

PAIA Manual

Compiled in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000 (PAIA)
read with the Protection of Personal Information Act 4 of 2013 (POPIA)

Talentide (Pty) Ltd

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Information Officer	Andrea van Hirtum
Approved by	Andrea van Hirtum, Managing Director

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1. Introduction

1.1 About Talentide

Talentide (Pty) Ltd ("Talentide") is a private company that provides outsourced payroll and human resources services to businesses in South Africa. In providing these services, Talentide processes payroll on behalf of its clients, which includes processing the personal information of its clients' employees and preparing statutory submissions on its clients' behalf.

1.2 Purpose of this manual

This manual is compiled in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA"). Its purpose is to:

- describe the subjects and categories of records held by Talentide;
- explain how a person may request access to a record held by Talentide, and the fees, timeframes and grounds for refusal that apply;
- set out the remedies available to a requester whose request is refused;
- provide the information about Talentide's processing of personal information that section 51(1)(c) of PAIA requires; and
- direct requesters to the Guide on how to use PAIA published by the Information Regulator.

1.3 Definitions

In this manual, unless the context indicates otherwise:

Term	Meaning
Guide	The Guide on how to use PAIA made available by the Information Regulator in terms of section 10 of PAIA.
Information Officer	The head of Talentide for purposes of PAIA, or the person duly authorised to act as such, as set out in section 2.2.
Information Regulator	The Information Regulator (South Africa) established in terms of section 39 of POPIA.
PAIA Regulations	The Regulations relating to the Promotion of Access to Information, 2021 (GN R757 of 27 August 2021), as amended from time to time.
Personal requester	A requester who seeks access to a record containing personal information about that requester.
Record	Any recorded information in the possession or under the control of Talentide, regardless of its form or medium, and whether or not Talentide created it.
Requester	Any person, including a person acting on behalf of another, who requests access to a record of Talentide.

2. Contact Details (Section 51(1)(a))

2.1 Details of Talentide

Detail	Information
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Detail	Information
Full name	Talentide (Pty) Ltd
Registration number	2024/171575/07
Physical (street) address	677 Elvira Street, Garsfontein, Pretoria, 0081
Postal address	677 Elvira Street, Garsfontein, Pretoria, 0081 (same as physical address)
Telephone	+27 76 587 5881
Email	andrea@talentide.co.za
Website	www.talentide.co.za

2.2 Information Officer

Detail	Information
Name	Andrea van Hirtum
Designation	Managing Director and Information Officer
Telephone	+27 76 587 5881
Email	andrea@talentide.co.za
Address	677 Elvira Street, Garsfontein, Pretoria, 0081

All requests for access to records, and all queries about this manual, should be addressed to the Information Officer. To help us route your request promptly, please use the subject line “PAIA Request” when sending it by email.

3. Guide on How to Use PAIA (Section 10)

The Information Regulator has, in terms of section 10 of PAIA, made available a Guide on how to use PAIA. The Guide is intended to assist any person who wishes to exercise a right of access to information under PAIA or POPIA. It explains, among other things, the objects of PAIA and POPIA, how to make a request to a public or private body, the assistance available from the Information Regulator, the remedies available, and the fees that may be charged.

Responsibility for the Guide, and for the other PAIA functions previously performed by the South African Human Rights Commission, passed to the Information Regulator with effect from 30 June 2021.

The Guide is available in the official languages of South Africa on the Information Regulator’s website. A copy may also be inspected at Talentide’s offices during normal business hours, or requested from the Information Officer.

Information Regulator	Contact details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll-free	0800 017 160
General enquiries	enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za

Information Regulator	Contact details
Website	www.inforegulator.org.za

4. Records Available Without a Request (Sections 51(1)(b)(ii) and 52)

The following records are freely available on Talentide's website or on general enquiry, and may be obtained without submitting a formal PAIA request:

- general information about Talentide and its services;
- Talentide's contact details;
- this PAIA manual; and
- Talentide's Privacy Policy.

5. Records Kept in Terms of Other Legislation (Section 51(1)(b)(iii))

Talentide keeps records in accordance with the legislation that applies to it and to the services it provides, including the following. This list is not exhaustive, and the inclusion of an Act does not mean that every record kept under it is available on request.

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

6. Subjects and Categories of Records Held (Section 51(1)(b)(iv))

Talentide holds the categories of records listed below. Listing a category does not mean that a record in that category will be made available: every request is considered on its merits and is subject to the grounds for refusal described in section 11 of this manual.

6.1 Company and statutory records

- Company registration documents issued by the Companies and Intellectual Property Commission (CIPC)
- Memorandum of Incorporation
- Tax registration records (SARS)
- UIF and SDL registration records
- B-BBEE certificates or affidavits (where applicable)
- Shareholders' agreements, resolutions and minutes

6.2 Financial records

- Annual financial statements
- Tax returns and assessments
- VAT records
- Banking records
- Invoices, statements and payment records
- Asset registers

6.3 Employment and human resources records (Talentide staff)

- Employment contracts
- Personnel files
- Payroll records for Talentide's own staff
- Leave records
- Training records
- Disciplinary records
- Internal policies and procedures

6.4 Client and payroll service records

- Service agreements, contracts and related correspondence
- Operator agreements and data-processing terms concluded with clients (where applicable)
- Client onboarding and payroll set-up information
- Payroll data processed on behalf of clients, including employee master data, remuneration, deductions, contributions and payslips
- Statutory submissions prepared or filed on behalf of clients, including SARS employer returns and reconciliations (such as EMP201, EMP501 and IRP5/IT3(a) certificates) and UIF declarations
- Payment and deduction schedules relating to medical aid, retirement funds and garnishee orders
- Client instructions and correspondence
- Invoicing and payment records

Talentide holds client payroll records on behalf of its clients, who are generally the responsible parties for their employees' personal information. Where a request relates to such records, Talentide may need to consult the client concerned and, where PAIA requires it, notify affected third parties before deciding the request. Employees of Talentide's clients who want their own payroll information are encouraged to approach their employer first, as this is often the quickest route.

6.5 Operational records

- Insurance policies
- Lease agreements (where applicable)
- Supplier and service provider contracts
- Information technology records
- Website analytics data

7. Processing of Personal Information (Section 51(1)(c))

This section sets out the information about Talentide's processing of personal information that PAIA, as amended by POPIA, requires to be included in this manual. Further detail is available in Talentide's Privacy Policy.

7.1 Purposes of processing

Talentide processes personal information in order to:

- provide outsourced payroll and human resources services to clients;
- administer employee benefits and deductions, including medical aid, pension and provident fund contributions;
- make statutory submissions to SARS, the Department of Employment and Labour and other regulatory bodies;
- perform its contracts with clients, suppliers and employees;
- employ and manage its own staff;
- comply with its legal and regulatory obligations; and
- market its services and develop its business, where the law permits or with consent.

7.2 Categories of data subjects and of personal information

Data subjects	Categories of personal information
Talentide employees	Names, identity numbers and contact details; employment and remuneration details; banking details; tax numbers; benefit membership; leave, training and disciplinary records
Employees of Talentide's clients (payroll data subjects)	Names, identity numbers and contact details; employment and remuneration details; banking details; tax numbers and SARS information; medical aid and retirement fund membership; leave and attendance records; deduction details such as garnishee orders
Directors and shareholders	Names, identity numbers, contact details and shareholding information
Clients and prospective clients (including their contact persons)	Names and contact details; company, tax and VAT details; banking and billing information; correspondence
Suppliers and service providers	Names and contact details; company, tax and VAT details; banking information; contract information
Website visitors	Contact details submitted through the website, and technical and analytics data

Where payroll processing requires it (for example, medical aid membership or deductions such as trade union subscriptions), Talentide may process limited special personal information. It does so only as POPIA permits.

7.3 Recipients or categories of recipients

Depending on the purpose, Talentide may share personal information with:

- SARS, for statutory tax submissions;
- the Department of Employment and Labour, including for UIF purposes;
- medical aid administrators;
- pension and provident fund administrators;
- banking institutions, for salary and other payments;
- PaySpace (Deel Local Payroll), as Talentide's payroll platform provider and operator;
- courts, sheriffs and attorneys, in relation to garnishee and similar orders; and
- regulators and other authorities, where the law requires it.

7.4 Planned transborder flows of personal information

Talentide's payroll platform provider, PaySpace (Deel Local Payroll), may store or process personal information outside South Africa. Talentide transfers personal information outside South Africa only as section 72 of POPIA permits. For example, the recipient must be subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, or the data subject must have consented, or the transfer must be necessary to perform a contract.

7.5 Security measures

Talentide has implemented appropriate, reasonable technical and organisational measures, as required by section 19 of POPIA, to protect the integrity and confidentiality of the personal information it processes. These include access controls, encryption, secure cloud infrastructure, confidentiality undertakings and regular reviews of its security safeguards. Talentide also requires its operators to maintain appropriate security measures.

7.6 Data subject rights and complaints

A data subject may:

- request access to their personal information held by Talentide (section 23 of POPIA), using the procedure in section 8 of this manual;
- request the correction or deletion of their personal information (section 24 of POPIA), using Form 2 under the POPIA Regulations, 2018;
- object to the processing of their personal information on the grounds set out in section 11(3) of POPIA, using Form 1 under the POPIA Regulations, 2018; and
- lodge a complaint with the Information Regulator (section 74 of POPIA), using the contact details in section 3.

We encourage data subjects to contact the Information Officer first, so that we can try to resolve any concern directly.

8. How to Request Access to a Record (Section 53)

8.1 The prescribed form

A request for access to a record of Talentide must be made on Form 2 (Request for Access to Record), as prescribed by regulation 7 of the PAIA Regulations. Form 2 replaced the previous Form C. It is available on the Information Regulator's website, and the Information Officer will provide a copy on request.

8.2 Completing and submitting the request

The requester must:

- (a) complete Form 2 and provide enough detail to enable the Information Officer to identify the record(s) requested and the requester;
- (b) state the form of access required (for example, a copy of the record or an inspection of it);
- (c) provide an email address, postal address or other contact details in South Africa for correspondence;
- (d) identify the right the requester is seeking to exercise or protect, and explain why the record is required to exercise or protect that right;
- (e) indicate if the requester wishes to be informed of the decision in a manner other than in writing, and give the details;
- (f) if the request is made on behalf of another person, provide proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer;

- (g) provide proof of identity; and
- (h) submit the completed form, together with proof of payment of the request fee (where applicable), to the Information Officer by email or by hand at the address in section 2.

8.3 Assistance

The Information Officer will give reasonable assistance, free of charge, to any requester who needs help completing Form 2 or identifying the records they need.

8.4 Requests for your own personal information

A personal requester does not pay the request fee. Prescribed access fees may still apply for reproducing records or for search and preparation time (see section 9).

9. Fees (Section 54)

Talentide charges only the fees prescribed for private bodies in Annexure B of the PAIA Regulations, as published by the Information Regulator (www.inforegulator.org.za). The amounts below are the prescribed fees at the date of this manual. If the Regulations are amended, Talentide will apply the fees prescribed at the time of the request.

Item	Description	Prescribed fee
1	Request fee payable by every requester (other than a personal requester)	R140.00
2	Photocopy or printed black-and-white copy of an A4-size page	R2.00 per page or part thereof
3	Printed copy of an A4-size page	R2.00 per page or part thereof
4	Copy in computer-readable form on a flash drive (provided by the requester)	R40.00
5	Copy in computer-readable form on a compact disc	R40.00 if provided by the requester; R60.00 if provided to the requester
6	Transcription of visual images, or a copy of visual images, per A4-size page	Service outsourced; cost as quoted by the service provider
7	Transcription of an audio record, per A4-size page	R24.00
8	Copy of an audio record on a flash drive (provided by the requester) or compact disc	R40.00 (flash drive or CD provided by the requester); R60.00 (CD provided to the requester)
9	Search for and preparation of the record for disclosure, for each hour or part of an hour, excluding the first hour	R145.00 per hour, up to a maximum of R435.00
10	Deposit, if the search is expected to exceed six hours	One third of the estimated access fee calculated under items 2 to 9
11	Postage, email or other electronic transfer	Actual expense, if any

Please note the following:

- The request fee must be paid before Talentide processes the request any further.
- If the search for and preparation of a record is likely to take more than six hours, the Information Officer will notify the requester and may require a deposit before proceeding.

- If access is refused, any deposit paid will be refunded.
- Access to a record may be withheld until all applicable fees have been paid.
- The requester will be told in writing what fees are payable and how they were calculated, and of the right to lodge a complaint with the Information Regulator about the fees or deposit.
- Payment details will be provided by the Information Officer on request.

10. Decisions, Timeframes and Third Parties (Sections 56 to 60 and 71)

10.1 Time for a decision

The Information Officer will decide on a request as soon as reasonably possible, and in any event within 30 days after receiving it. The requester will be notified of the decision in writing (or in the other manner requested) and, if access is granted, of any access fee payable and the form in which access will be given.

10.2 Extension

The Information Officer may extend the 30-day period once, by no more than a further 30 days, if:

- the request is for a large number of records, or requires a search through a large number of records, and complying within the original period would unreasonably interfere with Talentide's activities;
- the request requires a search for records held at an office in a different town or city;
- consultation with other divisions of Talentide, or with another private body, is needed and cannot reasonably be completed within the original period;
- more than one of these circumstances applies; or
- the requester consents to the extension in writing.

The requester will be notified of any extension, the reasons for it, and the right to lodge a complaint with the Information Regulator about it.

10.3 Deemed refusal

If the Information Officer does not decide a request within the applicable period, the request is regarded as refused in terms of section 58 of PAIA, and the requester may use the remedies in section 12 of this manual.

10.4 Third-party notification

If a request concerns a record that may contain personal, commercial or confidential information of a third party, Talentide must take reasonable steps to inform that third party, within 21 days of receiving the request, in terms of section 71 of PAIA. The third party may make representations or consent to disclosure, and the timeframes in PAIA for third-party procedures will apply.

11. Grounds for Refusal of Access (Chapter 4 of Part 3)

Talentide may, or in some cases must, refuse access to a record on the grounds set out in Chapter 4 of Part 3 of PAIA. These grounds include:

- mandatory protection of the privacy of a third party who is a natural person (section 63);
- mandatory protection of the commercial information of a third party (section 64);
- mandatory protection of certain confidential information of a third party, where disclosure would breach a duty of confidence owed in terms of an agreement (section 65);
- mandatory protection of the safety of individuals and the protection of property (section 66);
- mandatory protection of records privileged from production in legal proceedings (section 67);
- protection of Talentide's own commercial information, including trade secrets and financial, commercial, scientific or technical information that would be likely to cause harm if disclosed (section 68); and

- mandatory protection of research information of a third party or of Talentide (section 69).

Despite these grounds, Talentide must grant access to a record if disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm contemplated by the ground for refusal (section 70).

Where only part of a record is protected, Talentide will give access to the rest of the record where it can reasonably be severed (section 59). PAIA also does not apply to a record requested for criminal or civil proceedings after those proceedings have commenced, where another law provides for its production (section 7).

If access is refused, the requester will be given adequate reasons for the refusal, with reference to the relevant provisions of PAIA, and informed of the remedies available.

12. Remedies if a Request Is Refused (Sections 77A and 78)

Talentide does not have an internal appeal procedure; PAIA provides for internal appeals only against public bodies. A requester or third party who is dissatisfied with a decision of the Information Officer (including a refusal, a deemed refusal, or a decision about fees, an extension or the form of access) may:

- lodge a complaint with the Information Regulator, within 180 days of the decision, using the prescribed complaint form (PAIA Form 5), sent to PAIAComplaints@inforegulator.org.za or delivered to the Regulator's offices (see section 3); and
- once the complaints procedure has been exhausted, apply to a court of competent jurisdiction for appropriate relief in terms of sections 78 and 82 of PAIA.

13. Availability and Updating of This Manual (Section 51(3))

This manual is available:

- on Talentide's website at www.talentide.co.za;
- for inspection, free of charge, at Talentide's offices at 677 Elvira Street, Garsfontein, Pretoria, during normal business hours;
- on request from the Information Officer; and
- to the Information Regulator on request.

Talentide will review this manual regularly and update it when its business operations or the applicable law change. The version number and review date on the cover show which version is current.

14. Approval

This manual has been approved by the Managing Director and Information Officer of Talentide (Pty) Ltd and is effective from 6 October 2026.

Signed: *Andrea van Hirtum*

Name: Andrea van Hirtum

Designation: Managing Director and Information Officer, Talentide (Pty) Ltd

Date: 13 October 2026

Place: Pretoria