



**LIGHT-TECH MEDIA SOLUTIONS (PTY) LTD**

2022/224855/07

("Light-Tech Media Solutions")

# **PAIA MANUAL**

(of a private body)

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

Version: 3 September 2024



## TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS .....	3
2.	PURPOSE OF PAIA MANUAL .....	3
3.	LIGHT-TECH MEDIA SOLUTIONS KEY CONTACT DETAILS FOR ACCESS TO INFORMATION	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	4
5.	CATEGORIES OF RECORDS OF LIGHT-TECH MEDIA SOLUTIONS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS .....	6
6.	DESCRIPTION OF THE RECORDS OF LIGHT-TECH MEDIA SOLUTIONS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION.....	7
7.	DESCRIPTION OF THE SUBJECTS ON WHICH LIGHT-TECH MEDIA SOLUTIONS HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LIGHT-TECH MEDIA SOLUTIONS .....	7
8.	PROCESSING OF PERSONAL INFORMATION.....	9
9.	AVAILABILITY OF THE MANUAL .....	13
10.	UPDATING OF THE MANUAL .....	13



## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |                    |  |
|-----|--------------------|--|
| 1.1 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                     |
| 1.2 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.3 | <b>“POPIA”</b>     | Protection of Personal Information Act No.4 of 2013;               |
| 1.4 | <b>“Regulator”</b> | Information Regulator.   |

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer (if any) who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;



- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. LIGHT-TECH MEDIA SOLUTIONS KEY CONTACT DETAILS FOR ACCESS TO INFORMATION**

#### **3.1. Information Officer:**

Name: Lukhanyo Dyosopu  
Tel: +27 (063 133 4808)  
Email: lukhanyo@light-tech.co.za

#### **3.3 Access to information general contacts**

Email: lukhanyo@light-tech.co.za

#### **3.4 Head Office**

Physical Address: 40 First Avenue West, Parktown North, Johannesburg, 2193  
Telephone: +27 (063 133 4808)  
Email: lukhanyo@light-tech.co.za  
Website: <https://www.ooh-marketplace.com/>

### **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 comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of:
  - 4.3.1. the objects of PAIA and POPIA;



- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:
  - 4.3.2.1. the Information Officer of every private body, and
  - 4.3.2.2. every Deputy Information Officer of every private body (if any) designated in terms of section 56 of POPIA<sup>1</sup>;
  - 4.3.2.3. the manner and form of a request for access to a record of a private body contemplated in section 50<sup>2</sup>;
- 4.3.3. the assistance available from the Information Officer of a private body in terms of PAIA and POPIA;
- 4.3.4. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.5. all remedies in law available regarding 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-
  - 4.3.5.1. an internal appeal;
  - 4.3.5.2. a complaint to the Regulator; and
  - 4.3.5.3. an application with a court against a decision by the information officer of a private body, a decision on internal appeal or a decision by the Regulator;
- 4.3.6. the provisions of section 51<sup>3</sup> requiring a private body to compile a manual, and how to obtain access to a manual;
- 4.3.7. the provisions of section 52<sup>4</sup> providing for the voluntary disclosure of categories of records by a private body;

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<sup>1</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, 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.

<sup>2</sup> 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 contemplated in Chapter 4 of this Part.

<sup>3</sup> 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.

<sup>4</sup> 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



- 4.3.8. the notices issued in terms of section 54<sup>5</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.9. the regulations made in terms of section 92<sup>6</sup>.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
  - 4.5.1. upon request to the Information Officer;
  - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6. A copy of the Guide is also available in the following three official languages, for public inspection during normal office hours-
  - 4.6.1 English:  
<https://www.ooh-marketplace.com/>
  - 4.6.2 Sesotho:  
4.6.3 <https://www.ooh-marketplace.com/>
  - 4.6.4 isiXhosa:  
<https://www.ooh-marketplace.com/>

## **5. CATEGORIES OF RECORDS OF LIGHT-TECH MEDIA SOLUTIONS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

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<sup>5</sup> 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.

<sup>6</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-  
(a) any matter which is required or permitted by this Act to be prescribed;  
(b) any matter relating to the fees contemplated in sections 22 and 54;  
(c) any notice required by this Act;  
(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 this Act.”



All information available to the public on the LIGHT-TECH MEDIA SOLUTIONS'S website at <https://www.ooh-marketplace.com/> which may be downloaded or requested via telephone, email or post.

**6. DESCRIPTION OF THE RECORDS OF LIGHT-TECH MEDIA SOLUTIONS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Light-Tech Media Solutions holds records in terms of the following legislation (this is not an exhaustive list):

- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
- Consumer Protection Act No. 68 of 2008
- Electronic Communications and Transactions Act No. 25 of 2002
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No. 4 of 2013
- Short-term Insurance Act No. 53 of 1998
- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Insurance Contributions Act No. 4 of 2002
- Value Added Tax Act No. 89 of 1991

Only those authorities, individuals or organisations authorised in terms of the abovementioned legislation to have access to these records may request them.

**7. DESCRIPTION OF THE SUBJECTS ON WHICH LIGHT-TECH MEDIA SOLUTIONS HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LIGHT-TECH MEDIA SOLUTIONS**

Subject:	Category of Record:
Business and Legal Records	<ul style="list-style-type: none"> <li>• Business plans and strategy documents</li> <li>• Company statutory records</li> <li>• Board and management records</li> <li>• Operational manuals</li> </ul>



	<ul style="list-style-type: none"> <li>• Company policies and procedures</li> <li>• Intellectual property records (including trade marks and copyright)</li> <li>• Insurance portfolio records</li> <li>• Internal correspondence</li> <li>• Regulatory records</li> <li>• programme registration records</li> <li>• Property and leasing records</li> <li>• Contracts with suppliers and service providers</li> </ul>
Financial Records:	<ul style="list-style-type: none"> <li>• Budget and financial performance records</li> <li>• Accounting records (including annual financial statements and management accounts)</li> <li>• Banking records</li> <li>• Financial contracts</li> <li>• Payment information from third party service providers</li> </ul>
Tax Records:	<ul style="list-style-type: none"> <li>• Corporate income and value-added tax records (including returns and payments to SARS)</li> <li>• Employee PAYE, SDL, UIF and Workmen's Compensation Records</li> </ul>
Information Technology ("IT") Records:	<ul style="list-style-type: none"> <li>• Technology hosts, hardware and software suppliers and service providers</li> <li>• IT Infrastructure and architecture information and manuals</li> <li>• Project implementation plans</li> <li>• Website information (including Internet protocol address/es, login data, browser type and version, time zone setting and location, geo-location data, GPS pings and calculations, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Light-Tech Media Solutions website)</li> <li>• Social media content</li> </ul>
Marketing Records:	<ul style="list-style-type: none"> <li>• Marketing and advertising material</li> <li>• Marketing strategy and plans</li> </ul>





	<ul style="list-style-type: none"> <li>• Subscriber identification, contact details and marketing communication preferences</li> <li>• Website usage, analytics and third-party cookie information</li> <li>• Lead generation and referral information</li> <li>• Online surveys, webinars and events</li> <li>• Newsletter subscription records</li> <li>• Promotional campaigns</li> <li>• Promotional competition records</li> </ul>
Light-Tech Media Solutions Records:	<ul style="list-style-type: none"> <li>• Website Terms and Conditions</li> <li>• Application and enrolment forms</li> <li>• Contracts between agencies and media owners;</li> <li>• General correspondence records (email and WhatsApp communications)</li> </ul>
Staff Records	<ul style="list-style-type: none"> <li>• Staff records (identification, emergency, next-of-kin, marital status, salary and payment details, CV and training information, assessments, disciplinary, medical health, grievance procedure, employment contracts and benefit information, leave records, accident information records and general correspondence)</li> <li>• Policy and procedure records</li> <li>• Recruitment records (job advertisements, applicant CV information, interview and feedback records)</li> </ul>

Access to the abovementioned records may only be requested in terms of this PAIA Manual.

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

Light-Tech Media Solutions processes the personal information of various categories of individuals and organisations (described in clause 8.2 below) in accordance with POPIA and for the purposes set out in its Privacy Policy for Light-Tech Media Solutions and its Privacy Policy for Light-Tech Media Solutions available at <https://www.ooh-marketplace.com/privacy-policy/>.



## 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Light-Tech Media Solutions processes the personal information of the following data subjects:

Categories of Data Subjects:	Personal Information that may be processed:
Agencies' Records	<ul style="list-style-type: none"> <li>• Company registration number, contact details (physical and email addresses, telephone and mobile numbers)</li> <li>• Billing and payment data</li> <li>• Agency Terms &amp; Conditions</li> <li>• Employees or representatives contact information</li> <li>• General correspondence</li> <li>• Internet protocol address/es, login data, browser type and version, time zone setting and location, geo-location data related to accessing Light-Tech Media Solutions's website at <a href="http://www.ooh-marketplace.com">www.ooh-marketplace.com</a></li> </ul>
Media Owners' Records	<ul style="list-style-type: none"> <li>• Company registration (shareholder/directors information) or identity number, contact details (physical and email addresses, telephone and mobile numbers)</li> <li>• Rental agreements with Advertisers</li> <li>• Central supplier database checks for contracts with government</li> <li>• Billing and payment data</li> <li>• Media Owners Terms &amp; Conditions</li> <li>• Employees or representatives contact information</li> <li>• General correspondence</li> <li>• Internet protocol address/es, login data, browser type and version, time zone setting and location, geo-location data related to accessing Light-Tech Media Solutions's website at <a href="http://www.ooh-marketplace.com">www.ooh-marketplace.com</a></li> </ul>



Advertisers	<ul style="list-style-type: none"> <li>Rental agreements with Media Owners</li> </ul>
Staff	<ul style="list-style-type: none"> <li>Identity, gender, language and contact details (residential and email addresses, telephone and mobile numbers) as well as emergency and next-of-kin contact details</li> <li>Health information</li> <li>First aid information</li> <li>CV information (including employment history, education and qualifications and contacts for references)</li> <li>Police clearance and credit check records</li> <li>Bank details</li> </ul>
Service Providers & Suppliers	<ul style="list-style-type: none"> <li>Supply and/or services agreements (names and registration or identification numbers)</li> <li>Billing and payment data (bank account details, VAT numbers, address details)</li> <li>Names and contact details of representatives</li> <li>CV information (including employment history, education and qualifications and contacts for references)</li> <li>General correspondence</li> </ul>

**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 to whom the personal information may be supplied:
Identity numbers and names for criminal and credit checks	<ul style="list-style-type: none"> <li>Recruitment service providers</li> </ul>
Credit and payment history for credit information	<ul style="list-style-type: none"> <li>Recruitment service providers</li> </ul>



Verifications of Qualifications	<ul style="list-style-type: none"> <li>LexisNexis</li> </ul>
Agencies, Media Owners, Advertisers, Staff, Supplier and Service Provider Records	<ul style="list-style-type: none"> <li>IT service providers who provide data capturing, processing, storage, email, payroll, communication, billing, marketing and security services</li> </ul>

#### 8.4 Planned transborder flows of personal information

Light-Tech Media Solutions shares personal information with third parties which may involve the transborder flow of personal information. When personal information is transferred outside of South Africa, Light-Tech Media Solutions ensures that it complies with its obligations under POPIA when doing so. More specifically, it seeks to ensure that:

- the third parties are subject to laws, binding corporate rules or binding agreements which provide an adequate level of protection;
- the transfer is necessary for the performance of Light-Tech Media Solutions contractual obligations to the data subjects;
- the transfer is necessary for the performance of a contract concluded in the interest of the data subject between Light-Tech Media Solutions and/or third parties; or
- upon any other basis permitted in terms of POPIA.

#### 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

Light-Tech Media Solutions has put in place appropriate security measures to prevent personal information processed by it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed by using coding best practices for its systems and keeping its software up to date. Light-Tech Media Solutions also only captures data on an encrypted connection to secured private hosting, and backup data securely in the cloud with dual-authorisation access limited to system administrators only. In addition, it limits access to that personal information to those employees, contractors and other third parties who have a legitimate need to know. They will only process personal information on the instructions of Light-Tech Media Solutions and they are subject to a duty of confidentiality.



Light-Tech Media Solutions has furthermore put in place procedures to deal with any suspected personal data breach and will notify the data subjects and the Information Regulator of any breach where legally required to do so.

## **9. AVAILABILITY OF THE MANUAL**

- 9.1 A copy of this PAIA Manual is available-
  - 9.1.1 on <https://www.ooh-marketplace.com/paia-manual/>;
  - 9.1.2 at the office of Light-Tech Media Solutions for public inspection during normal business hours;
  - 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 9.1.4 to the Information Regulator upon request.
- 9.2 A fee for a copy of the PAIA Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## **10. UPDATING OF THE MANUAL**

The Information Officer of Light-Tech Media Solutions will on a regular basis update this manual.