
DUWARDGAN PROMOTION OF ACCESS TO INFORMATION ACT (“PAIA”) MANUAL

MARCH 31, 2026
DUWARDGAN ICT CONSULTING & SOLUTIONS

The Protection of Personal Information Act (POPIA) governs the collection, storage, and processing of personal information in South Africa. It was enacted to protect individuals' privacy by ensuring that personal data is processed responsibly and securely. Compliance with POPIA is mandatory for all public and private organisations that process personal information.

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1. INTRODUCTION

This Manual is prepared in accordance with

- The Promotion of Access to Information Act, 2 of 2000 (“PAIA”)
- The Protection of Personal Information ACT, 4 of 2013 (“POPIA”)

DuWardgan is committed to ensuring:

- Lawful and transparent processing of personal information.
- Protection of employee and business-related data.
- Compliance with all applicable South African data protection laws.

2. COMPANY DETAILS

Business Name: DuWardgan ICT Solutions & Consulting

Nature of Business: ICT Consulting

Information Officer: Rosemarie Van Wyk

Email Address: rosemarie@duwardgan.co.za

Contact Number: 0824588860

Physical Address: 755 24th Avenue, Rietfontein, 0084

3. PURPOSE OF THIS MANUAL

This manual outlines:

- What information DuWardgan holds.
 - How to request access to information.
 - How personal information is processed and protected.
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4. INFORMATION OFFICER

The Information Officer is responsible for:

- Ensuring compliance with POPIA and PAIA
 - Handling access requests
 - Managing data protection policies
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5. RECORDS HELD BY DUWARDGAN

Our organisation collects and processes various types of personal information while conducting business. Below are the categories of records that we hold, categorised by their nature and purpose:

5.1 Employee Records

DuWardgan processes personal information relating to employees, including:

- Personal Identification Information (e.g., name, surname, identity number, date of birth).
- Employment-related information (e.g., contract details, job title, performance evaluations).
- Payroll and compensation data (e.g., salary, tax information, banking details for salary payments).

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- Health and wellness information (e.g., medical aid details, sick leave records).
 - Disciplinary records and grievance information.

5.2 Customer Records

- Personal details (e.g., name, surname, organisation, email address, contact information).
- Transaction history (e.g., purchase records, product/service usage, preferences).
- Payment and billing information (e.g., credit card details, bank account information, invoices).
- Customer support interactions (e.g., communication logs, feedback, complaints).

5.3 Supplier and Vendor Records

- Contact and identification details (e.g., business name, representative details, contact information).
- Contractual agreements (e.g., terms of service, pricing, service delivery schedules).
- Financial records (e.g., payment terms, invoicing, and banking details).

5.4 Website Data

Although DuWardgan does **not allow subscriptions or user accounts**, limited data may be collected:

- Contact form submissions
- Email inquiries
- Basic website analytics (e.g., cookies, IP addresses)

5.5 Third-Party Records

- Data collected from external sources (e.g., business partners).
- Personal details related to partnerships or collaborations.

6. PURPOSE OF PROCESSING PERSONAL INFORMATION

DuWardgan processes personal information to:

- Fulfill employment obligations
- Comply with legal and tax requirements
- Communicate with clients and suppliers

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- Maintain internal business operations
 - Ensure website functionality and security
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7. LEGAL BASIS FOR PROCESSING (POPIA)

Personal information is processed based on:

- Consent (where applicable)
 - Contractual necessity
 - Legal obligations
 - Legitimate business interests
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8. DATA SUBJECT RIGHTS

Under POPIA, individuals have the right to:

- Access their personal information
 - Request correction or deletion
 - Object to processing
 - Lodge a complaint with the Information Regulator
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9. REQUEST FOR ACCESS TO INFORMATION (PAIA)

Access to personal information held by the organisation is strictly regulated to ensure that only authorised individuals can retrieve or view sensitive data. The following procedures are in place to manage access requests:

9.1 Access by Data Subjects (Individuals)

- Request Process: A data subject (e.g., employee, customer, or vendor) wishing to access their personal information must submit a written request to the Information Officer or designated person within the organisation.
 - Timeframe: Access requests must be responded to within 30 days from the date of receipt, as stipulated by POPIA.
 - Verification: To ensure the privacy and security of personal data, the individual making the request must verify their identity before the records are released.
 - Method of Access: Data subjects can access their records either through physical copies or via a secure digital portal, depending on the nature of the information and organisational capabilities.
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- Fees: Pay applicable request fees (if required).

9.2 Access by Employees and Other Authorised Personnel

- Authorisation: Only employees who are authorised by the Information Officer or senior management may access personal information for work-related purposes. Access is granted based on job responsibilities and need-to-know principles.
- Internal Requests: Employees who require access to personal information for internal purposes (e.g., HR personnel accessing employee records) must submit a request through the designated internal process.
- Access Logs: All access to personal information is logged to ensure transparency and accountability. This includes tracking who accessed the data and the purpose of the access.
- Fees: Pay applicable request fees (if required).

9.3 Third-Party Access

- Consent: Third parties (e.g., service providers, contractors) wishing to access personal information must have explicit written consent from the data subject or meet the legal requirements for processing data.
- Data Processing Agreements: A formal agreement must be in place with third parties to ensure that they comply with POPIA's provisions for protecting personal information.
- Fees: Pay applicable request fees (if required).

10. MEASURES TAKEN TO PROTECT PERSONAL INFORMATION

DuWardgan implements reasonable safeguards, including

- Secure storage of records
- Access control for sensitive data
- Confidentiality agreements with employees
- Personal information that is no longer needed is securely destroyed through shredding or other approved methods to prevent unauthorised recovery or access.

11 SHARING OF PERSONAL INFORMATION

Personal information may be shared with:

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- Regulatory authorities (if required by law)
 - Service providers (e.g., payroll, accounting)
 - Third parties were necessary for operations

All third parties are required to respect confidentiality.

12. DATA RETENTION

Personal information is retained:

- Only as long as necessary for business purposes
 - In accordance with legal and regulatory requirements
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13. COOKIES AND WEBSITE TRACKING

DuWardgan may use cookies for:

- Website functionality
- Basic analytics

Users can disable cookies via browser settings.

14. UPDATES TO THIS MANUAL

This manual may be updated periodically to reflect:

- Legal changes
 - Business operations updates
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15. COMPLAINTS

If you believe your personal information is being misused, you may contact:

Information Regulator (South Africa)

Website: <https://www.justice.gov.za/inforeg/>

Email: inforeg@justice.gov.za

16. CONCLUSION

Compliance with POPIA is not only a legal obligation but also a commitment to safeguarding the personal information of all data subjects. The organisation has implemented procedures and security measures to ensure that personal data is

processed responsibly and securely. We are dedicated to maintaining transparency, protecting privacy, and upholding the rights of individuals under POPIA. Our commitment to POPIA is also defined on our website and can be viewed at <https://duwardgan.co.za>.

For any questions or requests regarding personal information or data privacy, please contact our Information Officer using the details provided above.