

GOVERNANCE / DIGITAL SERVICES

PAIA & Information Access Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), incorporating the relevant disclosures required by the Protection of Personal Information Act 4 of 2013.

Edukat (Pty) Ltd | Section 51 PAIA Manual

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1. Purpose and organisational profile

Edukat (Pty) Ltd is a South African consultancy and digital solutions provider specialising in student success, youth employability and education-sector solutions. Its services include consulting and advisory engagements, programme support and the Axola digital platform.

Where Edukat processes applicant, student, graduate or programme-participant information under an institutional or other client engagement, those records form part of the relevant client or project information. The responsibilities of the client and Edukat are determined by the applicable arrangements and POPIA.

This manual describes the categories of records held by Edukat, information made available without a formal PAIA request, the procedure for requesting access to records and relevant processing of personal information.

1.1 Legal entity and contact details

Detail	Information
Legal entity	Edukat (Pty) Ltd
Company registration number	2015/270997/07
Information Officer	Mr Katlego Thindisa, Managing Director
Deputy Information Officer	Mr Kopano Molefe
PAIA and privacy requests	legal@edukat.co.za
General enquiries	info@edukat.co.za
Telephone	012 006 5975
Principal office	Thornhill Office Park, Building 10, 94 Bekker Road, Vorna Valley, Midrand, Gauteng, 1686, South Africa
Postal correspondence	Address to the Information Officer at the principal office above
Website	https://edukat.co.za

2. PAIA Guide, forms and the Information Regulator

The Information Regulator publishes the Guide to PAIA, the private-body manual template, applicable forms, the fee schedule and complaint guidance. The Guide explains how access-to-information rights may be exercised and what assistance is available.

The current prescribed forms relevant to private-body requests include Form 02 (request for access), Form 03 (outcome and fees payable), and Form 05 (complaint to the Information Regulator). The Guide and forms are available at the official resources below:

Information Regulator PAIA resources: [View PAIA resources and Guide](#)

Form 02 - Request for Access to Record: [Download Form 02 \(PDF\)](#)

Form 05 - Complaint Form: [Download Form 05 \(PDF\)](#)

Information Regulator eServices: [Open eServices portal](#)

The Information Regulator can be contacted through enquiries@infoeregulator.org.za and its official website. PAIA complaints may be directed to PAIAComplaints@infoeregulator.org.za or submitted through the applicable eServices process.

3. Availability of this manual and the PAIA Guide

This manual is made available without a formal PAIA request through Edukat's website. An inspection copy can also be requested at the principal office during ordinary business hours. A copy may be provided to the Information Regulator as required by law. Applicable reproduction fees may be charged for copies requested in another form.

The Information Regulator publishes the PAIA Guide in the official languages of South Africa and in accessible formats. The Guide is available through the Information Regulator website and may be requested from Edukat's Information Officer, including for inspection at the principal office during ordinary business hours. For assistance, email legal@edukat.co.za.

4. Subjects and categories of records held by Edukat

The table indicates broad classes of records held or processed during Edukat's operations. The existence of a category does not mean that every record is accessible: a request is assessed under PAIA and any applicable exemption or ground for refusal.

Record subject	Examples of records
Corporate and governance	Company registration, shareholding and authorisations; governance decisions; policies; organisational and internal-control records.
Client and commercial	Proposals, quotations, contracts, statements of work, service schedules, client correspondence, project deliverables and invoices.
Client / project / programme information	Authorised applicant, student, graduate and participant academic, funding, support, engagement and programme records processed within client engagements.
Axola and technology	Platform architecture and approved technical documentation, system configuration, access records, service operations, audit logs, incident and change records.
Finance, tax and procurement	Accounting records, statutory financial documents, tax, banking, procurement, supplier and related transaction records.
People and workforce	Recruitment, employment, consultant and contractor, payroll, performance, training and workplace records.
Privacy, compliance and suppliers	PAIA/POPIA requests, notices, compliance records, incidents, due diligence, operator agreements and supplier security records.

4.1 Records available without a formal PAIA request

The following records or information are made available to the public without submitting a formal PAIA request, where published on Edukat's website or otherwise provided as public information:

Information made public	Where it can be accessed
Company profile and services	About, Solutions and Contact sections of https://edukat.co.za
Published news, events and resources	Website and other public Edukat communication channels, where issued



Information made public	Where it can be accessed
PAIA & Information Access Manual	Website legal links and on request for inspection at Edukat's principal office
Website privacy information and terms	Privacy Notice and Terms & Conditions, where published on the website
Publicly advertised opportunities	Relevant website page or public announcement, where made available

This list does not make confidential contracts, internal records, personal information or client-controlled programme information automatically accessible. Other records may be requested under PAIA and will be assessed on their individual merits.

4.2 Records maintained under other legislation

Edukat creates or retains records in terms of legislation applicable to its activities. The following are indicative categories of statutory records, insofar as the legislation applies. Holding a record under other legislation does not, of itself, make the record available without a lawful access request.

Legislation	Relevant categories of records (where applicable)
Companies Act 71 of 2008	Incorporation and company governance records, statutory registers and company filings.
PAIA 2 of 2000 and POPIA 4 of 2013	PAIA manual, access requests, personal-information-related records and privacy governance documents.
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011	Income tax returns and financial/tax supporting records.
Value-Added Tax Act 89 of 1991	VAT registration, invoices and VAT records, where registered and applicable.
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995	Employment agreements, leave, remuneration and employment-relations records.
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002	UIF contributions and related employment records, where required.
Employment Equity Act 55 of 1998; Occupational Health and Safety Act 85 of 1993	Employment equity and workplace health/safety records, to the extent applicable.

5. Processing of personal information

Edukat processes personal information for specified and lawful purposes connected to its own business, recruitment, employment, supplier and client activities, and in authorised client engagements. Processing must have an appropriate lawful justification under POPIA and be limited to what is necessary for the relevant purpose.

5.1 Data subject categories, information and purposes

Category	Illustrative information and processing purpose
Clients, prospects and professional stakeholders	Names, contact details, role, correspondence and commercial information for engagement, proposals, contract administration and service management.
Client project and programme participants	Within client-authorised services: identity and contact information, academic, funding, participation, engagement, support and uploaded records, subject to the client's instructions and lawful basis.
Employees, applicants and contractors	Recruitment, identity, qualification, employment, payroll, access and workplace information for employment and legal obligations.
Suppliers and operators	Contact, corporate, banking, due-diligence and service records for procurement, contracting and supplier assurance.
Website visitors and enquirers	Contact submissions, correspondence and limited technical data required for website operation, security and responding to enquiries.

5.2 Recipients or categories of recipients

Where necessary and lawfully authorised, personal information may be provided to the following categories of recipients, subject to confidentiality, contractual and security requirements, where applicable:

Information / purpose	Potential recipient category
Client service and programme delivery	Authorised institutional or other client representatives and approved client-designated recipients.
Hosting and technology support	Contracted cloud, infrastructure, software and technical support providers acting in the authorised service chain.
Administration, employment and financial services	Payroll, banking, professional advisory, auditor and other authorised administrative service providers.
Legal compliance, verification and enforcement	Regulators, public authorities or authorised verification bodies where required or permitted by law.
Supplier and contractual management	Service providers and counterparties where disclosure is necessary for the relevant arrangement.

5.3 International storage, access and transfers

Where relevant to a particular service or client engagement, personal information may be stored, accessed or otherwise processed outside South Africa by authorised technology, hosting, backup or support service providers. Any such transfer must meet the applicable conditions under section 72 of POPIA and any relevant contractual requirements. The relevant recipient categories are cloud infrastructure and hosting providers, software service providers, backup service providers and authorised technical-support providers. The countries involved depend on the particular systems and client arrangements; enquiries about a specific engagement may be directed to the Information Officer.

5.4 Information-security measures

Edukat requires appropriate organisational and technical safeguards to protect the confidentiality, integrity and availability of personal information, taking account of its sensitivity, the relevant risks and legal or contractual requirements.

Depending on the system, service or client engagement, these measures may include restricted access, authentication controls, and confidentiality undertakings, secure information handling, supplier assurance, operational monitoring, incident management and secure retention or disposal.

Public descriptions of security practices are necessarily general; the detailed design and implementation of particular controls are maintained in applicable internal policies and service arrangements. Measures may vary by system and contractual context.

5.5 Responsible-party and operator roles

When Edukat determines the purposes and means of processing for its own business functions, it acts as responsible party. Where a client determines those purposes and means and Edukat processes personal information within an authorised mandate, Edukat ordinarily acts as operator under the applicable agreement and lawful instructions. Requests involving information controlled by a client may need to be directed to, or coordinated with, the relevant client responsible party.

Further information about Edukat's processing of personal information and the rights of data subjects appears in the public Privacy Notice on Edukat's website, as applicable. Client- or platform-specific notices may also apply.

6. How to request access to a record

Access to a private body's records under section 50 of PAIA ordinarily requires the requester to identify the right sought to be exercised or protected and explain why the requested record is required for that purpose, in addition to satisfying applicable procedural requirements.

- Obtain and complete Form 02 (Request for Access to Record) using the official Information Regulator link in section 2.
- Describe the record in enough detail for Edukat to identify it, state the preferred form of access, and identify the right to be exercised or protected and why the record is required.
- Provide proof of identity. Where a request is made on behalf of another person or entity, include adequate proof of authority to act.
- Submit the completed Form 02 to Edukat's Information Officer at legal@edukat.co.za or at the physical address in section 1.1.
- Where a requester cannot make a written request because of illiteracy or disability, reasonable assistance will be given in accordance with the applicable regulations.

- Edukat will assess whether the request meets PAIA requirements, whether statutory third-party consultation is necessary, and whether any request fee or deposit applies.
- Edukat will communicate its decision and applicable access fees in the prescribed manner. If access is granted, the record will be supplied in the lawful form and subject to payment where required.

6.1 Decision period and extension

Under section 56 of PAIA, Edukat must make and communicate a decision as soon as reasonably possible, and in any event within 30 days after receipt of the request or the particulars required by section 53(2), subject to applicable statutory provisions. Section 57 permits one extension of no more than a further 30 days on specified grounds. A requester must receive timely written notification of the extension and reasons, as required by PAIA.

6.2 Requests relating to personal information

Requests by individuals about their own personal information may also engage section 23 of POPIA. Edukat will determine the applicable PAIA/POPIA route, verification and fee provisions on the facts. Requests for information controlled by a client may be coordinated with that responsible party.

7. Lawful grounds for refusing access

An application may be refused where the grounds in PAIA require or permit refusal, including to protect a third party's privacy, confidential commercial information, privileged material, safety, security, research or other legally protected interests. The existence of confidentiality or contractual obligations does not automatically determine a request; statutory grounds and any applicable public-interest override will be considered.

Where access is refused, the requester will receive the decision and reasons, including relevant statutory provisions and information about available remedies, as required by PAIA.

8. Prescribed fees

Fees are determined by the PAIA Regulations and the Information Regulator's current fee schedule, subject to applicable statutory exemptions. The March 2026 private-body fee schedule provides, among other charges:

Fee item	Current published amount
Standard request fee	R140.00 (subject to lawful exemptions)
A4 black-and-white copy / print	R2.00 per page or part of a page
Electronic copy on requester-provided flash drive or CD	R40.00
Electronic copy on CD supplied to requester	R60.00
Audio transcription	R24.00 per A4 page
Search and preparation (after the first hour)	R145.00 per hour or part, capped at R435.00
Deposit where search exceeds six hours	One-third of the applicable amount calculated under the prescribed schedule
Postage or electronic transfer	Actual expense, if any

A requester will be notified of any fee or deposit payable before the relevant step of processing or release, as prescribed. The statutory rules for personal requests and other exemptions will be applied where applicable. Fees may change; the current official schedule takes precedence over any superseded amount.

Official PAIA fee schedule (Information Regulator): [View the current fee schedule](#)

9. Complaints and external remedies

Edukat, as a private body, has no statutory PAIA internal appeal procedure equivalent to that applicable to certain public bodies. A requester or eligible third party dissatisfied with a refusal, non-response or other relevant decision may use the complaint procedure before the Information Regulator or seek appropriate court relief in accordance with PAIA.

The Regulator states that a PAIA complaint should ordinarily be lodged on Form 05 within 180 days of the relevant refusal, non-response or decision, subject to applicable rules and condonation. Requesters should first submit the access request to Edukat and provide the Regulator with relevant supporting correspondence.

PAIA complaints: PAIAComplaints@infoeregulator.org.za. Official complaint information and Form 05 appear in section 2 of this manual.

10. Review and maintenance

The Information Officer coordinates the review and maintenance of this manual at least once annually and whenever a material change to Edukat's records, services, contact information, relevant processing operations or applicable law requires a revision.

The current edition is effective from September 2026 and is made publicly available on Edukat's website. When revised, the most recent authorised version will replace this edition, while superseded editions will be retained as part of Edukat's records.

Reference framework

- Promotion of Access to Information Act 2 of 2000, as amended (notably sections 50-57 and 62-70).
- Protection of Personal Information Act 4 of 2013 (including relevant privacy and transfer requirements).
- Regulations relating to the Promotion of Access to Information, 2021, as amended, and current prescribed fees.
- Information Regulator private-body PAIA manual template, Guide, prescribed forms and fee publication.
- Edukat Information Security, Privacy & Data Protection Policy and applicable service or client obligations.