



Linkqage (Pty) LTD

PAIA MANUAL

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

1. INTRODUCTION

This Manual is published in terms of section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"). PAIA gives effect to the provisions of section 32 of the Constitution of the Republic of South Africa, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.

This Manual may be amended from time to time, and once amendments have been affected, the latest version of this Manual will be distributed and published in accordance with PAIA

This Manual was last reviewed and amended in May 2026 to reflect current contact details, branding, and compliance practices

It provides details on:

- Access to records held by **Linkqage (PTY) LTD**
- The process to request access
- How personal information is processed and protected

2. COMPANY PARTICULARS

Item	Details
Company Name	Linkqage (pty) ltd
Registration Number	2024/850274/07
Physical Address	32 Gold Street, Northgate Estate, Brooklyn, Cape Town 7405
Telephone	021 514 4800
Website	https://www.linkqage.com/

3. DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them

hereunder, namely:

- 1.1. **"Data Subjects"** means the natural or juristic person/s to whom Personal Information relates;
- 1.2. **"Group Information Officer"** means the person acting on behalf of Linkqage and discharging the duties and responsibilities assigned to the head of Linkqage by PAIA. The Group Information Officer is duly authorised to act as such, and such authorisation has been confirmed by the head of Linkqage in writing;
- 1.3. **"Information Regulator"** shall bear the meaning ascribed thereto in POPIA;
- 1.4. **"Manual"** means this manual published in compliance with section 51 of PAIA, together with all annexures thereto;
- 1.5. **"Minister"** means the Minister of Justice and Correctional Services;
- 1.6. **"Personal Information"** has the meaning ascribed thereto under POPIA
- 1.7. **"Personnel"** means any person who works for or provides services to or on behalf of Linkqage and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- 1.8. **"POPIA"** means the Protection of Personal Information Act 4 of 2013, together with any regulations published thereunder;
- 1.9. **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, and "Process" has a corresponding
- 1.10. **"Request"** means a request for access to a Record
- 1.11. **"Requester"** means any person, including a public body or an official thereof, making a Request for access to a Records and includes any person acting on behalf of that person; and
"Third Party" means any independent contractor, agent, consultant, sub-contractor or other representatives

4. INFORMATION OFFICER

In terms of PAIA and POPIA:

Registered Information Officer

Name: Keith Julian Blacher

Email: Keithb@Linkqage.co.za

5. Deputy Information Officer(s)

Name: Richard McQueen

Email: richardm@Linkqage.co.za

Name: Gadija Naicker

Email: Gadijan@Linkqage.co.za

6. INFORMATION REGULATOR GUIDE

The official PAIA Guide is available from:

Information Regulator (South Africa)

Website: <https://www.justice.gov.za/infoereg/>

Email: infoereg@justice.gov.za

7. APPLICABLE LEGISLATION (EXPANDED FOR AUDIT)

The Company retains records in terms of the following legislation:

- Promotion of Access to Information Act, 2000
 - Protection of Personal Information Act, 2013
 - Companies Act, 2008
 - Labour Relations Act, 1995
 - Basic Conditions of Employment Act, 1997
 - Employment Equity Act, 1998
 - Occupational Health and Safety Act, 1993
 - Income Tax Act, 1962
 - VAT Act, 1991
 - Skills Development Act, 1998
 - UIF Act, 2001
 - Electronic Communications and Transactions Act, 2002
 - Consumer Protection Act, 2008
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8. RECORDS HELD

8.1 Corporate Governance

- Memorandum of Incorporation
- Director registers
- Names of directors
- Codes of Ethics
- Intellectual property
- Legal Record
- Statutory Records
- Internal policies and procedures

8.2 Financial Records

- Annual Financial Statements
- Audit reports
- Tax submissions

8.3 Human Resources

- Employee personal files
 - Conditions of employment and other Personnel-related contractual and quasi-legal Records
 - Payroll and salary data
 - Termination Payments
 - Medical and disability records
 - Internal policies and procedures
 - Disciplinary and grievance records
 - General correspondence
 - Training schedules, Attendance Registers and manuals
-

8.4 Client & Customer Records

- Contracts
 - Personal information
 - Transaction records
-

8.5 Supplier Records

- Agreements
 - Banking details
-

8.6 IT & Digital Records

- Email archives
 - CCTV footage
 - Access logs
-

9. RECORDS AUTOMATICALLY AVAILABLE

- Website content
 - Marketing materials
 - Public reports
-

10. POPIA COMPLIANCE

10.1 Purpose of Processing

- Recruitment and employment
 - Payroll administration
 - Client service delivery
 - Legal compliance
-

10.2 Lawful Basis for Processing

Personal information is processed in accordance with:

- Consent
 - Contractual necessity
 - Legal obligation
 - Legitimate interest
-

10.3 Data Subjects

- Employees
 - Applicants
 - Customers
 - Suppliers
-

10.4 Categories of Personal Information

- Identity numbers
 - Contact details
 - Financial data
 - Biometric/CCTV (if applicable)
-

10.5 Recipients

- SARS
 - Payroll providers
 - IT vendors
-

10.6 Cross-Border Transfers

Transfers occur only where:

- Adequate protection laws exist, or
 - Contractual safeguards are in place
-

10.7 Information Security Measures

The Company implements:

- Access control systems
 - Password protection
 - Encrypted storage
 - Confidentiality agreements
 - Staff training on data protection
-

11. REQUEST PROCEDURE

Step 1: Submit PAIA Request Form

Use **Form 2**

Step 2: Submit to Information Officer

- Email: HR@Linkqage.co.za
 - Address: 32 Gold Street, Northgate Business Park, Brooklyn, Cape Town
-

Step 4: Response Time

- Within **14 days**
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12. GROUNDS FOR REFUSAL (LEGAL REQUIREMENT)

Access may be refused to protect:

- Personal privacy
 - Commercial information
 - Legal privilege
 - Safety/security
 - Third-party rights
-

13. INTERNAL APPEALS & REMEDIES

As a private body:

- No internal appeal is required

Requesters may:

- Lodge complaint with Information Regulator
-

14. AVAILABILITY OF MANUAL

This manual is available:

- On the company website
 - At head office
 - On request
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15. APPROVAL & SIGN-OFF

Approved by:

Name: Keith Blacher

Position: Director - Finance and Operations

FORM2
REQUEST FOR ACCESS TO RECORD
(Regulation 7)

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address; _____

Fax number. _____

Mark with an 'X' -



Request is made in my own name



Request is made on behalf of another person.

PERSONAL INFORMATION		
Full Name		
Identity Number		
☐ Only in which request is made (When made on behalf of another person ☐)		
Postal Address		
Street Address		
E-mail Address		
Contact Numbers	Tel. (B):	Facsimile:
	Cellular:	
Full names of person on whose behalf request is made (If applicable):		
Identity Number		
Postal Address		

Street Address.			
E-mail Address			
Contact Number(s)	Tel (Bl)	Facsimile	
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is sought, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record (On):			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the appropriate box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mori<theoppli<;able bolt whlJan "It?</i>	
Printed oopy of record <i>(including copies of any vittual images, transcriptionsand fnformation held on compvter or in an eloc1ronic or m8Chine-read8ble form)</i>	
Written or pri'lled transaaption of virtual images <i>(thisincludes photographs, slides. video reoordings. computer-generated imeges, sketches; etc)</i>	
Transcr j)tlonof soondtra.ck <i>(written or printed document)</i>	
Copyof record on flash drive <i>(including vrtual imagos and soundtracks)</i>	
Copyof rocotd on comp.act djsc drive <i>(Ittcludingvirtual Imagos and soundttacks)</i>	
Copyof record saved on cloud sto,age server	

MANNER OF ACCESS <i>/Marl<th<l app/icsble boxwith on ")(")</i>	
Personal In.specUon of reoord at re,gistered address of public/private body <i>{Includft,g ltstenNlg to rocorfed words, infonnothion which can b8 roprodl.ICfid In sound. or Information held on computer or in an electronic or machlno...eadabfe form)</i>	
Postal S8fV!ces to postal address	
Postal s8C"llces to s·1reat address	
Courier service to slr&eladdress	
FacslmlJe of information In written or printed format <i>(including transclfpptions)</i>	
E-maOol Inronna!lon <i>/Including sound/rocks if possiblo)</i>	
Cbud share/ftt& transfer	
Preferred language <i>{Note that if the record is not available in the language you prefer, acooss may be granted In the language in which the racordis avallablo)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If tho provided s,n,cehslnadequate, please contlttueon a sopsratepage and sttlJOhl to this Form. The requester must signall the additional pages.</i>	
Indicate whleh rfshtls IQ be exercised or protected	

El<Q <lin wily the record 1&quested Is required for Ille exercise or pm<ection of tho aforementionedright	

FEES	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
t/	The fee, payable for access to a record depends on the amount, in which case, as required at the time of the request, the fee is payable for the search (of and prepare a record) if the request is for a record of information, or, if the request is for a record of information, the fee is payable for the search (of and prepare a record) if the request is for a record of information.
di	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs related to your request. If any. Please indicate your preferred manner of correspondence:

P0&tal addreu	FacloImUe	Electronic communication (Plus specify)

Signed at _____ 11 is _____ day of _____ 20 ____ _

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Off (if any):	

Signature of Information Officer