info@dg.co.za
www.dg.co.za

DG Store (SA)(PTY) Ltd

PAIA Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act

(PAIA Act),

Act 2 of 2000 (as amended)

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1. Glossary of Terms

Terminology

Terminology	Definition
DG	Digital Generation
Regulator	Information Regulator
Republic	Republic of South Africa

Abbreviations

Abbreviation	Definition
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
POPIA	Protection of Personal Information Act No.4 of 2013

2. Introduction

DG Store(SA) PTY LTD trading as Digital Generation Promotion of Access to Information Manual ("Manual") is published in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA) and section 23 -25 of the Protection of Personal Information Act No. 4 of 2013 (POPIA).

PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information. This is information held by the State but also information held by any another person. A person that is entitled to exercise a right or who needs information for the protection of any right, is entitled to access that information, subject to certain restraints.

Section 51 of PAIA creates a legal right to access records (as defined in section 1 of PAIA) of a private body (both natural and juristic), however this right may be negated in circumstances as set out under Chapter 4 of Part 3 of PAIA. In addition, in compliance with POPIA a responsible party who processes personal information must notify the person to whom personal information relates ("Data Subject") of the manner in which the Data Subject can access their personal information held by the responsible.

3. Purpose

This PAIA Manual is useful for the public to check the categories of records held by a body which are available without a person having to submit a formal PAIA request; 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; know the description of the records of the body which are available in accordance with any other legislation; access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access; know the description of the guide on how to use PAIA, as updated by the Regulator and how to

obtain access to it; 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;

know the description of the categories of data subjects and of the information or categories of information relating thereto; know the recipients or categories of recipients to whom

the personal information may be

supplied; 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 know whether the body has appropriate security measures to ensure the confidentiality, integrity

and availability of the personal information which is to be processed.

4. Company Overview

DG, is the subsidiary of the Alviva Group of companies, operating within the IT sector and is regarded as a private body in terms of PAIA.

5. Information required under Section 51 (1) (a) of PAIA

Head of DG **(Designated Information Officer)**	Mr. Gary Pickford (MD)
Deputy Information Officers	Ms. Simphiwe Z Sithole (Regional Business Executive)
Email address	SimphiweS@dg.co.za
Postal address	PO Box 175 Mutual Park, Cape Town, 7451
Street address	International Business Gateway, Corner New Road and 6th Road, Midrand, Gauteng, South Africa
Phone number	+27 11 312 0374
Website	www.dg.co.za

6. Requirements in terms of PAIA

6.1. Guide on how to use PAIA - Description of guide referred to in section 10: section51(1)(b)

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. This Guide will assist persons in using and understanding PAIA.

The Guide can be accessed via the Information Regulator of South Africa website (https://inforegulator.org.za/paia-guidelines/)

The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of the objects of PAIA and POPIA; the postal and street address, phone and fax number and, if available, electronic mail address ofthe Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of

section 17(1) of PAIA and section 56 of POPIA; the manner and form of a request for- access to a record of a public body contemplated in section 11; and access to a record of a private body contemplated in section 50; the assistance available from the IO of a public body in terms of PAIA and POPIA; the assistance available from the Regulator in terms of PAIA and POPIA; all remedies in law available regarding an act or failure to act in respect of right or duty conferred

or imposed by PAIA and POPIA, including the manner of lodging- an internal appeal; a complaint to the Regulator; and an application with a court against a decision by the information officer of a public body, a

decision on internal appeal or a decision by the Regulator or a decision of the head of a private body; the provisions of sections 14 and 51 requiring a public body and private body, respectively, to

compile a manual, and how to obtain access to a manual; the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records

by a public body and private body, respectively;

the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 92.

Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

The Guide can also be obtained- upon request to the Information Officer;

from the website of the Regulator (https://www.justice.gov.za/inforeg/).

A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

English and Afrikaans.

6.2. Automatically available information - Notice in terms of section 52(2) of the PAIA:

The following records are automatically available, and it is therefore not necessary to apply for access thereto in terms of the Act:

Records that are automatically available in terms of the Companies Act, No.71 of 2008.

All other information freely available on DG's website at https://www.dg.co.za/.

Category of Records	Types of Records	Available on website	Available on request
Automatically available in terms of the Companies Act, No.71 of 2008	Records available from CIPC (Disclosure certificate)		X
Freely available on DG's website	PAIA Manual	X	X

6.3. Records available in terms of other legislation: section 51(1)(d)

The following legislation creates the obligation to keep certain records:

Category of Records	Applicable Legislation
CIPC Records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Summary of Conditions	Basic conditions of Employment No. 75 of 1997
BEE Certificate	Broad Based Black Economic Empowerment Act No. 53 of 2003
CGSO ******	Consumer Protection Act No. 68 of 2008
Importers Certificate	Customs and Excise Act No 91 of 1964
Proof of EE Annual Submissions	Employment Equity Act No. 55 of 1998
Compliance Certificate	Income Tax Act No. 95 of 1967
Proof of submission of WSP	Skills Development Act No. 97 of 1998
Tax Certificate of Compliance	Unemployment Insurance Act No. 63 of 2001
Tax Certificate of Compliance	Value Added Tax Act No. 89 of 1991

Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual.

6.4. Subjects and categories of records held by DG: section 51(1)(e)

PAIA requires that sufficient detail be provided to facilitate a request for access to a record of DG.

The table below describes the subjects on which DG holds records and the categories of the records held by each subject.

Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honored. All requests for access will be evaluated on a "case by case" basis in accordance with the provisions of the Act.

Subjects on which the body holds records	Categories of records
Companies Act Records	• Codes of Conduct • Documents of Incorporation • Legal Compliance Records • Licenses of Copyrights • Memorandum of Incorporation • Minutes of Board of Directors Meetings • Minutes of Shareholders Meetings • Policies • Records relating to the appointment of directors/ auditors/ secretary/ public office and other officers • Share Register and other statutory registers and/or records and/or documents
Financial Records	• Accounting Records • Annual Financial Statements • Asset Register
	□ Auditors' Report □ Bank Payments and Transfers □ Bank Statements □ Banking Records □ Detail of Auditors □ Electronic Banking Records □ Invoices □ Rental Agreements □ Tax Returns
Income Tax Records	□ Documents issued to employees for income tax purposes □ PAYE Records □ Records of payments made to SARS on behalf of employees □ Value Added Tax Clearance Certificate

	▯ All other statutory compliances: ○ Value Added Tax ○ Skills Development Levies ○ Unemployment Insurance Fund ○ Workman's Compensation ▯ Customs and excise
Personnel Documents & Records	▯ Attendance Registers ▯ Benefits Records – Medical Aid, Retirement and Group Life ▯ Contacts – Telephone and Cell Numbers and Addresses ▯ Disciplinary Code ▯ Disciplinary Records ▯ Employment Contracts ▯ Employment Equity Plan ▯ Leave Records ▯ Records containing all employees' names and occupation ▯ Salary Records ▯ Sector Education and Training Authority Records ▯ Training Manuals ▯ Training Records
Client Records Processing	• Correspondence • Service Agreements • DG Employees ○ Personal information such as name, contact details, company information, work experience, educational history, race, gender.
Supplier Records	▯ The name of the supplier

	• The address of the supplier • A description of the goods • The quantity or volume of the goods • Proof of date of payment
Electronic Communication and Transactions Records	□ Record of the personal information and the specific purpose for which the personal information was collected.
Insurance Records	• DG - General Insurance • Professional Indemnity Insurance • Directors and Officers Insurance • Cyber Security Insurance
Immovable and Movable Property Records	• Agreements for the lease of movable property • Agreements for the lease or sale of land and/or other immovable property • Other agreements for the purchase, ordinary sale, conditional sale, or hire of assets
Miscellaneous Records	• Agency, management, and distribution agreements • Agreements for the trading activities of the DG business • Agreements for the acquisitions and disposals of group companies
Third Party Records	• Records held by DG pertaining to third parties, including, but not limited to financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about any contractors and / or suppliers; • Records held by DG pertaining to contractors, subsidiary companies, joint venture companies, special purpose vehicle companies and service providers. [In cases where information requested by the Requester may impact on a third party, the Information Officer is obliged to comply with the requirements as set out in terms of the Act (especially Sections 71 to 73 of the Act).

7. Processing of Personal Information

7.1. Purpose of Processing Personal Information

We respect the privacy of people, and we protect the personal data we process. We balance our need to process personal data for our activities with the legal requirements to protect it.

Information obtained for Processing will only be used for the purposes intended and consented to by the data subject, and no other purpose.

7.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Nature of personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, shareholder FICA details, race, gender and bank details
Service Providers	names, registration number, vat numbers, address, trade information, shareholder details, race, gender and bank details
Employees	name, identity numbers address, qualifications, medical, children's information, bank details, gender, and race

7.3. The recipients or categories of recipients to whom the personal information may be disseminated

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	Government departments, including South African Police Services
Qualifications for qualification verifications	Government departments, including South African Qualifications Authority
Credit and payment history, for credit information	Government departments, including Credit Bureaus

7.4. Planned transborder flows of personal information

There are no planned transborder flows of personal information

Payroll data is hosted in a South African Azure instance and their disaster recovery resides in Cape Town.

DG's Servers, customer and supplier information is hosted by a South African third-party whose disaster recovery resides in Centurion, Gauteng.

All email is hosted in South African Microsoft data Centre's and backed up with Commvault.

7.5. General description of Information Security Measures to be implemented by the party responsible to ensure the confidentiality, integrity and availability of the information

The information security measures as governed by the Information Security Policy aims to minimize risks through preventative measures, timely identification of irregularities, limitation of losses and effectively managed restoration. This policy will:

Provide a secure and productive computing environment;

Increase awareness of computer security amongst users and their responsibilities when using ICT resources;

Encourage responsible behavior in respect of information resources;

Provide a guideline for protecting valuable information resources from theft, damage, and unauthorized access or change;

Increase the awareness for confidentiality of sensitive information;

Ensure processes are in place to identify and correct damaged systems such that operations continue with minimal disruption; and

Ensure the suppliers of ICT products and services are clearly aware of the expected standard of ICT security.

The security safeguards can be summarised as follows:

All Endpoints are encrypted with BitLocker,

Every Endpoint runs a full and extensive XDR (Extended Detection and Response) which detects malware, suspicious activity,

Secure web gateway which encrypts all internet traffic to and from each device,

Inventory management systems which patches and scans for any vulnerabilities and software updates.

Full third-party identity management system which secures all private and cloud-based apps with MFA,

24/7 SOC (Security Operations Centre) which monitors all endpoints and servers for potentially malicious activity and breaches, and

All backups are both immutable and encrypted.

8. The Request Process

8.1. Introduction

Access to records held by DG is not automatic and can be refused by DG on any of the grounds for refusal contemplated in Chapter 4 of Part 3 of PAIA.

In order to request access to records held by DG, the Requester must not only identify the right it is seeking to exercise or protect and explain why the record requested is required for the exercise or protection of that right but must also comply with all the procedural requirements set out in PAIA.

If the Requester requests information on behalf of a public body (i.e., state), the Requester must identify that the request for information is in the public's interest by stipulating adequate reasons.

If the Requestor is making a request on behalf of another person, sufficient proof (to the satisfaction of DG) of the capacity in which the Requestor is making the request/acting must be submitted. The type of proof required will be advised by DG upon receipt of request.

8.2. Procedural Requirements

In order to facilitate such a request for access to records, the Requester needs to complete "Form 02 Request for Access to Record" (Form 02) (https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf), as prescribed by the Information Regulator, which is available on the Information Regulator website (https://inforegulator.org.za/paia-forms/).

Please note that Form 02 must be completed in full. If not, the process may be delayed until such additional information has been provided.

In terms of section 23(1) of POPIA, adequate proof of identity is required from the Requestor/Data Subject. Therefore, in addition to Form 02, the Requestor will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.

The duly completed Form 02 and proof of identity must be provided to the Information Officer of DG at the physical address or e-mail set out above. DG may, in its sole discretion, request that original certified copies be provided in certain circumstances such as if the electronic copies provided are not clear or are questionable.

The Requester must provide sufficient detail on Form 02 to enable the Information Officer to identify the record requested. When completing Form 02, the Requester should also indicate:

which form of access is required; the right the Requester is seeking to exercise or protect and explain why the requested record is

required for the exercise or protection of that right;

whether the Requester wishes to be informed of the decision in any other manner, in addition to a written reply, to state the manner and necessary particulars to be so informed; and an email address, telephonic contact numbers and postal address in the Republic of South Africa.

If a request is made on behalf of another person, the Requester must show, to the reasonable satisfaction of the CEO or the Information Officer, that he or she is duly authorised to make such request.

If an individual is unable to complete the prescribed access form because of illiteracy or disability, such an individual may make the request verbally.

Form 02 must be adequately completed, with sufficient information particularly so that the Information Officer of DG can identify and determine what the access fee will be, should access be granted.

A request will not be processed until the request fee has been paid.

8.3. Refusal in terms of PAIA

DG may refuse access to the requested record of parts thereof as allowed in terms of Chapter 4, namely section 62 till 70 (inclusive) of PAIA.

In instances whereby a third party needs to be notified of request, in order to authorise or decline access, the CEO or Information Officer undertakes to request same from the third party within 21 (twenty-one) days of receipt of the request and to include the required information provided for in terms of section 71(3) of PAIA.

In the event that the request is declined by the third party – DG cannot be held responsible for same.

8.6. Notification of refusal or granting of access to information

Requestors will be informed within 30 (thirty) days of receipt of the prescribed access form of DG's decision is to refuse access to the information requested based on any of the grounds for refusal as contemplated in Chapter 4 of Part 3 of the PAIA. Take note that the 30 (thirty) day period may be extended for a further 30 (thirty) day period should more time be required to gather the requested information. The Requester will, however, be notified if the initial 30 (thirty) day notice period is to be extended for a further 30 (thirty) days.

8.9. Refusal since the record cannot be found

If all reasonable steps have been taken by DG to find the record requested by the Requester and same cannot be found for reasons justifiable as per section 55 of PAIA, the Information Officer shall

provide an affidavit or affirmation to the Requester advising that it is not possible to give access to the record requested.

The affidavit or affirmation will comply with all the requirements provided for in terms of section 55(2) of the Act.

In the event the record is found subsequently, DG undertakes to contact the Requester in order to gain access to same, subsequent to the payment of the applicable access fee.

9. Fees

There are two basic types of fees applicable in terms of PAIA – "request" and "access" fees.

9.1. Request Fee

The request fee is an administration fee that is payable on submission of the request for access to a record and must be paid before the request is considered (unless the request is to access the requestor's personal information in which event there is no applicable fee). The request fee is not refundable if the request for access has been granted. However, it is refundable if the request for access has been denied by DG.

The request fee is currently statutorily set at R140-00 (one hundred and forty rand) for a private body and is subject to change as announced in terms of PAIA.

In line with section 23(1)(a) of POPIA, a Data Subject (i.e., personal requestor) has a right to request DG to confirm, free of charge, whether or not DG holds personal information about the Data Subject.

9.2. Access Fee

The access fee is payable prior to the Requester actually gaining of access to the records in the required form.

The access fee is intended to reimburse DG for the costs involved in reproduction of documents, searching, and preparing the record requested and for any time reasonable required (in excess of the prescribed hours) to search and prepare the record.

Should the preparation of the required record take more than 6 (six) hours, a deposit (which is 1/3 (one third)) of the access fee is payable before the request will be processed by DG as a deposit.

DG may withhold a record until the Requester has paid the applicable fees (if any).

In accordance with Section 23(3) of the POPIA, DG may charge an access fee to the Data Subject to enable DG to respond to the request. In such instances DG must provide the Data Subject with a written estimate of the fee before providing the services.

10. Prescribed Fees

Section 22(1) of PAIA states that fees payable for access to records of the Regulator are to be prescribed. The prescribed fees are as set out in Annexure A, attached hereto.

A requester who seeks access to any record may be required to pay a fee, unless an exempted, as referred to in paragraph 17.3 below.

The requester does not need to pay an access fee30 to a public body if:-

He or she is a single person whose annual income, after permissible deductions, such as PAYE and UIF, is less than R14 712 a year, or

He or she is married and the joint income with his or her partner, after permissible deductions, such as PAYE and UIF, is less than R27 192 per year.

DG, as a registered private body, will add VAT to all fees in terms of the Value-Added Tax Act.

10.2. Notices

The CEO or the Information Officer shall provide the Requester with a notice in terms of section 54(3) of PAIA on initial receipt and consideration of the request for access. This notice is Annexure B.

Once the request fee has been paid in full, the CEO or the Information Officer will consider the request for access and will provide the Requester with its decision to the request. This notice is "Form 03 Outcome of Request and of Fees Payable" (Form 03), as prescribed by the Information Regulator, which is available on the Information Regulator website (https://inforegulator.org.za/paia-forms/).

11. Availability of the manual

As prescribed by Section 51(3) of PAIA, a copy of the manual is available

on DG's website at www.dg.co.za; at the offices of the DG for public inspection during normal business hours; to any person upon request and upon the payment of a reasonable prescribed fee; and to the Information Regulator upon request.

A fee for a copy of the manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

12. Updating of the manual

The DIO, as mandated by the CEO will, on a regular basis, update this manual.

13. Annexure A

FEES ***(as per IR PAIA Manual dated Nov.2023)***

Fees in Respect of Private Bodies

Item	Description	Amount
1.	The request fee is payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc ▯ If provided by requestor ▯ If provided to the requestor	 R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (v) Flash drive (to be provided by requestor) (vi) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

14. Annexure B

DG Notice in terms of Section 54(3) of PAIA

1. Please be advised the Requester is required to pay the prescribed request fee (if any), before further processing the prescribed access form is done.

2. Please be advised that in the event that:

   (a) the search for the requested record for which a request for access by a Requester, has been made; and

   (b) the preparation of the record for disclosure (including any arrangements contemplated in PAIA Section 29 (2) and (b) (i) and (ii) (aa)), would, in the opinion of DG, require more than the hours prescribed, the Requester is herewith requested to pay as a deposit, one third of the access fee.

3. The Requester is herewith advised that the aforesaid instance is applicable and therefore a required deposit is payable. Such amounts totals _____ (which is one third of the access fee, which amount is _____.

4. In the event that the Requester finds the aforesaid unacceptable, the Requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the request fee in terms of subsection (1), or the tender or payment of a deposit in terms of subsection (2), as the case may be.

5. The procedure for lodging the complaint stated in subsection 4 is available in the PAIA and its Regulations.

DATE AT MIDRAND ON THE _____ DAY OF _____ 2026

_____

From the desk of the Information Officer

Document Ref. No:	Revision No:	Approval Date:
DG PAIA Manual_V01.00_2021	01.00	30 June 2021
DG PAIA Manual_V02.00_2023	02.00	19 October 2023
DG PAIA-Manual_V03.00_2025	03.00	5 May 2025
DG PAIA-Manual_V04.00_2026	04.00	13 April 2026
DG PAIA-Manual_V05.00_2026	05.00	23 October 2026