

PAIA & POPIA Manual — Cylon Consulting (Pty) Ltd

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, read with the Protection of Personal Information Act 4 of 2013 (POPIA).

Version / date 1.0 — 2026-08-27

Review Annual

1. Company and contact details

Private body	Cylon Consulting (Pty) Ltd, Reg. 2015/420349/07
Nature of business	ICT and information-management consulting (M-Files and related services)
Information Officer	Robert Briggs (sole director)
Email	paia@cylon.biz
Postal/physical address	Suite 12, Featherbrooke Business Park, Falls Street, Krugersdorp, 1746
Website	cylonconsulting.com (preferred first contact: the website contact form)

2. Purpose of this manual

This manual tells any person how to request access to records held by Cylon Consulting under PAIA, and describes how Cylon processes personal information under POPIA.

3. The Regulator's guide

A Guide on how to use PAIA (section 10 guide) is available in all official languages from the Information Regulator: info regulator.org.za / enquiries@info regulator.org.za. This manual is available on Cylon's website, at its offices on request, and from the Information Officer.

4. Records held by Cylon Consulting

Automatically available (no PAIA request needed): public website content; marketing materials; this manual.

Available on PAIA request (subject to grounds for refusal in PAIA):

Category	Examples
Company records	Incorporation documents, statutory registers, resolutions
Financial records	Accounting records, tax records, banking details (own)
Personnel records	Employment contracts, remuneration, training records
Client & contractual records	Contracts, SOWs, correspondence, timesheets (note: records held on behalf of clients are the client's records; requests are referred to the client as responsible party)
Operational & IT records	Policies, registers, system documentation, logs

Records held under other legislation: Companies Act 71 of 2008; Tax Administration Act; Basic Conditions of Employment Act; Unemployment Insurance Act; POPIA.

5. How to request a record

1. Use **PAIA Form 02** (Request for Access to Record) from the Regulator's website, addressed to the Information Officer at the contacts in clause 1.
2. Provide sufficient detail to identify the record, the right you seek to exercise/protect (where required), and proof of identity.
3. Fees: the prescribed request fee and access/reproduction fees per the PAIA Regulations apply (personal requesters: no request fee).
4. Cylon responds within 30 days (extendable once by 30 days per PAIA), granting access or giving written, referenced reasons for refusal. Refusals may be taken to the Information Regulator or a court per PAIA Part 4.

6. POPIA processing description (section 51(1)(c) read with POPIA)

Element	Description
Purposes of processing	Staff administration; client service delivery and contract management; supplier management; security and legal compliance

Element	Description
Categories of data subjects	Employees; client personnel and contacts; supplier contacts
Categories of personal information	Identity and contact details; employment and remuneration details; contractual and billing information; system access logs
Recipients	Service providers (cloud hosting, backup, IT management platforms) under appropriate safeguards; regulators where required by law; clients in respect of engagement records
Cross-border transfers	Limited cloud infrastructure/backup services outside South Africa (encrypted; POPIA section 72 conditions applied) — detailed in Cylon's Data Protection & Classification Policy
Security measures	Documented in Cylon's Information Security Policy suite: MFA, encryption in transit and at rest, least-privilege access, monitored and audited systems, encrypted offsite backups, incident-response and breach-notification procedures

Data subjects may request access, correction or deletion of their personal information from the Information Officer (see clause 1); complaints may be lodged with the Information Regulator.

7. Availability

This manual is available at cylonconsulting.com, from the Information Officer by email, and at the physical address in clause 1. General enquiries are best made via the website contact form; formal PAIA requests (Form 02) should be addressed to the Information Officer at the contacts in clause 1. First published 2026; updated annually or on material change.

Adopted and approved

A handwritten signature in black ink, appearing to be "R. Briggs", written over a light blue horizontal line.

Robert Briggs — Sole Director, Cylon Consulting (Pty) Ltd

Date: 2026-08-27