CELERITY

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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CELERITY SYSTEMS (PTY) LTD T/A CELERITY

(Registration number: 2000/005883/07)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

"MD"	Managing Director;
"DIO"	Deputy Information Officer;
"IO"	Information Officer;
"Minister"	Minister of Justice and Correctional Services;
"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as amended);
"POPIA"	Protection of Personal Information Act No.4 of 2013;
"Regulator"	Information Regulator;
"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 CELERITY

3.1. **Chief Information Officer**

Name:	Richard James Brynn Simpson
Tel:	021-528 3420
Email:	privacy@celerity.chat
Fax number:	021-552 2848

3.2. **Deputy Information Officer**

Name:	Glen Thompson
Tel:	021-528 3420
Email:	privacy@celerity.chat
Fax Number:	021-552 2848

3.3. **Access to information general contacts**

Email:	hello@celerity.chat

3.4. **National or Head Office**

Postal Address:	PO Box 1263, Milnerton, 7440
Physical Address:	Building 4, Riverlands, 51 Gogosoa Street, Observatory, Cape Town, 7925
Telephone:	021-528 3420
Email:	hello@celerity.chat
Website:	www.celerity.chat

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;

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;

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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.

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

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).

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

4.6.2. Afrikaans

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

Category of records	Types of the Record	Available on Website	Available upon request
Pamphlets / Brochures	Product Information	X	X
Price Lists	Product Information	X	X
Marketing and promotional material	Product Information	X	X
Terms and Conditions	Legal-commercial	X	X
Data Processing Addendum	Data Protection Governance	X	X
Corporate Policies	Governance	X	X

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."

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

Category of Records	Applicable Legislation
Employee details Labour relations report Information regarding dismissals for dishonesty-related behaviour Information on disability, trade union membership, race and religion Employee next of kin or emergency contact details Conflict-of-interest declarations Education information Health and safety records Leave records Internal evaluations and performance records Disciplinary records Training records Background checks	Basic Conditions of Employment Act 75 of 1997
Skills development report BBBEE status BBBEE status of suppliers Supplier information Employee information Shareholder information	BBBEE Act 53 of 2003
Memorandum of association Certification of incorporation Annual financial statements Share register Records of directors Notices and minutes of shareholder meetings Resolutions and their supporting documents Record of auditors	Companies Act 71 of 2008
Record of the earnings and other prescribed particulars of employees	Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
Promotion and marketing material Terms and conditions Direct marketing consent Complaints process document	Consumer Protection Act 68 of 2008
Covid-19 registers Business continuity management plans Business impact assessment	Disaster Management Act, 57 of 2002

Category of Records	Applicable Legislation
Digital signatures Transactional record Electronic terms and conditions Records of third parties to whom information is disclosed	Electronic Communications and Transactions Act 25 of 2002
Direct marketing consent Complaints process document	Electronic Communications Act 36 of 2005
Employment equity plans and targets	Employment Equity Act 55 of 1998
IT3 IRP5 IT3a Monthly IRP5 files Unemployment Insurance Fund (UIF) files PAYE information SDL information VAT records Ledgers Cash books Journals Cheque books Bank statements Deposit slips Paid cheques Invoices Stock lists Other books of accounts Electronic representations of information	Income Tax Act 58 of 1962
Occupational health and safety (OHS) reports including the following: Incident reports Personal information for workmen's compensation Personal information of visitors to our premises	Occupational Health and Safety Act, 85 of 1993
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Data processing addendum Privacy Policy	Protection of Personal Information Act, 4 of 2013
Employee ID and proof of address SIM card number IME number Cellphone number	Regulation of Interception of Communications and Provision of Communication Related Information Act 70 of 2002

Category of Records	Applicable Legislation
Sector Education and Training Authority (SETA) reports Learning history reports Skills development levies Certificates of completion	Skills Development Act 97 of 1998
Employee details Unemployment Insurance Fund (UIF) files	Unemployment Contributions Act 4 of 2002
Employee details Leave records Unemployment Insurance Fund (UIF) files	Unemployment Insurance Act 63 of 2001
Invoices Tax invoices Credit notes Debit notes Bank statements Deposit slips Paid cheques relating thereto (no longer relevant since 30 December 2020)	Value Added Tax Act 89 of 1991

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

Subjects on which the body holds records	Categories of records
Accounting	Annual financial statements and working papers General ledger Subsidiary ledgers (receivables, payables, etc.) Subsidiary ledgers (receivables, payables, etc.) Client and supplier statements and invoices Cash books and petty cash books Fixed asset register Tax returns and assessments VAT returns Lease or instalment sale agreements Insurance records Investment records Auditor's reports Systems documentation Capital expenditure Record of assets Record of liabilities Record of loans to related parties Record of liabilities and obligations Record of revenue Record of expenses

Subjects on which the body holds records	Categories of records
Auditors	Working papers Correspondence
Clients	Client profile Message history Client invoices
Human Resources	HR policies and procedures Advertised posts Employees records Onboarding and offboarding of employees Psychometric assessment information Leave records Salary records Tax records Performance management Training records
Information Technology	Agreements Audits Client database Disaster recovery processes and procedures Hardware Internet Intranet Licenses Systems support, programming and development LAN Installations Operating systems Software packages Telephone exchange equipment Telephone lines, leased lines and data lines
Insurance	Details of coverage, limits and insurers Insurance policies
Intellectual Property	Designs, trademarks, trade names and protected names
Legal Agreements and Contracts	Agreements with contractors, suppliers and clients Agreements with shareholders, officers or director Joint venture agreements, partnership agreements, participation, comarketing, copromotion or other alliance agreements Contracts, including lease agreements and finance agreements Electronic communications: Personal information and the purpose for which the data was collected Electronic communications: Record of any third party to whom the information was disclosed Electronic communications: All personal data which has become obsolete

Subjects on which the body holds records	Categories of records
Occupation Health and Safety	OHS policies, procedures and guidelines Register Record of earnings, time worked, payment and particulars of all employees
Personnel Records	Employee information records Employee remuneration Employee date of birth Employment contracts RP 5 and IT 3 certificates Letters of appointment Maternity and parental leave policy Medical aid records Name and occupation of each employee Organisational design Particulars of each employee Personnel file Policies and procedures Recruitment and appointments Salary slips and wage records Study assistance schemes Tax returns of employees Training and development records UIF, PAYE and SDL returns
Sales and Marketing	Brochures, newsletters and marketing material Media releases Public relations policies and procedures Service and product information
Shareholders	Share registers Tax reporting
Service Providers	Supplier profile Supplier invoices
Statutory Company Records	Annual Statutory Returns Certificate of Change of Name Certificate of Incorporation Certificate to Commence Business Dividend register Directors' attendance register Memorandum and Articles of Association Memorandum of Incorporation and alterations / amendments Minutes of directors' meetings Minutes of directors' committee meetings Register of company secretary and auditors Register of directors and officers Register of directors' shareholding Register of past directors

Subjects on which the body holds records	Categories of records
Statutory Company Records	Registration Certificate Reports presented at Annual General Meeting Resolutions Shareholders' agreement Shareholders' register
Tax	Income tax returns Provisional tax returns Tax assessments VAT documents

8. PROCESSING OF PERSONAL INFORMATION

8.1. **Purpose of Processing Personal Information**

The provision and support of business messaging services.

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
Clients	Name, surname, company name, registration or identity number, email address, telephone and cellphone number, physical address or postal address, and banking details, purchasing information, connection data, message data.
Employees	Name, surname, email address, telephone and cellphone number, physical address, postal address, qualifications and professional registrations, CVs, tax information, marital status, gender, disability status, citizenship, race, banking details, identity number, next of kin, beneficiaries and benefit selections, training records, leave, and Covid-19 information.
Service Providers	Name, registration number, VAT number, email address, telephone and cellphone number, physical address, postal address, and banking details.
Shareholders	Names, address, identity number, registration number, banking details, income tax number, email addresse, telephone and cellphone number, physical address, postal address, race, disability status, and gender.

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Qualifications, for qualification verifications.	South African Qualifications Authority
Credit and payment history, for credit information.	Credit Bureaus
Company name and contact name, for messaging complaints.	Wireless Application Service Providers' Association
BBBEE reporting (shareholders, services providers and employees)	BBBEE assessment or verification agency
Employee records (name, identity number, names, contact details, employment dates, statutory requirements (including tax), and salary information.	Department of Employment and Labour (UIF); South African Revenue Service (PAYE, SDL, UIF)

8.4. **Planned transborder flows of personal information**

Some personal information may be stored in the cloud outside the Republic, with the necessary service provider contracts in place.

Category of personal information	The country in which personal information will be stored
Clients	Ireland; USA
Employee	USA
Service Provider	USA
Shareholder	USA

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**

8.5.1. We undertake an analysis of the risks presented by our processing and use this to assess the appropriate level of security we need to put in place.

8.5.2. When deciding what measures to implement, we take account of the state of the art and costs of implementation.

8.5.3. We have an information security policy and take steps to make sure the policy is implemented. We also have additional policies and ensure that controls are in place to enforce them.

8.5.4. We make sure that we regularly review our information security policies and measures and, where necessary, improve them.

8.5.5. We have put in place basic technical controls such as those specified by established frameworks.

8.5.6. We understand that we may also need to put other technical measures in place depending on our circumstances and the type of personal data we process.

8.5.7. We use encryption and pseudonymisation where it is appropriate to do so.

8.5.8. We understand the requirements of confidentiality, integrity and availability for the personal data we process.

8.5.9. We make sure that we can restore access to personal data in the event of any incidents, such as by establishing an appropriate backup process.

8.5.10. We conduct regular testing and reviews of our measures to ensure they remain effective, and act on the results of those tests where they highlight areas for improvement.

8.5.11. Where appropriate, we implement measures that adhere to an approved industry code of conduct.

8.5.12. We ensure that any data processor we use also implements appropriate technical and organisational measures.

9. AVAILABILITY OF THE MANUAL

9.1. A copy of the Manual is available:-

9.1.1. At our website: www.celerity.chat.

9.1.2. At the head office of Celerity 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 Celerity will update this manual on a regular basis.

Issued by:-

Name of Information Officer:	**Richard Simpson**
Signature:	
Date Signed:	**26 September 2025**

ANNEXURE 1: MAKING A PAIA REQUEST TO A PRIVATE BODY

A PAIA request may be made by submitting the prescribe form, Form 2. This form should be directed to the Head or the Deputy Information Officer of the private body, the contact details of whom are set out in this PAIA Manual.