



PAIA MANUAL

Promotion of Access to Information Act 2 of 2000

Prepared in terms of section 51 of the PAIA

Entegri Connect

Version 1.0 | Effective 1 October 2026

Entegriconnect.net

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1. Introduction and Purpose

This Manual is prepared by Entegri Connect in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and the PAIA Regulations, 2021 (Government Notice R.757, Government Gazette 45057, 27 August 2021).

PAIA gives effect to the constitutional right of access to information in section 32 of the Constitution of the Republic of South Africa, 1996. Access to information held by a private body may be requested where the information is required for the exercise or protection of any right.

This Manual tells members of the public, Clients, Suppliers, employees, regulators, and other stakeholders:

- the categories of records Entegri Connect holds;
- the procedure and prescribed forms for requesting access to records;
- the fees payable in connection with such requests;
- the timeframes within which requests are processed;
- the grounds on which access may be refused; and
- the remedies available where access is refused or a request is not answered in time.

This Manual also sets out Entegri Connect's obligations and procedures under the Protection of Personal Information Act 4 of 2013 ("POPIA") in respect of the personal information it processes as the operator of the Entegri Connect Platform.

2. Contact Details of Private Body

Company Name	Entegri Connect (Pty) Ltd
Registration Number	2026/674044/07
Incorporated	24 August 2026, Republic of South Africa
Registered Address	477 Jan Bantjies Road, Sinoville, Pretoria, Gauteng, 0129, South Africa
Postal Address	477 Jan Bantjies Road, Sinoville, Pretoria, Gauteng, 0129, South Africa
Email Address	info@entegri.net
Platform	entegriconnect.net
Nature of Business	Operator of an online marketplace platform connecting Clients who need professional services with Suppliers who provide them. Entegri Connect does not itself provide the professional services offered on the Platform.

3. Information Officer

Entegri Connect (Pty) Ltd has designated the following person as its Information Officer, registered with the Information Regulator of South Africa. The Information Officer is responsible for handling PAIA requests, ensuring compliance with data protection legislation, and serving as the primary point of contact for matters relating to personal information.

Name	Rayno Loubser
Designation	Information Officer
Email Address	rayno@entegri.net
Telephone	+27 84 558 8084
Postal Address	477 Jan Bantjies Road, Sinoville, Pretoria, Gauteng, 0129
Registered with the Information Regulator	2 September 2026, registration number 2026-065740

All PAIA requests, POPIA queries, and complaints should be directed to the Information Officer in the first instance.

Information Regulator of South Africa Website: www.inforegulator.org.za Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 Email: enquiries@inforegulator.org.za
The Information Regulator is the supervisory authority for both PAIA and POPIA in South Africa.

4. Guide on How to Exercise Rights under PAIA

The Information Regulator has published a guide explaining how a person may exercise their rights under PAIA, covering the procedure for requests, prescribed forms and fees, response timeframes, and remedies. It is available free of charge from the Information Regulator at the details above.

5. Records Held by Entegri Connect

Entegri Connect maintains records in connection with operating the Platform and in accordance with its statutory and regulatory obligations. The categories below, with indicative retention periods, are cross-referenced to clause 12 of the Platform Privacy Policy, which is the more detailed source. Access to records may be subject to the grounds for refusal in section 10 below, and records may contain the personal information of third parties, in which case access may be limited to protect their privacy.

5.1 Corporate and Governance Records

Category	Description	Typical Retention
Incorporation and constitutional documents	CIPC registration documents, Memorandum of Incorporation, amendments	Indefinite (statutory)
Ownership and shareholding records	Shareholder register, director records, securities register	Indefinite (Companies Act)
Statutory filings	Annual returns, CIPC filings, regulatory submissions	7 years

5.2 Financial and Accounting Records

Category	Description	Typical Retention
Accounting records	General ledger, journals, management accounts	5 years (Tax Administration Act)
Tax records	Income tax and, if applicable, VAT returns, SARS correspondence	5 years minimum (TAA s29)
Platform Fee and commission records	Records of the 10% Platform Fee invoiced to Suppliers under the current interim payment model and, if introduced later, records generated by any payment or escrow provider	5 years after the end of the relevant financial year
Banking records	Bank statements, payment records, reconciliations	5 years

5.3 Platform Records: Clients and Suppliers

Category	Description	Typical Retention
Account and registration records	Names, contact details, and, for Suppliers, professional credentials and verification status	Duration of registration plus 5 years
Credential and eligibility records	Credentials uploaded for verification, and the outcome of the automated eligibility engine described in Privacy Policy clause 7	Duration of registration plus 5 years
Service Requirements and Bids	Requirements posted by Clients, and Bids submitted by Suppliers	Duration of registration plus 3 years

Category	Description	Typical Retention
Engagement letters	Signed engagement letters concluded through the Platform	Life of the record, not automatically deleted
Workspace documents	Documents uploaded to an Engagement workspace	Life of the Engagement plus 12 months
Non-circumvention records	Records supporting enforcement of the Platform's non-circumvention terms	24 months from Introduction, plus a 1-year prescription tail
Dispute records	Records of a Platform Dispute under the Dispute Resolution Policy	3 years from the final decision

5.4 Information Technology and Security Records

Category	Description	Typical Retention
Access and audit logs	System access logs, authentication records	12 months minimum
Cookie preferences and marketing consent records	Cookie preferences stored locally in the visitor's browser; separately retained marketing consent and opt-out records, where applicable	Cookie preferences: until changed or browser data is cleared. Marketing opt-out records: as long as necessary to honour the opt-out
Data protection records	This Manual, POPIA compliance documentation, data subject requests	5 years from creation
IT security records	Incident logs, security policies, malware scanning records	3 years

5.5 Human Resources Records

Category	Description	Typical Retention
Employment records	Contracts of employment, termination documentation	Duration of employment plus 3 years (BCEA)
Payroll records	Salary records, IRP5/IT3(a) certificates, PAYE returns	5 years (SARS/BCEA)

5.6 Compliance and Regulatory Records

Category	Description	Typical Retention
Regulatory correspondence	Correspondence with SARS, CIPC, the Information Regulator	5 years
PAIA documentation	This Manual, PAIA requests, responses, refusals	5 years from the date of request
POPIA compliance records	Consent records, processing records, breach notifications, operator agreements	5 years from the date of the record

6. Records Available Without a Formal Request

The following may be accessed without a formal PAIA request:

- Published content on entegriconnect.net, including the Platform Privacy Policy, Cookie Policy and Website Terms of Use;
- This PAIA Manual, available on the Platform and on request from the Information Officer;
- General information about the Platform provided through normal business communication;
- Publicly available records filed with CIPC (for example annual returns and the Memorandum of Incorporation), accessible through the CIPC portal.

A requester seeking any other record held by Entegri Connect must follow the formal request procedure in section 7.

7. Request Procedure and Prescribed Forms

7.1 Who May Submit a Request

Any person, including a juristic person, may request access to a record held by Entegri Connect, provided access is required for the exercise or protection of a right. A requester must identify the right they seek to exercise or protect and explain why the record is required for that purpose.

7.2 Prescribed Form

Requests must be submitted using the prescribed Form 2 set out in the PAIA Regulations, 2021. The current form is available from the Information Regulator (www.inforegulator.org.za), the Department of Justice and Constitutional Development (www.justice.gov.za), and from the Entegri Connect Information Officer as described in Annexure A. Entegri Connect does not accept requests on other forms unless the Information Officer agrees in writing.

7.3 How to Submit a Request

Email	rayno@entegri.net (preferred method)
Postal address	477 Jan Bantjies Road, Sinoville, Pretoria, Gauteng, 0129 (mark envelope: PAIA Request, Confidential)
Hand delivery	477 Jan Bantjies Road, Sinoville, Pretoria, Gauteng, 0129 (by prior arrangement with the Information Officer)

7.4 What the Request Must Include

- The requester's full name and contact details, and, where the request is made on behalf of someone else, that person's details;
- A description of the record sought, in enough detail for the Information Officer to identify it;
- The right the requester seeks to exercise or protect, and why the record is required for that purpose;
- The preferred form of access;
- Proof of identity.

A request missing this information may be returned to the requester for completion.

8. Prescribed Fees

Fees are prescribed under the Regulations relating to the Promotion of Access to Information, 2021, published under Government Notice R.757 in Government Gazette 45057 of 27 August 2021, and may be amended from time to time. The Information Officer will confirm the fees applicable at the time of a request.

8.1 Request Fee

A request fee of R140.00 is payable in respect of a request for access to a record of a private body under PAIA.

Where a data subject requests access to their own personal information under section 23 of POPIA, confirmation of whether Entegri Connect holds personal information about that person is provided free of charge. A copy or description of the personal information may be subject to the prescribed fee, if any.

8.2 Reproduction and Access Fees

Item	Fee
Photocopy, A4, black and white	R2.00 per page
Photocopy, A4, colour	R7.00 per page
Printed copy of an electronic record, A4	R2.00 per page
Copy of an audio record on a flash drive supplied by the requester	R40.00
Search for and preparation of a record (excluding the first hour), per hour or part thereof	R145.00 per hour, to a maximum of R435.00

8.3 Deposit

Where the search for and preparation of the requested records is reasonably expected to exceed six (6) hours, the Information Officer may require payment of the prescribed deposit before processing continues. The deposit is calculated in accordance with Annexure B to the PAIA Regulations and is currently one-third of the applicable amount calculated in terms of the prescribed reproduction and access-fee items.

If access is refused after a deposit has been paid, the deposit will be refunded as required by PAIA.

8.4 Payment Method

Fees are paid by electronic funds transfer to Entegri Connect's designated bank account, details of which the Information Officer will provide when acknowledging the request. Proof of payment must be submitted where payment is required before processing continues.

9. Response Timeframes

Acknowledgement of receipt	Within 5 business days of a valid, complete request
Standard response period	Within 30 days of a valid, complete request (PAIA section 56)
Extended response period	Up to a further 30 days for a large volume of records, records held elsewhere, or where the standard timeframe would unreasonably interfere with Entegri Connect's activities (PAIA section 57)
Notice of extension	Given in writing before the standard 30-day period expires
Deemed refusal	A request not answered within the applicable timeframe is deemed refused (PAIA section 58). The requester may then use the remedies in section 11

10. Grounds for Refusal

The Information Officer may refuse access on grounds including:

- Protection of personal privacy. Disclosure would unreasonably disclose a third party's personal information (PAIA section 63).
- Confidential commercial information. Disclosure would reveal trade secrets or commercial, financial, or technical information whose disclosure could harm Entegri Connect's or a third party's commercial interests, including a Supplier's credential or verification file, or another user's Bid (PAIA section 64).
- Legal privilege. The record is protected by legal professional privilege (PAIA section 67).
- Prejudice to negotiations. Disclosure would prejudice a contractual or other negotiation (PAIA section 64).
- Records not held. The record is not held by Entegri Connect or does not exist.
- Manifestly frivolous or vexatious requests, or requests whose disclosure would be unlawful (PAIA section 45).
- Where access is refused, the Information Officer will give written reasons and inform the requester of the right to internal review, or to approach the Information Regulator or a court.

11. Remedies and Appeals

11.1 Complaint to the Information Regulator

A requester may lodge a complaint with the Information Regulator under PAIA section 77A if access has been refused, or if Entegri Connect has failed to meet its PAIA or POPIA obligations.

Website: www.inforegulator.org.za Email: PAIAComplaints@inforegulator.org.za. Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

11.2 Court Application

A requester may apply to the High Court of South Africa under PAIA section 78 where access has been refused, deemed refused, or where Entegri Connect has otherwise failed to comply with PAIA. Such an application must be brought within 180 days of the refusal or deemed refusal.

11.3 Internal Escalation

A requester is encouraged to first raise concerns in writing with the Information Officer. Entegri Connect will try to resolve disputes informally and promptly.

12. Processing of Personal Information (POPIA)

12.1 The Eight Conditions for Lawful Processing

POPIA Condition	How Entegri Connect Complies
1. Accountability	The Information Officer oversees POPIA compliance across the Platform and is the first point of contact for data protection matters
2. Processing Limitation	Personal information is collected only for the purposes set out in clause 4 of the Platform Privacy Policy, and no more than is needed for those purposes
3. Purpose Specification	Purposes are communicated at or before collection, principally through the Platform Privacy Policy
4. Further Processing Limitation	Personal information is not used for a materially different purpose without a lawful basis for that further use
5. Information Quality	Users can correct their own account and profile information, and may request correction under clause 15 of the Privacy Policy
6. Openness	This Manual and the Platform Privacy Policy, published on entegriconnect.net , explain what is processed and why
7. Security Safeguards	Technical and organisational measures are described in the Information Security Statement, which also serves as the record required by section 19 of POPIA
8. Data Subject Participation	Data subjects may access, correct, or request deletion of their personal information, and may object to processing, under clause 15 of the Privacy Policy

12.2 Categories of Data Subjects

- Clients and prospective Clients using the Platform, whether natural persons or juristic persons
- Suppliers and prospective Suppliers, including their nominated individuals
- Directors, employees, and contact persons of Client and Supplier entities
- Website visitors and business contacts
- Entegri Connect's own employees and contractors

12.3 Categories of Personal Information Processed

- Full names and contact details
- Professional credentials, qualifications, and professional body membership status
- Identity or registration numbers, where required for verification
- Content of Service Requirements, Bids, messages, and workspace documents
- Financial and banking information supplied for account, verification or payment administration where applicable, and, if a payment or escrow provider is introduced, records generated by that provider
- Website and Platform usage data, including access and audit logs
- Cookie and consent records

12.4 Purpose of Processing

The purposes are set out in full in clause 4 of the Platform Privacy Policy, and include: operating Client and Supplier accounts; verifying Supplier credentials and eligibility; operating the Service Requirement, Bid, and Introduction process; hosting workspace documents; administering the Platform Fee; investigating disputes and misuse; providing optional AI-assisted drafting features where a user chooses to use them; and, where consented to, direct marketing.

12.5 Lawful Basis for Processing

Entegri Connect relies on the bases in POPIA section 11: performance of a contract, compliance with a legal obligation, legitimate interests, and consent where it is the basis relied on, such as for non-essential cookies and direct marketing. The purpose-by-purpose table is at clause 4 of the Platform Privacy Policy. Registration is not treated as blanket consent to every processing activity; consent is asked for separately wherever it is the basis relied on.

12.6 Recipients of Personal Information

Personal information is shared with the providers named in Annexure A to the Platform Privacy Policy, including Render (application hosting), Neon (database), Cloudflare (document storage), Resend (transactional email), Scanii (malware scanning of uploaded files), Sentry (application error and performance monitoring), and Google (optional AI-assisted drafting and Google Sign-In, on the terms described in the Platform Privacy Policy). Entegri Enterprises (Pty) Ltd, a related company, acts as an operator where individuals who work for both companies perform Platform functions, under a written operator agreement, and may also participate on the Platform as a Supplier on the same terms as any other Supplier. A payment or escrow provider will be added only if one is contracted and introduced. Current processors are engaged under written data processing agreements accepted by Entegri Connect and kept on record.

12.7 Data Subject Rights under POPIA

The rights of access, correction, deletion, objection, withdrawal of consent, and complaint to the Information Regulator are set out in full in clause 15 of the Platform Privacy Policy. Requests are made in writing to the Information Officer at rayno@entegri.net and are answered within 30 days.

13. Cross-Border Transfers of Personal Information

Entegri Connect's application and database infrastructure is hosted by Render and Neon in Frankfurt, Germany, within the European Union. Document storage (Cloudflare R2) has its location set to Western Europe (WEUR). Personal information processed through the Platform is therefore routinely transferred outside South Africa. The specific processing locations and transfer safeguards for each provider are set out in clause 11 and Annexure A of the Platform Privacy Policy.

In accordance with POPIA section 72, Entegri Connect only makes this transfer because the European Union's data protection law is substantially similar to POPIA, which satisfies section 72(1)(a). The full analysis, including the position for Clients and Suppliers located in the European Economic Area or the United Kingdom, is at clause 11 of the Platform Privacy Policy.

Suppliers on the Platform are, for now, based in South Africa. Clients may be located outside South Africa, including in the European Economic Area. The Platform is not currently offered to Clients located in the United Kingdom; if that changes, Entegri Connect will address the applicable UK GDPR requirements before accepting UK registrations. The GDPR position is explained in clause 15 of the Platform Privacy Policy.

Where any other service provider processes personal information outside South Africa, Entegri Connect will only use that provider where the recipient country's law is substantially similar to POPIA, the data subject has consented to the transfer, or the transfer is necessary to perform a contract, and, in every case, only under a written agreement imposing obligations equivalent to POPIA's conditions for lawful processing.

14. Records Retention Schedule

The retention periods for records containing personal information are set out in full in clause 12 of the Platform Privacy Policy, and are summarised in section 5 of this Manual above. Records are securely deleted or de-identified at the end of the applicable retention period, including purging from backups in the ordinary backup rotation cycle in accordance with section 14(5) of POPIA, unless a legal hold requires further retention.

15. Availability of this Manual

This Manual is available:

- on the Platform at entegriconnect.net (freely accessible);
- on request from the Information Officer at rayno@entegri.net, provided free of charge in electronic format;
- in printed format at Entegri Connect's registered office, by prior appointment.

This satisfies the requirement in PAIA section 51(3) that the manual be available at the registered office and on the private body's website.

16. Amendments

Entegri Connect (Pty) Ltd may update this Manual from time to time to reflect changes in applicable legislation, regulatory requirements, or its operational practices. Amendments are published on the Platform with an updated version number and effective date. Material changes are communicated to known stakeholders where practicable.

Current Version	1.0
Effective Date	1 October 2026
Approved By	Rayno Loubser, Information Officer
Next Review Date	October 2027, or earlier if legislation changes

ANNEXURE A: PAIA FORM 2 - HOW TO OBTAIN AND SUBMIT THE FORM

Form 2 is the prescribed request form under the PAIA Regulations, 2021. Requesters must complete and submit Form 2 to the Information Officer when requesting access to records held by Entegri Connect (Pty) Ltd.

Where to obtain the current prescribed Form 2:

- The Information Regulator of South Africa: www.inforegulator.org.za, enquiries@inforegulator.org.za
- The Department of Justice and Constitutional Development: www.justice.gov.za/inforeg/
- Entegri Connect's Information Officer: rayno@entegri.net (a copy is provided free of charge on request)

As form specifications may change, requesters should obtain the current version of Form 2 directly from the Information Regulator before submitting a request.

Completed forms should be submitted by email to rayno@entegri.net, with a copy of the requester's identity document or passport, and proof of payment of the applicable request fee where one is payable.

ACCESS TO INFORMATION - CLEARLY STRUCTURED