



**iTRINITY**

YOUR TURN-KEY IT SOLUTIONS PARTNER

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ACCESS TO INFORMATION

# PAIA Manual

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DATE

**14 September 2026**

COMPILED

**1 June 2026**

REVISED

**14 September 2026**

INFORMATION OFFICER

**Terence Conrad Holding**

REGULATOR REGISTRATION

**2026-052897**

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

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**iTRINITY Consulting (Pty) Ltd**

Reg No 2012/170337/07

VAT No 4770268235

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## 1. Definitions

|                  |                                                                   |
|------------------|-------------------------------------------------------------------|
| <b>IO</b>        | Information Officer                                               |
| <b>DIO</b>       | Deputy Information Officer                                        |
| <b>Minister</b>  | Minister of Justice and Constitutional Development                |
| <b>PAIA</b>      | Promotion of Access to Information Act, 2 of 2000, as amended     |
| <b>POPIA</b>     | Protection of Personal Information Act, 4 of 2013                 |
| <b>Regulator</b> | The Information Regulator (South Africa)                          |
| <b>Republic</b>  | The Republic of South Africa                                      |
| <b>iTRINITY</b>  | iTrinity Consulting (Pty) Ltd, registration number 2012/170337/07 |

## 2. Purpose of this manual

This manual lets a member of the public:

1. Check the categories of records iTRINITY holds that are available without a formal PAIA request.
2. Understand how to request access to a record, by describing the subjects on which iTRINITY holds records and the categories of records held on each.
3. See which records are available under other legislation.
4. Find the contact details of the Information Officer, who will assist with any records they intend to access.
5. Know how to obtain the Regulator's Guide on how to use PAIA.
6. Know whether iTRINITY processes personal information, for what purposes, and about which categories of data subjects.
7. Know the recipients, or categories of recipients, to whom personal information may be supplied.
8. Know whether iTRINITY transfers personal information outside the Republic, and to whom.
9. Know whether iTRINITY has appropriate security measures to protect the confidentiality, integrity and availability of the personal information it processes.

## 3. Key contact details

Requests for access to records, and any question about this manual or about how we handle personal information, go to the Information Officer. General enquiries can also come through the support desk.

## Information Officer

|                               |                                           |
|-------------------------------|-------------------------------------------|
| <b>Name</b>                   | Terence Conrad Holding, Managing Director |
| <b>Regulator registration</b> | 2026-052897, registered 30 June 2026      |
| <b>Telephone</b>              | 011 664 6219                              |
| <b>Mobile</b>                 | 082 787 3338                              |
| <b>Email</b>                  | terence@itrinity.co.za                    |

No Deputy Information Officer has been designated. Requests are handled by the Information Officer directly.

## Access to information, general enquiries

|                  |                        |
|------------------|------------------------|
| <b>Email</b>     | support@itrinity.co.za |
| <b>Telephone</b> | 011 664 6219           |

## Office

|                         |                                                                                                      |
|-------------------------|------------------------------------------------------------------------------------------------------|
| <b>Physical address</b> | Clearwater Office Park, Building 5, Ground Floor, Millennium Blvd, Strubens Valley, Roodepoort, 1724 |
| <b>Postal address</b>   | As above                                                                                             |
| <b>Website</b>          | <a href="https://itrinity.co.za">https://itrinity.co.za</a>                                          |

## 4. The Regulator's Guide on how to use PAIA

The Regulator has, in terms of section 10(1) of PAIA, published a Guide on how to use PAIA and POPIA, written so that any person who wishes to exercise a right under either Act can understand how to do so. It is available in every official language and in braille.

The Guide describes:

- the objects of PAIA and POPIA;
- the contact details of the Information Officer of every public body, and of every Deputy Information Officer designated under section 17(1) of PAIA and section 56 of POPIA;

- the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);
- the assistance available from an Information Officer, and from the Regulator, in terms of PAIA and POPIA;
- every remedy in law for an act or failure to act under either Act, including how to lodge an internal appeal, a complaint to the Regulator, or an application to court;
- the duty on public and private bodies to compile a manual (sections 14 and 51), and how to obtain one;
- the voluntary disclosure of categories of records (sections 15 and 52);
- the fee notices issued under sections 22 and 54; and
- the regulations made under section 92.

**Where to get the Guide.** It can be inspected or copied at the offices of any public or private body, including the Regulator, during normal working hours. It is also available on request from our Information Officer, and from the Regulator's website at <https://infoeregulator.org.za>. A copy is available at our office in English and Afrikaans for public inspection during office hours.

## 5. Records available without a request

The following categories of records are available automatically, without a formal PAIA request.

| Category                      | Types of record                                                    | On our website | On request |
|-------------------------------|--------------------------------------------------------------------|----------------|------------|
| Company information           | Company profile, overview of services, contact details             | Yes            | Yes        |
| Products and services         | Service offerings, brochures, and pricing where publicly available | Yes            | Yes        |
| PAIA manual                   | This document                                                      | Yes            | Yes        |
| Privacy notice                | POPIA privacy policy                                               | Yes            | Yes        |
| Standard terms and conditions | General terms and conditions of business                           |                | Yes        |
| Employment opportunities      | Vacancy and recruitment information                                | Yes            | Yes        |
| Public announcements          | News releases and public notices                                   | Yes            | Yes        |
| Supplier information          | Supplier registration forms, where applicable                      |                | Yes        |

## 6. Records available under other legislation

| Category of record          | Legislation                                       |
|-----------------------------|---------------------------------------------------|
| Memorandum of Incorporation | Companies Act, 71 of 2008                         |
| PAIA manual                 | Promotion of Access to Information Act, 2 of 2000 |

## 7. Subjects on which we hold records

| Subject                | Categories of record                                                                               |
|------------------------|----------------------------------------------------------------------------------------------------|
| Company records        | CIPC registration documents, Memorandum of Incorporation, share register, directors' resolutions   |
| Financial records      | Accounting records, bank statements, annual financial statements, management accounts, tax records |
| Human resources        | Employee records, employment contracts, payroll records, leave records                             |
| Customer records       | Quotations, invoices, contracts, correspondence, support tickets and service documentation         |
| Supplier records       | Supplier invoices, purchase orders, contracts                                                      |
| Asset records          | Fixed asset register, asset purchase documentation                                                 |
| Compliance records     | PAIA manual, POPIA documentation, company policies, SARS correspondence                            |
| General administration | Correspondence, insurance policies, meeting minutes                                                |

## 8. Processing of personal information

### 8.1 Purposes

iTRINITY processes personal information only where it is lawful and necessary for its business. The purposes are:

- to provide products and services to customers, and to establish and maintain customer relationships;
- to communicate with customers, suppliers, employees and other stakeholders;

- to administer and perform contracts with customers, suppliers and service providers;
- to manage quotations, orders, invoicing, payments and debt collection;
- to comply with legal, regulatory and statutory obligations, including tax and labour legislation, and to maintain accounting and financial records;
- to recruit, employ and manage employees, including payroll, benefits, performance, training, and health and safety records where applicable;
- to manage supplier relationships and procurement;
- to secure company premises, systems and information, and the systems of clients we support;
- to manage insurance claims and business risk;
- to resolve complaints, disputes and legal matters;
- to maintain company records and business continuity;
- to conduct internal reporting, auditing and governance;
- to send business-related communications and service updates; and
- to comply with obligations under POPIA, PAIA, the Companies Act, the Income Tax Act, the VAT Act and other applicable legislation.

## 8.2 Categories of data subjects and information

| Data subjects                  | Personal information that may be processed                                                                                                                                                      |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customers and clients          | Contact details, identity and company information, billing information, banking details, correspondence, and information about their IT systems and users that we need in order to support them |
| Service providers              | Company details, contact details, banking details, invoices, contracts                                                                                                                          |
| Employees                      | Identification details, contact details, payroll information, banking details, employment records                                                                                               |
| Website visitors and enquirers | Name, company, email address, telephone number and message submitted through our website or by email                                                                                            |

### 8.3 Recipients of personal information

| Category of information               | Recipients or categories of recipients                                                                                                                                                                                                                                |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employee information                  | Payroll service providers, pension and provident fund administrators, medical aid providers, insurers, SARS, the Department of Employment and Labour, UIF, the Compensation Fund, banks                                                                               |
| Customer information                  | Banks, payment service providers, debt collection agencies where applicable, legal advisers, auditors, and the service providers we engage to fulfil our contractual obligations, including Microsoft and our security, monitoring, backup and support-desk platforms |
| Supplier information                  | Banks, auditors, accountants, payment service providers, SARS where required by law                                                                                                                                                                                   |
| Financial records                     | Auditors, accountants, banks, SARS, regulatory authorities                                                                                                                                                                                                            |
| Company records                       | CIPC, auditors, legal advisers, regulators, financial institutions                                                                                                                                                                                                    |
| Identity and verification information | Regulatory authorities, financial institutions, legal advisers, and service providers performing identity verification where required                                                                                                                                 |
| Tax information                       | SARS, accountants, registered tax practitioners, auditors                                                                                                                                                                                                             |
| Contractual information               | Legal advisers, insurers, courts or tribunals where required, regulatory authorities                                                                                                                                                                                  |

### 8.4 Transborder flows

iTRINITY uses reputable third-party cloud service providers for email, document management, accounting, support ticketing, form delivery and data storage. Personal information may therefore be transferred to, or stored in, jurisdictions outside the Republic. Such transfers take place only where appropriate contractual, technical and organisational safeguards are in place, in accordance with section 72 of POPIA. Our website privacy policy at <https://itrinity.co.za/privacy/> names the providers concerned.

### 8.5 Security measures

iTRINITY implements appropriate technical and organisational measures to safeguard personal information against loss, misuse, unauthorised access, disclosure, alteration and destruction. These are reviewed and updated in the light of the information processed, legal requirements, technological developments and identified risks, and include:

- regular security awareness training for employees;
- multi-factor authentication on critical systems;
- secure remote access, using VPN or secure cloud authentication where applicable;
- role-based access permissions, and regular review of user access rights;
- logging and monitoring of system access where available;
- clean-desk and clear-screen practices;
- device security through automatic screen locking and encryption;
- business continuity and disaster recovery procedures; and
- secure document destruction using shredding or certified disposal providers.

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## 9. How to request a record

A request for access to a record of iTRINITY must be made on the Regulator's prescribed form (Form 2), available from the Regulator's website or from our Information Officer, and sent to the Information Officer at the contact details in section 3. The request must identify the record, state the right the requester seeks to exercise or protect and why the record is required for that purpose, and give the requester's contact details.

The request fee prescribed in the PAIA regulations is payable before the request is processed, and an access fee may be charged for search, preparation and reproduction. Personal requesters asking for records about themselves pay no request fee. We will respond within 30 days of receiving a complete request, which may be extended once by up to 30 days where the Act allows.

If a request is refused, the requester may lodge a complaint with the Regulator, or apply to court, as set out in the Guide.

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## 10. Availability of this manual

A copy of this manual is available:

1. on our website, at <https://itrinity.co.za/paia-manual.pdf>;
2. at our office, for public inspection during normal business hours;
3. to any person on request, on payment of the prescribed fee for copies; and
4. to the Information Regulator on request.

A fee for a copy of this manual, as contemplated in Annexure B of the regulations, is payable per A4 page copied.

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## 11. Updating this manual

The head of iTRINITY will update this manual as and when required, and at least annually.

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Issued by

**Terence Conrad Holding**

Managing Director and Information Officer

iTrinity Consulting (Pty) Ltd