

PAIA MANUAL

Broadside Technologies — Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- “CEO” — Chief Executive Officer
- “DIO” — Deputy Information Officer
- “IO” — Information Officer
- “Minister” — Minister of Justice and Correctional Services
- “PAIA” — Promotion of Access to Information Act 2 of 2000 (as amended)
- “POPIA” — Protection of Personal Information Act 4 of 2013
- “Regulator” — the Information Regulator (South Africa)
- “Republic” — the Republic of South Africa

2. PURPOSE OF THIS PAIA MANUAL

This Manual is published in accordance with section 51 of PAIA and is intended to help members of the public to:

- check the categories of records held by Broadside that are available without having to submit a formal PAIA request;
- understand how to make a request for access to a record held by Broadside, including the subjects on which records are held;
- identify records that are available under other legislation, without needing to submit a PAIA request;
- access the contact details of Broadside's Information Officer and Deputy Information Officer(s);
- access the Regulator's Guide on how to use PAIA;
- understand the purpose for which Broadside processes personal information, the categories of data subjects and information involved, and the recipients to whom that information may be disclosed;
- know whether Broadside transfers personal information outside the Republic; and

- understand the security measures Broadside has in place to protect personal information.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1 Information Officer

Name: De Wet Swart

Title: Chief Executive Officer

Email: dewet@broadside.co.za

3.2 Deputy Information Officer(s)

Not currently designated.

3.3 General Access-to-Information Contact

Email: info@broadside.co.za

3.4 Head Office

Postal Address: Broadside Technologies (Pty) Ltd, 18 Vista, Rantkant Crescent, Zwartkops, Centurion, 0157

Physical Address: Broadside Technologies (Pty) Ltd, 18 Vista, Rantkant Crescent, Zwartkops, Centurion, 0157

Email: info@broadside.co.za

Website: <https://www.broadside.co.za>

4. GUIDE ON HOW TO USE PAIA

The Regulator has, in terms of section 10(1) of PAIA, published a Guide on how to use PAIA (the “Guide”), in an easily comprehensible form, to assist any person who wishes to exercise a right under PAIA or POPIA. The Guide describes the objects of PAIA and POPIA, the contact details of information officers, how to request access to records, the assistance available from information officers and the Regulator, and the remedies available — including internal appeals, complaints to the Regulator, and applications to court.

The Guide is available:

- from the Regulator's website: www.inforegulator.org.za;
- upon request to Broadside's Information Officer (see clause 3.1); and
- for inspection at Broadside's head office during normal business hours.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A REQUEST

The following categories of records are available without a person having to submit a formal PAIA request:

Category of Records	Types of Record	On Website	On Request
Legal & Compliance	Privacy Policy, Cookie Policy, this PAIA Manual	Yes	Yes
Company Information	Company profile, service overview, and client case studies	Some Info Available	Yes

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

The following categories of records are created and held in accordance with other South African legislation:

Category of Records	Applicable Legislation
Company registration documents (e.g. Memorandum of Incorporation)	Companies Act 71 of 2008
Annual financial statements and tax records	Companies Act 71 of 2008; Tax Administration Act 28 of 2011
This PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

Broadside holds records on the following subjects:

Subject	Categories of Records
Corporate Governance	Registration documents, internal policies, this Manual
Client Engagements	Proposals, service level agreements, non-disclosure agreements, workplans, meeting minutes, invoices
Finance	Invoices, financial statements, banking records
Marketing & Website	Privacy Policy, Cookie Policy, website enquiry records, game leaderboard/lead-capture records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing

Broadside processes personal information to deliver its services to clients, manage relationships with service providers and vendors, respond to enquiries submitted through its website, follow up with participants of its website-based marketing activities (such as the Broadside Defender game leaderboard), and comply with its legal and regulatory obligations.

8.2 Categories of Data Subjects and Personal Information Processed

Category of Data Subject	Personal Information Processed
Website visitors / enquirers	Name, email address, telephone number, message content, browsing and cookie data
Clients and client contacts	Name, job title, business contact details, engagement-related correspondence
Service providers / vendors	Name, business contact details, banking details (for invoicing)
Game leaderboard participants	Name, surname, company, email address, and in-game score

8.3 Recipients of Personal Information

Category of Personal Information	Recipients / Categories of Recipients
Client engagement correspondence	Professional advisors (e.g. auditors, legal counsel), where necessary
Website analytics data	Analytics and hosting service providers
Financial and banking details	Accountants and banking institutions
Any personal information	Regulators or law enforcement, where required by law

8.4 Planned Transborder Flows of Personal Information

Some of Broadside's service providers (for example, cloud hosting or analytics providers) may store or process personal information outside the Republic of South Africa, in the country where that provider hosts its infrastructure. Where this occurs, Broadside takes reasonable steps in accordance with section 72 of POPIA to ensure the recipient is subject to a law, binding corporate rules, or agreement that provides an adequate level of protection.

8.5 Information Security Measures

Broadside has implemented, or is implementing, the following categories of security safeguards to protect the confidentiality, integrity, and availability of personal information:

- access controls restricting personal information to authorised personnel;
- encryption of data in transit;

- confidentiality undertakings and non-disclosure agreements with staff and service providers;
- staff awareness of data protection obligations; and
- all staff PCs are protected with up-to-date antivirus software.

9. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available:

- on Broadside's website: <https://www.broadside.co.za>;
- at Broadside's head office, for inspection during normal business hours;
- to any person upon request and upon payment of the reasonable prescribed fee (as set out in Annexure B of the PAIA Regulations); and
- to the Information Regulator, upon request.

10. UPDATING OF THIS MANUAL

Broadside will review and update this Manual on a regular basis, and in any event when there is a material change to the categories of records it holds or to how it processes personal information.

Issued by

De Wet Swart

Chief Executive Officer