



Leading Edge Business Solutions (PTY) LTD 1999/028024/07

PAIA Manual

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

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1. List of Acronyms and Abbreviations

- “CEO”** Chief Executive Officer
“IO” Information Officer;
“Minister” Minister of Justice and Correctional Services;
“PAIA” Promotion of Access to Information Act No. 2 of 2000 (as Amended)
“POPIA” Protection of Personal Information Act No.4 of 2013;
“Regulator” Information Regulator; and
“Republic” Republic of South Africa

2. Purpose of PAIA Manual

This PAIA Manual is useful for the public to:

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;

- 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
- 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 Leading Edge Business Solutions (PTY) LTD

3.1. Chief Information Officer

Name: Kerrin Leigh Badham
Tel: 011 656 4233
Email: kerrin@ledge.co.za

3.3 Access to information general contacts

Email: enquiries@ledge.co.za

3.4 National Office

Postal Address: 41 Sparrow Crescent, Flamingo Vlei, Cape Town, 7441
Physical Address: 41 Sparrow Crescent, Flamingo Vlei, Cape Town, 7441
Telephone: 011 656 4233
Email: enquiries@ledge.co.za
Website: <https://www.ledge.co.za/>

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 on the information regulator's website <https://inforegulator.org.za/paia/>
- 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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ 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.

² 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

³ 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

⁴ 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.
 - 4.1 an internal appeal;
 - 4.2 a complaint to the Regulator; and
 - 4.3 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;

⁵ 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.

⁶ 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.

- 4.3.8. the provisions of sections 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92¹¹.
 - 4.3.11. 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.
- 4.4. The Guide can also be obtained-
- 4.4.1. upon request to the Information Officer;
 - 4.4.2. 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 Leading Edge Business Solutions (PTY) LTD Which Are Available Without a Person Having to Request Access

Category of Record	Type/Example of Record	Publicly Available	Available on Request
Corporate Governance	Company Registration Docs (CIPC)		- [x] - [x] - [x]

⁷ 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

⁸ 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

⁹ 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

¹⁰ 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.

¹¹ 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.”

	Memorandum of Incorporation (MOI) Board/Shareholder Resolutions		
Compliance & Accreditation	Accreditation Certificates (SETA/QCTO) Tax Clearance Certificate B-BBEE Certificate/Affidavit	- [X]	- [x] - [x]
Policies & Procedures	Code of Conduct/Ethics Policy Health & Safety Policy Refund/Payment T&Cs		- [X] - [x] - [x]
Financial Records	Audited Financial Statements Annual Financial Statements (AFS)		- [x] - [x]
HR & Employment	Employee Handbooks Workplace Skills Plan (WSP) Annual Training Report (ATR)		- [x] - [x] - [x]
Training & Course Info	Course Catalogue / Prospectus Learner Policies (Attendance, Assessment) Marketing Brochures	- [x] - [x]	- [x]
Client & Supplier Docs	Vendor/Supplier Contracts Service Level Agreements Marketing or Product Proposals		- [x] - [x] - [x]
Data Protection & Privacy	PAIA Manual POPIA Privacy Policy Security or Data Protection Policy	- [x] - [x]	- [x]
General Marketing/Communications	Company Profile Press Releases Newsletters	- [x]	- [x] - [x]

6. Description of the Records Leading Edge Business Solutions (PTY) LTD Which Are Available in Accordance with Any Other Legislation

Category of Record	Applicable Legislation	Typical Contents
Company Formation & Governance	Companies Act 71 of 2008	<ul style="list-style-type: none"> - Memorandum of Incorporation (MOI) - Share Registers - Board/Shareholder Meeting Minutes
Annual Financial Statements	Companies Act 71 of 2008	<ul style="list-style-type: none"> - Audited/Unaudited Financials - Directors' Reports - Auditor's Reports (if applicable)
Tax & Accounting Records	Income Tax Act, 1962 VAT Act, 1991	<ul style="list-style-type: none"> - Tax Returns (IT14, VAT201) - General Ledgers - Invoices & Receipts - Correspondence with SARS
B-BBEE Affidavit	Broad-Based Black Economic Empowerment (B-BBEE) Act Codes of Good Practice	<ul style="list-style-type: none"> - B-BBEE Certificate or Affidavit - Supporting Documents for B-BBEE Verification
Employment & Labour Records	Basic Conditions of Employment Act (BCEA) Labour Relations Act (LRA)	<ul style="list-style-type: none"> - Employee Contracts, Payroll & Leave Records - Disciplinary Records - Staff Policies & Procedures
Health & Safety Records	Occupational Health & Safety Act (OHSA)	<ul style="list-style-type: none"> - Health & Safety Policy - Incident/Accident Reports - Risk Assessments - Compliance Certificates
Accreditation & Training Records	Skills Development Act, 1998 SETA/QCTO Regulations	<ul style="list-style-type: none"> - Accreditation Certificates - Approved Curricula - Assessment & Moderation Policies - Learner Achievement Records

7. Description Of The Subjects On Which The Body Holds Records And Categories Of Records Held On Each Subject By Leading Edge Business Solutions (Pty) Ltd

1. Corporate Governance and Legal

- **Foundational Documents:** Memorandum of Incorporation (MOI), Share Registers, Share Certificates.
- **Company Resolutions & Minutes:** Board meetings, shareholder meetings, executive committee meetings.
- **Contracts & Agreements:** Service contracts, partnership agreements, non-disclosure agreements (NDAs), vendor/supplier contracts.
- **Licenses & Registrations:** CIPC registration documents, B-BBEE certificates,
- **Policies & Procedures:** Company code of conduct, ethics policy, compliance manuals, PAIA Manual, POPIA policies.

2. Human Resources (HR)

- **Employee Personal Files:** Personal details, employment contracts, job descriptions, performance appraisals, disciplinary records.
- **Recruitment Records:** Job applications, CVs, interview notes, references.
- **Payroll & Benefits:** Salary information, tax contributions (PAYE, UIF), pension/provident fund details, medical aid documents.
- COIDA Annual Disclosures
- **Training & Development:** Records of employee training, skills audits, learnership documentation.
- **Leave Administration:** Leave forms, sick notes, family responsibility leave requests.

3. Finance & Accounting

- **Financial Statements:** Income statements, balance sheets, cash flow statements, auditor's reports, assets register.
- **Tax Records:** VAT returns, company tax returns, correspondence with SARS, proof of payments.
- **Accounting Records:** General ledgers, debtors/creditors records, bank statements, reconciliations and journals.
- **Invoices & Receipts:** Sales invoices, supplier invoices, receipts of payments.

4. Supply Chain Management (SCM) & Procurement

- **Supplier/Vendor Records:** Contracts, vendor details, invoices.
- **Purchase Orders:** Goods ordered, invoices and credit notes.

- **Inventory Records:** Company equipment inventory and insurance register.

5. Sales & Marketing

- **Customer Database:** Contact details, sales history, customer preferences (subject to POPIA compliance) stored in the cloud.
- **Sales Records:** Quotes, proposals, sales reports, order confirmations.
- **Marketing Campaigns:** Advertising materials, digital marketing analytics, social media strategies.
- **Agreements:** Partnerships, sponsorships, affiliate or franchise agreements.

6. Operations & Project Management

- **Operational Plans:** Business plans & strategy documents.
- **Project Documentation:** Project timelines, deliverables, contracts and plan
- **Standard Operating Procedures (SOPs):** Documents detailing how tasks/processes are to be carried out.
- **Quality Control Records:** Quality Committee Records of meetings and action points.

7. Information Technology (IT)

- **Hardware & Software Inventories:** Lists of company-owned devices, software licenses, warranties.
- **System Access & Security Logs:** User access credentials, network security logs, backup protocols.
- **Data Management Policies:** Data retention schedules, backup/recovery procedures, POPIA compliance records.
- **Incident Reports:** Records of cybersecurity breaches or IT-related incidents.

8. Health, Safety & Environmental (HSE)

- **Occupational Health & Safety:** Incident reports, risk assessments, safety training records, compliance certifications (e.g., COIDA).
- **Environmental Management:** Waste disposal logs, environmental impact assessments (if applicable).
- **Emergency Plans & Procedures:** Evacuation plans, fire safety protocols, first-aid registers.

9. Customer Service & Support

- **Client Communications:** Emails, call logs, support tickets.
- **Complaints & Resolutions:** Issue tracking, resolutions offered, follow-up documentation.

- **Service Level Agreements (SLAs):** Documentation on service commitments, performance metrics.

8. Processing of Personal Information

8.1. Purpose of Processing Personal Information

1. To Schedule a Meeting with a Potential Customer (Website Inquiry)
 - a. **Lawful Basis: Legitimate interest** (responding to an explicit inquiry) or **consent** (if the person submits a contact form).
 - b. **Retention:** Information retained as long as necessary to arrange and follow up on the meeting; subsequently archived or deleted if not leading to an ongoing business relationship.
 - c. **Data Subject Rights:** Individuals can **object** to further use of their information beyond the initial inquiry if they wish.
2. To Handle General Website Inquiries
 - a. **Lawful Basis: Consent** when the user voluntarily provides personal data (e.g., via contact forms).
 - b. **Retention:** We keep inquiry details only as long as needed to address the query or comply with any legal/regulatory obligations.
 - c. **Rights:** Users may request **deletion** of their inquiry data or withdraw consent at any time.
3. To Allow a Customer to Register on the Website
 - a. **Lawful Basis: Contractual necessity** (enabling service access) and **consent** for any optional marketing communication.
 - b. **Retention:** Registration details are stored for the duration of the user's account, and securely removed upon account closure (unless required for record-keeping).
 - c. **Rights:** Customers can **update** or **rectify** their registration data at any time.
4. To Enable Customers to Edit Their Basic Profile Information
 - a. **Lawful Basis: Contractual necessity** (to maintain accurate, up-to-date user accounts).
 - b. **Retention:** Profile information is kept as long as the account is active.
 - c. **Rights:** Users have the right to **access**, **rectify**, or **delete** their personal information in their profile.
5. To Capture SAQA-Required Details for Accredited Training
 - a. **Lawful Basis: Legal obligation** (meeting SAQA requirements) and **contractual necessity** (providing accredited training services).
 - b. **Retention:** Retained for as long as legally mandated by SETA/SAQA for verification and record-keeping of qualifications.

- c. **Rights:** Individuals can **request access** to their records or correct any inaccurate information at any time.
6. To Facilitate AI Chatbot or Consultant Chats
 - a. **Lawful Basis:** **Legitimate interest** (enhancing customer support) and **consent** (user-initiated chat).
 - b. **Retention:** Chat transcripts retained for a limited period to resolve inquiries and for quality assurance; deleted or anonymized thereafter.
 - c. **Rights:** Users can **request deletion** of chat data if it's no longer needed for support purposes.
7. To Allow Customers to Book and Attend Training Courses
 - a. **Lawful Basis:** **Contractual necessity** (user-initiated booking) and **consent** for optional marketing follow-ups.
 - b. **Retention:** Information stored until the completion of the training, issuance of certificates, and any subsequent verification periods.
 - c. **Rights:** Users can **object** to further processing of their personal data (e.g., marketing) after course completion.
8. To Print Nametags, Attendance Registers, and Course Certificates
 - a. **Lawful Basis:** **Contractual necessity** for effective event/course management and compliance with accreditation requirements.
 - b. **Retention:** Documents are retained only as needed for accreditation validation, event administration, and potential future reference.
 - c. **Rights:** Data subjects may **request corrections** if any personal details are incorrect on certificates or attendance registers.
9. To Send Quotations and Invoices to Customers
 - a. **Lawful Basis:** **Contractual necessity** (providing requested services) and **legal obligation** (SARS compliance).
 - b. **Retention:** Financial records (quotations, invoices) maintained for at least five years, as required by tax regulations.
 - c. **Rights:** Individuals can **access** or **request correction** of their billing details.
10. To Send Course Reminders via Email and SMS
 - a. **Lawful Basis:** **Contractual necessity** (ensuring attendees receive essential course information) and **consent** for any marketing-related reminders.
 - b. **Retention:** Contact details retained for the duration of the course cycle; unsubscribed contacts are removed from marketing lists.
 - c. **Rights:** Recipients can **opt out** of reminders if they no longer need them.
11. To Track Website Analytics
 - a. **Lawful Basis:** **Legitimate interest** (improving site functionality and user experience).

- b. **Retention:** Data stored in anonymized or aggregated form where possible; identifiable data held only as needed for site optimization.
- c. **Rights:** Users can manage **cookie preferences** or refuse certain analytics cookies via their browser settings.

12. To Maintain Employee Records for HR Purposes

- a. **Lawful Basis:** **Contractual necessity** (employment contracts), **legal obligation** (labour laws, tax), and **legitimate interest** (HR administration).
- b. **Retention:** HR data kept for the duration of employment and thereafter for as long as legally required (e.g., payroll and compliance audits).
- c. **Rights:** Employees can **access, update, or object** to the processing of certain personal information, subject to labour law constraints.

8.1 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of Data Subjects	Personal Information That May Be Processed
Learners / Students / Delegates	<ul style="list-style-type: none"> - Full name, contact details (email, phone, address) - Identity/passport number, date of birth - Employment status, job title (if sponsored by an employer) - Assessment results, course progress, certification records - Special needs or medical information (if voluntarily provided for accommodation)
Corporate Clients & Their Representatives	<ul style="list-style-type: none"> - Full name, business contact details (email, phone number) - Job title, company name, business address - Billing information and purchase history (invoices, statements) - Contract details (service level agreements, proposals)
Suppliers / Service Providers	<ul style="list-style-type: none"> - Company registration number, VAT number (if applicable) - Business address, banking and payment details - Contact person's name, phone, email - B-BBEE or compliance documents (where relevant)
Employees (Permanent, Contract, Temporary)	<ul style="list-style-type: none"> - Full name, identity/passport number - Contact details (residential address, email, phone) - Employment contracts, performance reviews, training records - Payroll and banking information (salaries, UIF, tax details) - Qualifications, demographic data (race, gender) if required by legislation

<p>Job Applicants / Prospective Employees</p>	<ul style="list-style-type: none"> - CVs, references, qualifications, employment history - Identity/passport number - Contact details (email, phone) - Interview notes and assessments
<p>Website Visitors</p>	<ul style="list-style-type: none"> - IP address, browser type, operating system - Device identifiers, referral URLs - Any personal details voluntarily submitted via contact forms (e.g., name, email)

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

8.2.1 Categories of Data Subjects and Types of Personal Information

1. Employees (Permanent, Contract, and Temporary)
 - a. **Personal Information:** Full names, identity/passport numbers, contact details, employment contracts, performance reviews, payroll/banking information, tax and statutory information (e.g., PAYE, UIF), disciplinary records, and training records.
2. Job Applicants/Prospective Employees
 - a. **Personal Information:** CVs, identity/passport numbers, contact details, references, qualifications, employment history, and any additional supporting documents submitted for recruitment purposes.
3. Learners/Students/Delegates
 - a. **Personal Information:** Full names, contact details, identity/passport numbers, course enrollments and progress, assessment results, attendance records, and certificates awarded.
 - b. **In certain cases** (e.g., learnerships): Additional info such as employer details, workplace-based assignments, and any special needs/medical information provided for learning accommodations.
4. Contract Facilitators, Assessors and Moderators
 - a. **Personal Information:** Full names, contact details, identity/passport numbers, qualifications and scope with accrediting bodies, business name, bank account details, quotes and invoices, training reports, assessments and moderations.
5. Corporate Clients (Company Representatives)
 - a. **Personal Information:** Names, job titles, business contact details (email addresses, phone numbers), and any other necessary details for booking or contract administration.
 - b. **Company Information:** Company registration number, VAT information, physical and postal address, and billing information.
6. Suppliers/Service Providers

- a. **Personal Information** (for individual contractors or representatives): Names, contact details, banking/payment details, B-BBEE certificates (where relevant), and contractual agreements.
 - b. **Company Information** (if it is a corporate entity): Registration details, business addresses, tax and banking details, and any relevant compliance certificates.
7. Website Visitors
- a. **Personal Information:** Potentially IP addresses, browser information, and other online identifiers collected through cookies or analytics tools.
 - b. **Voluntary Submissions:** Contact form entries, email inquiries, and newsletter sign-ups.
8. Regulatory Bodies or Accreditation Entities
- a. **Personal Information:** Names and contact details of liaison officers within these bodies, any compliance documentation that references individuals (e.g., assessor or moderator registrations).

8.3 Planned transborder flows of personal information

Leading Edge Business Solutions (Pty) Ltd may store or process certain categories of personal information on cloud-based platforms or servers located **outside** the Republic of South Africa. This includes:

1. Xero Accounting (Cloud-Based, Various Data Centers)
 - a. **Location:** Xero primarily hosts data in secure data centers located outside of South Africa, which may include regions such as the United States, Australia, or other jurisdictions as part of Xero's global infrastructure.
 - b. Categories of Personal Information:
 - i. Financial records (invoices, payment details, transactional data),
 - ii. Client and supplier names, contact details, and billing information,
 - iii. Related accounting documentation.
2. Sales/Ticket Server (Droplet in the Netherlands)
 - a. **Location:** A hosting environment or "droplet" based in the Netherlands.
 - b. Categories of Personal Information:
 - i. Client names, email addresses, and related ticket/support inquiries,
 - ii. Potentially phone numbers or other contact details, depending on the information clients submit.

When we use **transborder** data storage or processing, we act appropriately to ensure the protection of personal information in line with POPIA and other applicable data protection laws. This may include:

- Ensuring the recipient jurisdiction has laws/regulations that offer an adequate level of protection, **or**

- Entering contracts that uphold POPIA principles for safeguarding personal information, including security, confidentiality, and restricted processing purposes.

We regularly monitor our service providers' compliance and update our processes to maintain the highest standards of **data protection** and **privacy**. If you have any questions or concerns about how your personal information is transferred or stored, please contact us at enquiries@ledge.co.za.

8.4 General description of Information Security Measures to be implemented by the party responsible to ensure the confidentiality, integrity and availability of the information

Leading Edge Business Solutions (Pty) Ltd is committed to protecting the **confidentiality, integrity, and availability** of all personal information under its control. Our security measures include:

1. Encryption & Secure Transmission
 - a. **SSL/TLS Encryption:** All data exchanges with our platforms (e.g., user registration, login, and profile updates) are protected via SSL/TLS to prevent unauthorized access during transmission.
 - b. **Database-Level Encryption:** Sensitive personal data (e.g., ID/passport numbers, phone numbers, date of birth, residential addresses) is encrypted at rest within our databases.
2. Secure Password Handling
 - a. **Hashing & Salting:** User passwords are hashed and salted before storage to mitigate the risk of credential compromise.
 - b. **Password Policies:** We enforce minimum complexity policies where feasible.
3. Access Controls & Authentication
 - a. **Role-Based Access:** Staff access to databases and systems is granted on a need-to-know basis, ensuring only authorized personnel can view or modify sensitive information.
 - b. **Multi-Factor Authentication (MFA):** Where possible, MFA is enabled for administrative accounts and critical systems, adding an extra layer of security.
4. Infrastructure Security
 - a. **Firewalls:** Our servers are protected by firewalls to guard against malicious traffic.
5. Monitoring & Logging
 - a. **System Logs:** Key systems maintain comprehensive event logs, enabling monitoring of access, changes, and security events.
 - b. **Regular Reviews:** We periodically review logs to identify unusual activity or potential security incidents.

6. Data Backups & Disaster Recovery
 - a. **Regular Backups:** Data is backed up on a routine schedule and stored securely, both on- and off-site (or in secure cloud storage), to facilitate recovery in case of system failure.
 - b. **Disaster Recovery Plan:** We have documented procedures to restore critical services and data in the event of a major disruption.
7. Staff Training & Policies
 - a. **Privacy & Security Awareness:** Employees undergo training on POPIA requirements, data handling best practices, and recognizing security risks (e.g., phishing).
 - b. **Confidentiality Agreements:** Staff members sign confidentiality and non-disclosure agreements to uphold data protection standards.
8. Vendor & Third-Party Security
 - a. **Due Diligence:** We assess our service providers' data protection standards to ensure they meet our security requirements.
 - b. **Contractual Obligations:** Agreements with third parties include clauses on confidentiality, data protection, and breach notifications.
9. Ongoing Security Assessments
 - a. **Policy Updates:** Security policies and procedures are reviewed and updated regularly to align with evolving threats and regulatory changes.

Through these **technical, administrative, and organizational measures**, Leading Edge Business Solutions (Pty) Ltd aims to maintain a robust security posture, safeguarding personal information in accordance with **POPIA** and industry best practices. For any questions or concerns regarding our information security protocols, please contact us at enquiries@ledge.co.za.

9. Availability of the Manual

A copy of the Manual is available on <https://www.ledge.co.za/paia-manual> at the head office of Leading Edge Business Solutions (Pty) Ltd for public inspection during normal business hours; to any person upon request and upon the payment of a reasonable prescribed fee; and to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, and included as Annexure C of this manual, shall be payable per each A4-size photocopy made.

10. Updating of the Manual

The Information Officer of Leading Edge Business Solutions (Pty) Ltd will update this manual on an annual basis.

Issued by

Kerrin Leigh Badham

Information Officer

11. Annexure A: Form 2 – Request For Access To Record

Please download from the website of the Information Regulator: <https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

12. Annexure B: Form 3 – Outcome Of Request And Of Fees Payable

Please download from the website of the Information Regulator: <https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

13. Annexure C: Fees Payable 2024-2025

Item	Description	Amount ex VAT
1.	Request fee, payable by every requester	R140.00
2.	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3.	Printed copy of A4-size page	R2.00 per page or part of the page
4.	<p>For a copy in a computer-readable form on:</p> <ul style="list-style-type: none"> a flash drive (provided by the requester) a compact disc (CD) if the requester provides the CD to us a compact disc (CD) if we give the CD to the requester 	<p>R40.00</p> <p>R40.00</p> <p>R60.00</p>

5.	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6.	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	For a copy of an audio record on a flash drive (provided by the requester) For a copy of an audio record on compact disc (CD) if the requester provides the CD to us For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9.	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure The search and preparation fee cannot exceed	R145.00 R435.00
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11.	Postage, email or any other electronic transfer	Actual expense, if any.