



**PROMOTION OF ACCESS TO INFORMATION
MANUAL
(PRIVATE BODY)**

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT 2 OF 2000
(‘PAIA’)**

1 Introduction

- 1.1 IQ Business (Pty) Ltd (“iqbusiness”) is a leading independent management consulting firm providing a comprehensive range of services, including business consulting, process improvement, technology implementation, and data-driven decision-making solutions. Focused on innovation and sustainability, iqbusiness collaborates with clients across various industries to deliver tailored strategies that drive growth and efficiency. Known for its client-centric approach, the firm leverages deep industry expertise and advanced methodologies to address complex business challenges, while adhering to applicable laws, regulations, ethical practices, and fostering transparency and accountability in its operations.
- 1.2 This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”).
- 1.3 PAIA seeks, among other things, to give effect to the constitutional right of access to any information held by any person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information (a) if the requester is able to show that the record is required for the exercise or protection of any rights; and (b) no grounds of refusal contained in PAIA are applicable.
- 1.4 This manual has been compiled in accordance with section 51 of PAIA which promotes the protection of personal information processed by both private and public bodies. This manual includes information regarding the lodging of objections to the processing of personal information and requests to destroy or delete personal information held by iqbusiness.
- 1.5 The objectives of this manual are:

- 1.5.1 to list all categories of records held by iqbusiness;
- 1.5.2 set out the requirements with regard to who may request information in terms of PAIA;
- 1.5.3 Set out the grounds on which such a request may be denied; and
- 1.5.4 to define the manner and form in which a request for information must be submitted.

2 Contact details

2.1 The Chief Financial Officer, Ms. Annalize Buck, is the duly appointed head of iqbusiness for the purposes of PAIA and is the person to whom requests for access to records in terms of this manual should be addressed. Her contact details are as follows:

- 2.1.1 **Contact Person:** Annalize Buck
- 2.1.2 **Street Address:** iqbusiness Park, 3 Third Avenue, Rivonia, 2128
Telephone
- 2.1.3 **Postal Address:** PO Box 4435, Rivonia, 2128
- 2.1.4 **Telephone number:** +27 11 259 4375
- 2.1.5 **Email:** popi@iqbusiness.net
- 2.1.6 **Website:** <https://iqbusiness.net>

3 Notice in terms of section 52(2) of PAIA

3.1 As of the date of publication of this manual, no notice has been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

4 Records available in terms of other legislation

4.1 Records are held by iqbusiness in accordance with the following legislation:

- 4.1.1 Basic conditions of Employment Act 75 of 1997
- 4.1.2 Broad-based Black Economic Empowerment Act 53 of 2003
- 4.1.3 Companies Act 71 of 2008
- 4.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 4.1.5 Electronic Communications and Transactions Act 25 of 2002
- 4.1.6 Employment Equity Act 55 of 1998
- 4.1.7 Financial Intelligence Centre Act, 38 of 2001;
- 4.1.8 Financial Sector Regulation Act 9 of 2017
- 4.1.9 Income Tax Act 58 of 1962
- 4.1.10 Labour Relations Act 66 of 1995
- 4.1.11 Occupational Health and Safety Act 85 1993
- 4.1.12 Pension Funds Act 24 of 1956
- 4.1.13 Skills Development Act 97 of 1998
- 4.1.14 Skills Development Levies Act 9 of 1999
- 4.1.15 Unemployment Insurance Act 63 of 2001
- 4.1.16 Unemployment Insurance Contributions Act 4 of 2002
- 4.1.17 Value-Added Tax Act 89 of 1991

5 Subjects and Categories of Records Held

- 5.1 This section sets out the subjects and categories of records held by iqbusiness. The inclusion of any subject or category of records should not be construed as an indication that records falling within that subject or category shall be made available. In particular, certain grounds of refusal as set out in the PAIA may be applicable to such records.

- 5.1.1 Statutory company documents
 - 5.1.1.1 Memorandum of incorporation.
 - 5.1.1.2 Registration certificate of iqbusiness.
- 5.1.2 Accounting records
 - 5.1.2.1 Accounting records, books and documents.
 - 5.1.2.2 Interim and annual financial reports.
 - 5.1.2.3 Invoices in respect of creditors and debtors.
 - 5.1.2.4 Tax returns.
 - 5.1.2.5 Banking information.
 - 5.1.2.6 Other financial records.
- 5.1.3 Information technology
 - 5.1.3.1 Computer and telecommunications software, support and maintenance agreements.
 - 5.1.3.2 Other documentation pertaining to computer and printer systems, telecommunications and computer programmes.
- 5.1.4 Intellectual Property
 - 5.1.4.1 Trademarks and copyright works.
 - 5.1.4.2 Records relating to domain names.
 - 5.1.4.3 Licenses and other agreements relating to intellectual property rights.
- 5.1.5 Personnel records
 - 5.1.5.1 List of employees.
 - 5.1.5.2 Contracts and/or documentation pertaining to arrangements with directors.
 - 5.1.5.3 Personnel files in respect of the employees.

- 5.1.5.4 Other information relating to employees.
- 5.1.6 Governance records
 - 5.1.6.1 Minutes of meetings.
 - 5.1.6.2 Policies.
 - 5.1.6.3 Directives.
 - 5.1.6.4 Resolutions.
- 5.1.7 Marketing
 - 5.1.7.1 Articles and newsletters.
 - 5.1.7.2 Circulars and communications
 - 5.1.7.3 Other information relating to marketing.
- 5.1.8 Miscellaneous Agreements
 - 5.1.8.1 Agreements relating to movable and immovable property
 - 5.1.8.2 Agreements for the lease of immovable property.
 - 5.1.8.3 Other agreements for the purchase, ordinary sale, conditional sale or hire of assets.

6 Requests for Information

- 6.1 In terms of PAIA, a request for information may only be made if the information is required for the exercise or protection of a legitimate right.
- 6.2 All requests for information must include sufficient particulars to enable iqbusiness to identify the right that the requester is seeking to exercise or protect together with an explanation as to why the information requested is required to exercise or protect such right.
- 6.3 Requests for information in terms of this manual may not be used to access a record for criminal or civil proceedings, nor should a record be requested after the commencement of such proceedings.

7 Right to Refuse Access to Information

7.1 iqbusiness has the right to refuse access to records where:

7.1.1 the record would unreasonably disclose personal information about a natural person, including a deceased individual (unless written permission for access is granted) or such disclosure may amount to a contravention of any law, regulation or contractual obligation, including but not limited to the Protection of Personal Information Act, No.4 of 2013 (“POPIA”); and

7.1.2 the record contains any of the following:

7.1.2.1 trade secrets;

7.1.2.2 financial, commercial, scientific or technical information whereby the disclosure thereof could likely cause harm to the financial or commercial interests of a third party or iqbusiness;

7.1.2.3 information about research by a third party or iqbusiness which could put that third party or iqbusiness at a disadvantage in a negotiation or prejudice it in competition, unless written consent is given;

7.1.2.4 access would put iqbusiness in breach of a duty of confidence which we owe a third party unless that third party gives written consent for access to be granted;

7.1.2.5 access could be expected to endanger someone’s life or physical safety, prejudice or impair the security of a building, structure, system, means of transport or other property;

7.1.2.6 the record is privileged from being produced as evidence in legal proceeding, unless the person protected has waived that protection;

7.1.2.7 if the request is for access to your personal information and you could not provide adequate proof of identity to iqbusiness; and

7.1.2.8 requests for information that are frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

8 Procedure for Requesting Documents

8.1 Form of request

8.1.1 The requester is mandated to use the prescribed form in terms of PAIA, annexed hereto as Form 2, to submit a request for access to a record held by iqbusiness. The request is required to be made to the address or email address and should be clearly addressed to the person identified in paragraph 3 above.

8.1.2 The requester is required to provide sufficient particularity on the request form to enable the information officer to identify the record and the requester. The requester should also indicate which form of access to the record is required and if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

8.1.3 The requester is required to state the right that he or she is seeking to exercise or protect and provide a written explanation as to why the requested record is required for the exercise or protection of that right.

8.1.4 The requester will be informed whether or not the request has been granted in accordance with Form 3 annexed hereto.

8.2 Fees

8.2.1.1 The fee for a copy of this manual is R1.10 for every photocopy of an A4-size page or part thereof.

8.2.1.2 The request fee payable by a requester, other than a person seeking access to a record containing his or her personal information, is R50.00.

8.2.1.3 The access fees payable by a requester whose request for access to a record of iqbusiness has been granted are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4- size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on: (a) Flash drive To be provided by requester	R40.00

(b) Compact disc If provided by requester	R40.00
If provided to the requester	R60.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof	R20.00
For a copy of an audio record	
(a) Flash drive	
To be provided by requester	R40.00
(b) Compact disc	
If provided by requester	R40.00
If provided to the requester	R60.00
Postage, email or any other electronic transfer	Actual costs

8.2.2 To search for and prepare the record for disclosure, R30.00 for each hour or part of an hour reasonably required for such search and preparation.

8.2.3 For purposes of section 54(2) of PAIA, the following applies:

8.2.3.1 Six hours as the hours to be exceeded before a deposit is payable; and

8.2.3.2 One third of the access fee is payable as a deposit by the requester.

8.2.4 The actual postage is payable when a copy of a record must be posted to a requester.

9 Availability of the Manual

The manual will be available for inspection at the offices of iqbusiness free of charge or on iqbusiness's website at [.]

10 Updating of the Manual

Iqbusiness will on a regular basis update this manual.