PAIA AND POPIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
for ISOGuardian (Pty) Ltd

Version 1.0
Compiled: January 2026
Next review: January 2027

1. Introduction

ISOGuardian (Pty) Ltd (the "Company") is a private body operating a SaaS platform that provides AI-powered advisory services for ISO compliance.

This manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (PAIA), as amended, and incorporates requirements under the Protection of Personal Information Act, 2013 (POPIA) regarding the processing of personal information.

The purpose of this manual is to facilitate requests for access to records held by the Company and to promote transparency in how personal information is processed.

This manual is available free of charge on our website at www.isoguardian.co.za/paia-manual and for inspection at our physical address.

2. Company Contact Details

- Company name: ISOGuardian (Pty) Ltd
- Registration number: 2026/082362/07
- Head of the private body / Information Officer:Tyreece Kruger
  (Designated and registered with the Information Regulator)
- Physical address: 1 Goodwood Avenue, Comet, Boksburg, Gauteng, 1459
- Postal address: Same as above
- Telephone number: 071 606 0250
- Email address (for PAIA/POPIA requests): krugerreece@gmail.com
- Website: www.isoguardian.co.za

3. The PAIA Guide

The Information Regulator has published a Guide in terms of Section 10 of PAIA, which contains information to assist any person wishing to exercise rights under PAIA and POPIA.

The Guide is available in English at:
https://inforegulator.org.za/paia/
or directly: https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

Copies may also be requested from the Company or the Regulator.

4. Records Available Without a Request (Voluntary Disclosure – Section 52)

The following records are voluntarily made available without the need for a formal PAIA request:

- Privacy Policy
- Terms of Service / User Agreement
- Pricing and service overview
- This PAIA and POPIA Manual

These are accessible on the website: www.isoguardian.co.za

5. Records Available in Terms of Other Legislation

The Company maintains records required or made available in terms of the following legislation (where applicable):

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008

6. Categories of Records Held by the Company
The Company holds records in the following categories:

- Administration & Governance
  MOI, board resolutions, director details, financial statements, tax returns, asset register

- Client / User Records
  Account information (names, emails, contact details), uploaded ISO compliance documents (which may contain employee personal information), AI-generated advisory reports, user correspondence

- Technical & IT Records
  System logs, database configurations, security audit trails, operator agreements (e.g., Supabase DPA)

- Human Resources (if applicable)
  Employee contracts, payroll records, internal policies

- Marketing & Communications
  Leads, newsletters, website analytics

- Legal & Compliance
  Contracts, privacy policy, POPIA records of processing, breach incident logs

Certain records contain personal information and are processed in accordance with POPIA (see Section 7).

7. Protection of Personal Information (POPIA)
Purpose of Processing
Personal information is processed to:
- Provide ISO compliance advisory services via the SaaS platform
- Manage user accounts and support
- Maintain business records and comply with statutory obligations (e.g., SARS, CIPC)
- Improve platform functionality and security

Lawful Basis
Processing is based on:
- Legitimate interest (delivering ISO advisory services)
- Performance of a contract (user agreements)
- Compliance with legal obligations

Categories of Data Subjects and Personal Information
- **Clients / Users**: Names, contact details (email/phone), company registration info, uploaded compliance documents (potentially containing employee names, IDs, or special personal information such as health/safety data)
- **Suppliers / Service Providers**: Contact details, banking information

Recipients / Sharing
Personal information may be shared with:
- Regulatory authorities or law enforcement when required by law
- Third-party operators (e.g., cloud storage provider Supabase in EU regions) under signed Data Processing Addendums and Standard Contractual Clauses

Transborder Flows
Data may be transferred outside South Africa to operators providing adequate safeguards (e.g., EU-based cloud services compliant with POPIA adequacy or SCCs).

Security Measures
Encryption at rest and in transit, Row Level Security, access logging, operator agreements, and regular reviews.

Retention
Personal information is retained only as long as necessary for the purpose or required by law (e.g., tax records for 5 years).

Data Subject Rights
Data subjects may request access, correction, deletion, restriction, or objection by contacting the Information Officer (details in Section 2).

8. Access Request Procedure
To request access to a record:

1. Complete **Form 2** (available at https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf).
2. Submit the completed form and proof of identity (e.g., copy of ID) to: krugerreece@gmail.com
3. Pay the prescribed request fee (unless exempt – see below).
4. Provide sufficient detail to identify the record and the requester.

Fees (as per current PAIA regulations):
- Request fee: **R140.00** (non-refundable, unless requesting own personal information)
- Access fees: e.g., R2.00 per A4 photocopy, R30.00–R435.00 per hour for search/preparation (after first hour free in certain cases)
- Deposit: May be required for extensive requests (up to 1/3 of access fee)

Fees must be paid before processing.

9. Grounds for Refusal
A request may be refused on grounds including (but not limited to):
- Mandatory protection of privacy of a third party
- Protection of commercial information / trade secrets
- Protection of safety or security
- Unreasonable or vexatious requests
- Records do not exist

(Full grounds in Chapters 3–4 of PAIA.)

10. Remedies
There is no internal appeal process for private bodies.
If dissatisfied with the decision, the requester may:
- Lodge a complaint with the Information Regulator using **Form 5** (available on their website) within 180 days, or
- Approach a court.

Approval
Approved by:
Tyreece Kruger
Information Officer & Director
ISOGuardian (Pty) Ltd
2026-01- 30