LEAD GURUS KSG (PTY) LTD

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	**"CEO"**	Chief Executive Officer
1.2	**"DIO"**	Deputy Information Officer;
1.3	**"IO"**	Information Officer;
1.4	**"PAIA"**	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.5	**"POPIA"**	Protection of Personal Information Act No.4 of 2013;
1.6	**"Regulator"**	Information Regulator; and
1.7	**"Republic"**	Republic of South Africa

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 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. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LEAD GURUS

3.1. **Information Officer:**

Name:	Kevin Govender
Tel:	+27 10 4492354
Email:	kevin@leadgurus.co.za

3.2. **Deputy Information Officer:**

Name:	Shireen Govender

Tel:	+27 10 4492354
Email:	shireen@leadgurus.co.za

3.3 **National or Head Office:**

Physical Address:	208 Coubrough Road, Blue Hills, Noordwyk
Postal Address:	208 Coubrough Road, Blue Hills, Noordwyk
Telephone:	+27 10 4492354
Email:	Shireen@leadgurus.co.za
Website:	https://leadgurus.co.za/

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 public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a public body contemplated in

section 11[3]; and

4.3.3.2. access to a record of a private body contemplated in section 50[4];

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. 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-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. 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;

4.3.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *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.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *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.

4.3.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92[11].

4.4. 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.

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://inforegulator.org.za/paia-guidelines/).

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[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *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.*

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

[8] *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*

[9] *Section 22(1) of PAIA- The information officer of a public 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.*

[10] *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.*

[11] *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."

4.6 A copy of the Guide is also available in the following **two official languages**, for public inspection at the head office, during normal office hours:

4.6.1 English; and

4.6.2 isiXhosa.

5. CATEGORIES OF RECORDS OF LEAD GURUS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on website	Available upon request
Newsletters, booklets, pamphlets, brochures, reports, price lists and other literature intended for public viewing	Marketing/advertising	X	X
PAIA manual	Manual	X	X
PAIA Guidelines	Guidelines	X	X

6. DESCRIPTION OF THE RECORDS OF LEAD GURUS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI) Certificate of incorporation or registration Register of members Register of board members Records of changes to registers Minutes of board meetings Resolutions passed by the board Annual financial statements Auditor's reports	Companies Act 71 of 2008

Supporting financial schedules Contracts and agreements affecting governance or finances Registers of accounting records	
PAIA Manual & Guides	Promotion of Access to Information Act 2 of 2000
Employee contracts, incentive and staff records, employment policies, employee details (name, DOB, time worked, remuneration, equity info, etc.), staff records	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998
Books of account, financial records, invoices, receipts, tax returns, VAT records, company and financial compliance documentation	South African Revenue Service Act 34 of 1997; Value-Added Tax Act 89 of 1991; Companies Act 71 of 2008

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LEAD GURUS

Subjects on which the body holds records	Categories of records
Company information	Certificate of Incorporation; Certificate of Change of Name (if any); Memorandum and Articles of Association; Certificate to Commence Business; Minute Book, CM25 and CM26, as well as Resolutions passed at general/class meetings; Register of Fixed Assets; Register of shareholdings; Register of Directors and Certain Officers Annual Financial Statements including: • Annual Accounts • Director's Reports • Auditor's Report Books of accounts regarding information required by the Companies Act, 1973; Supporting schedules to books of account and account and ancillary books of account.
Accounting records	Books of Account including journals and ledgers; Delivery notes, orders, invoices, statements, receipts, vouchers and bills of exchange
Statutory employee records	Employees' names and occupations; Time worked by each employee;

	Remuneration paid to each employee. Date of birth of each employee; Time register; Employment equity plan; Salary register; Staff records (after date of employment ceases); Expense accounts.
Other employee records	Company policies and procedures
Movable property	Asset register; Finance and Lease Agreements
Intellectual Property	Trademarks, trade names and protected names.
Agreements and contracts	Service agreements with clients; Agreements with contractors and suppliers.
Taxation	Copies of all Income Tax Returns and other tax returns and documents;
Legal	Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation.
Insurance	Insurance policies; Claim records; Details of insurance coverages, limits and insurers.
Information Technology	EULAs
Sales and marketing	Brochures; Price lists; Proposals.
Lead management	Records of interactions with leads; Internal 'do-not-contact' lists; Lead databases

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Categories of data subjects	Purpose for processing personal information
Service Providers	To conclude and give effect to a contract for services rendered; To comply with legal and financial reporting obligations, including tax compliance; For due diligence, verification, and vendor management; To protect our operational and financial interests in the procurement and delivery of services, and to maintain accurate records for payment processing

	and audit requirements.
Employees	To enter into and perform the employment contract; To comply with legal obligations imposed on Lead Gurus under labour and tax laws; For legitimate interests of Lead Gurus in managing HR processes, payroll, benefits, training, and leave; To protect the legitimate interests of the employee, such as health and safety or emergency contact; To ensure compliance with internal policies and procedures, including disciplinary action and performance management, and for statistical and equity reporting as required by employment legislation.
Board members	To perform duties in terms of a fiduciary or governance relationship; To comply with legal and statutory obligations under company laws; For record-keeping, board evaluations, and governance oversight; To verify identity and qualifications to ensure board integrity and accountability, and to protect the legitimate interests of Lead Gurus and its members through responsible governance.
Clients	To market to potential clients and contract with clients; to provide services to clients; to invoice and process payments from clients.

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

Categories of Data Subjects	Personal Information that may be processed
Service Providers	Registered company name, registration number, VAT number, physical and postal address, contact person's name and contact details, bank account details for payment purposes, tax number, B-BBEE certificate, relevant compliance documentation, service agreements, and any proprietary or trade secret information necessary for the provision of services.
Employees	Full name and surname, residential and postal address, identity number, contact details, date of birth, gender, race, marital status, emergency contact details, banking information, tax number, job title and employment history, qualifications and certifications, copies of identification documents, employment contract details, remuneration and benefits information, records of sick leave and other leave, performance evaluations, disciplinary records, and any declarations required for compliance or internal policy purposes.

Clients	Name, email address, contact number, contact person's job title or position, company name and description, company registration details, VAT number, business address, company website, B-BBEE status, level and certificate.
Board members	Full name and surname, identity or passport number, residential and postal addresses, email address, contact details, professional qualifications and certifications, employment history, current occupation, details of directorships or trustee positions held, race and gender, bank account details, tax number, copies of identification documents, conflict of interest declarations, board meeting attendance records, performance evaluation inputs, declarations related to fiduciary duties or POPIA compliance, and signature specimens (for official records or governance requirements).
Leads	Name, contact details, income bracket, residential area, vehicle ownership, records of consent obtained, records of objections, interest in financial services, industry employed in, age.

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, names, and criminal history (for vetting and verification purposes)	South African Police Services
Qualifications, certificates, and academic history	South African Qualifications Authority
Name, ID/registration number, and contact information	Credit Bureaus
Tax numbers, earnings, UIF, PAYE	South African Revenue Service (SARS), Unemployment Insurance Fund (UIF)
Financial and governance information	Auditors/Accountants and legal advisors/consultants (bound by confidentiality)
Personal information collected during events, webinars or programs	Marketing agency/Event coordinators

8.4 Planned transborder flows of personal information

There are no current planned transborder flows of personal information.

8.5 General description of Information Security Measures to be implemented by Lead Gurus to ensure the confidentiality, integrity and availability of the information

Lead Gurus is continuously working towards establishing and maintaining appropriate, reasonable technical and organisational measures to prevent:

- loss of personal information;
- damage to unauthorised destruction of personal information;
- unlawful access to personal information; and
- unlawful processing of personal information.

Lead Gurus is taking reasonable measures to:

- Identify reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- establish and maintain appropriate safeguards against risks identified;
- regularly verify that the safeguards are effectively implemented; and
- ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on https://leadgurus.co.za/;

9.1.2 at the head office of Lead Gurus 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 Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Lead Gurus will review and update this manual as necessary.

Issued by

Shireen Govender

Chief Executive Officer