CORDS (Pty) LTD

PAIA MANUAL

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

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VAT NO 4190273492 | **REG NO** 2016/039003/07

1. INTRODUCTION

This Manual is published in terms of section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"). PAIA gives effect to the provisions of section 32 of the Constitution of the Republic of South Africa, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right

This Manual may be amended from time to time, and once amendments have been affected, the latest version of this Manual will be distributed and published in accordance with PAIA

This Manual was last reviewed and amended in May 2026 to reflect current contact details, branding, and compliance practices

It provides details on:

- Access to records held by **CORDS (PTY) LTD**
- The process to request access
- How personal information is processed and protected

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2. COMPANY PARTICULARS

Item	Details
Company Name	CORDS (pty) ltd
Registration Number	2022/433410/07
Physical Address	Unit 18 , Northgate Estate, Brooklyn, Cape Town 7405
Telephone	021 514 4800
Website	www.cords.com

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3. DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them

hereunder, namely:

1.1. "**Data Subjects**" means the natural or juristic person/s to whom Personal Information relates;

1.2. "**Group Information Officer**" means the person acting on behalf of CORDS and discharging the duties and responsibilities assigned to the head of CORDS by PAIA. The Group Information Officer is duly authorised to act as such, and such authorisation has been confirmed by the head of CORDS in writing;

1.3. "**Information Regulator**" shall bear the meaning ascribed thereto in POPIA;

1.4. "**Manual**" means this manual published in compliance with section 51 of PAIA, together with all annexures thereto;

1.5. "**Minister**" means the Minister of Justice and Correctional Services;

1.6. "**Personal Information**" has the meaning ascribed thereto under POPIA

1.7. "**Personnel"** means any person who works for or provides services to or on behalf of CORDS and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;

1.8. **"POPIA"** means the Protection of Personal Information Act 4 of 2013, together with any regulations published thereunder;

1.9. "**Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, and "Process" has a corresponding

1.10. **"Request"** means a request for access to a Record

1.11. "**Requester"** means any person, including a public body or an official thereof, making a Request for access to a Records and includes any person acting on behalf of that person; and

"Third Party" means any independent contractor, agent, consultant, sub-contractor or other representatives

4. INFORMATION OFFICER

In terms of PAIA and POPIA:

Registered Information Officer

Name: Keith Julian Blacher
Email: Keithb@Linkqage.co.za

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5. Deputy Information Officer(s)

Name: Richard McQueen
Email: richardm@Linkqage.co.za

Name: Gadija Naicker
Email: Gadijan@Linkqage.co.za

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6. INFORMATION REGULATOR GUIDE

The official PAIA Guide is available from:

Information Regulator (South Africa)
Website: https://www.justice.gov.za/inforeg/
Email: inforeg@justice.gov.za

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7. APPLICABLE LEGISLATION (EXPANDED FOR AUDIT)

The Company retains records in terms of the following legislation:

- Promotion of Access to Information Act, 2000
- Protection of Personal Information Act, 2013
- Companies Act, 2008
- Labour Relations Act, 1995
- Basic Conditions of Employment Act, 1997
- Employment Equity Act, 1998
- Occupational Health and Safety Act, 1993
- Income Tax Act, 1962
- VAT Act, 1991
- Skills Development Act, 1998
- UIF Act, 2001
- Electronic Communications and Transactions Act, 2002
- Consumer Protection Act, 2008

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8. RECORDS HELD

8.1 Corporate Governance

- Memorandum of Incorporation
- Director registers
- Names of directors
- Codes of Ethics
- Intellectual property
- Legal Record
- Statutory Records
- Internal policies and procedures

8.2 Financial Records

- Annual Financial Statements
- Audit reports
- Tax submissions

8.3 Human Resources

- Employee personal files
- Conditions of employment and other Personnel-related contractual and quasi-legal Records
- Payroll and salary data
- Termination Payments
- Medical and disability records
- Internal policies and procedures
- Disciplinary and grievance records
- General correspondence
- Training schedules, Attendance Registers and manuals

8.4 Client & Customer Records

- Contracts
- Personal information
- Transaction records

8.5 Supplier Records

- Agreements
- Banking details

8.6 IT & Digital Records

- Email archives
- CCTV footage
- Access logs

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9. RECORDS AUTOMATICALLY AVAILABLE

- Website content
- Marketing materials
- Public reports

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10. POPIA COMPLIANCE

10.1 Purpose of Processing

- Recruitment and employment
- Payroll administration
- Client service delivery
- Legal compliance

10.2 Lawful Basis for Processing

Personal information is processed in accordance with:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interest

10.3 Data Subjects

- Employees
- Applicants
- Customers
- Suppliers

10.4 Categories of Personal Information

- Identity numbers
- Contact details
- Financial data
- Biometric/CCTV (if applicable)

10.5 Recipients

- SARS
- Payroll providers
- IT vendors

10.6 Cross-Border Transfers

Transfers occur only where:

- Adequate protection laws exist, or
- Contractual safeguards are in place

10.7 Information Security Measures

The Company implements:

- Access control systems
- Password protection
- Encrypted storage
- Confidentiality agreements
- Staff training on data protection

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11. REQUEST PROCEDURE

Step 1: Submit PAIA Request Form

Use **Form 2**

Step 2: Submit to Information Officer

- Email: HRLQ@Linkgage.co.za
- Address: 32 Gold Street, Northgate Business Park, Brooklyn, Cape Town

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Step 4: Response Time

- Within **14 days**

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12. GROUNDS FOR REFUSAL (LEGAL REQUIREMENT)

Access may be refused to protect:

- Personal privacy
- Commercial information
- Legal privilege
- Safety/security
- Third-party rights

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13. INTERNAL APPEALS & REMEDIES

As a private body:

- No internal appeal is required

Requesters may:

- Lodge complaint with Information Regulator

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14. AVAILABILITY OF MANUAL

This manual is available:

- On the company website
- At head office
- On request

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15. APPROVAL & SIGN-OFF

Approved by:

Name: Keith Blacher
Position: Director - Finance and Operations

FORM2

REQUEST FOR ACCESS TO RECORD

(Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests madoon bohalfof anot/'J6r pers0tt, proof of such authorlst1tion, must be attachlJd to this fonn.*

TO: The Information Officer

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_____

(Address)

E-mail address; _____

Fax number. _____

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