



PAIA MANUAL · SECTION 51

Access to information manual.

Compliance Online (Pty) Ltd

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

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INFORMATION OFFICER

Sarah Lovemore Roux

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Approval and sign-off

Version 2.3 of this document was approved on 6 October 2026 by Nino Haasbroek, through review and approval of pull request #60 in the Compliance Online policy repository.

Approved text: commit 39a979aa931bbd082b5be8d857f6ad3ea19f50a6 (SHA-1). This identifies exactly the wording that was approved; any change to the text produces a different commit.

The signatures below confirm this approval.

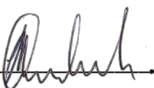
Sarah Lovemore Roux

CEO

Signature:  Date: 06 October 2026

Nino Haasbroek

Head: Infrastructure and Technology

Signature:  Date: 06 October 2026

1. List of acronyms and abbreviations

ABBREVIATION	MEANING
1.1 'CEO'	Chief Executive Officer
1.2 'Compliance Online', 'we', 'us', 'our'	Compliance Online (Pty) Ltd
1.3 'DIO'	Deputy Information Officer
1.4 'IO'	Information Officer
1.5 'Minister'	Minister of Justice and Constitutional Development
1.6 'PAIA'	Promotion of Access to Information Act 2 of 2000 (as amended)
1.7 'POPIA'	Protection of Personal Information Act 4 of 2013
1.8 'Regulator'	Information Regulator
1.9 'Republic'	Republic of South Africa

2. Purpose of this PAIA manual

Use this manual to:

- 2.1 check the categories of records we hold that are available without a formal PAIA request;
- 2.2 understand how to request access to a record we hold, using the description of the subjects on which we hold records and the categories of records held on each subject;
- 2.3 find the records we hold that are available under other legislation;
- 2.4 find the contact details of our Information Officer and Deputy Information Officer, who will help you with the records you want to access;
- 2.5 find the Regulator's Guide on how to use PAIA and how to get a copy of it;
- 2.6 know whether we process personal information, why we process it, and the categories of data subjects and personal information involved;
- 2.7 know the categories of data subjects and the information or categories of information relating to them;
- 2.8 know the recipients or categories of recipients to whom we may supply personal information;

- 2.9 know whether we plan to transfer or process personal information outside the Republic, and the recipients or categories of recipients involved; and
- 2.10 know whether we have appropriate security measures to protect the confidentiality, integrity, and availability of the personal information we process.

3. Key contact details for access to information of Compliance Online

3.1 Information Officer

FIELD	DETAILS
Name	Sarah Lovemore Roux
Designation	Chief Executive Officer (head of the private body)
Telephone	021 863 0073
Email	support@complianceonline.co.za

3.2 Deputy Information Officer

FIELD	DETAILS
Name	Nino Haasbroek
Designation	Head: Infrastructure and Technology (designated in terms of section 17 of PAIA and section 56 of POPIA)
Telephone	021 863 0073
Email	support@complianceonline.co.za

3.3 Access to information general contact

FIELD	DETAILS
Email	support@complianceonline.co.za

3.4 Head office

FIELD	DETAILS
Postal address	88 Main Road, Vrykyk, Paarl, 7646

FIELD	DETAILS
Physical address	88 Main Road, Vrykyk, Paarl, 7646
Telephone	021 863 0073
Email	support@complianceonline.co.za
Website	https://complianceonline.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 understandable form and manner, as may reasonably be required by a person who wishes to exercise any right in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The Guide contains the description of:
 - 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone number, and, if available, email address of:
 - (i) the Information Officer of every public body; and
 - (ii) every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3 the manner and form of a request for:
 - (i) access to a record of a public body in terms of section 11³; and
 - (ii) access to a record of a private body in terms of section 50⁴;
 - 4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

¹ 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.

² Section 56(a) of POPIA: each public and private body must make provision, in the manner prescribed in section 17 of PAIA, 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.

³ 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 in Chapter 4 of Part 2.

⁴ 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 in Chapter 4 of Part 3.

- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 all remedies in law available for 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:
 - (i) an internal appeal;
 - (ii) a complaint to the Regulator; and
 - (iii) an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Regulator, or a decision of the head of a private body;
- 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;
- 4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92¹¹.
- 4.4 You can inspect or make copies of the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5 You can also get the Guide:
 - 4.5.1 on request from our Information Officer; or
 - 4.5.2 from the Regulator's website: <https://inforegulator.org.za/paia-guidelines/>.
- 4.6 A copy of the Guide is available at our head office in the following two official languages, for public inspection during normal office hours:
 - 4.6.1 English; and

⁵ Section 14(1) of PAIA: the information officer of a public body must, in at least three official languages, make available a manual containing the information listed in paragraph 4 above.

⁶ 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.

⁷ 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.

⁸ 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.

⁹ 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.

¹⁰ 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.

¹¹ Section 92(1) of PAIA: the Minister may, by notice in the Gazette, make regulations regarding (a) any matter which is required or permitted by PAIA to be prescribed; (b) any matter relating to the fees in sections 22 and 54; (c) any notice required by PAIA; (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 PAIA.

4.6.2 Afrikaans.

5. Categories of records of Compliance Online that are available without a person having to request access

CATEGORY OF RECORDS	TYPES OF THE RECORD	AVAILABLE ON WEBSITE	AVAILABLE ON REQUEST
PAIA	This PAIA manual	X	X
Privacy	Privacy Notice	X	X
Legal terms	Website terms and conditions	X	X
Products and services	Product brochures and course catalogue	X	X

You can download these records from <https://complianceonline.co.za> or ask for a copy by emailing support@complianceonline.co.za.

6. Description of the records of Compliance Online that are available in accordance with any other legislation

We keep records in terms of the following legislation. Where a record is not listed in section 5, you need to request access to it in terms of PAIA.

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
PAIA manual	Promotion of Access to Information Act 2 of 2000
Privacy Notice, records of processing, and security compromise records	Protection of Personal Information Act 4 of 2013
Memorandum of Incorporation, registers of directors and securities, minutes, and annual financial statements	Companies Act 71 of 2008
Tax records, including income tax, PAYE, and provisional tax	Income Tax Act 58 of 1962 Tax Administration Act 28 of 2011

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
VAT records	Value-Added Tax Act 89 of 1991
Employment contracts, time and remuneration records	Basic Conditions of Employment Act 75 of 1997
Disciplinary records and collective agreements	Labour Relations Act 66 of 1995
Employment equity records and reports	Employment Equity Act 55 of 1998
Skills development and levy records	Skills Development Act 97 of 1998 Skills Development Levies Act 9 of 1999
UIF records and contributions	Unemployment Insurance Act 63 of 2001 Unemployment Insurance Contributions Act 4 of 2002
Workplace injury records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
B-BBEE records	Broad-Based Black Economic Empowerment Act 53 of 2003
Consumer records and electronic transaction records	Consumer Protection Act 68 of 2008 Electronic Communications and Transactions Act 25 of 2002

7. Description of the subjects on which Compliance Online holds records and categories of records held on each subject

SUBJECTS ON WHICH WE HOLD RECORDS	CATEGORIES OF RECORDS
Company records	Memorandum of Incorporation and registration documents Share register and directors' information Board and shareholder minutes and resolutions
Strategic and governance records	Business strategy and plans Budgets and forecasts Internal policies and procedures, including our information security policies Risk registers and audit reports
Financial records	Annual financial statements Accounting records, invoices, and statements Banking records Tax and VAT records Insurance policies

SUBJECTS ON WHICH WE HOLD RECORDS	CATEGORIES OF RECORDS
Human resources	Employee records and employment contracts Payroll and benefits records Training records and performance reviews Disciplinary records Job applications, CVs, interview notes, and references Screening and qualification verification results
Client records	Client company information and contact details Contracts, quotations, and service agreements Billing details and invoices Support tickets and correspondence Client documents and policies uploaded to our platforms
Platform user and trainee records	User profiles on ELLO and Policy Passport Training records, test results, and certificates Policy acknowledgement records Training reports for clients
Supplier records	Supplier company information and contact details Contracts and data processing agreements Third-Party Supplier Register Invoices and correspondence
Information technology	Asset and software licence registers System, security, and audit logs Backup records Penetration test reports
Marketing	Newsletter subscriber lists Marketing material and campaigns Website analytics

8. Processing of personal information

8.1 Purpose of processing personal information

CATEGORIES OF DATA SUBJECTS	PURPOSE OF PROCESSING
Clients (companies and their contact persons)	Provide our services and platforms Conclude and perform contracts Invoice and collect payment Provide technical support Communicate about our services Comply with legislation

CATEGORIES OF DATA SUBJECTS	PURPOSE OF PROCESSING
Platform users and trainees (our clients' employees)	Give access to ELLO and Policy Passport Deliver training and record results Track policy acknowledgements Report to the client employer, including to help it comply with B-BBEE legislation Send service messages by email and SMS
Employees	Manage the employment relationship Pay salaries and benefits Comply with labour, tax, and employment equity legislation Manage performance and training Provide and manage company devices
Job applicants	Assess applications Verify qualifications and conduct criminal record checks, with consent
Service providers and suppliers	Conclude and perform contracts Pay for goods and services Assess supplier security risk Comply with legislation
Directors and shareholders	Keep statutory company registers Comply with the Companies Act and tax legislation
Newsletter subscribers and marketing contacts	Send newsletters and information about our services, with consent or as permitted by section 69 of POPIA
Website visitors	Run and secure our website Understand how visitors use our website Respond to enquiries

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
Clients	Company name, registration number, VAT number, physical and postal addresses, contact persons' names, email addresses and telephone numbers, banking and billing details, and correspondence.
Platform users and trainees	Name and surname, identity number or employee number, employer and position, email address, telephone number, gender and race (for B-BBEE reporting), training and test results, and policy acknowledgements.
Employees	Name and surname, identity number, contact details, address, race, gender, disability status, qualifications, employment history, income tax number, banking details, remuneration and benefits, performance records, emergency contact details, and device information.

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Job applicants	Name and surname, contact details, CV, qualifications, references, interview notes, and criminal record and qualification verification results.
Service providers and suppliers	Company name, registration number, VAT number, address, contact persons' names and contact details, and banking details.
Directors and shareholders	Name and surname, identity number, address, contact details, and shareholding.
Newsletter subscribers and marketing contacts	Name and email address.
Website visitors	IP address, browser and device information, usage data from cookies and analytics, and details provided in enquiries.

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
Tax, PAYE, and VAT information of the company, employees, and suppliers	South African Revenue Service (SARS)
Employee information for statutory reporting	Department of Employment and Labour, Unemployment Insurance Fund, and Compensation Fund
Employee payroll information	FHBC Payroll Services
Financial records, including client and supplier billing information	External auditors and accountants Xero (accounting software)
Payment and banking information	Our bank and payment service providers
Identity number and name, for criminal record checks	South African Police Service, through a screening service provider
Qualifications, for qualification verification	South African Qualifications Authority (SAQA)
Training results and user information	The client employer that enrolled the user
Platform user and client information (application hosting)	Google Cloud Platform (databases) Amazon Web Services (document storage) Redis (application data cache) Cloudflare (content delivery and website security)
Service messages to platform users	Resend (email) Twilio (SMS)
Training content delivered through client learning systems	WelcomeNext (ScormProxy)

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS
Support requests and correspondence	Freshdesk
Email, documents, and internal collaboration	Google Workspace Microsoft 365 Slack Superhuman Docs (Coda) Linear
Information used with AI assistants	OpenAI (ChatGPT) Anthropic (Claude)
Error and performance data, which may include user identifiers	Sentry
Employee device information	Mosyle and Apple (device management)
Newsletter subscriber information	Beehiiv
Marketing material	Canva
Website enquiries and website analytics	Xneelo (website hosting) Google Analytics
Call records and internet connectivity	Vox Telecom

We share personal information with service providers only for the purposes in section 8.1, and we require them to protect it under our **Third Party Supplier Security Policy and Procedures**.

8.4 Planned transborder flows of personal information

We use cloud service providers, some of which store or process personal information outside the Republic. Before we transfer personal information, we make sure the recipient is subject to a law, binding corporate rules, or a binding agreement that gives an adequate level of protection, as required by section 72 of POPIA. Where relevant, we enter into data processing agreements with these providers.

PROVIDER	WHAT WE USE IT FOR	WHERE PERSONAL INFORMATION IS STORED OR PROCESSED
Google Cloud Platform	ELLO and Policy Passport databases	European Union
Amazon Web Services (S3)	Client documents, policies, and training reports	Ireland, replicated to Germany
Google Workspace and Google Analytics	Email, documents, and website analytics	Google data centres, including the United States and the European Union
Microsoft 365	Email, office apps, document storage, and online meetings and chat	South Africa (Exchange Online, Teams, and Copilot) Europe (OneDrive and SharePoint, which are committed to move to South Africa)

PROVIDER	WHAT WE USE IT FOR	WHERE PERSONAL INFORMATION IS STORED OR PROCESSED
Freshdesk (Freshworks)	Customer support	United States
Xero	Accounting	United States and New Zealand
Resend and Twilio	Email and SMS service messages	United States
Cloudflare	Content delivery and website security	Global network
Redis	Application data cache	European Union
Sentry	Error monitoring	European Union (Germany)
WelcomeNext (ScormProxy)	Training content delivery	European Union
OpenAI and Anthropic	AI assistants (business plans)	United States
Slack	Internal collaboration	European Union (Frankfurt, Germany); member profiles and account information in the United States
Linear	Internal collaboration	European Union; user account information in the United States
Superhuman Docs (Coda)	Internal collaboration	United States
Mosyle and Apple	Device management	United States
Beehiiv and Canva	Newsletters and marketing material	United States

The following providers store information in the Republic: FHBC Payroll Services, Xneelo, and Vox Telecom.

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

We run an information security management system aligned to ISO/IEC 27001. Our security measures include:

- **Policies and governance:** documented information security policies, reviewed every year and approved by management.
- **Access control:** least-privilege access to systems and data, with multi-factor authentication on critical systems, including our code repositories.
- **Encryption:** we encrypt personal information when it is stored and when it is transmitted.
- **Device security:** company devices are centrally managed, with full-disk encryption, antivirus and anti-malware software, and firewalls.

- **Secure development:** we follow the OWASP Top Ten, review code, and scan code and dependencies for vulnerabilities automatically.
- **Testing:** an external specialist company tests our platforms for vulnerabilities every year.
- **Patch management:** we apply security patches within set timeframes based on their severity.
- **Backups:** we back up platform data daily, weekly, and monthly, and keep backups for up to 12 months.
- **Supplier management:** we assess the security of service providers before we share personal information with them, and we enter into data processing agreements where relevant.
- **Training:** employees complete POPIA and information security training at induction and every year after that.
- **Incident management:** we report security compromises to the Regulator and affected data subjects as required by section 22 of POPIA.

9. Availability of the manual

9.1 A copy of this manual is available:

- 9.1.1 on our website: <https://complianceonline.co.za>;
- 9.1.2 at our head office, for public inspection during normal business hours;
- 9.1.3 to any person on request and on payment of a reasonable prescribed fee; and
- 9.1.4 to the Regulator on request.

9.2 A fee for a copy of the manual, as set out in Annexure B of the Regulations, is payable for each A4-size photocopy made. The current fee is R2.00 per page.

10. Updating of the manual

The head of Compliance Online will update this manual regularly, and at least once a year.

Issued by:

Sarah Lovemore Roux

Chief Executive Officer and Information Officer

Annexure A

How to request access to a record

This annexure summarises the request process. The Guide in section 4 explains it in full.

A.1 Submit a request

1. Complete Form 2 (Request for access to a record), available at <https://infoeregulator.org.za/paia-forms/>.
2. Describe the record you want, the form of access you need, and the right you want to exercise or protect, as required by section 53 of PAIA.
3. If you make the request on behalf of someone else, attach proof of the capacity in which you make it.
4. Email the form to support@complianceonline.co.za or deliver it to our head office.
5. Pay the request fee of R140.00. We start processing your request once we receive the fee.

A.2 Fees

ITEM	FEE
Request fee	R140.00
Photocopy or printed copy, per A4 page	R2.00
Copy on a flash drive or CD you provide	R40.00
Copy on a CD we provide	R60.00
Transcription of an audio record, per A4 page	R24.00
Search and preparation, per hour after the first hour	R145.00, up to a maximum of R435.00
Deposit, if the search will take more than 6 hours	One third of the access fee
Postage, email, or other electronic transfer	Actual cost

These are the fees prescribed for private bodies in Annexure B of the Regulations Relating to the Promotion of Access to Information, 2021. If we refuse your request, we refund any deposit you paid.

A.3 Our decision

We will tell you in writing whether we grant your request within 30 days of receiving it. We may extend this period once, by up to 30 days, in terms of section 57 of PAIA, and we will tell you why. If we do not respond within this period, your request is regarded as refused in terms of section 58 of PAIA.

If we cannot find a record, or it does not exist, we will tell you by affidavit or affirmation in terms of section 55 of PAIA.

A.4 Grounds for refusal

We may or must refuse access to a record to protect:

- the privacy of a third party who is a natural person (section 63);
- the commercial information of a third party (section 64);
- confidential information of a third party (section 65);
- the safety of individuals and the protection of property (section 66);
- records privileged from production in legal proceedings (section 67);
- our own commercial information (section 68); or
- research information of a third party or of Compliance Online (section 69).

We must still grant access where disclosure is in the public interest as set out in section 70 of PAIA.

A.5 If you disagree with our decision

Within 180 days of our decision, you may:

1. lodge a complaint with the Regulator in terms of section 77A of PAIA, using Form 5 at <https://infoeregulator.org.za/paia-forms/> or by email to PAIAComplaints@infoeregulator.org.za; or
2. apply to a court with appropriate jurisdiction in terms of section 78 of PAIA.

Document control

Version history

VERSION #	DATE	AUTHOR/REVIEWER	BRIEF DESCRIPTION OF CHANGE
1.0	8 June 2023		Access to Information Manual, last revised 8 June 2023 (source-originals/PAIA-Compliance-Online-2023.pdf)
Not applicable: predates the policy repository			
2.0	5 October 2026	Nino Haasbroek	Rebuilt on the Information Regulator's template for private bodies (sections 1 to 10, Annexure A); replaces the manual dated 8 June 2023 Section 8.4: confirmed data regions; Slack, Linear and Coda listed separately
Approved in PR #48 · commit 805815e0e5bc9b166f6446a6db06cb14566fc233			
2.1	5 October 2026	Nino Haasbroek	Section 10: signature and date lines removed; the manual is signed once, on the Approval and sign-off page
Approved in PR #52 · commit 59d36cec073073f57c05648bff613d0e8607a54a			
2.2	6 October 2026	Nino Haasbroek	Section 4.3: fourth-level clauses numbered (i), (ii), (iii) per parent instead of 4.3.2.1 etc.
Approved in PR #58 · commit 15c3872ac9e990f334b5ffa499a29449ebe87b46			
2.3	6 October 2026	Nino Haasbroek	Updated the Information Officer's name to Sarah Lovemore Roux
Approved in PR #60 · commit 39a979aa931bbd082b5be8d857f6ad3ea19f50a6			

Approval

NAME	DESIGNATION	DATE
Nino Haasbroek	Head: Infrastructure and Technology	5 October 2026 (pull request #48)

Document owner

NAME	DESIGNATION	DATE
Nino Haasbroek	Head: Infrastructure and Technology	5 October 2026