PAIA manual

Poloza Coldvault (Pty) Ltd

Registration number 2025/421464/07

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

Company or **Poloza Coldvault**	Poloza Coldvault (Pty) Ltd, registration number 2025/421464/07, which owns and operates the Poloza software
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulations	Regulations relating to the Promotion of Access to Information, 2021
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of this PAIA manual

Poloza Coldvault (Pty) Ltd is a private body as defined in PAIA. This manual is published in terms of section 51 of PAIA. It helps the public to:

1. see the categories of records held by the Company that are available without a person having to submit a formal PAIA request;
2. understand how to make a request for access to a record of the Company, by describing the subjects on which the Company holds records and the categories of records held on each subject;
3. know which records of the Company are available in accordance with any other legislation;
4. find the contact details of the Information Officer, who will assist the public with the records they want to access;
5. know about the Guide on how to use PAIA, as updated by the Regulator, and how to obtain it;
6. know whether the Company processes personal information, the purpose of that processing, and the categories of data subjects and of the information relating to them;
7. know the recipients or categories of recipients to whom personal information may be supplied;
8. know whether the Company transfers or processes personal information outside the Republic, and to whom; and
9. know whether the Company has appropriate security measures to protect the confidentiality, integrity and availability of the personal information it processes.

3. Key contact details for access to information

3.1 Information Officer

The Company is a private company with one director, who is the head of the Company for the purposes of PAIA and its Information Officer under PAIA and POPIA.

Name	Lungile Ngidi
Designation	Director and Information Officer
Telephone	070 434 2857
Email	privacy@poloza.app
Fax	None

3.2 Deputy Information Officer

No Deputy Information Officer has been designated. All requests are handled by the Information Officer. This section will be updated if a Deputy Information Officer is designated in terms of section 17 of PAIA and section 56 of POPIA.

3.3 Access to information general contact

Email	privacy@poloza.app

3.4 Head office

Postal address	15 Eric Avenue, Mount Vernon, Durban, KwaZulu-Natal, 4094
Physical address	15 Eric Avenue, Mount Vernon, Durban, KwaZulu-Natal, 4094 (registered office)
Telephone	070 434 2857
Email	privacy@poloza.app
Website	poloza.app

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, updated and made available the revised Guide on how to use PAIA (the "Guide"), in an easily understandable form, as may reasonably be required by a person who wishes to exercise any right in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The Guide contains a description of:

1. the objects of PAIA and POPIA;
2. the postal and street address, phone and fax number and, if available, email address of the Information Officer of every public body, and of every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
3. the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);
4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
5. the assistance available from the Regulator in terms of PAIA and POPIA;
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 an internal appeal, a complaint to the Regulator, and an application to court against a decision by the information officer of a public body, a decision on internal appeal, a decision by the Regulator or a decision of the head of a private body;
7. the provisions of sections 14 and 51 of PAIA requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
8. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;
9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

10. the regulations made in terms of section 92 of PAIA.

4.4 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained upon request to the Information Officer, or from the Regulator's website at inforegulator.org.za.

4.6 A copy of the Guide is also available from the Information Officer in the following two official languages: **English** and **isiZulu**. Because the Company has no public office, the Guide is provided by email or post on request, free of charge.

5. Categories of records available without a person having to request access

In terms of section 52 of PAIA, the following records are available without a formal request:

Category of records	Types of records	Available on website	Available upon request
Public information about the Company	Company name, registration number, contact details, information about the Poloza products	Yes	Yes
Legal and policy documents	This PAIA manual, privacy policy, information on data subject rights under POPIA	Yes	Yes
Product help	Help guides, questions and answers	Yes	Yes
Product terms	Plan and pricing information given to customers when a workspace is approved	No	Yes

6. Records available in accordance with other legislation

The Company keeps records in terms of the following legislation, as far as it applies to the Company. Records kept in terms of this legislation are available only to the people or bodies entitled to them under that legislation, or on a request made in terms of this manual.

Category of records	Applicable legislation
Memorandum of incorporation, registration certificate, securities register, director records, minutes and resolutions	Companies Act 71 of 2008
Tax returns, assessments and supporting records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
PAIA manual	Promotion of Access to Information Act 2 of 2000
Privacy policy, records of processing, operator agreements, security compromise records	Protection of Personal Information Act 4 of 2013
Electronic records, data messages and electronic agreements	Electronic Communications and Transactions Act 25 of 2002
Customer agreements and related records, where the Act applies	Consumer Protection Act 68 of 2008

The Company has no employees at the date of this manual. Records under employment legislation (for example the Basic Conditions of Employment Act 75 of 1997 and the Unemployment Insurance Act 63 of 2001) will be added when employees are appointed.

7. Subjects on which the Company holds records and categories of records held

Subjects on which the Company holds records	Categories of records
Company administration and statutory records	Incorporation documents, CIPC filings, director records, resolutions, annual returns
Finance and tax	Accounting records, bank statements, invoices issued and received, tax records, financial statements
Customers and sales	Workspace requests, customer and workspace details, plan and subscription records, billing records, proof of payment, customer correspondence and support records
Product and platform	Software source code and documentation, product designs, system and security logs, audit trails, service configuration

Subjects on which the Company holds records	Categories of records
Customer operational data held as an operator	Records that customers enter into Poloza for their own businesses (purchases, sales, stock, cash, weighing records, evidence files, participant details). These are the customers' records, held by the Company on their behalf.
Suppliers and service providers	Agreements, operator and data processing agreements, invoices and correspondence
Privacy and information governance	PAIA manual, privacy policy, records of PAIA and POPIA requests and complaints, security compromise records
Marketing and communication	Website content, published materials, Google Business Profile content, records of consent for direct marketing
Intellectual property	Trade marks, brand assets and related records

A record listed here is not automatically available. Access is subject to the procedure in section 10 and the grounds for refusal in PAIA.

8. Processing of personal information

8.1 Purpose of processing personal information

The Company processes personal information to:

1. receive, verify and assess requests for Poloza workspaces, and set up approved workspaces and free trials;
2. provide the Poloza software to customers, including signing in, permissions, support and service emails;
3. bill customers, check payments and keep financial records;
4. keep the platform secure, prevent fraud and abuse (including repeat free trials) and investigate incidents;
5. answer enquiries and complaints and handle PAIA and POPIA requests;
6. process personal information on behalf of customers, on their instructions, when they record it in Poloza;
7. manage relationships with suppliers and service providers;
8. comply with the Company's legal obligations, including company, tax and privacy law; and
9. send information about Poloza to people who have agreed to receive it, or to existing customers about similar services, with a way to opt out every time.

8.2 Categories of data subjects and of the personal information relating to them

Category of data subjects	Personal information that may be processed
People who request a Poloza workspace	Full name, email address, phone number, business name and type, number of branches, the people who will sign in and their roles, answers about weighing, plan choice, email verification records, and a keyed (one-way) hash of the IP address used for rate limiting. The IP address itself is not stored.
Customers and the people they authorise to use Poloza	Name, email address, phone number where given, role, branch, sign-in and authentication records, and a record of the actions each person takes in the app (the audit trail).
Customers' billing contacts	Subscription plan and period, billing records, payment references and proof of payment, which may include bank statement details.
People whose information our customers record in Poloza (for example their suppliers, customers, sellers and drivers)	Whatever the customer chooses to record, which can include names, contact details, identity numbers, vehicle registration numbers, transaction and weighing records, and photos taken as evidence. Poloza processes this as an operator on the customer's behalf (see section 8.6).
People who contact us	Name, contact details and the content of the email, phone call, WhatsApp message or feedback form.
Service providers and suppliers	Company or trading name, contact people, contact details, registration and tax numbers, banking details and contract records.
Directors of the company	Name, identity number, contact details and residential address, as required by the Companies Act and the South African Revenue Service.
Visitors to poloza.app	This website uses no cookies, analytics or advertising trackers. Our hosting provider processes technical information such as IP address and browser type to deliver the site and protect it from attacks.

8.3 Recipients or categories of recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients
Account, workspace and operational data stored in Poloza	Our hosting and infrastructure providers (operators) listed in section 8.4, under written agreements
Names and email addresses needed to send service emails	Our email delivery provider (operator)

Category of personal information	Recipients or categories of recipients
Financial, billing and tax records	South African Revenue Service; the Company's accountants and auditors
Company and director records	Companies and Intellectual Property Commission
Information needed for legal advice or proceedings	The Company's attorneys and advisers; courts and tribunals
Any personal information, where the law requires it	The Information Regulator, the South African Police Service or other authorities, but only when legally required or authorised
A customer's operational data	That customer and the people they authorise; nobody else except as above

The Company does not sell personal information.

8.4 Planned transborder flows of personal information

The Company uses cloud service providers, so personal information is stored and processed outside the Republic:

Service provider	What they do for us	Where the information is processed
Supabase, Inc.	Database, user sign-in (authentication) and private file storage for the Poloza apps	European Union (Ireland)
Cloudflare, Inc.	Hosting and delivery of this website and the Poloza apps, security and bot protection on the workspace request form, and forwarding of email sent to our poloza.app addresses	Global network, including the United States
Resend, Inc.	Sending emails from the Poloza apps, such as invitations, verification codes and documents	United States
Google LLC	The optional feedback form linked from the Poloza app	United States
WhatsApp (Meta Platforms)	Messages you choose to send us on WhatsApp	Outside South Africa

In line with section 72 of POPIA, the Company transfers personal information outside the Republic only where the recipient is bound by law, binding corporate rules or a binding agreement that gives an

adequate level of protection, or where another ground in section 72 applies. The Poloza database is hosted in the European Union, which is subject to the General Data Protection Regulation.

8.5 General description of information security measures

The Company has implemented, and keeps improving, the following measures to protect the confidentiality, integrity and availability of personal information:

- Each customer's records are kept separate from every other customer's at database level, using row-level security that checks the signed-in person's workspace on every request.
- Access within a workspace depends on the person's role (Owner, Branch Manager, Operational Manager, Cashier or Auditor). Sensitive actions such as price overrides need a supervisor's PIN and a reason.
- All connections to this website, the Poloza apps and their services are encrypted in transit (HTTPS/TLS). Our database provider encrypts stored data at rest.
- Evidence photos, documents and proof-of-payment files are kept in private storage, reachable only through short-lived signed links issued to authorised users.
- The public workspace request form is protected by bot detection, per-address and per-email rate limits, and one-time email verification codes.
- Completed transactions cannot be edited; corrections are recorded as separate reversing entries, so there is always a full history.
- Our staff use a separate internal app with its own access controls to set up and support workspaces.
- Passwords, keys and other secrets are kept out of source code and stored in the hosting providers' secret stores.
- New features are tested in a separate test environment with test data, never on live customer data.
- Browser security headers restrict where the apps can load content from and stop them being embedded in other sites.

If the Company has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, it will notify the Regulator and the affected data subjects as required by section 22 of POPIA.

8.6 Personal information processed on behalf of customers

When a customer records information about other people in Poloza (for example its own suppliers, customers, sellers or drivers), the customer is the responsible party for that information and the Company acts as its operator under section 21 of POPIA. The Company processes that information only on the customer's instructions and to provide the service. Requests about that information should be directed to the business concerned; the Company will refer any such request it receives to the relevant customer.

9. Requesting access to a record of the Company

9.1 Who may request access

In terms of section 50 of PAIA, a requester must be given access to a record of a private body if the record is required for the exercise or protection of any rights, the requester complies with the procedural requirements of PAIA, and access is not refused on a ground set out in Chapter 4 of Part 3 of PAIA.

9.2 How to make a request

1. Complete **Form 2** (Request for access to a record) prescribed by the Regulations. The form is available from the Regulator's website or from the Information Officer.
2. Describe the record clearly enough for the Information Officer to identify it, state the form of access you want, and explain which right you want to exercise or protect and why the record is needed for it.
3. Attach proof of your identity. If you are requesting on behalf of someone else, attach proof of your authority to do so.
4. Send the form to the Information Officer by email to privacy@poloza.app, or by post to the postal address in section 3.4.

A person who asks for their own personal information may also use section 23 of POPIA (see the POPIA rights page).

9.3 Fees

The fees are prescribed in Annexure B of the Regulations. For private bodies they currently include:

- a **request fee of R140.00**, payable before the request is processed, except by a personal requester asking for their own personal information;
- access fees for reproduction, for example **R2.00 per A4 page** for a photocopy or printed copy, and the prescribed amounts for copies on a flash drive, compact disc or other media, transcriptions and search and preparation time; and
- a deposit of one third of the access fee where the search and preparation is expected to take more than six hours, and the actual cost of postage or electronic transfer, if any.

The current fee schedule is published on the Regulator's website. The Company is not registered for VAT, so no VAT is added.

9.4 Decision on the request

- The Information Officer will decide on the request within **30 days** of receiving it, and tell you the outcome in writing (section 56 of PAIA).
- The period may be extended once by up to **30 more days** in the circumstances listed in section 57 of PAIA; you will be told why.

- If a record relates to a third party, the Company will notify that third party and give them the opportunity to make representations before deciding (sections 71 to 73 of PAIA).
- If no decision is made within the time allowed, the request is regarded as refused (section 58 of PAIA).

9.5 Grounds for refusal

Access may be refused on the grounds in Chapter 4 of Part 3 of PAIA, including where access would involve the unreasonable disclosure of personal information about a third party (section 63); would disclose a third party's trade secrets or confidential commercial information (sections 64 and 65); could endanger someone's life or safety or the security of property (section 66); concerns records privileged from production in legal proceedings (section 67); would disclose the Company's own trade secrets, confidential commercial information or information whose disclosure could cause it harm, such as source code and security details (section 68); or concerns research information (section 69). Access must be given despite these grounds where section 70 of PAIA requires disclosure in the public interest. Where part of a record may be refused, the rest will be made available (section 59).

9.6 Remedies

The Company has no internal appeal procedure. If you are not satisfied with a decision of the Information Officer (including a refusal, a fee, an extension or the form of access), you may, within 180 days of the decision:

- lodge a complaint with the Regulator using PAIA Form 5, in terms of sections 77A and 77B of PAIA; or
- apply to a court with appropriate jurisdiction in terms of section 78 of PAIA.

The Regulator's contact details are:

Name	Information Regulator (South Africa)
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 (toll-free 0800 017 160)
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

10. Availability of the manual

A copy of this manual is available:

1. on the Company's website at poloza.app/legal/paia/, as a web page and as a PDF;
2. at the head office of the Company, for public inspection during normal business hours, by arrangement with the Information Officer, because the Company does not have a public office;
3. to any person on request, by email free of charge, or as a printed copy at the prescribed fee of R2.00 per A4 page; and
4. to the Regulator on request.

11. Updating of the manual

The head of Poloza Coldvault (Pty) Ltd will update this manual whenever the Company's records, contact details, processing of personal information or service providers change materially, and will review it at least once a year.

Issued by

Lungile Ngidi
Director and Information Officer, Poloza Coldvault (Pty) Ltd
Date of compilation: 20 November 2026
Date of revision: 20 November 2026

Signature: _____