

Pivot Technology PAIA Manual

Version 1.0 | Last updated 12 March 2026

This is a practical launch-ready PAIA Manual draft prepared from official South African PAIA guidance for private bodies. It should still be reviewed by South African legal counsel and updated with the final legal entity and Information Officer details before being treated as final.

1. Introduction and purpose of this manual

This manual is prepared in line with the Promotion of Access to Information Act, 2000 ("PAIA"), as amended, and the Protection of Personal Information Act, 2013 ("POPIA"). Its purpose is to help any person understand what records Pivot Technology may hold, how access requests may be made, and what information is available regarding the processing of personal information.

This manual applies to the business activities conducted under the Pivot Technology name and should be read together with the website Privacy Notice / POPIA page where relevant.

2. Private body details

Trading name used publicly	Pivot Technology
Registered legal entity details	To be confirmed in the legally reviewed final manual
Website	https://www.pivottechnology.co.za
Primary business email	contact@pivotec.co.za
Telephone	076 578 8380 / 069 956 7613
Physical address	38A Burger Ave, Lyttelton Manor, Centurion, Gauteng, South Africa

3. Information Officer contact

Designated contact route	contact@pivotec.co.za
Designation note	The final named Information Officer or Deputy Information Officer should be confirmed in the legally reviewed version of this manual.

4. PAIA guide

The Information Regulator is required to make available a guide on how to exercise rights under PAIA and POPIA. The current guide and regulator contact details should be obtained from the official Information Regulator website: <https://inforegulator.org.za/>

5. Records available without a formal PAIA request

Certain information may be made available automatically through the website or normal business communication channels without the need for a formal PAIA request, subject to availability and relevance. This may include:

- General website information about services and contact routes
- Website legal pages such as the Privacy Notice / POPIA page and Terms of Use
- Publicly available contact information

- General business or service information voluntarily provided during pre-sales discussions

6. Records available in terms of other legislation

Where applicable, Pivot Technology may hold records in line with obligations under other South African laws and regulatory frameworks. Depending on the nature of the business activity and the final legal entity structure, these may include record-keeping obligations under tax, company, labour, contractual, or data-protection legislation.

The legally reviewed version of this manual should confirm the final list of legislation relevant to the business entity.

7. Subject categories of records held by the business

Record category	Examples of records that may be held
Business and governance	Founding information, policies, internal procedures, contracts, compliance records, insurance or supplier records where applicable
Finance and administration	Invoices, quotations, statements, tax-related records, payment records, and administrative working papers
Client and service delivery	Project proposals, statements of work, service notes, client communication, environment documentation, deliverables, and handover material
Marketing and website	Website content, enquiry submissions, analytics reports, campaign material, and correspondence arising from prospective client engagement
IT and operational records	System records, backups, logs, access-control records, vendor coordination notes, and implementation documentation
Human resources and contractors	Where applicable, identity and contact details, contracts, onboarding records, and payment or performance-related records

8. Processing of personal information in terms of POPIA

8.1 Purpose of processing

Personal information may be processed for one or more of the following purposes:

- Responding to enquiries and assessing service fit
- Scheduling meetings, preparing proposals, and delivering services
- Managing client relationships, contracts, and communication
- Meeting legal, contractual, financial, and compliance obligations
- Securing and improving business systems and the website

8.2 Categories of data subjects and information

Data subject category	Types of personal information that may be processed
Website visitors and prospects	Name, company, email address, phone number, company size, service-interest details, enquiry details, website interaction data
Clients and client representatives	Identity and contact details, billing details, communication records, project information, system access or environment information where relevant to service delivery
Suppliers, partners, and contractors	Contact details, agreements, billing details, and operational coordination records
Employees or service resources where applicable	Employment, identity, payroll, compliance, and internal operational records

8.3 Categories of recipients

Personal information may be shared, where lawful and necessary, with cloud platform operators, hosting providers, email or collaboration service providers, website and analytics operators, payment and accounting systems, professional advisers, implementation partners, and regulators or authorities where required.

8.4 Cross-border transfers

Certain business systems used for email, cloud collaboration, analytics, hosting, scheduling, or operational delivery may process information outside South Africa. Where this occurs, appropriate contractual, technical, and organisational safeguards should be used.

8.5 Security measures

Reasonable technical and organisational measures should be used to secure personal information. These may include access control, secure devices, reputable cloud platforms, MFA where appropriate, limited access to business data, disciplined credential management, and backup and resilience controls.

9. Request procedure

A requester seeking access to a record should direct the request to the Information Officer contact route identified in this manual. The request should provide enough detail to identify the record or record type sought, the reason the information is required where applicable, and the requester's contact details.

Pivot Technology may request proof of identity, clarification of scope, or any prescribed form or process information needed to evaluate the request properly. Requests will be handled in line with PAIA, including any lawful grounds for refusal, extension, or partial access.

10. Fees

Applicable request, search, reproduction, or access fees, where permitted by PAIA, will be handled in line with the law and any current prescribed fee framework. The legally reviewed final manual should confirm the final fee wording appropriate to the business.

11. Availability of this manual

This manual is made available through the Pivot Technology website and may also be supplied on request in electronic format where reasonable.

12. Updates to this manual

This manual may be updated from time to time to reflect changes in legal requirements, business structure, privacy practices, or operational systems. The version number and last-updated date shown in this document should be used as the current reference point.