



South African Business Intelligence Support Services Proprietary Limited

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
- “DIO”: Deputy Information 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
- “Republic”: Republic of South Africa
- “SaaS”: Software as a Service
- “ECTA”: Electronic Communications and Transactions Act 25 of 2002
- “SABiSS”: South African Business Intelligence Support Services Proprietary Limited

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 SABISS (Pty) Ltd

3.1. Chief Information Officer

Name: Gareth Sincock
Tel: 087 222 8292
Email: gareth@sabiss.com
Fax number: N/A

3.2. Deputy Information Officer

Name: Braden Sincock
Tel: 087 222 8292
Email: braden@sabiss.com

3.3 Access to information general contacts

Email: marketing@sabiss.com

3.4 National or Head Office

Postal Address: 17 Vincent Road, Vincent, East London, South Africa, 5247

Physical Address: 17 Vincent Road, Vincent, East London, South Africa, 5247

Telephone: 087 222 8292

Email: info@sabiss.com

Website: www.sabiss.com and www.hrpm.co.za and www.supercard.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. 4.3. The aforesaid Guide contains the description of the objects of PAIA and POPIA, the postal and street address, phone and email address of the Information Officer of every public body, and the manner and form of a request for access to a record. 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. 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/infoereg/>).

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

5. CATEGORIES OF RECORDS OF SABiSS (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

These are records that are automatically available.

Category of records	Types of the Record	Available on Website	Available upon request
Marketing	Product Brochures (Time & Attendance / Loyalty)	X	X
Public Corporate Records	CIPC Registration Details		X
Legal	Privacy Policy	X	X
Legal	Terms of service	X	X

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

To be comprehensive and limit liability, we list all acts relevant to a software company dealing with finance and employees.

- Basic Conditions of Employment Act No. 75 of 1997
- Broad-Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Consumer Protection Act No. 68 of 2008
- Copyright Act No. 98 of 1978
- Cybercrimes Act No. 19 of 2020
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Financial Intelligence Centre Act No. 38 of 2001 (FICA)
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No. 4 of 2013
- Skills Development Levies Act No. 9 of 1999

- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects on which the body holds records	Categories of records
Corporate Governance	Memorandum of Incorporation, Directors' records, Shareholder certificates, Minutes of meetings, Resolutions.
Finance	Annual Financial Statements, Tax records (PAYE/VAT/UIF), Asset register, Invoices, Banking records, Audit reports.
Human Resources	Employment contracts, Disciplinary records, Salary records, Leave records, Training records, CVs, Internal Policies.
Information Technology & Intellectual Property	Source Code (Proprietary), Software architecture documentation, API Documentation, Software Licenses, Domain registrations, Server access logs, Incident reports.
Client Records (B2B)	Service Level Agreements (SLAs), Non-Disclosure Agreements (NDAs), Client onboarding forms, Client correspondence, Billing history.
Product: Time & Attendance	Note: <i>Data held as Operator for clients.</i> Biometric templates (if applicable), Employee shift logs, Geolocation data, Attendance reports.

Product: Loyalty & Payments

Transaction logs, User reward balances, Tokenized payment data, Merchant settlements, User profiles.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

SABiSS (Pty) Ltd processes personal information for the following purposes:

- To provide software development services and maintain software products (Time & Attendance, Loyalty/Payments).
- To facilitate workforce management and payroll integration for clients.
- To process loyalty transactions and facilitate payments.
- To verify the identity of users for security purposes (App login/Web access).
- To comply with legal obligations (e.g., Tax, Labour, FICA).
- To manage staff and maintain the employer-employee relationship.
- To detect and prevent fraud or technical abuse of services.

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

Categories of Data Subjects	Personal Information that may be processed
Employees	Name, ID number, address, banking details, tax number, qualifications, gender, race, biometric data (for internal access), employment history.
Clients (Corporate Entities)	Company name, registration number, VAT number, contact person details, banking details, billing history.
End Users (Time & Attendance)	Name, Employee ID, Biometric data (Fingerprint/Facial recognition templates), Geolocation/GPS coordinates, shift times, leave balances.
End Users (Loyalty & Payments)	Name, mobile number, email address, transaction history, shopping preferences, credit card tokens (masked/encrypted), loyalty point balances.

Service Providers / Suppliers	Company registration, contact details, banking details, BEE certificates.
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8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Employee & Payroll Data	SARS, Department of Labour, Medical Aid Schemes, Pension Funds.
Time & Attendance Data	The specific Client (Employer) utilizing the software, Third-party Payroll Systems (via API integration as per client instruction).
Payment & Transaction Data	Payment Gateways (e.g., PayFast, Yoco, Peach), Banks, Fraud detection agencies.
General User Data (Hosting)	Cloud Service Providers (e.g., AWS, Microsoft Azure, Google Cloud) acting as Operators.
Criminal/Background Checks	South African Police Services, Background Check Agencies.

8.4 Planned transborder flows of personal information

The body stores data in the cloud using Microsoft Azure and similar reputable service providers.

- Data may be stored on servers located outside the Republic of South Africa (e.g., Ireland, Western Europe, or USA).
- The body ensures that the recipient country adheres to data privacy laws similar to POPIA or that a binding agreement (Operator Agreement) is in place to protect the 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

SABiSS (Pty) Ltd employs the following security measures to limit liability and protect data:

- Encryption: Data is encrypted at rest (database) and in transit (SSL/TLS) for all web and mobile apps.
 - Access Control: Strict role-based access control (RBAC) is applied; only authorized personnel can access sensitive data.
 - Authentication: Multi-Factor Authentication (MFA) is enforced for administrative access.
 - Network Security: Use of firewalls, anti-virus, and anti-malware solutions.
 - Backups: Regular automated backups are performed to ensure data availability and business continuity.
 - Physical Security: Access to physical premises is restricted.
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9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available:

9.1.1 on www.sabiss.com and www.hrpm.co.za and www.supercard.co.za

9.1.2 head office of SABiSS (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

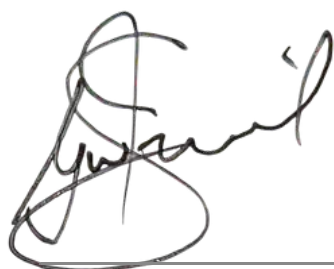
9.1.4 to the Information Regulator upon request.

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 SABiSS (Pty) Ltd will on a regular basis update this manual.

Issued by



Gareth Sincock
Chief Executive Officer