PAIA and POPIA Manual

TAKT OPERATIONS SOLUTIONS (PTY) LTD · 1 NOVEMBER 2026

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), and to give the information about processing of personal information required by the Protection of Personal Information Act 4 of 2013 (POPIA). Structure follows the Information Regulator's template manual for private bodies.

ITEM	DETAIL
Date compiled	1 November 2026
Date of last revision	— (first issue)

1. Acronyms and abbreviations

TERM	MEANING
Takt / the Company	Takt Operations Solutions (Pty) Ltd, registration number 2026/855793/07
IO	Information Officer
DIO	Deputy Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Minister	Minister of Justice and Constitutional Development

2. Purpose of this manual

This manual helps anyone who wants to request access to records held by Takt. It explains:

- which records Takt holds, and which are available without a formal request;
- how to make a request, what it costs and how Takt will respond;

- how Takt processes personal information, for what purposes, and how it is protected; and
- where to obtain the Regulator's PAIA guide, and how to complain if a request is refused.

3. Contact details

3.1 INFORMATION OFFICER

ITEM	DETAIL
Name	Winand Carstens
Position	Managing Director (sole director)
Email	winand@taktops.co.za
Telephone	082 221 5347

3.2 DEPUTY INFORMATION OFFICER

None appointed. Requests go to the Information Officer.

3.3 ACCESS TO INFORMATION — GENERAL CONTACT

ITEM	DETAIL
Registered name	Takt Operations Solutions (Pty) Ltd
Registration number	2026/855793/07
Registered and physical address	618 William Nicol Street, Constantia Park, Pretoria, 0010
Email	winand@taktops.co.za
Website	taktops.co.za

4. Guide on how to use PAIA

The Regulator has published a guide, in each official language, on how to use PAIA (section 10). It explains, among other things, the objects of PAIA and POPIA, the contact details of information officers, how to request records, the help available from information officers and the Regulator, the remedies available, and the prescribed forms and fees.

The guide can be obtained:

- from the Regulator's website, **inforegulator.org.za**; or
- on request from Takt's Information Officer, for inspection at the address in section 3 during business hours, or as a copy at the fees in section 9.2.

5. Records available without a request

The following are available without a PAIA request:

CATEGORY	RECORDS	HOW TO GET THEM
Company registration	Registered name, number, registration date and registered address	CIPC public records; or ask the IO
Marketing and service information	Service descriptions and brochures	Website (once published) or on request
This manual	PAIA and POPIA manual	Website and registered address

6. Records available under other legislation

Takt keeps records as required by the following laws, where applicable to it. Some of these records are available under those laws to the persons they specify.

ACT	NO.
Companies Act	71 of 2008
Income Tax Act	58 of 1962
Tax Administration Act	28 of 2011
Value-Added Tax Act (once registered as a vendor)	89 of 1991
Basic Conditions of Employment Act (once it has employees)	75 of 1997
Labour Relations Act (once it has employees)	66 of 1995
Unemployment Insurance Act (once it has employees)	63 of 2001
Compensation for Occupational Injuries and Diseases	130 of 1993

ACT	NO.
Act (once it has employees)	
Consumer Protection Act	68 of 2008
Electronic Communications and Transactions Act	25 of 2002
Protection of Personal Information Act	4 of 2013
Promotion of Access to Information Act	2 of 2000
Copyright Act	98 of 1978
Trade Marks Act	194 of 1993

7. Subjects and categories of records held

SUBJECT	CATEGORIES OF RECORDS
Company secretarial	Memorandum of Incorporation; CIPC certificates and filings; securities, directors' and beneficial-interest registers; resolutions; beneficial ownership filings
Finance	Bank statements; invoices and receipts; ledgers; management accounts; annual financial statements
Tax	SARS registrations, returns, assessments and correspondence
Clients	Proposals, pilot and service agreements, data-handling addenda, correspondence, project deliverables and invoices
Client data (as operator)	Business records a client provides for a project, held for that client under its written instructions and deleted at the end of the project
Suppliers and service providers	Agreements, quotations, invoices and correspondence
Intellectual property	Brand artwork, trade mark applications, assignments of rights, software and methods developed by Takt

SUBJECT	CATEGORIES OF RECORDS
Information technology	System configuration, access and security records, backups
Employees and contractors (once appointed)	Contracts, payroll and statutory records, leave and performance records

8. Processing of personal information

8.1 PURPOSE OF PROCESSING

Takt processes personal information only for lawful purposes connected to its business, including:

- providing consulting, analysis, dashboard and automation services to clients;
- entering into and managing agreements with clients and suppliers;
- invoicing, payments, bookkeeping and tax compliance;
- meeting obligations under company, tax, labour and other law;
- marketing its services to businesses that have shown interest; and
- keeping its systems and information secure.

8.2 CATEGORIES OF DATA SUBJECTS AND THEIR PERSONAL INFORMATION

DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
Clients and their contact persons	Names, job titles, business contact details, company details, agreement and billing records
People in client data (Takt as operator)	Only what a client provides for a project, kept to the minimum needed. Payroll information is taken as department totals only, never individual payslips or identity numbers
Prospective clients	Names, business contact details, meeting notes
Suppliers and service providers	Names, contact details, banking and tax details
Directors and shareholders	Names, identity numbers, addresses, contact details (statutory registers and filings)
Employees and contractors	Identity, contact, banking, tax, remuneration and

DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
(once appointed)	employment records
Website and email correspondents	Names, email addresses and message content

8.3 RECIPIENTS OF PERSONAL INFORMATION

Personal information is shared only where needed for the purposes above, or where the law requires, with:

- regulators and government bodies (for example SARS, CIPC and the Information Regulator);
- Takt's bank, accountant, auditor and legal advisers;
- information technology providers that host Takt's email, files and systems, under written terms. Microsoft (Microsoft 365) is currently Takt's only such provider;
- courts or law enforcement, where legally required.

Client data processed as an operator is never shared with anyone other than the client, except as the client agrees in writing. Clients agree in their data-handling addendum to Microsoft 365 being used to receive files in transit.

8.4 PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Takt's Microsoft 365 service is set up with South African data residency, so its email and files are stored in South Africa. Takt does not plan to transfer personal information outside South Africa. If a provider processes or backs up information outside South Africa, it is transferred outside South Africa only where section 72 of POPIA allows it, for example where the recipient is bound by law, binding corporate rules or an agreement giving protection substantially similar to POPIA.

8.5 INFORMATION SECURITY MEASURES

- Multi-factor authentication on email and cloud accounts.
- Client files received through an upload-only link and moved at once to encrypted storage, kept separate from other data and accessible only to authorised persons; the transit copy is then deleted.
- Access limited to people who need it for their work.
- Client data returned or deleted at the end of a project, and the deletion confirmed in writing.
- Security compromises reported to the Regulator and affected data subjects as section 22 of POPIA requires, and to the client without undue delay where Takt acts as operator.

9. How to request access to a record

9.1 THE REQUEST

1. Complete **Form 2 (Request for Access to Record)**, available from the Regulator's website or from the Information Officer.
2. Send it to the Information Officer by email or deliver it to the address in section 3.
3. Give enough detail to identify the record, state the form of access you want, and identify the right you are exercising or protecting and why the record is needed for it (section 53).
4. If you request on behalf of someone else, include proof of your authority.
5. Pay the request fee. Takt will tell you of any access fee and deposit before it processes the request.

Takt will decide within **30 days** of receiving a complete request and tell you in writing. The period may be extended once, by up to 30 days, in the cases section 57 allows. Access may be refused only on the grounds in Chapter 4 of Part 3 of PAIA (sections 62 to 70), such as protecting the privacy of third parties, commercial information and confidential information.

9.2 FEES

Fees are those prescribed in the PAIA regulations, Annexure B. At the time of compiling this manual they are:

ITEM	FEE
Request fee (payable by every requester other than a personal requester)	R140.00
Copy or printout of an A4 page, per page or part	R2.00
Copy on a flash drive or CD supplied by the requester	R40.00
Copy on a CD supplied by Takt	R60.00
Transcription of audio, per A4 page	R24.00
Search and preparation, per hour or part after the first hour	R145.00
Postage or electronic transfer	Actual cost

If the search and preparation is expected to take more than six hours, a deposit of one third of the access fee is payable. Fees may change when the regulations are amended; the current regulations apply.

9.3 REMEDIES

Takt has no internal appeal procedure. If you are not satisfied with Takt's decision, you may, within 180 days of being notified of it:

- lodge a complaint with the Information Regulator (inforegulator.org.za); or
- apply to a court for appropriate relief.

10. Availability of this manual

This manual is available:

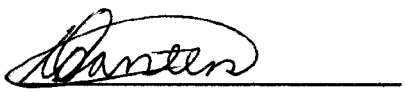
- on Takt's website, taktops.co.za, once published;
- at the registered address in section 3, for inspection during business hours;
- from the Information Officer by email, free of charge; and
- to the Information Regulator on request.

Printed copies are provided at the copy fee in section 9.2.

11. Updating of this manual

The Information Officer reviews this manual at least once a year, and updates it whenever Takt's details, records or processing change materially.

Issued by



Winand Carstens, Information Officer

Takt Operations Solutions (Pty) Ltd

Date: 01 / 11 / 2026