



Simply AIVA Proprietary Limited

Registration Number: 2018/622069/07

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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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 (**“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 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

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 - SIMPLY AIVA PROPRIETARY LIMITED (“AIVA”)

3.1. Chief Information Officer

Name: Jacquis Tolsma
Tel: +27 87 551 7735
Email: jacquis@aiva.co.za

3.2. Deputy Information Officer

Name: David von Hoesslin
Tel: +27 87 551 7735
Email: david@aiva.co.za

3.3 Access to information general contacts

Email: information@aiva.co.za

3.4 National or Head Office

Postal Address: Postnet Box 53
Private Bag X9
Karenpark
Gauteng
0118

Physical Address: 140 Krinkhout Avenue Florauna
Pretoria
Gauteng
0182

Telephone: +27 833745983

Email: information@aiva.co.za

Website: <https://aiva.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

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

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; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50;
 - 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 and 51 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 and 52 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 and 54 regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92.
- 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 for public inspection during normal office hours.

5. CATEGORIES OF RECORDS OF AIVA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Available on Website	Available on Mobile Application	Available upon request
Privacy Policy	X		X
Terms and Conditions	X		X
Client Personal Profile		X	

6. DESCRIPTION OF THE RECORDS OF AIVA 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

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

Subjects on which the body holds records	Categories of records held
Personal Information Held	- Client Information; - Supplier and Service Provider Information; - Employee Personal Information; - User Information: Information in correspondence and transaction documents, ownership status, user logs, photographs of identity documents, license photos, number plate information, CCTV footage, vehicle registration details; - Account details: Username, password (processed but not viewable by AIVA), usage data, aggregate statistical information; - Technical/device data: Device type, operating system, browser, IP address, connection timestamps, cookies and tracking technologies; and - Biometric/access data: Facial photos, vehicle number plates, persons visited, payment amount and payment method.

This list includes the main categories of records held by AIVA but does not cover every document in our possession. We may also keep other records needed for our business operations, legal obligations, and compliance with relevant laws. All records are managed and retained in line with legal requirements and data protection laws.

The Company does not maintain physical records at its registered address. Records are retained electronically and are stored using cloud-based document management and storage systems.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal information is processed by AIVA for purposes related to its AI-driven access control and security solutions, including but not limited to managing physical access to residential estates and commercial properties, processing and verifying visitor and resident identity, maintaining client and supplier records, complying with legal and regulatory obligations, managing employee and contractor relationships, facilitating effective communication with clients, service providers, and stakeholders, and processing payments where applicable.

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
Customers / Clients	Name, identity numbers, contact information, date of birth, age, medical information.
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details.
Employees	Name, identity numbers, email address, bank details and qualifications.

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
Where a case number relates to a security incident	South African Police Services
Payment information and logs shared for fraud prevention purposes (applicable to commercial properties that use	Payment processors / fraud prevention services

the payment feature)	
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8.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

While AIVA may process personal information on behalf of its clients and is not generally the responsible party in respect of such personal information, AIVA implements and maintains appropriate technical and organisational security measures designed to protect information against unauthorised access, loss, misuse, alteration, disclosure or destruction.

AIVA hosts its services with reputable and secure cloud-hosting providers that maintain industry-standard security controls and follow recognised security best practices. Information processed through AIVA's systems is encrypted in transit using appropriate encryption protocols. Access to information is restricted to authorised personnel on a need-to-know basis, and up-to-date anti-virus, monitoring and security solutions are maintained to safeguard the confidentiality, integrity and availability of information and to mitigate cybersecurity risks.

9. REQUEST FOR ACCESS TO RECORD/INFORMATION

Data subjects requesting access to records and/or information pertaining to them and held by AIVA shall be required to complete the annexed **Form 2: Request for Access to Record** and submit the same to the Chief Information Officer referred to in clause 3.

Such requests shall be limited strictly to information relating to the data subject concerned and shall not extend to any proprietary information of AIVA. The Company reserves the right to refuse any such request where appropriate, provided that approval shall not be unreasonably withheld.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on (<https://aiva.co.za/>)

10.1.2 head office of AIVA for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

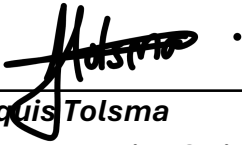
10.1.4 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The head of AIVA will update this manual on a regular basis.

Issued by



Jacquie Tolsma

Chief Executive Officer

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: ☐
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or	

protection of the aforementioned right:	
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FEES	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
c)	The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
d)	If you qualify for exemption of the payment of any fee, please state the reason for exemption
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer