

PAIA & POPIA MANUAL

Promotion of Access to Information &
Protection of Personal Information

SCS INVICTUS SOUTH AFRICA (PTY) LTD

Prepared in terms of:

Section 51 of the Promotion of Access to Information Act,
No. 2 of 2000

and

Section 17 of the Protection of Personal Information Act,
No. 4 of 2013





Table of Contents

1. Introduction
2. Company Contact Details
3. The PAIA Guide
4. Records Automatically Available
5. Records Available in Terms of Other Legislation
6. Records Held by the Company (Subject to Formal Request)
7. Protection of Personal Information Act (POPIA) Compliance
8. How to Request Access to a Record
9. Fees Payable
10. Granting or Refusal of Requests
11. Complaints and Remedies
12. Availability of this Manual
13. Annexures
 - Annexure A – Prescribed PAIA Fees
 - Annexure B – Form 2: Request for Access to Record
 - Annexure C – Form 3: Outcome of Request and Internal Records (for reference)





Definitions

For purposes of this Manual:

"Company" means SCS Invictus South Africa (Pty) Ltd.

"Data Subject" means the person to whom personal information relates.

"Information Officer" means the person designated in terms of POPIA and PAIA to ensure compliance with the Company's obligations under the Acts.

"Deputy Information Officer" means a person appointed by the Company, where applicable, to assist the Information Officer in performing his or her duties.

"PAIA" means the Promotion of Access to Information Act, No. 2 of 2000.

"POPIA" means the Protection of Personal Information Act, No. 4 of 2013.

"Personal Information" has the meaning assigned to it in Section 1 of POPIA and includes information relating to an identifiable natural person and, where applicable, an identifiable existing juristic person.

"Requester" means any person requesting access to a record of the Company in terms of PAIA.

"Record" means any recorded information regardless of form or medium which is in the possession or under the control of the Company.



1

Introduction

SCS Invictus South Africa (Pty) Ltd provides professional corporate services, corporate secretarial management, accounting, tax advisory and payroll compliance. This manual assists potential requesters in understanding what records are held by the company and how to exercise their right of access to information under South African law.

2

Company Contact Details

Information Officer

- **Name:** Seiya Matsumoto
- **Postal Address:** 138 West Street, Sandown, Sandton, 2031
- **Physical Address:** 138 West Street, Sandown, Sandton, 2031
- **Telephone Number:** +27 64 700 3542
- **Email Address:** matsumoto@scsinvictus.co.za
- **Website:** <https://scs-invictus-africa.co.za/>

Deputy Information Officer

- **Name:** Asheel Budharam
- **Telephone Number:** +27 72 766 3200
- **Email Address:** asheel@scsinvictus.co.za





3

The PAIA Guide

The Information Regulator has updated and published a guide on how to use PAIA. It is available in all official languages and braille. Members of the public can download the guide directly from the Information Regulator South Africa Official Site or request a copy from our physical office.

4

Records Automatically Available

The following records are available without a person having to request access in terms of the Act (they are available on our website or via email request):

- Marketing brochures and company profiles.
 - Publicly accessible web content.
 - Public press releases and industry insights.
-

5

Records Available in Terms of Other Legislation

Where applicable, records are available in terms of the following legislation, subject to the provisions and disclosure requirements contained in each Act:

- Basic Conditions of Employment Act, No. 75 of 1997
- Broad-Based Black Economic Empowerment Act, No. 53 of 2003





- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Electronic Communications and Transactions Act, No. 25 of 2002
- Employment Equity Act, No. 55 of 1998
- Financial Intelligence Centre Act, No. 38 of 2001
- Income Tax Act, No. 58 of 1962
- Labour Relations Act, No. 66 of 1995
- Occupational Health and Safety Act, No. 85 of 1993
- Pension Funds Act, No. 24 of 1956
- Promotion of Access to Information Act, No. 2 of 2000
- Protection of Personal Information Act, No. 4 of 2013
- 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

The above list is not exhaustive and shall include any legislation applicable to the Company's operations from time to time.

6

Records Held by the Company (Subject to Formal Request)

The following internal records are held by SCS Invictus South Africa (Pty) Ltd and may require a formal PAIA Request Form 2 submission:

Statutory and Corporate Secretarial Records

- Memorandum of Incorporation (MOI) and Registration Certificates.
- Minutes of Board of Directors and Shareholder Meetings.
- Share Registers, Director Registers and related statutory returns.

Financial and Tax Records

- Audited Annual Financial Statements and Accounting ledgers.





- Operational Bank Statements and Asset Registers.
- Tax Returns, Provisional Tax assessments and VAT filings.

Client Records & Service Delivery Documents

- Client engagement letters, onboarding files and FICA verification data.
- Financial accounting data, payroll calculations and corporate tax folders processed for clients.
- Vendor, supplier and third-party commercial contracts.

Human Resources

- Employment contracts, payroll logs, IRP5 certificates and employee personnel files.
- Internal operational policies, training plans and Employment Equity records.

7

Protection of Personal Information Act (POPIA) Compliance

In terms of Section 17 of POPIA, the company processes personal data under strict protocols.

- To deliver corporate secretarial, accounting, tax compliance and payroll advisory services.
- To conduct statutory client onboarding, conflict checks and FICA anti-money laundering verifications.
- To manage internal payroll, employment benefits and human resource structures.

Categories of Data Subjects and Information

- **Clients (Corporate Entities & Individuals):** Name, CIPC data, tax numbers, financial books, payroll files of their staff and identity documents of directors.





- **Employees & Candidates:** Identity numbers, qualifications, bank details, contact data, physical addresses and tax histories.
- **Suppliers & Vendors:** Commercial details, banking information, VAT details and service-level agreements.

Planned Transborder Flows of Personal Information

As part of the global SCS Invictus network, your personal data may be securely transferred across borders (e.g., to regional hubs or holding networks like Singapore, or cloud servers located abroad). All cross-border data routing conforms to Section 72 of POPIA, ensuring the destination country enforces equivalent data security laws or binding corporate agreements.

Information Security Measures

- Enforced end-to-end data encryption across internal systems and cloud networks.
- Dual-factor authentication (2FA) protocols on all enterprise infrastructure.
- Regular external security auditing and restricted access privileges based on administrative tiering.

Recipients or Categories of Recipients to whom Personal Information may be Supplied

The Company may disclose personal information where such disclosure is lawful, necessary and consistent with the purposes for which the information was collected.

Recipients may include:

- employees of the Company who require access in the performance of their duties;
- members of the SCS Invictus group of companies and affiliated entities;
- professional advisers including attorneys, auditors, accountants and tax advisers;
- financial institutions and payment service providers;
- software and cloud service providers engaged by the Company;
- regulatory authorities, government departments and statutory bodies, including SARS, CIPC, the Information Regulator and other competent authorities where disclosure is required by law;
- banks, insurers and pension administrators;
- third-party service providers assisting the Company in delivering services to clients;





- any other person where disclosure is required by law or authorised by the data subject.

Personal information will only be disclosed where there is an appropriate legal basis under POPIA.

8

How to Request Access to a Record

A requester seeking access to records held by the Company must complete the prescribed Form 2 issued under PAIA.

As SCS Invictus South Africa (Pty) Ltd is a private body, a requester must demonstrate that the requested record is required for the exercise or protection of a right in accordance with PAIA.

The completed request must include:

- sufficient details to identify the record requested;
- the requester's identity and contact details and proof of identity;
- the form in which access to the record is requested;
- the right that the requester seeks to exercise or protect;
- an explanation of why the requested record is required for the exercise or protection of that right; and
- payment of the prescribed request fee (where applicable).

Requests that do not contain sufficient information to enable the Company to identify the requested record or to determine the right being exercised or protected may be returned to the requester for clarification.

Completed requests must be submitted to the Information Officer using the contact details provided in Section 2 of this Manual.



9

Fees Payable

The Promotion of Access to Information Act, 2000 and the Regulations issued thereunder prescribe the fees payable in respect of requests for access to records held by private bodies.

A requester, other than a personal requester seeking access to his or her own personal information, is required to pay the prescribed request fee before the Company will process the request.

Where access to a record is granted, the requester may also be required to pay the prescribed access fees. These fees relate to the cost of searching for, preparing, reproducing and, where applicable, transmitting the requested records.

The prescribed fees applicable to requests made to SCS Invictus South Africa (Pty) Ltd are set out in **Annexure A** to this Manual.

Where the estimated time required to search for and prepare the requested records exceeds six (6) hours, the Company may require the requester to pay a deposit equal to one-third (1/3) of the estimated access fee before the request is processed further.

Actual postage, courier or electronic transmission costs may also be recovered where records are required to be delivered to the requester.

Personal requesters seeking access to records containing their own personal information are exempt from payment of the prescribed request fee but remain liable for any applicable access fees prescribed under PAIA.

If SCS Invictus South Africa (Pty) Ltd is registered as a vendor under the Value-Added Tax Act, No. 89 of 1991, Value-Added Tax (VAT) will be added to all prescribed fees set out in Annexure A, where applicable.





10

Granting or Refusal of Requests

The Company will consider every request received in accordance with PAIA.

Where access is granted, the requester will be notified in writing of:

- whether the request has been approved;
- any applicable access fees payable;
- the manner in which access will be provided; and
- the period within which access will be made available.

Where access is refused, the requester will receive written reasons for the refusal.

In terms of Chapter 4 of PAIA, access may be refused on, amongst others, the following grounds:

- protection of the privacy of a third party;
- protection of commercially confidential information;
- protection of confidential information supplied by a third party;
- protection of legally privileged records;
- protection of the safety of individuals or property;
- protection of research information; and
- protection of the Company's own commercial information where disclosure would cause prejudice.

The Company will notify the requester of its decision within 30 days after receipt of the request.

Where the request is particularly complex or involves a substantial number of records, the Company may extend the period for responding by a further period not exceeding 30 days, in accordance with PAIA. The requester will be informed of the extension and the reasons for it before expiry of the initial 30-day period.





11

Complaints and Remedies

SCS Invictus South Africa (Pty) Ltd is a private body. Accordingly, PAIA does not provide for an internal appeal against decisions made by the Company.

Where a requester is dissatisfied with the Company's decision, the requester may:

- lodge a complaint with the Information Regulator of South Africa in accordance with PAIA and POPIA; or
- apply to a court of competent jurisdiction for appropriate relief.

Information regarding the complaint procedures and prescribed forms may be obtained from the Information Regulator.

12

Availability of the Manual

This manual is active, updated annually and accessible on the SCS Invictus Website as well as for physical inspection at our South African head office.





ANNEXURE A: STATUTORY FEES FOR PRIVATE BODIES

1. The Request Fee

- **Amount Payable:** R140.00
- **When to pay:** This is a non-refundable administration fee that must be paid by every requester (except a personal requester seeking their own personal records) *before* the company processes the request.

2. Access Fees (For Reproduction and Time)

If the request for information is granted, the requester must pay the access fees before the records are released. These fees cover the cost of searching for, preparing, and reproducing the records:

Type of Record / Activity	Prescribed Fee (ZAR)
Photocopy / Printed Copy (per A4 page or part thereof)	R2.00
Electronic Copy (Flash Drive / USB provided by requester)	R40.00
Electronic Copy (Compact Disc provided by requester)	R40.00
Electronic Copy (Compact Disc provided by company)	R60.00
Transcription of Visual Images (per A4 page or part thereof)	Will depend on quotation
Copy of Visual Images	Will depend on quotation
Transcription of an Audio Record (per A4 page or part thereof)	R24.00
Copy of an Audio Record (Flash drive provided by requester)	R40.00
Copy of an Audio Record (Compact disc provided by requester)	R40.00
Copy of an Audio Record (Compact disc not provided by requester)	R60.00

3. Search and Preparation Fees

- **Fee rate:** **R145.00 per hour** (or part of an hour) reasonably required to search for and prepare the record for disclosure.
- **Maximum Cap:** The total search and preparation fee may not exceed **R435.00**.

4. Deposit for Extensive Searches





- **Condition:** If the Information Officer determines that searching for and preparing the requested records will take longer than **6 hours**.
- **Deposit Amount: One-third (1/3)** of the total estimated access fee must be paid by the requester as a deposit.

5. Postal / Delivery Fees

- If the requester wants the copy of the record to be posted or couriered to them, the **actual postal or courier fees** will be charged to the requester.

ANNEXURE B: FORM 2

Request for Access to Record

<https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

ANNEXURE C: FORM 3

Outcome of Request and of Fees Payable

<https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

