

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000

(Act No. 2 of 2000)

Effective Date: 23 February 2026

Last Updated: 20 February 2026

1. INTRODUCTION

This Manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), as amended.

- This Manual is published in compliance with Section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”), as amended.
- PAIA gives effect to the constitutional right of access to information contained in section 32 of the Constitution of the Republic of South Africa, 1996.
- 1.3 This Manual is also read together with the Protection of Personal Information Act, 2013 (“POPIA”), which governs the lawful processing of personal information and provides additional rights to data subjects.
- 1.4 DIDx is a South African private company operating in the field of digital identity infrastructure, credential enablement, and regulated digital transaction facilitation. In the ordinary course of business, DIDx creates, receives, and maintains records that may be subject to access requests in terms of PAIA.

The purpose of this Manual is to:

- Describe the structure and functions of DIDx;
- Identify categories of records held;
- Prescribe the procedure for requesting access to records;
- Explain fees and deposits;
- Outline grounds for refusal;
- Clarify remedies available to requesters;
- Provide links to official prescribed forms.

2. INTERPRETATION AND DEFINITIONS

For purposes of this Manual:

- “Act” means the Promotion of Access to Information Act 2 of 2000.
- “Information Officer” means the head of a private body as defined in PAIA.
- “POPIA” means the Protection of Personal Information Act 4 of 2013.
- “Record” means any recorded information in any form or medium.
- “Requester” means any person requesting access to a record of DIDx.

3. PARTICULARS OF THE PRIVATE BODY

| Company Details | Registered Address |
|--|--|
| DIDx (Pty) Ltd Registration Number: 2019/162420/07 VAT Number: 4120288628 Tax Reference Number: 9176303254 | Building A, Section 2 Cotillion Place, 22 Techno Drive Techno Park, Stellenbosch, 7600 Republic of South Africa |
| General Enquiries: info@didx.co.za PAIA & Privacy Requests: privacy@didx.co.za | Website: www.didx.co.za |

4. INFORMATION OFFICER

In accordance with section 55 of the Protection of Personal Information Act, the Chief Executive Officer of a private body is its statutory Information Officer.

Statutory Information Officer:

Martin Grunewald
 Chief Executive Officer

Designated PAIA Contact:

Willem Basson
 Chief Information Officer
 Email: privacy@didx.co.za

5. GUIDE ON HOW TO USE PAIA

In terms of Section 10 of PAIA, the Information Regulator has compiled a guide to assist persons wishing to exercise rights under PAIA.

The Guide contains:

- The objects of PAIA;
- The manner and form of requests;
- Assistance available from Information Officers;
- Legal remedies;
- Applicable forms and prescribed fees.

The Guide may be obtained from the Information Regulator.

6. CATEGORIES OF RECORDS HELD BY DIDx

DIDx maintains records in both physical and electronic formats.

6.1 Corporate Governance Records

- Memorandum of Incorporation;
- Share registers;
- Board resolutions;
- Statutory filings;
- Governance policies.

6.2 Financial and Tax Records

- Annual financial statements;
- Accounting records;
- VAT documentation;
- Tax returns and supporting schedules;
- Banking documentation.

6.3 Commercial Records

- Client agreements;
- Supplier agreements;
- Service level agreements;
- Statements of work;
- Procurement documentation;
- Confidentiality agreements.

6.4 Human Resources Records

- Employment contracts;
- Payroll records;
- Leave records;
- Disciplinary records;
- Policy acknowledgements.

6.5 Technical and Operational Records

- IT governance policies;
- Information security policies;
- Incident management documentation;
- Access control logs (subject to lawful disclosure);
- Risk and compliance records.

Inclusion of a record category does not imply that access will automatically be granted.

7. VOLUNTARY DISCLOSURE

In terms of Section 52 of PAIA, DIDx may make certain records available without requiring a formal PAIA request.

These include:

- DIDx Privacy Policy;
- DIDx Terms of Service;
- This PAIA Manual.

These are published at www.didx.co.za.

8. REQUEST PROCEDURE

8.1 A request for access to a record must be made using the prescribed Form 02.

8.2 The request must:

- Provide sufficient detail to identify the record;
- Specify the form of access required;
- State the right to be exercised or protected;
- Include proof of identity;
- Include proof of authority (if acting for another person).

8.3 Requests must be submitted to privacy@didx.co.za.

8.4 DIDx will respond within 30 calendar days as prescribed in section 56 of PAIA.

8.5 This period may be extended once for an additional period not exceeding 30 calendar days in circumstances contemplated in section 57 of PAIA, including where:

- The request involves a large volume of records;
- Consultation with third parties is required.

8.6 Failure to adequately identify the record or the right to be exercised may result in refusal.

9. FEES

9.1 Fees are prescribed under PAIA Regulations.

9.2 DIDx may charge:

- Request fee;
- Access fee for copies;
- Search and preparation fee;
- Deposit where search exceeds statutory threshold;
- Postage or electronic transfer costs.

9.3 The Information Officer will notify the requester of fees payable before access is granted.

10. GROUNDS FOR REFUSAL

Access may be refused where:

- Disclosure would unreasonably disclose personal information of a third party;
- Disclosure would reveal confidential commercial information;
- The record is legally privileged;
- Disclosure would compromise security or safety;
- The request is manifestly frivolous or vexatious;
- The record does not exist.

Reasons for refusal will be provided in writing.

11. POPIA DATA SUBJECT RIGHTS

In addition to PAIA rights, a data subject may request:

- Confirmation of whether personal information is processed;
- Access to personal information;
- Correction or deletion;
- Objection to processing;
- Withdrawal of consent (where applicable).

Such requests may be submitted to privacy@didx.co.za.

12. SECURITY SAFEGUARDS

DIDx maintains appropriate, reasonable technical and organisational measures to safeguard personal information against loss, unauthorised access, unlawful processing, or destruction. DIDx may store records electronically, including through secure third-party service providers and cloud infrastructure providers, subject to contractual, technical, and regulatory safeguards.

13. CROSS-BORDER TRANSFERS

Where personal information is transferred outside South Africa, such transfers are conducted in accordance with Section 72 of POPIA and applicable safeguards.

14. REMEDIES

If dissatisfied with a decision:

- The requester may lodge a complaint with the Information Regulator;
- The requester may apply to a competent court for appropriate relief.

15. INFORMATION REGULATOR CONTACT DETAILS

Information Regulator (South Africa)

JD House

27 Stiemens Street

Braamfontein, Johannesburg

2001

Telephone: 010 023 5200

Website: www.justice.gov.za/inforeg

PROMOTION OF ACCESS TO INFORMATION (PAIA) FORMS

The prescribed forms issued by the Information Regulator are available at:

<https://inforegulator.org.za/paia-forms/>

Applicable forms include:

- Form 01: [Request for a Guide from the Regulator](#) [Regulation 2]
- Form 01: [Request for a Copy of the Guide from an Information Officer](#) [Regulations 3]
- Form 02: [Request for Access to Record](#) [Regulation 7]
- Form 03: [Outcome of request and of fees payable](#) [Regulation 8]
- Form 04: [Internal Appeal Form](#) [Regulation 9]
- Form 05: [Complaint Form](#) [Regulation 10]
- Form 13: [PAIA Request for Compliance Assessment Form](#) [Regulation 14(1)]

DOCUMENT CONTROL

Owner: Chief Operating Officer

Responsible Function: Governance & Compliance

Review Frequency: Annual

Approved by: DIDx Executive Management