PAIA Manual

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

Entity: Castor Project Consultants (Pty) Ltd
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1. List of acronyms and abbreviations

Acronym	Meaning
CPC	Castor Project Consultants (Pty) Ltd
DIO	Deputy Information Officer
DSD	Department of Social Development
ECTA	Electronic Communications and Transactions Act 25 of 2002
IO	Information Officer
NPO	Non-Profit Organisation
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of this PAIA Manual

This Manual is intended to assist members of the public and other requesters to understand what records CPC holds, which records are publicly available, how to request access to a record, what personal information CPC processes, and what safeguards and remedies apply.

- identify categories of CPC records that are available without a formal PAIA request;
- understand the subjects on which CPC holds records and the categories of records held on each subject;
- obtain the contact details of CPC's Information Officer for access-to-information requests;
- understand how to use the Information Regulator's PAIA Guide and prescribed forms;
- understand CPC's processing of personal information, data-subject categories, recipients, transborder flows and information-security measures; and
- understand the request, fee, refusal and complaint/court processes applicable under PAIA.

3. Key contact details for access to information

For a private juristic person, the head of the private body is the Information Officer by virtue of that position, subject to the registration requirements under POPIA. CPC currently identifies the following person as its Information Officer / Head of Private Body for PAIA and POPIA purposes:

Item	Details
Information Officer / Head of Private Body	Stephan Haupt - Managing Director
Telephone	+27 81 645 9338
Email	stephan@castorprojects.com
General access-to-information email	info@castorprojects.com
Physical / registered address	27 Outeniqua Street, Noordheuwel, Krugersdorp, 1739, South Africa
Website	https://castorprojects.com
Secure NPO application	https://npoapp.castorprojects.com

Deputy Information Officer: CPC has not designated a Deputy Information Officer at the date of compilation. CPC may designate and register one if its size, structure, processing activities or accessibility requirements make this reasonably necessary.

4. Guide on how to use PAIA

The Information Regulator has published a Guide in terms of section 10 of PAIA explaining how PAIA and POPIA access rights operate, the prescribed request forms, fees, available assistance and remedies. The Guide is available from the Information Regulator and may also be requested from CPC's Information Officer.

Information Regulator website: https://inforegulator.org.za

Information Regulator eServices: https://eservices.inforegulator.org.za

Information Regulator contact	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, South Africa
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za

5. Records available without a formal PAIA request

The following records are generally available without a formal PAIA request where they are published or otherwise intended for public access. Availability does not create a right to confidential, privileged, security-sensitive or client-specific information.

Category	Examples	How available
Public corporate information	CPC name, contact details, public service descriptions, public notices	CPC website or direct enquiry
Customer-facing legal documents	Privacy & POPIA Policy; Terms of Use / Terms of Sale; Refund & Fix Guarantee; DSD Submission Disclaimer; this PAIA Manual	CPC website / application legal links or on request
Public marketing and educational content	Website pages, public articles, public product/Tier summaries and general guidance	CPC website
Public contact channels	General enquiry and support information	CPC website or email
Published statutory / regulatory information	Information CPC is required by law to make publicly available	Website or on request, as applicable

CPC's paid digital toolkits, templates, source material, secure application records and client-specific files are not automatically available merely because CPC holds them. Access remains subject to intellectual-property rights, confidentiality, POPIA, contractual restrictions and PAIA.

6. Records available in accordance with other legislation

CPC may create, maintain or make records available under the following South African legislation, where applicable to the particular record, transaction, employee, tax status or business activity:

Legislation	Examples of relevant records
Companies Act 71 of 2008	Company incorporation, Memorandum of Incorporation, statutory company records and resolutions
Promotion of Access to Information Act 2 of 2000	PAIA Manual, access requests, outcomes, fee and request records

Legislation	Examples of relevant records
Protection of Personal Information Act 4 of 2013	Privacy governance, consent/objection records, information requests, security-compromise and Information Officer records
Electronic Communications and Transactions Act 25 of 2002	Electronic transaction, website and e-commerce records where applicable
Consumer Protection Act 68 of 2008	Customer transactions, complaints, refund/remedy and consumer-facing records where applicable
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax, accounting and supporting business records where applicable
Basic Conditions of Employment Act 75 of 1997	Employment-related records where applicable
Unemployment Insurance Act 63 of 2001 and related legislation	Employment and contribution records where applicable
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Employment and incident records where applicable

This list is not exhaustive and does not mean every listed record exists in every period. CPC will apply the legislation actually applicable to its circumstances and the specific request.

7. Subjects and categories of records held by CPC

Subject	Categories of records
Corporate governance	Incorporation documents, company registers, resolutions, contracts, policies, insurance and governance records
Finance and tax	Invoices, quotations, orders, payment records, bank/payment references, reconciliations, refunds, accounting and tax records
Clients and NPOs	Client/NPO master profiles, contact records, CPC References, service records, orders, permissions, compliance-cycle records, assistance cases and communications
CPC NPO Platform	User accounts, roles/permissions, authentication linkage, audit/security events, entitlements, downloads, uploads, scan records, configuration and integration/event logs
Documents and intellectual property	Master templates, toolkits, document versions, issued documents, licence records, document mapping/supporting records and proprietary methodologies
Projects and consulting	Proposals, scopes, reports, project records, correspondence, deliverables, stakeholder records and client-supplied information
Marketing and communications	Enquiries, campaign records, communication preferences, consent records, unsubscribe/suppression records and delivery events
Suppliers and service providers	Contracts, due diligence, invoices, contact information, service/system records and provider governance
Human resources / contractors	Personnel, contractor, remuneration, leave, performance, training, disciplinary and statutory employment records, where applicable
Legal, risk and compliance	Policies, legal agreements, complaints, incidents, data-subject requests, PAIA requests, security/compliance registers and audit trails
IT and security	System configurations, credentials metadata, security logs, backups/exports, recovery records, change/release records and access-control records

8. Processing of personal information

8.1 Purpose of processing personal information

CPC processes personal information for legitimate business, contractual, legal, security and service-delivery purposes. These include operating the public website and CPC NPO Platform, registering and supporting users/NPOs, providing products and professional services, processing orders and payments, managing document release and uploads, communicating with customers and stakeholders, protecting systems and records, meeting legal obligations, maintaining audit trails and carrying out lawful marketing subject to preference/consent controls.

8.2 Categories of data subjects and personal information

Data-subject category	Personal information that may be processed
Website visitors and enquirers	Name, organisation, contact details, enquiry/message, source page, device/IP and basic usage/security information
Prospective and existing clients	Contact and organisation details, correspondence, contracts, service requirements, billing/payment references and project information
NPO users and office bearers	Name, email, mobile number, role/authority, NPO membership, account/security data, governance/contact information and supporting evidence where required
NPOs / organisations	Registration details, sector/type, address/location, financial year-end, compliance/service history and organisational records
Client personnel / project stakeholders	Identity/contact, role, organisation, project and correspondence information relevant to the engagement
Suppliers / operators / professional advisers	Contact details, registration/tax information, contracts, invoices, bank/payment details and service records
Employees / contractors	Identity/contact, employment/contract, remuneration, leave, performance, qualification and statutory records where applicable
Marketing / imported contacts	Name, organisation/NPO, email, geographic/sector information, source, consent/preferences, unsubscribe/suppression and delivery events
Payment counterparties	Order, payment reference/status, proof of EFT where supplied, refund and reconciliation information. CPC does not intentionally store raw card credentials.

8.3 Recipients or categories of recipients

Category of information	Recipients / recipient categories
Client/NPO and service records	Authorised CPC personnel/contractors and the authorised client/NPO users with a legitimate need to access the record
Platform/database/authentication/storage data	Approved cloud database, authentication, hosting and private-storage operators such as Supabase and related infrastructure providers
DNS/perimeter/security metadata	Approved DNS, CDN, WAF and security providers such as Cloudflare
Email/contact information and message events	Approved email-delivery provider such as Resend and intended message recipients
Uploaded files requiring malware scanning	Approved malware-scanning provider such as Cloudmersive, subject to CPC's upload/quarantine process
Payment transaction data	Approved payment gateway, banks and payment processors as required to process or reconcile a transaction
Legal/regulatory information	Professional advisers, auditors, insurers, regulators, courts, law-enforcement or government bodies where lawfully required or justified

8.4 Planned transborder flows of personal information

CPC uses or may use cloud and software service providers whose infrastructure, support, resilience, message delivery or security-processing systems may operate outside South Africa. Depending on provider configuration, personal information may therefore be processed in international cloud regions, including North America and other jurisdictions used by approved providers.

CPC applies section 72 of POPIA to cross-border processing and considers provider security, contractual terms, data location, necessity and the nature of the information. CPC seeks to minimise information sent to external providers and does not intentionally transmit more personal information than is reasonably necessary for the approved service.

8.5 General description of information-security measures

- HTTPS/TLS and provider-managed encryption controls where applicable;
- private storage and NPO-level data segregation;
- role-based access control, least privilege and server-side authorisation checks;
- row-level security and controlled database privileges;
- mandatory email verification and secure authentication/recovery controls;
- server-side protection of API keys and privileged operations;

- quarantine and malware scanning for permitted uploads before trusted use;
- audit/security-event logging for material actions;
- separate Development/Test and Production environments, with real production client data not ordinarily used in Development/Test;
- controlled backups/exports, restore procedures, release/change controls and rollback records; and
- provider, dependency and security review appropriate to CPC's size, risk and processing activities.

9. How to request access to a CPC record

A person requesting access to a CPC record under PAIA must use the prescribed Form 2 - Request for Access to Record, or any replacement form prescribed by the Information Regulator, and submit it to CPC's Information Officer at stephan@castorprojects.com or info@castorprojects.com.

For access to a record of a private body under section 50 of PAIA, the requester must identify the record sufficiently, comply with the procedural requirements, indicate the right the requester seeks to exercise or protect and explain why the record is required for that right.

A requester should provide sufficient identity, authority and contact information to allow CPC to verify the requester, locate the record and communicate the outcome. Where the requester acts for another person or organisation, proof of authority may be required.

Current PAIA forms are available from the Information Regulator: https://inforegulator.org.za/paia/

10. Grounds for refusal, fees and remedies

Access is not automatic merely because CPC holds a record. CPC may refuse access where PAIA permits or requires refusal, including to protect another person's privacy, confidential commercial information, CPC's or a third party's intellectual property/trade secrets, privileged material, safety/security, research information or other protected interests.

CPC may charge the request, access, reproduction, search/preparation or other fees prescribed by PAIA and its Regulations. CPC will notify the requester where a prescribed fee or deposit is payable before further processing or release.

A private body does not have an internal PAIA appeal process. A requester who is dissatisfied with CPC's decision may use the complaint process provided by the Information Regulator and/or approach a court in accordance with PAIA.

Information Regulator complaints / eServices: https://eservices.inforegulator.org.za

11. Availability of this Manual

A copy of this Manual will be made available:

- on CPC's website at https://castorprojects.com, once published;
- at CPC's principal place of business for inspection during reasonable business hours by prior arrangement;
- to a person upon request, subject to any fee lawfully prescribed for reproduction; and
- to the Information Regulator upon request or through the Regulator's eServices portal where applicable.

This Manual is prepared in English. CPC will consider reasonable accessibility requirements and any further language/publication requirement applicable to CPC at the time of publication.

12. Updating of this Manual

CPC will review this Manual periodically and when there is a material change to its business, records, legal obligations, processing activities, service providers or contact details. Superseded versions may be retained for governance and audit purposes.

Issued by: Stephan Haupt
Capacity: Managing Director / Head of Private Body
For: Castor Project Consultants (Pty) Ltd