



UBUNIFU AKILI SOLUTIONS

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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1 LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa
1.9	“UBAS”	Ubunifu Akili Solutions

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 UBUNIFU AKILI SOLUTIONS (UBAS)

3.1. Chief Information Officer

Name:	Dr. U Chipfupa
Tel:	0613649535
Email:	chipfu@ubas-grp.com
Fax number:	N/A

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: N/A
Tel: N/A
Email: N/A
Fax Number: N/A

- 3.3 Access to information: general contacts

Email: info@ubas-grp.com

3.4 National or Head Office

Postal Address: 7 Sintra Court, 5 Evelyn Street, Horizonview, Roodepoort, 1724
Physical Address: 7 Sintra Court, 5 Evelyn Street, Horizonview, Roodepoort, 1724
Telephone: 0613649535
Email: info@ubas-grp.com
Website: www.ubas-grp.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 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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-

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.*

- 4.3.6.1. 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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.”

4.4. 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://www.justice.gov.za/infoereg/>).

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

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

The following records held by the UBAS are available without a person having to request access by completing Form C. A person can send an email or make a telephone request to UBAS for access to the documents.

Category of records	Types of the Record	Available on Website	Available upon request
Policies and Manuals	- Privacy Policy - HR Policy - PAIA Manual		X
Publications	- Journal articles - Published technical reports		X
Corporate Governance	- Memorandum of Understandings		X

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

mCategory 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 THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY UBAS

The records listed in the categories below may be formally requested, but access to parts of these records or the whole record may be refused on legal grounds listed in sections 33 to 46 and sections 62 to 70 of PAIA. Please refer to PAIA Guide on how to use PAIA.

Subjects on which the body holds records	Categories of records
Organizational documents	- Strategic Plan - Proposals
Human Resources	- Employees records - Employee contracts - Client contracts
Finance	- Project budgets - Bank statements
Research	- Client research datasets - Client research reports

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

UBAS engages research assistants, associate consultants, and research respondents in its operations and would need to process personal information to effectively manage its operations, comply with legal obligations, and ensure the integrity and quality of its research outputs. Processing personal data allows the company to recruit, contract, and remunerate assistants and consultants, as well as monitor their performance and ensure adherence to ethical research standards.

Similarly, when collecting data from research respondents, personal information is essential for identifying eligible participants, tracking responses, analyzing data accurately, and ensuring that findings are representative and robust. In all cases, the responsible processing of personal data also enables the company to uphold principles of accountability, consent, confidentiality, and data protection as required by POPIA and PAIA.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below are the categories of data subjects in respect of whom UBAS processes personal information and the nature or categories of the personal information being processed.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Employees	address, qualifications, gender and race, tax numbers, banking details
Research subjects/respondents	Name, age, gender, level of education, occupation, school (children), parental status (children), income (adults), personal opinions,

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Below are category of recipients to whom UBAS may disseminate personal information.

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
Identity number, names and tax numbers, for tax compliance	South African Revenue Authority

Qualifications, for qualification verifications	South African Qualifications Authority
Research data for further analysis and programme decision making	Contracting Clients or organizations

8.4 Planned transborder flows of personal information

UBAS may, at times, transfer personal information to entities outside of South Africa, particularly when working with international clients based in other African countries, Europe, or the USA. Such transfers occur when UBAS collects data on behalf of these clients for purposes such as analysis, reporting, or informing the design and implementation of development programmes. The transfer of this information is necessary to fulfill contractual obligations, support evidence-based programming, and contribute to international development and research collaborations.

To ensure the protection of personal information during these cross-border transfers, UBAS adheres strictly to the provisions of POPIA. All data shared with external entities is anonymised, meaning that any direct identifiers (such as names, ID numbers, contact details, or addresses) are removed or masked to prevent the identification of individual data subjects. This ensures that the privacy and rights of research participants are preserved. UBAS also ensures that the receiving entities uphold comparable data protection standards and make appropriate contractual or legal assurances regarding the safe handling, storage, and use of the data. This approach safeguards personal information while enabling UBAS to contribute to global research and development efforts in a compliant and ethical manner.

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

UBAS implements a comprehensive range of data protection measures to ensure the confidentiality, integrity, and lawful processing of personal information in its custody. In line with South Africa's Protection of Personal Information Act (POPIA), UBAS secures all data from the point of collection to final storage and sharing. Personal data is stored on a firewalled, encrypted local server hosted in South Africa with role-based access controls and strong password protocols updated every 30 days. Field data is transmitted using end-to-end encryption via secure VPNs, and devices used for collection are preconfigured with password protection, encrypted storage, and remote wipe capabilities. Before any

data is shared externally, it is rigorously anonymized, removing all personally identifiable information and replacing it with unique respondent codes—while de-identification keys are kept securely by the project lead. Access to raw data is restricted to essential team members, and all activity is logged for audit purposes. Furthermore, any sharing with third parties is governed by strict Data Sharing Agreements (DSAs), ensuring ethical and purpose-specific use. All UBAS personnel, including field staff, undergo mandatory POPIA training and sign confidentiality agreements to reinforce compliance and accountability throughout the data lifecycle.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 at the head office of UBAS for public inspection during normal business hours;

9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

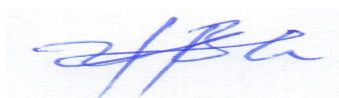
9.1.3 to the Information Regulator upon request.

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 a UBAS will, on a regular basis, update this manual.

Issued by



Dr. U Chipfupa
Executive Director