

(Registration Number:2018/604313/07)
PAIA Manual Prepared In Terms Of Section 51 Of
The Promotion Of Access To Information Act
(PAIA Act), Act 2 Of 2000 (as amended)

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51 Of The Promotion Of Access To
Information Act (PAIA Act),Act 2 Of 2000 (as
amended)

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Definitions and abbreviations

ABBREVIATION	MEANING
CEO/MD	Chief Executive Officer/Managing Director
IO	Information Officer
PAIA	Promotion of Access to Information Act, No. 2 of 2000
POPIA	Protection of Personal Information Act, No. 4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa
Resolute	Resolute Education (Proprietary) Limited

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1 Introduction

This PAIA Manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA), as amended, and aligned with the Protection of Personal Information Act, No. 4 of 2013 (POPIA).

It outlines how Resolute Education facilitates access to its records and processes personal information in a manner that promotes transparency and upholds the rights of data subjects and the public.

This manual is developed in line with the guidance issued by the Information Regulator of South Africa to ensure continued compliance with legislative requirements.

2 Purpose of this document

This updated manual is compiled in compliance with:

- Section 51 of the Promotion of Access to Information Act, 2 of 2000 (PAIA)
- Sections 23 to 25 of the Protection of Personal Information Act, 4 of 2013 (POPIA)

The purpose of this manual is to:

- Identify the categories of records held by [insert company name] and the applicable legislation governing them
- Describe the procedures for requesting access to records
- Provide contact information for the Information Officer and Deputy Information Officer
- Outline the categories of data subjects and the types of personal information processed
- Explain the purpose of processing, potential recipients, and any transborder flows of information
- Summarise the security safeguards in place to protect personal information
- Ensure compliance with the requirements set out by the Information Regulator

3 Company Overview

Name: Resolute Education

Reg. No.: 2018/604313/07

Street Address: The Aviary, 60 Glenwood Road, Lynwood Glen, Pretoria, 0081

Postal Address: The Aviary, 60 Glenwood Road, Lynwood Glen, Pretoria, 0081

Phone: 067 609 0699

Email: info@resolute.education

Website: <https://resolute.education/>

4 Contact Particulars

Information Officer: Anya Sonnendecker

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5 PAIA Guide

In terms of Section 10(1) of the Promotion of Access to Information Act, the Information Regulator has made available a Guide to assist individuals in exercising their rights under PAIA and POPIA.

This Guide is available in all official languages and in Braille and can be accessed:

- On the Regulator's website: <https://info regulator.org.za/paia-guidelines>
- From the offices of the Information Regulator
- Upon request from the Information Officer of Resolute Education

6 Automatically Available Information

The following records are automatically available to the public without the need to submit a formal PAIA request:

Category of Records	Types of Record	Availability
Company Information	Brochures, newsletters, posters, reports	Available on https://resolute.education/ or upon request via email
Commercial Materials	Price lists, promotional content, service overviews	Available on https://resolute.education/ or upon request

Members of the public may access these records directly from the company's website or request them from the Information Officer.

7 Records Available in Terms of Other Legislation

Records held by Resolute Education are available in accordance with various South African laws, as listed below:

Category of Record	Applicable Legislation
Employment and Labour Records	Basic Conditions of Employment Act, 75 of 1997; Employment Equity Act, 55 of 1998; Unemployment Insurance Act, 63 of 2001
Company Governance	Companies Act, 71 of 2008
Financial Records	Income Tax Act, 58 of 1962; Value-Added Tax Act, 89 of 1991
Skills Development & BBBEE	Skills Development Act, 97 of 1998; Skills Development Levies Act, 9 of 1999; Broad-Based Black Economic Empowerment Act, 53 of 2003
Health and Safety	Occupational Health and Safety Act, 85 of 1993

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Other records may be held in accordance with additional legislation applicable to the nature of the company's operations.

8 Functional Areas and Categories of Records Held

The following subjects and categories of records are held by Resolute Education:

Functional Area	Categories of Records
Accounting / Financial	Tax returns, invoices, financial statements, general ledger, audit reports,
Personnel / Human Resources	Employment contracts, payroll records, leave records, UIF forms, disciplinary records
Legal / Company Governance	Memorandum of Incorporation, board resolutions, shareholder meeting minutes, statutory registers
Clients / Suppliers	Service level agreements, quotations, correspondence, supplier invoices
Third Parties	Records on contractors, subsidiaries, service providers, consultants, and partners
Information and Communication Technology (ICT)	Access logs, asset registers, system documentation, security procedures, backup records
Marketing & Communications	Newsletters, public communications, campaign materials, website content
Operations / General Admin	Operational plans, project documentation, logistics reports, service records
Health and Safety	Safety training records, incident reports, compliance documentation, PPE registers
Strategic / Organisational Planning	Annual performance plans, strategic proposals, board-level submissions

Access to these records is subject to the formal PAIA request procedure and may be limited by applicable legal grounds for refusal.

9 Processing of Personal Information

In accordance with the Protection of Personal Information Act (POPIA), Resolute Education processes personal information for the following purposes and under the following conditions:

9.1 Processing of Personal Information

Personal information is processed for purposes including:

- Legal and regulatory compliance
- Human resource management
- Customer service and support

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9.2 Categories of Data Subjects

Data Subject Category	Examples
Clients	Contact persons, representatives
Employees	Current and former staff
Suppliers and Service Providers	Account managers, support personnel

9.3 Categories of Personal Information Processed

- Identity and contact details (e.g. name, ID, phone, email)
- Demographic information (e.g. race, gender)
- Financial and payment information
- Employment and HR-related data

9.4 Recipients or Categories of Recipients

- Personal information may be disclosed to:
- Regulatory authorities (e.g. Information Regulator, SARS)
- Law enforcement agencies
- Auditors and legal service providers
- Credit bureaus (where applicable)

9.5 Transborder Flows of Personal Information

No transborder flows are currently planned. All personal data is securely hosted within South Africa.

9.6 Information Security Safeguards

Resolute Education implements the following safeguards to protect personal information:

- Data encryption and secure backups
- Multi-factor authentication (MFA)
- Extended Detection and Response (XDR) solutions
- 24/7 Security Operations Centre (SOC) monitoring
- Local hosting with physical and logical access controls

10 Request Procedure

Any person wishing to request access to a record held by Resolute Education must follow the procedure set out in the Promotion of Access to Information Act (PAIA).

The following steps must be followed:

- Complete the official PAIA Request Form 02, available from the Information Regulator at: <https://inforegulator.org.za/paia-forms/>

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- Clearly state the reason for the request
- Indicate the preferred method of communication for receiving the response
- Attach a certified copy of your South African identification document (ID)
- Submit the completed form and supporting documents to the Information Officer via email, using the contact details provided in this manual

11 Grounds for Refusal

Requests for access to records may be refused by the Information Officer in accordance with Sections 62 to 70 of the Promotion of Access to Information Act (PAIA).

Grounds for refusal may include, but are not limited to:

- Protection of personal information relating to a third party
- Protection of the commercial or confidential information of a third party
- Legal professional privilege
- Protection of the safety of individuals or property

If a request is refused, the requester will be informed of the reasons for refusal in writing within 30 calendar days of receipt of the request.

The Information Officer may also extend this response period by a further 30 days, with written notice provided to the requester explaining the reason for the delay.

12 Fees

In accordance with the PAIA Regulations (Annexure B), the following fees may be charged for requests submitted to Resolute Education under the Promotion of Access to Information Act:

Type of Fee	Description
Request Fee	R140.00 (non-refundable administrative fee payable on submission of the request)
Access Fee	R2.00 per A4 page or part thereof; R40.00 for a compact disc (CD); R60.00 for a USB flash drive
Search Fee	R145.00 per hour (only applicable after the first hour of search time)
Deposit	One-third ($\frac{1}{3}$) of the estimated total cost for requests requiring more than 6 hours of search and preparation

Value-added Tax (VAT) may apply to the fees listed above.

Requesters who are indigent or low-income persons may be exempted from payment, as prescribed under PAIA.

All fees are subject to updates in line with the PAIA fee regulations issued by the Minister of Justice.

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13 Manual Access and Updates

This PAIA Manual is available to the public through the following channels:

- On the Resolute Education website
- At the company's head office, for public inspection during normal business hours
- From the Information Officer, upon formal request

A reasonable fee, as prescribed in Annexure B of the PAIA Regulations, may apply for printed copies (R1.10 per A4-size page).

The manual is reviewed and updated annually, or whenever there are material changes to relevant legislation, company structure, or processing activities.

Date: 19 September 2025

Approved by: Anya Sonnendecker

Designation: Information Officer

Signature:

