

Beeline Learn (Pty) Ltd



# **PAIA MANUAL**

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

**DATE OF COMPILATION: 24/06/2025**

**DATE OF REVISION: 18/09/2025**

**NEXT REVIEW: Within 12 months of revision or upon material change**

## **TABLE OF CONTENTS**

## **1. LIST OF ACRONYMS AND ABBREVIATIONS**

**1.1 CIPC — Companies and Intellectual Property Commission**

**1.2 COIDA — Compensation for Occupational Injuries and Diseases Act 130 of 1993**

**1.3 DIO — Deputy Information Officer**

**1.4 DPA — Data Processing Agreement**

**1.5 IO — Information Officer**

**1.6 PAIA — Promotion of Access to Information Act 2 of 2000 (as amended)**

**1.7 POPIA — Protection of Personal Information Act 4 of 2013**

**1.8 Regulator — Information Regulator (South Africa)**

**1.9 SARS — South African Revenue Service**

**1.10 SAQA — South African Qualifications Authority**

**1.11 UIF — Unemployment Insurance Fund**

## **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 THE Beeline Learn (Pty) Ltd

#### 3.1. Chief Information Officer

Name: Dylan Evans  
Tel: +27 71 685 8612  
Email: dylan@beelinelearn.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: Peter Turner  
Tel: +27 82 881 2096  
Email: peter@beelinelearn.com  
Fax Number: n/a

### 3.3 Access to information general contacts

Email: *info@beelinelearn.com*

### 3.4 National or Head Office

Postal Address:

9 Gardenia Street, Heldervue, Somerset West, 7130

Physical Address: 9 Gardenia Street, Heldervue, Somerset West, 7130

Telephone: +27 837097978

Email: *info@beelinelearn.com*

Website: <https://www.beeline.life/>

## 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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 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 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 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-
  - 4.3.6.1. an internal appeal;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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.*

- 4.3.6.2. 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 14<sup>5</sup> and 51<sup>6</sup> 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 15<sup>7</sup> and 52<sup>8</sup> 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 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 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.

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

4.5. 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/inforeg/>).

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

4.6.1 English and Afrikaans

## 5. CATEGORIES OF RECORDS OF THE Beeline Learn (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

*NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.*

*Below is an example of the table that can be used.*

Category of records	Types of the Record	Available on Website	Available upon request
Company Information	Registration docs, CIPC cert, business address		X
Financial Records	Annual financials, tax returns		X
HR/Employee Records	Employment contracts, payroll, policies		X
Client Records	Service agreements, contact info, onboarding docs		X



Policies & Manuals	POPIA/PAIA Manual, Privacy Policy, Terms and Conditions	X	X
Marketing Material	Brochures, website content, press releases	X	X
Product/Service Info	Product descriptions, training/learning materials	X	X

**6. DESCRIPTION OF THE RECORDS OF Beeline Learn (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

**NB:** Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable legislation.

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Annual Financial Statements	Companies Act 71 of 2008
Employment Contracts & Policies	Basic Conditions of Employment Act 75 of 1997
Tax Returns & Records	Income Tax Act 58 of 1962
UIF & Workman's Comp Records	Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993
POPIA Policy/Manual	Protection of Personal Information Act 4 of 2013

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY Beeline Learn (Pty) Ltd

**NB:** Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used. .

Subjects on which the body holds records	Categories of records
Human Resources	HR policies and procedures, employment contracts, payroll, leave records, staff files
Finance	Annual financial statements, invoices, tax returns, budgets
Clients/Customers	Client contracts, onboarding docs, service records, communications
Operations	Standard operating procedures (SOPs), training materials, QA documents
Legal	Company registration docs, NDAs, agreements, CIPC certificates
Marketing & Sales	Brochures, campaigns, presentations, press releases, website content
IT/Data Security	Access logs, security policies, data protection records

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

**NB:** Describe the purpose or reasons for processing personal information in your organisation.

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

**NB:** Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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

**NB:** Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the 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
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

#### 8.4 Planned transborder flows of personal information

*As part of providing our Services, Beeline utilises third-party sub-processors for infrastructure, storage, and other functions. This may result in Personal Information being transferred to and stored in countries outside of the Republic of South Africa, including but not limited to Ireland, Germany, the United States, and France. A full list of our sub-processors is available in our Data Processing Agreement. All such transfers are conducted in compliance with Chapter 9 of POPIA, using appropriate safeguards to ensure the protection of Personal Information.*

#### 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

*Beeline implements a variety of security measures to ensure the confidentiality, integrity, and availability of information, including:*

- *Encryption of data in transit (TLS 1.2 and above) and at rest (AES-256).*
- *Strict access controls and the principle of least privilege.*
- *Multi-factor authentication (MFA) for all administrative access.*
- *Regular vulnerability scanning and penetration testing.*
- *A formal incident response protocol for handling data breaches.*

## 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://www.beeline.life/>,

9.1.2 head office of the **Beeline Learn (Pty) Ltd** for public inspection during normal business hours;

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

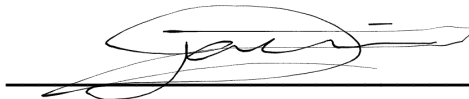
9.1.4 to the Information Regulator upon request.

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 **Beeline Learn (Pty) Ltd** will on a regular basis update this manual.

***Issued by***

A handwritten signature in black ink, appearing to read 'Dylan Evans', is written over a horizontal line.

***Dylan Evans, Information Officer***