InfraVerity Advisory

PAIA and POPIA Manual

How to request access to records held by InfraVerity Advisory (Pty) Ltd, and how we process personal information.

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Company	InfraVerity Advisory (Pty) Ltd
Registration number	2026/703334/07
Information Officer	Hloso Fuyana Pr Tech Eng, Director
Approved by	Hloso Fuyana, Director
Next review	By 31 December 2027, and whenever a material change occurs
Classification	Public

01 PURPOSE OF THIS MANUAL

InfraVerity Advisory (Pty) Ltd ("InfraVerity", "we", "us") is a private company providing independent infrastructure, project and contract advisory services. This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA). It enables any person to:

- identify the categories of records we hold;
- understand how to request access to a record, and the fees that apply;
- understand the grounds on which a request may be refused, and the remedies available;
- understand how we process personal information under the Protection of Personal Information Act 4 of 2013 (POPIA); and
- contact our Information Officer.

02 ABBREVIATIONS

Term	Meaning
CIPC	Companies and Intellectual Property Commission
Information Officer	The head of InfraVerity for the purposes of PAIA and POPIA
PAIA	Promotion of Access to Information Act 2 of 2000
PAIA Regulations	Regulations Relating to the Promotion of Access to Information, 2021 (Government Gazette 45057, 27 August 2021)
POPIA	Protection of Personal Information Act 4 of 2013
POPIA Regulations	Regulations Relating to the Protection of Personal Information, 2018
Regulator	Information Regulator of South Africa

03 KEY CONTACT DETAILS

Item	Details
Information Officer	Hloso Fuyana Pr Tech Eng, Director
Email	info@infraverity.com
Telephone	[Telephone number]
Physical address	The Business Exchange, 96 Rivonia Road, Sandton, Johannesburg, 2196
Registered address	140 West Street, Sandton, Johannesburg, 2031
Postal address	The Business Exchange, 96 Rivonia Road, Sandton, Johannesburg, 2196
Website	www.infraverity.com

All requests and correspondence under this manual should be addressed to the Information Officer.

04 GUIDE ON HOW TO USE PAIA

The Regulator has compiled a Guide, in terms of section 10 of PAIA, on how to exercise the rights in PAIA and POPIA. The Guide explains the objects of both Acts, how to request access to records, the assistance available from the Regulator, and the remedies available to requesters.

- The Guide is available in each official language and in braille.
- It may be downloaded from the Regulator's website at https://inforegulator.org.za.
- A copy may be inspected at our physical address during office hours, or requested from our Information Officer.

05 RECORDS AVAILABLE WITHOUT A REQUEST

We have not published a notice under section 52 of PAIA. The following are freely available without a formal request:

- information published on our website;
- this manual; and

- our Privacy Notice and Cookie Notice.

06 RECORDS KEPT IN TERMS OF OTHER LEGISLATION

We keep records in accordance with the following legislation, as applicable to us. Access to these records remains subject to PAIA.

Legislation	Records
Companies Act 71 of 2008	Memorandum of Incorporation, registers, minutes, resolutions and financial statements
Income Tax Act 58 of 1962	Tax returns and supporting records
Tax Administration Act 28 of 2011	Records supporting tax returns and assessments
Value-Added Tax Act 89 of 1991	VAT records, where the company is registered for VAT
Basic Conditions of Employment Act 75 of 1997	Employee records, where the company employs staff
Labour Relations Act 66 of 1995	Employment and disciplinary records, where applicable
Unemployment Insurance Act 63 of 2001	UIF records, where applicable
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Workplace injury records, where applicable
Engineering Profession Act 46 of 2000	Professional registration records of the Principal Adviser
Electronic Communications and Transactions Act 25 of 2002	Website and electronic communication records
Promotion of Access to Information Act 2 of 2000	This manual and records of requests
Protection of Personal Information Act 4 of 2013	Personal information processing records

07 SUBJECTS AND CATEGORIES OF RECORDS HELD

Subject	Categories of records
Company and statutory	Registration documents, Memorandum of Incorporation, share register, director records, resolutions and minutes, CIPC filings
Finance and tax	Financial statements, accounting records, bank records, invoices, tax and VAT records
Client matters	Letters of appointment, conflict check records, correspondence, instructions, working papers, reports and expert evidence
Dispute board and adjudicator appointments	Appointment agreements, disclosures, correspondence and decisions
Registers	Conflict, appointment, instruction and outcome registers
Insurance	Professional indemnity and other insurance policies, and related correspondence
Associates and suppliers	Associate agreements, supplier contracts, operator agreements and correspondence
Personnel	Director records, and employee records where the company employs staff
Policies	Conflicts and independence, information security and other internal policies
Business development	Proposals, capability statements, marketing material and contact records
Information technology and website	Website content, enquiry records, system and security logs, IT service agreements

CLIENT CONFIDENTIALITY

Most records relating to client matters are confidential, commercially sensitive or subject to legal privilege. Access to them will generally be refused on the grounds set out in section 8.6, unless the client concerned consents.

08 HOW TO REQUEST ACCESS TO A RECORD

8.1 Making a request

- Use Form 2 (Request for Access to Record) prescribed by the PAIA Regulations, available on the Regulator's website or from our Information Officer.
- Send the completed form to the Information Officer by email or hand delivery, using the details in section 03.

- Provide enough detail to identify the record, state the form of access you require, and give your contact details.
- Identify the right you seek to exercise or protect, and explain why the record is required for that purpose.
- If you request on behalf of another person, provide proof of your authority to do so.
- If you cannot read, write or complete the form because of a disability, you may make the request orally. The Information Officer will record it on the prescribed form.

8.2 Response time

We will decide on a request within 30 days of receiving it. We may extend this period once, by up to 30 days, on the grounds permitted by section 57 of PAIA. We will notify you of any extension and the reasons for it. If we do not respond within the required period, the request is regarded as refused.

8.3 Fees

Fees are prescribed by the PAIA Regulations. A personal requester seeking their own personal information pays no request fee.

Item	Fee
Request fee (other than a personal requester)	R140.00
Photocopy or printed black and white A4 page	R2.00 per page or part of a page
Copy on a flash drive or CD supplied by the requester	R40.00
Copy on a CD supplied by InfraVerity	R60.00
Search and preparation, after the first hour	R145.00 per hour or part of an hour, to a maximum of R435.00
Postage or electronic transfer	Actual cost

- Where search and preparation will take more than six hours, we may require a deposit of one third of the access fee before processing the request.
- Access fees are payable before the record is released.
- Fees are reviewed as the PAIA Regulations are amended. The prescribed amounts apply.

8.4 Notice of the decision

We will notify you in writing of our decision. If access is granted, the notice states the access fee and the form of access. If access is refused, the notice states the reasons and your remedies.

8.5 Third parties

Where a request concerns a record containing information about a third party, we will take reasonable steps to notify that third party, who may make representations before we decide.

8.6 Grounds for refusal

We may, or in some cases must, refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, including:

Section	Ground
63	Protection of the privacy of a third party who is a natural person
64	Protection of the commercial information of a third party
65	Protection of confidential information of a third party
66	Protection of the safety of individuals and protection of property
67	Records privileged from production in legal proceedings
68	Commercial information of InfraVerity
69	Protection of research information

Section 70 of PAIA requires disclosure, despite these grounds, where the public interest in disclosure clearly outweighs the harm, and the record would reveal a substantial contravention of the law or an imminent and serious public safety or environmental risk.

8.7 Remedies

InfraVerity has no internal appeal procedure. If you are dissatisfied with our decision, including a decision on fees or an extension, you may, within 180 days of being notified of it, lodge a complaint with the Regulator or apply to a court for relief in terms of PAIA.

09 PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of processing

We process personal information to:

- check for conflicts of interest before accepting an instruction or appointment;
- respond to enquiries and prepare proposals;
- provide advisory, expert and dispute board services under our appointments;
- manage relationships with associates, suppliers and service providers;
- meet our legal, tax, regulatory and insurance obligations;
- establish, exercise or defend legal rights; and
- keep our website and information systems secure.

We do not sell personal information, and we do not use enquiry details for direct marketing.

9.2 Categories of data subjects and personal information

Data subject	Personal information
Clients and their representatives	Names, roles, contact details, instructions, correspondence, billing and payment details
Enquirers and prospective clients	Details submitted through the website or by email, including conflict check information
Other parties to matters	Names, roles and information contained in project, contract and dispute records
Associates, sub-consultants and suppliers	Names, contact details, qualifications, contract, banking and tax details
Directors and staff	Identity, contact, employment, tax and banking details
Website visitors	Shortened IP address, device and browser type, and pages visited

Special personal information, and information about criminal behaviour, is processed only where it appears in matter records and is necessary to establish, exercise or defend a right or obligation in law, as section 27(1)(b) of POPIA permits.

9.3 Recipients of personal information

- Service providers acting as operators under written agreements, including our website host, email and cloud service providers, and IT support.
- Specialist associates and sub-consultants engaged on a matter, under confidentiality obligations.
- Our professional advisers, auditors, insurers and insurance brokers.
- Tribunals, courts, adjudicators and other parties to a matter, where our appointment requires it.
- Regulators and authorities, including SARS, CIPC and the Regulator, where the law requires it.

9.4 Transfers outside South Africa

Our website is hosted in South Africa. Our email and some cloud service providers may process information outside South Africa. We use them only where the recipient is bound by law, binding corporate rules or an agreement providing protection substantially similar to POPIA, as section 72 requires.

9.5 Security measures

- Access to information restricted to those who need it, with two-factor authentication on email, cloud and website accounts.
- Encryption of data in transit, and at rest where our service providers support it.
- Password manager for credentials, and encrypted, screen-locked devices.
- Regular backups, and malware and security monitoring on the website.
- Written operator agreements with service providers, and confidentiality undertakings with associates.
- Conflict checks completed before confidential information is received.
- Retention for fixed periods, followed by secure deletion or destruction.
- Notification of security compromises to the Regulator and affected data subjects, as section 22 of POPIA requires.

9.6 Data subject rights

A data subject may request access to their personal information using the procedure in section 08. A data subject may also:

Right	Form
Object to the processing of personal information (POPIA, section 11(3))	Form 1 of the POPIA Regulations

Right	Form
Request correction or deletion of personal information, or destruction or deletion of a record (POPIA, section 24)	Form 2 of the POPIA Regulations
Lodge a complaint with the Regulator (POPIA, section 74)	Through the Regulator's eServices portal, or by email to POPIAComplaints@inforegulator.org.za

10 AVAILABILITY OF THIS MANUAL

This manual is available:

- on our website;
- for inspection at our physical address during office hours;
- from the Information Officer on request, at the prescribed fee for a printed copy; and
- to the Regulator on request.

11 INFORMATION REGULATOR

Item	Details
Website	https://inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za

12 UPDATES

We review this manual at least once a year and whenever a material change occurs. The current version is always published on our website.