PAIA MANUAL

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

Date Of Compilation: 01/10/2021

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Contents

1. List of acronyms and abbreviations

1.	**"DPO"**	Deputy Privacy Officer;
1.1	**"Minister"**	Minister of Justice and Correctional Services;
1.2	**"PAIA"**	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.3	**"POPIA"**	Protection of Personal Information Act No.4 of 2013;
1.4	**"Regulator"**	Information Regulator; and
1.5	**"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 Contract Corridor

2. **Deputy Privacy Officer**

Name:	RAPHAEL SEGAL
Tel:	+27117192000
Email:	privacy@avantedge.co.za
Fax Number:	N/A

3.2 Access to information general contacts

Email:	privacy@avantedge.co.za

3.3 National or Head Office

Postal Address:	Same as Physical
Physical Address:	70 Melville Road, Illovo Central Building, 6th Floor
Telephone:	+27117192000
Email:	privacy@avantedge.co.za
Website:	www.contractcorridor.com

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 aforesaid Guide contains the description of-

4.2.1. the objects of PAIA and POPIA;

4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.2.2.1. the Information Officer of every public body, and

4.2.2.2. 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];

4.2.3. the manner and form of a request for-

4.2.3.1. access to a record of a public body contemplated in section 11[3]; and

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

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

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

4.2.6. 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-

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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.

4.2.6.1.   an internal appeal;

4.2.6.2.   a complaint to the Regulator; and

4.2.6.3.   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;

4.2.7.   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;

4.2.8.   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;

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

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

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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."

4.3.   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.

4.4.   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://www.justice.gov.za/inforeg/).

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

4.6.1   English

5. Categories of records of contract corridor which are available without a person having to request access

Category of records	Types of the Record	Available on Website	Available upon request
Disclaimer	Disclaimer	Yes	Yes
Privacy Policy	Privacy Policy	Yes	Yes
Privacy Document	Terms & Conditions	Yes	Yes
PAIA	PAIA Manual	Yes	Yes

6. Description of the records of Contract Corridor which are available in accordance with any other legislation

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. Description of the subjects on which Contract Corridor holds records and categories of records held on each subject by Legal Interact

Subjects on which Contract Corridor holds records	Categories of records
Customers and their customers	First Name, Last Name, Email Address, Organization details and any personal details that may be contained in the legal matters or contracts.
	Contact numbers, Username, Password (encrypted).
	Financial details, banking details, and other personal information that may be contained in Invoices.

8. Processing of personal information

8.1 Purpose of Processing Personal Information

- Manage customer contract obligations
- Manage the user functions to process legal matter management, contracting, and obligations thereof
- Enable functionalities for Users to manage their contractual obligations
- Enable notifications and communications from the system to users
- Enable Contract/Document and legal process functionalites, such as key data points, summarisations, clause extractions and comparisions
- Enable the functionality for Invoice extraction and management thereof
- Enable authorisations and authentications to already configured user profiles in any client's environment
- Manage the users and permissions within the systems and integrations
- Manage and respond to issues and measure throughput of the systems
- Manage situations of lost data and restore points for retreival after any given event of loss of data
- Manage permissions and limit/expand functions to specific users
- Enable functionality througout the systems without replicating functionality (master data)
- Follow internal policies, or policies of clients depending on industry/individual clients
- Enable the ability to manage a legal matter, a contract life cycle or contract review from end-to-end
- To facilliate search features and as part of our data processing pipeline we require Elastic Search to help us extract data.
- To facilliate payment features in the system, we use Paypal as a payment solution provider.

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

Customers / Clients	Name, Address, Registration numbers or Identity numbers, Employment status and Bank details
Service Providers	Names, Registration number, VAT numbers, Address, Trade secrets and Bank details
Employees	Address, Qualifications, Gender and Race

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 number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4   Planned transborder flows of personal information

Limited to payment information through standard integrations with payment providers
Not Applicable

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

Annual penetration testing, standard access controls through ASP.NET Identity framework, Regular software updates, Secure premises, Anonymization, Segmented access control, User password management, Role based permissions, Network authentication tools (SQL), Multi-factor authentication, Firewalls, Internal Awareness and training, Data backups, Code vulnerability scanning, Code Review System.

API Keys, Encrypted Data Transfer, Secure Key Storage in Key Vault, Two-factor authentication, Limited Access for organisation employees, Access Keys, Secure premises, Firewalls

9.   Availability of the manual

9.1   A copy of the Manual is available -

9.1.1   on www.contractcorridor.com , if any;

9.1.2   head office of CONTRACT CORRIDOR 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 CONTRACT CORRIDOR will on a regular basis update this manual.

Issued by
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Raphael Segal (DPO)