



PAIA MANUAL FOR CHRONOLOGIC SOLUTIONS (PTY) LTD

Registration Number: 2003/003093/07

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000

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1. INTRODUCTION AND PURPOSE

This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and includes information required in terms of Section 51 and Regulation 2 of the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The purpose of this manual is to:

- Foster a culture of transparency and accountability in Chronologic Solutions (Pty) Ltd by giving effect to the constitutional right of access to information
- Provide information on the categories of records held by Chronologic Solutions
- Explain the procedures to be followed when requesting access to such records
- Outline the grounds for refusal of access to records

This manual applies to all records held by Chronologic Solutions (Pty) Ltd, whether created by us or received from external parties.

2. KEY CONTACT DETAILS AND PAIA CONTACT INFORMATION

Company Details

Name: Chronologic Solutions (Pty) Ltd

Registration Number: 2003/003093/07

Physical Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Postal Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Telephone: +27 10 591 8105

Email: info@chronologic.co.za

Website: <https://chronologic.co.za>

Information Officer (Section 51(1)(a) of PAIA)

Name: David Endersen

Title: CEO

Email: info@chronologic.co.za

Telephone: +27 10 591 8105

Physical Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

The Information Officer is responsible for:

- Ensuring compliance with PAIA and POPIA
- Processing requests for access to information
- Maintaining and updating this PAIA Manual
- Making decisions on requests for access to records

Deputy Information Officer (Section 51(1)(a) of PAIA)

Name: Andrew Yates

Title: Director

Email: info@chronologic.co.za

Telephone: +27 10 591 8105

Physical Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Deputy Information Officer (Section 51(1)(a) of PAIA)

Name: Chantel Balladon

Title: Operations Manager

Email: info@chronologic.co.za

Telephone: +27 10 591 8105

Physical Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

3. THE ACT AND APPLICABLE LEGISLATION

Chronologic Solutions (Pty) Ltd is subject to the following legislation which may impact on access to information:

- **Promotion of Access to Information Act, 2 of 2000 (PAIA)** - Gives effect to the constitutional right of access to information
- **Protection of Personal Information Act, 4 of 2013 (POPIA)** - Protects personal information processed by public and private bodies
- **Companies Act, 71 of 2008** - Governs corporate records and information
- **Basic Conditions of Employment Act, 75 of 1997** - Governs employment records
- **Labour Relations Act, 66 of 1995** - Governs labour relations records
- **Employment Equity Act, 55 of 1998** - Governs employment equity records
- **Occupational Health and Safety Act, 85 of 1993** - Governs workplace safety records
- **Income Tax Act, 58 of 1962** - Governs financial and tax records
- **Value Added Tax Act, 89 of 1991** - Governs VAT records
- **Electronic Communications and Transactions Act, 25 of 2002** - Governs electronic communications and transactions
- **Cybercrimes Act, 19 of 2020** - Governs cybersecurity and data breaches
- **Regulation of Interception of Communications and Provision of Communication-Related Information Act, 70 of 2002 (RICA)** - Governs interception of communications

This list is not exhaustive and other legislation may apply depending on the specific circumstances.

4. THE GUIDE OF THE INFORMATION REGULATOR

Section 10 of PAIA requires the Information Regulator to compile a guide to assist persons wishing to exercise their rights in terms of PAIA and POPIA. The Guide is available in all official languages and contains information on:

- The objects of PAIA and POPIA
- The postal and street address, phone and fax number, and email address of the Information Officer of every public body
- The manner and form of a request for access to a record, and assistance available from the Information Officer
- All remedies available in law regarding an act or failure to act by a public or private body
- The requirements and procedures for lodging complaints to the Information Regulator
- Other information prescribed by regulation

How to Obtain the Guide

The Guide is available from the Information Regulator in all official languages and can be obtained from:

The Information Regulator (South Africa)

Physical Address:

JD House, 27 Stiemens Street
Braamfontein, Johannesburg, 2001

Postal Address:

P.O. Box 31533
Braamfontein, Johannesburg, 2017

Telephone: +27 10 023 5200

Email: infoereg@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

The Guide is also available on the Information Regulator's website and at our offices upon request.

5. CATEGORIES OF RECORDS HELD BY CHRONOLOGIC SOLUTIONS

Chronologic Solutions (Pty) Ltd holds various categories of records in accordance with applicable legislation and business requirements. These records may be held in physical or electronic format.

5.1 Company Records

- Certificate of incorporation and company registration documents

- Memorandum of Incorporation (MOI)
- Minutes of Board of Directors meetings
- Minutes of shareholders' meetings
- Share certificates and share registers
- Directors' records and declarations of interest
- Company policies and procedures
- Business continuity and disaster recovery plans
- Insurance policies and records

5.2 Financial Records

- Annual financial statements
- Tax returns and SARS correspondence
- VAT records
- Management accounts
- Banking records and statements
- Invoices (issued and received)
- Payment records
- Debtor and creditor records
- Asset registers
- Audit reports and working papers
- Payroll records

5.3 Personnel and Employment Records

- Employee personal information (ID copies, contact details, next of kin)
- Employment contracts and letters of appointment
- Job descriptions and organizational charts
- Performance appraisals and disciplinary records
- Leave records and timesheets
- Training records and certificates
- Salary records and benefits information

- Pension/provident fund records
- Medical aid records
- Employment equity plans and reports
- Health and safety records
- Workplace injury records
- Termination records and exit interviews

5.4 Business Compliance Records

- Business licenses and permits
- Regulatory compliance documentation
- POPIA compliance records
- Data protection impact assessments
- Records of processing activities
- Data breach registers
- Internal audit reports
- Risk assessments and registers
- Quality management records (if applicable)
- Health and safety compliance records

5.5 Client and Customer Records

- Client/customer contact information
- Service level agreements (SLAs)
- Client contracts and amendments
- Proposals and quotations
- Project documentation
- Customer correspondence (email, letters, etc.)
- Customer IT environment data and configurations
- System access logs and credentials (encrypted)
- Technical support records and tickets
- Customer satisfaction surveys and feedback

- Non-disclosure agreements (NDAs)

5.6 Supplier and Service Provider Records

- Supplier contracts and agreements
- Purchase orders
- Supplier invoices and payment records
- Supplier registration and due diligence documents
- Supplier performance evaluations
- Service provider SLAs

5.7 Information Technology Records

- IT infrastructure documentation
- Network diagrams and configurations
- Software licenses and agreements
- Cybersecurity policies and procedures
- Information security incident logs
- Backup and recovery logs
- System access and authentication logs
- Cloud service agreements
- IT asset management records
- Disaster recovery and business continuity plans
- Cybersecurity assessment reports
- Penetration testing reports

5.8 Marketing and Communications Records

- Marketing materials and campaigns
- Website content and analytics
- Social media records
- Customer communications and newsletters
- Brand and intellectual property records

5.9 Legal Records

- Legal opinions and advice
- Litigation records
- Contracts and agreements
- Intellectual property registrations
- Non-disclosure agreements
- Terms and conditions

5.10 Operational Records

- Standard operating procedures
- Quality control records
- Service delivery records
- Incident reports
- Asset management records

Please Note: This list is not exhaustive. Chronologic Solutions may hold other records that are required for the ordinary course of business or in terms of applicable legislation.

6. PROCESSING OF PERSONAL INFORMATION

Chronologic Solutions (Pty) Ltd processes personal information in accordance with POPIA. As a responsible party, we are committed to protecting the personal information of our employees, clients, suppliers, and other data subjects.

6.1 Information Officer Details

The Information Officer (as detailed in Section 2 above) is responsible for ensuring compliance with POPIA and handling all requests relating to personal information.

6.2 Personal Information We Process

We process personal information for legitimate business purposes, including:

- Employment and human resources management
- Client relationship management and service delivery
- Supplier and vendor management
- Financial management and accounting
- Legal and regulatory compliance

- Marketing and business development (with consent where required)

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

Chronologic Solutions processes personal information for the following purposes:

7.1 Employees

- Recruitment and selection
- Employment administration
- Payroll and benefits administration
- Performance management
- Training and development
- Disciplinary and grievance procedures
- Health and safety compliance
- Compliance with employment legislation

7.2 Clients and Customers

- Providing IT solutions and managed services
- Contract management and service delivery
- Technical support and maintenance
- Customer relationship management
- Billing and invoicing
- Compliance with contractual obligations
- Service improvement and quality assurance
- Managing IT environments and cybersecurity

7.3 Suppliers and Service Providers

- Procurement and vendor management
- Contract management
- Payment processing
- Performance evaluation
- Compliance and due diligence

7.4 Website Visitors and Marketing

- Responding to enquiries
- Marketing communications (with consent)
- Website functionality and analytics
- Business development

7.5 Legal and Regulatory Compliance

- Compliance with legal obligations
- Defending or pursuing legal claims
- Record-keeping requirements
- Tax and financial reporting

8. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION

8.1 Employees

Personal Information Processed:

- Identification information (full names, ID number, date of birth, nationality)
- Contact details (address, telephone, email)
- Employment details (job title, department, employment history)
- Financial information (salary, banking details, tax information)
- Benefits information (medical aid, pension/provident fund)
- Emergency contact information
- Performance and disciplinary records
- Leave and attendance records
- Qualifications and training records
- Health and safety information

8.2 Clients and Customers

Personal Information Processed:

- Contact person details (name, email, telephone)
- Company information and registration details
- Contract and billing information

- IT environment data and configurations
- System access credentials (encrypted)
- Technical support interactions
- Communication records
- Service usage data

8.3 Suppliers and Service Providers

Personal Information Processed:

- Contact person details
- Company registration information
- Banking details for payments
- Tax registration information
- Contract and performance records

8.4 Directors and Shareholders

Personal Information Processed:

- Identification information
- Contact details
- Shareholding information
- Financial interests
- Declarations of interest

8.5 Website Visitors and Prospective Clients

Personal Information Processed:

- Name and contact details (if provided)
- Email address (for enquiries or newsletters)
- IP address and browser information
- Website usage data (cookies)

9. RECIPIENTS OF PERSONAL INFORMATION

Chronologic Solutions may share personal information with third parties where necessary for legitimate business purposes or as required by law. These recipients include:

9.1 Internal Recipients

- Management and authorized employees who require access for their duties
- Human resources department
- Finance and accounting department
- IT department
- Legal and compliance department

9.2 External Recipients

- **Payroll Service Providers** - for salary and benefits administration
- **Tax Authorities** - SARS, for tax compliance
- **Banking Institutions** - for payment processing
- **Medical Aid and Retirement Fund Administrators** - for employee benefits
- **Legal Advisors and Auditors** - for professional services
- **IT Service Providers and Cloud Providers** - for hosting, backup, and technical services
- **Regulatory Authorities** - when required by law
- **Insurance Companies** - for insurance purposes
- **Debt Collection Agencies** - where applicable
- **Business Partners and Subcontractors** - for service delivery (under confidentiality agreements)

All third-party recipients are required to process personal information in accordance with POPIA and maintain appropriate security measures.

10. TRANSBORDER FLOWS OF PERSONAL INFORMATION

Chronologic Solutions may transfer personal information to recipients outside the Republic of South Africa in the following circumstances:

- Use of cloud service providers with servers located outside South Africa
- Technical support from international software vendors
- Backup and disaster recovery services hosted internationally
- Communication with international clients or partners

Where personal information is transferred outside South Africa, we ensure that:

- The recipient country has adequate data protection laws, or

- The recipient is bound by appropriate data protection agreements, or
- The data subject has consented to the transfer, or
- The transfer is necessary for contractual or legal reasons

We conduct due diligence on all international data transfers to ensure compliance with POPIA.

11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

Chronologic Solutions takes the protection of personal information seriously and has implemented appropriate technical and organizational measures, including:

11.1 Technical Security Measures

- Firewalls and intrusion detection systems
- Encryption of sensitive data in transit and at rest
- Secure authentication and access controls
- Regular security updates and patch management
- Antivirus and anti-malware protection
- Secure backup and disaster recovery systems
- Network segmentation and monitoring
- Regular security assessments and penetration testing
- Cybersecurity incident response procedures

11.2 Organizational Security Measures

- Information security policies and procedures
- Employee confidentiality agreements
- Access controls based on need-to-know principles
- Regular staff training on data protection and security
- Background checks on employees with access to sensitive information
- Visitor access controls to physical premises
- Secure disposal of records containing personal information
- Data breach response procedures
- Third-party vendor security assessments

11.3 Continuous Improvement

We regularly review and update our security measures to address evolving threats and ensure ongoing compliance with best practices and legal requirements.

12. PROCEDURES FOR REQUESTING ACCESS TO RECORDS

12.1 Who May Request Access

Any person may request access to records held by Chronologic Solutions, provided they:

- Comply with the procedural requirements set out in PAIA
- Pay the prescribed request fee (if applicable)
- Demonstrate that access is required for the exercise or protection of a right

12.2 How to Request Access

Step 1: Complete the Request Form A request for access must be made on the prescribed form (Form A), which is attached as an annexure to this manual and is available:

- At our offices
- On our website at <https://chronologic.co.za>
- From the Information Regulator's website

Step 2: Submit the Request The completed form must be submitted to the Information Officer:

By email: info@chronologic.co.za

By post: David Endersen, Information Officer, Chronologic Solutions (Pty) Ltd., DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

By hand: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Step 3: Pay the Request Fee A request fee of R50.00 is payable (except for personal requesters seeking access to their own personal information). Payment details will be provided upon receipt of the request.

Step 4: Await Our Response We will respond to your request within 30 days of receipt, either:

- Granting access (subject to payment of access fees if applicable)
- Refusing access (with reasons)
- Requesting an extension of time (up to 30 additional days if the request is complex)

12.3 Information Required in the Request

The request form must contain the following information:

- Sufficient details to enable the Information Officer to identify the requester
- Sufficient details to identify the record(s) requested
- The form of access required (inspection, copy, etc.)
- The postal or email address for correspondence
- The right the requester seeks to exercise or protect, and an explanation of why the record is required
- If requesting on behalf of another person, proof of capacity to make the request

12.4 Assistance to Requesters

The Information Officer will provide reasonable assistance to requesters, including:

- Helping to complete the request form
- Providing information about the procedures
- Assisting with identifying the relevant records
- Explaining the reasons for refusal (if applicable)

12.5 Forms of Access

If a request is granted, access may be provided in the following forms:

- Inspection of the record at our offices
- A printed copy of the record
- An electronic copy of the record (email, USB, CD)
- A transcription or summary of the record
- An oral presentation of the record contents

The form of access will depend on the nature of the record and the requester's preference, subject to practical considerations and additional costs.

13. PRESCRIBED FEES

13.1 The Information Officer must by notice require the Requester to pay the prescribed request fee, in the amount of R50.00, before further processing the request;

If access to record is granted by Chronologic Solutions, the Requester may be required to pay an access fee in relation to the search for and preparation of the record and for re-production of the record;

The access and reproduction fees which apply are set out below (in accordance with Part III of Annexure A of the Regulations to the Act). Chronologic Solutions may withhold a record until any access fees payable by the requester have been paid according to the following tariffs:

A non-refundable request fee of **R50.00** is payable when submitting Form A, except:

- Personal requesters seeking access to their own personal information are exempt from this fee

13.2 Access Fees

If the request is granted, additional fees for reproduction and/or preparation of the record may apply:

Photocopies/Printed copies:

- R1.10 for every photocopy of an A4-size page or part thereof
- R0.75 for every printed copy of an A4-size page or part thereof
- R70.00 for a copy in a computer-readable form (e.g. USB)
- R40.00 per page for transcription of visual images on an A4-size page or part thereof
- R60.00 per copy of visual images
- R20.00 per page for transcription of an audio record on an A4-size page or part thereof
- R30.00: copy of an audio record

Search and Preparation:

If the search for the record requested and the preparation of the record disclosure would in the opinion of the Information Officer, require more than 6 hours, the Information Officer shall by notice to the Requester require the Requester to effect payment of a deposit to Chronologic Solutions (which deposit may not be more than one third of the access fee which would be payable if the request were granted);

- For search and preparation of the record for disclosure: R100.00 per hour (or part thereof), for a request that exceeds 6 hours, excluding the first hour
- For purposes of section 54(2), the following applies:
 - Six hours as the hours to be exceeded before a deposit is payable
 - One third of the access fee is payable as a deposit by the requester

Postage:

- Actual postal or courier costs

13.3 Payment Methods

Payment can be made via:

- Electronic funds transfer (EFT) - banking details will be provided
- Cash payment at our offices (by prior arrangement)

Proof of payment must be provided before access is granted.

13.4 Fee Waivers

The Information Officer may waive fees in whole or in part if:

- The requester is indigent and cannot afford the fees
- The information is in the public interest
- Other circumstances justify a waiver

A request for a fee waiver must be motivated in writing.

14. GROUNDS FOR REFUSAL OF ACCESS

Access to a record may be refused on one or more of the following grounds, as set out in PAIA:

14.1 Mandatory Protection of Privacy of Third Parties (Section 63)

Access must be refused if disclosure would constitute an unreasonable disclosure of personal information about a third party, unless:

- The third party consents to the disclosure
- The information is already publicly available
- The requester is the legal guardian or executor of the third party

14.2 Mandatory Protection of Commercial Information (Section 64)

Access must be refused if the record contains:

- Trade secrets
- Financial, commercial, scientific, or technical information that could harm the commercial or financial interests of Chronologic Solutions or a third party
- Information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage

14.3 Mandatory Protection of Confidential Information (Section 65)

Access must be refused if the record contains information given in confidence, or if disclosure would constitute a breach of a duty of confidence owed to a third party.

14.4 Safety of Individuals and Property (Section 66)

Access may be refused if disclosure could reasonably be expected to endanger the life or physical safety of an individual or prejudice the security of property or a building.

14.5 Protection of Research Information (Section 67)

Access may be refused if the record contains research information of a third party or Chronologic Solutions, and disclosure would place the research or researcher at a serious disadvantage.

14.6 Protection of Commercial Information (Section 68)

Access may be refused if disclosure would be likely to:

- Harm the commercial or financial interests of Chronologic Solutions
- Result in improper gain or advantage to a third party
- Prejudice the competitive position of Chronologic Solutions

14.7 Other Grounds

Other grounds for refusal include:

- The record does not exist or cannot be found after reasonable search
- The request is manifestly frivolous or vexatious
- The request involves an unreasonable diversion of resources
- The requester has failed to pay the required fees

14.8 Notice of Refusal

If a request is refused, the Information Officer will provide written reasons for the refusal and inform the requester of their right to lodge an internal appeal or approach the courts.

15. REMEDIES AVAILABLE WHEN ACCESS IS REFUSED

15.1 Internal Appeal

If access to a record is refused, the requester may lodge an internal appeal with the head of Chronologic Solutions (if different from the Information Officer). Currently, the Information Officer is the Managing Director, so internal appeals should be directed to the Board of Directors:

Address for Internal Appeals:

The Board of Directors

Chronologic Solutions (Pty) Ltd

DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Email: info@chronologic.co.za

The internal appeal must be lodged within 60 days of being notified of the refusal.

15.2 Application to Court

If the internal appeal is unsuccessful or not pursued, the requester may apply to a court of competent jurisdiction for relief within 180 days of being notified of the decision.

15.3 Complaint to the Information Regulator

A requester may also lodge a complaint with the Information Regulator regarding any alleged interference with the protection of personal information or non-compliance with POPIA:

The Information Regulator (South Africa)

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone: +27 10 023 5200

Email: infoereg@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

16. AVAILABILITY OF THIS MANUAL

This PAIA Manual is available:

- On our website at <https://chronologic.co.za>
- At our offices during business hours (by appointment)
- From the Information Regulator's website
- Upon request to the Information Officer

A printed or electronic copy may be obtained upon payment of a reasonable fee.

UPDATES TO THIS MANUAL

This manual will be reviewed and updated as necessary to ensure ongoing compliance with PAIA, POPIA, and other applicable legislation. The date of the last revision is indicated at the top of this document.

This manual was compiled in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000, and the Protection of Personal Information Act, 4 of 2013.

For any queries regarding this manual or to request access to records, please contact:

David Endersen, Information Officer

Chronologic Solutions (Pty) Ltd

Tel: +27 10 591 8105

Email: info@chronologic.co.za

Website: <https://chronologic.co.za>

ANNEXURE: REQUEST FOR ACCESS TO RECORDS FORM

FORM A: REQUEST FOR ACCESS TO RECORDS

[This form must be completed by requesters and submitted to the Information Officer]

PARTICULARS OF PRIVATE BODY

Name of Private Body: Chronologic Solutions (Pty) Ltd

Registration Number: 2003/003093/07

Information Officer: David Endersen

Physical Address: DQ Suites, Design Quarter, Leslie Avenue, Magaliessig, Sandton, 2195

Telephone: +27 10 591 8105

Email: info@chronologic.co.za

PARTICULARS OF REQUESTER

Full Names:

Surname:

Identity Number:

Capacity in which request is made (if on behalf of another person):

Postal Address:

Street Address:

Email Address:

Telephone Number:

Fax Number:

PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (Complete only if request is made on behalf of another person)

Full Names:

Surname:

Identity Number:

PARTICULARS OF RECORD REQUESTED

1. Provide full particulars of the record to which access is requested, including the reference number if known:

2. Provide any further details to enable the record to be located:

3. If the provided space is inadequate, attach additional pages.

FORM OF ACCESS REQUESTED

Please indicate your preferred form of access:

- ☐ Inspection of record at the private body's office (no fee applicable other than request fee)
- ☐ Printed copy of record (fees applicable per page)
- ☐ Electronic copy on email (fees applicable)
- ☐ Electronic copy on CD/USB (fees applicable)
- ☐ Other (please specify): _____

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, attach additional pages.

1. Indicate which right is to be exercised or protected:

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

FEES

Request fee (if applicable): R50.00 (not applicable for personal requesters seeking own information)

A request fee must be paid before the request will be processed.

Access fee: An access fee will be calculated and communicated to you if the request is granted. The access fee must be paid before access is provided.

Payment details will be provided by the Information Officer.

DECLARATION BY REQUESTER

I, the undersigned, _____ (full names), hereby:

1. Confirm that the information provided in this form is true and correct.
2. Understand that access may be refused on grounds specified in PAIA.

3. Agree to pay the prescribed fees.

Signature of Requester: _____

Date: _____

FOR OFFICIAL USE ONLY

Date request received: _____

Reference number: _____

Request fee paid: Yes / No

Date of response: _____

Decision: Granted / Refused / Partially granted

Access fee (if applicable): R _____