information, the categories of data subjects and information, recipients, cross-border transfers and security safeguards.

Access is not automatic. For a private body, the requester must show that the requested record is required for the exercise or protection of a right, meet PAIA's procedural requirements, and the request must not be subject to a lawful ground of refusal.

3. Company and access-to-information contact details

Item	Details
Registered name	Simplict (Pty) Ltd
Registration number	2015/315500/07
Nature of business	Managed ICT services, Microsoft cloud services, cybersecurity, technology procurement, support and related professional services
Head office / physical address	1 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town, Western Cape, 7441, South Africa
Postal address	1 Bridgeway Road, Bridgeways Precinct, Century City, Cape Town, Western Cape, 7441, South Africa
Telephone	+27 21 201 6824
General email	info@simplict.it
Accounts email	accounts@simplict.it
Website	www.simplict.it

3.1 Information Officer

Item	Details
Chief Information Officer	Jacobus Johannes Petrus van der Merwe Tel: +27 21 201 6824 Email: hannes@simplict.it
Deputy Information Officer	Francois Johannes Hougaard Tel: +27 21 201 6824 Email: francois@simplict.it

General PAIA enquiries may also be sent to info@simplict.it. Requests should be clearly marked “PAIA request”.

4. Guide on how to use PAIA

The Regulator has issued a guide under section 10 of PAIA explaining the objects of PAIA and POPIA, how to make a request, applicable assistance and remedies, prescribed fees, voluntary disclosure and

the PAIA Regulations. The guide is available in official languages and may be obtained from the Regulator or requested from Simplict's Information Officer.

Regulator contact	Details
Street address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 / 0800 017 160
General email	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za
eServices portal	https://eservices.inforegulator.org.za

5. How to request access to a record

A requester should use the current prescribed Form 2: Request for Access to Record, and submit it to Simplict's Information Officer. The request must contain enough detail to identify the requester, the record, the preferred form of access, the right to be exercised or protected, and why the record is required for that purpose.

- Complete Form 2 and identify the specific record or category of records. Avoid broad requests such as "all information".
- State the right to be exercised or protected and explain why access to the record is required for that right.
- Provide proof of identity. A representative must also provide proof of authority to act.
- Send the signed form and supporting documents to francois@simplict.it, with the subject "PAIA request", or deliver it to the head office.
- Pay the prescribed request fee if Simplict gives notice that a fee is payable. Additional access, search, preparation, reproduction, postage or deposit fees may apply under PAIA and the Regulations.
- Simplict will decide the request within the time allowed by PAIA, subject to any lawful extension, and will issue the prescribed outcome notice.
- If access is refused, delayed or not decided, the requester may lodge a complaint with the Regulator using Form 5 or seek relief from a competent court, subject to PAIA.

5.1 Grounds on which access may be refused

Simplict will consider every request on its facts. PAIA may require or permit refusal, including where disclosure would unreasonably reveal a third party's personal information, commercial information, confidential information, privileged material, research information, or information that could prejudice safety, security or legitimate commercial interests. Where reasonably possible, Simplict may sever protected information and provide access to the remainder.

6. Records available without a formal request

Category	Examples	Website	On request
Corporate and public information	Company profile, service descriptions, website terms, published contact details	Yes	Yes
PAIA and privacy information	This PAIA Manual, public privacy notices, PAIA request guidance and links to prescribed forms	Yes	Yes
Marketing and communications	Newsletters, service brochures, published articles and security-awareness material	Where published	Yes
Employment opportunities	Publicly advertised vacancies and application instructions	Where published	Yes

Automatic availability does not waive confidentiality, copyright, privacy or other legal restrictions. Simplict may remove third-party or sensitive information before release.

7. Records available under other legislation

The following legislation may require Simplict to create, retain or make records available. The list is indicative and applies only to the extent relevant to Simplict's activities:

Legislation	Examples of records
Companies Act 71 of 2008	Memorandum of Incorporation, securities and director records, statutory registers, annual returns and accounting records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax returns, assessments, supporting schedules and tax records
Value-Added Tax Act 89 of 1991	VAT registrations, tax invoices, returns and supporting records
Basic Conditions of Employment Act 75 of 1997	Employment particulars, hours, leave and remuneration records
Labour Relations Act 66 of 1995	Employee relations, disciplinary and dispute records
Employment Equity Act 55 of 1998	Employment-equity records and reports, where applicable

Legislation	Examples of records
Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999	Training and levy records
Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002	UIF registrations, declarations and contributions
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Registration, earnings, claims and return-of-earnings records
Occupational Health and Safety Act 85 of 1993	Health-and-safety records, incidents and risk controls
Electronic Communications and Transactions Act 25 of 2002	Electronic transactions and communications records
Consumer Protection Act 68 of 2008	Customer terms, complaints and service records, where applicable
POPIA 4 of 2013	Privacy notices, operator arrangements, security safeguards, data-subject requests and breach records
PAIA 2 of 2000	PAIA Manual, request register, requests and outcomes
Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE verification or status documentation and supporting procurement records, where applicable

8. Subjects and categories of records held

Subject	Categories of records
Corporate governance and legal	CIPC and incorporation documents; Memorandum of Incorporation; director and shareholder records; policies; delegations; minutes and resolutions; licences; insurance; legal opinions; contracts; confidentiality and data-processing agreements; disputes and litigation records.
Finance, tax and banking	Annual financial statements; management accounts; budgets; banking and payment records; customer and supplier invoices; credit notes; expense claims; asset registers; tax, VAT, PAYE, UIF and SDL records; audits; procurement and purchase orders.

Subject	Categories of records
Clients and service delivery	Client agreements; proposals and quotations; onboarding records; contact and billing information; service tickets; project records; technical documentation; service reports; communications; customer asset and licensing information; complaints and quality records.
Suppliers and procurement	Supplier onboarding and due-diligence records; agreements; contacts; banking confirmations; orders; licences; warranties; B-BBEE documents; invoices and payment records.
Human resources	Recruitment and applicant records; contracts; identification and contact details; payroll, banking and tax records; leave, attendance, training, qualifications, performance, disciplinary, health-and-safety and termination records.
Information technology and security	System and application inventories; user and access records; configuration and asset records; audit and activity logs; backup and recovery records; vulnerability, patching, monitoring and incident records; security policies and risk assessments.
Marketing and communications	Website content; mailing lists and preferences; newsletters; campaigns; event information; social-media content; brand assets and communications.
Compliance and risk	PAIA and POPIA records; information-officer records; data-subject requests; impact and risk assessments; retention schedules; processing registers; security-compromise records; regulator correspondence and compliance evidence.
Facilities and operations	Office, lease, access-control, equipment, vehicle, insurance, incident, health-and-safety and business-continuity records.

9. Processing of personal information

9.1 Purposes of processing

- providing managed ICT, support, cloud, cybersecurity, licensing, procurement and professional services;
- client onboarding, service management, support tickets, incidents, projects, asset management and billing;
- supplier onboarding, procurement, payments, due diligence and contract management;
- recruitment, employment, payroll, benefits, leave, performance, training, health and safety and termination;

- identity, qualification, credit, background and fraud-prevention checks where lawful and necessary;
- legal, regulatory, accounting, tax, audit, insurance, risk-management and record-retention obligations;
- marketing, events, newsletters and relationship management, subject to applicable consent and opt-out requirements;
- protecting systems, premises, users and information through access control, monitoring, backups, logging and incident response;
- establishing, exercising or defending legal rights.

9.2 Data subjects and categories of personal information

Data subject	Information that may be processed
Clients, prospects and their representatives	Identity and contact details; employer and role; correspondence; contracts; billing and payment information; service, ticket, project, device, user, licensing and technical information; call or meeting records where applicable.
Suppliers, vendors and contractors	Identity, company and contact details; contracts; tax, B-BBEE, banking, invoice, payment, credential, performance and due-diligence information.
Employees, former employees and applicants	Identity and contact details; demographic information where lawfully required; qualifications; employment history; references; contracts; payroll, bank, tax, leave, performance, training, disciplinary, health-and-safety, benefits and termination information.
Directors, shareholders and officers	Identity, contact, statutory, governance, financial-interest, signature and regulatory information.
Website users and marketing contacts	Contact details, communication preferences, enquiry content, IP/device and usage information, and cookie or analytics information where used.
Visitors and other individuals	Contact, access, correspondence, image or incident information where reasonably necessary and lawful.

9.3 Recipients or categories of recipients

Information / purpose	Potential recipients
Service delivery and cloud operations	Authorised employees; contracted technicians; software, cloud, hosting, backup, security, telecommunications and support providers acting under appropriate arrangements.

Information / purpose	Potential recipients
Payments, accounting and tax	Banks, payment providers, accountants, auditors, payroll providers, insurers, SARS and other competent authorities.
Employment and verification	Payroll and benefits providers; training bodies; medical or occupational-health providers; background, qualification or credit-verification providers where lawful; regulators and statutory bodies.
Legal and compliance	Legal advisers, courts, law-enforcement agencies, the Regulator and other public authorities where required or permitted by law.
Corporate transactions	Professional advisers and relevant counterparties, subject to confidentiality and lawful-processing safeguards.

9.4 Planned transborder flows

Simplict may use international or globally distributed technology and cloud services for email, collaboration, support, security, software licensing, backup, hosting and business operations. Personal information may therefore be stored in or accessed from countries outside South Africa. Simplict will make such transfers only where permitted by POPIA, including where the recipient is subject to a law, binding corporate rules or an agreement that provides an adequate level of protection, or another lawful basis applies. Access is limited to what is necessary for the relevant service.

9.5 Security safeguards

Simplict uses reasonable and appropriate technical and organisational measures having regard to the nature of the information and foreseeable risks. Measures may include:

- role-based access and least-privilege controls;
- multi-factor authentication, password and identity controls;
- encryption in transit and, where appropriate, at rest;
- endpoint protection, patching, firewalls, email security, vulnerability management and monitoring;
- logging, audit trails, alerting and incident-response procedures;
- backup, recovery, business-continuity and disaster-recovery controls;
- supplier and operator due diligence and written data-protection obligations;
- staff confidentiality duties, security awareness and access reviews;
- physical access controls and secure disposal;
- retention, deletion and data-minimisation practices.

No security measure can eliminate all risk. Simplict reviews safeguards and responds to suspected security compromises in accordance with its legal obligations and incident procedures.

10. Availability and updating of this Manual

A copy of this Manual is available:

- on www.simplict.it;
- for inspection at Simplict's head office during normal business hours, by prior arrangement;
- from the Information Officer upon request, subject to any prescribed reproduction fee; and
- to the Regulator upon request.

The Information Officer will review this Manual at least annually and update it when material changes occur to Simplict's records, processing activities, contact details, security arrangements or applicable law. The version and revision date on the cover identify the current edition.

11. Approval

Issued for and on behalf of Simplict (Pty) Ltd:

Name	Jacobus Johannes Petrus van der Merwe
Capacity	Director / Chief Information Officer
Signature	JJP v/d Merwe JJP v/d Merwe (Nov 19, 2026 09:54:48 GMT+2)
Date	Nov 19, 2026

Annexure A: PAIA request checklist

Check	Requirement
☐	Use the current prescribed Form 2.
☐	Identify the requester and provide proof of identity.
☐	If acting for another person, attach written authority and identification.
☐	Describe the record precisely, including dates, people, project, account or reference numbers where known.
☐	State the preferred form of access and contact method.
☐	Identify the right to be exercised or protected.
☐	Explain why the requested record is required for that right.
☐	Send the signed request to francois@simplict.it with “PAIA request” in the subject line.
☐	Keep a copy and proof of submission.
☐	Pay any prescribed fee only after receiving formal notice from Simplict.

Annexure B: External sources and prescribed forms

Resource	Location
Information Regulator PAIA page	https://inforegulator.org.za/paia/
Information Regulator eServices portal	https://eservices.inforegulator.org.za
Form 2: Request for Access to Record	Available from the Regulator's PAIA page
Form 3: Outcome of request and fees payable	Available from the Regulator's PAIA page
Form 5: Complaint Form	Available from the Regulator's PAIA page
PAIA Guide	Available from the Regulator's PAIA page and from Simplict's Information Officer
Official private-body PAIA Manual template	Available from the Regulator's PAIA page

Source note: This Manual was completed using the Information Regulator's private-body template and Simplict's existing signed PAIA Manual and corporate records. Legal and operational details should be reviewed whenever Simplict's activities or appointments change.

PAIA-Manual - Simplict PTY Ltd - Nov2026

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