Simple Eternity Holding (Pty) Ltd t/a Business Hustle ("PAIA") Manual

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, Number 2 of 2000("the Act")

Version 1.0 | Approved by Information Officer | Effective 1 January 2026 | Next Review: January 2028

This manual incorporates relevant Protection of Personal Information Act, 2013 principles to support integrated information governance.

HOW TO USE THIS INTEGRATED MANUAL

I.QUICK GUIDE: WHAT TYPE OF REQUEST DO YOU HAVE?

A. FOR PAIA REQUESTS (Company/Non-Personal Information):- You want: Company records, reports, minutes, policies

- Use: **Sections 1-14** + **Form 2**- Process: Formal, may involve fees, 30-day response
- Example: "I want copies of board meeting minutes from 2025"

B. **FOR POPIA REQUESTS** (Your Personal Information):- You want: Your data, to correct it, to delete it

- Use: **Sections 15-22** - Process: Simple, free, reasonable timeframe
- Example: "What personal data do you have about me?"

C. FOR OUR STAFF HANDLING REQUESTS:

1. **Receive request** → Classify as PAIA or POPIA
2. **PAIA**: Follow Sections 1-14, use Form 2, apply fees
3. **POPIA**: Follow Sections 15-22, no fees, privacy-first
4. **Document**: Use our internal tracking system

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1. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

1.1 The Promotion of Access to Information Act 2 of 2000 ("PAIA") was enacted on 3 February 2000, giving effect to section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, 1996, of access to any information held by the state and any information held by another person(s) required for the exercise or protection of any rights.

1.2 Therefore in terms of Section 51 of the Act, all Private Bodies are required to compile an Information Manual ("PAIA Manual").

1.3 Wherein a request is made in terms of the Act, the body to whom the request is made is obligated to release the information, subject to applicable legislative/regulatory requirements, except where the Act provides that the information may or must not be released. The Act therefore sets out the relevant procedure to be adopted when requesting information from a Public or a Private Body.

2. Simple Eternity Holdings (Pty) Ltd t/a Business Hustle

2.1 Business Hustle("www.businesshustle.co.za") is a provider of software development solutions and digital marketing services and is a product of Simple Eternity Holdings (Pty) Ltd, a company registered in accordance with the Companies Act 71 of 2008, managed by the Companies and Intellectual Property Commission (CIPC) in the Republic of South Africa.

2.2 In this PAIA Manual, any reference to "Simple Eternity Holdings" includes any of the products listed below:

2.2.1 Simple Eternity Holdings (Pty) Ltd t/a Business Hustle, registration number 2017/652523/07;

2.2.2 Business Hustle, ("www.businesshustle.co.za")

2.2.3 Hustle Portal, ("www.hustleportal.online")

2.2.4 Business Hustle Local, ("www.app.businesshustle.co.za")

2.2.5 Kloofstreet Online, ("www.kloofstreet.online")

2.2.6 Breestreet Online, ("www.breestreet.online")

2.2.7 Longstreet.online,("www.longstreet.online")
2.2.8 Bo-Kaap Online,("www.bo-kaap.online")
2.2.9 Camps Bay Online,("www.campsbay.online")
2.2.10 Century City Online,("www.centurycity.online
2.2.11 Longmarket Online,("www.longmarket.online")
2.2.12 Maboneng Online,("www.maboneng.online")
2.2.13 Sandton Online,("www.sandton.online")

3. **PURPOSE OF THE PAIA MANUAL**

3.1 This PAIA Manual is intended to ensure that Simple Eternity Holdings (Pty) Ltd complies with the Act to inspire a culture of transparency and accountability within the industry and promote a society wherein South African citizens have access to information to enable them to exercise and protect their rights.
3.2 Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, but not limited to:
3.2.1 Limitations aimed at the reasonable protection of privacy;
3.2.2 Commercial confidentiality; and
3.2.3 Effective, efficient and good governance; and in a manner that balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
3.3 This PAIA Manual complies with the requirements of Section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its Regulations by Public and Private Bodies.

4. **CONTACT DETAILS OF THE CHIEF EXECUTIVE OFFICER (SECTION 51(1)(a))**

Chief Executive Officer:	Mr Tselakgosi Jacob Seatlholo
Registered Address:	99 Kloof Street. Gardens. Cape Town. 8001
Postal Address:	99 Kloof Street. Gardens. Cape Town. 8001

Telephone Number: +27 21 422 5140 (Switchboard)
Website: www.businesshustle.co.za
Email: ceo@businesshustle.co.za

5. THE INFORMATION OFFICER Section 51(1)(b) of PAIA

5.1 The Act herein prescribes the appointment of an Information Officer for Public Bodies where such Information Officer is responsible to, inter alia, assess requests for access to information. The Chief Executive Officer of Simple Eternity Holdings (Pty) Ltd is designated as the Information Officer in terms of PAIA and POPIA.

5.2 The Information Officer(s) appointed in terms of the Act also refers to the Information Officers as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer appointed oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection Information Act 4 of 2013 after registering with the Information Regulator.

5.3 The Information Officer(s) of Simple Eternity Holdings have, as allowed in terms of section 17 of the Act and section 55 and 56 of the Protection of Personal Information Act 4 of 2013 has been appointed as of the 1st of January 2018.

6. DESCRIPTION OF GUIDE

6.1 Simple Eternity Holdings has compiled the Guide as required in terms of Section 10 of the Act. This Guide contains information as may be required within reason by a person who wishes to exercise any right as considered in the Act and accordingly it:

6.1.1 Contains information on understanding and how to use the Act;

6.1.2 Includes; The objective of the Act;

6.1.3 Will be updated and published every two years.

6.2 The Guide is available for inspection, inter alia, at the offices of Simple Eternity Holdings, at the physical address mentioned herein, and at the South African Human Rights Commission

7. ACTS AND OTHER LEGISLATION HELD AT PHYSICAL ADDRESS BY SIMPLE ETERNITY HOLDINGS

7.1 Basic Conditions of Employment 75 of 1997
7.2 Arbitration Act 42 of 1965
7.3 Companies Act 71 of 2008
7.4 Close Corporation Act 69 of 1984
7.5 Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
7.6 Consumer Protection Act 68 of 2008
7.7 Currency and Exchanges Act 9 of 1933
7.8 Copyright Act 98 of 1978
7.9 Electronic Communications and Transactions Act 25 of 2002
7.10 Debtor Collectors Act 114 of 1998
7.11 Employment Equity Act 55 of 1998
7.12 Financial Intelligence Centre Act 38 of 2001
7.13 Finance Act 35 of 2000
7.14 Financial Relations Act 65 of 1976
7.15 Harmful Business Practices Act 23 of 1999
7.16 Financial Advisory and Intermediary Services Act 37 of 2002
7.17 Financial Services Board Act 97 of 1990
7.18 Income Tax Act 95 of 1967
7.19 Intellectual Property Laws Amendment Act 38 of 1997
7.20 Insolvency Act 24 of 1936
7.21 Inspection of Financial Institution Act 80 of 1998
7.22 Labour Relations Act 66 of 1995
7.23 Occupational Health and Safety Act 85 of 1993
7.24 Protection of Business Act 99 of 1978
7.25 Promotion of Access to Information Act 2 of 2000
7.26 Skills Development Act 97 of 1998
7.27 Skills Development Levies Act 9 of 1999
7.28 SA Reserve Bank Act 90 of 1989
7.29 Tax on Retirement Fund Act 38 of 1996
7.30 Trade Marks Act 194 of 1993
7.31 Value Added Tax Act 89 of 1991

7.32 Unemployment Contributions Act 4 of 2002

7.33 Unemployment Insurance Act 63 of 2001

8. **SUBJECTS AND CATEGORIES OF RECORDS HELD AT PHYSICAL ADDRESS BY SIMPLE ETERNITY HOLDING**

8.1 Correspondences

8.2 Founding Documents

8.3 Meeting Attendance Registers

8.4 Minutes of Management Meetings

8.5 Minutes of Staff Meetings

8.6 Conditions of Service

8.7 Employee Records

8.8 Shareholder Register

8.9 Employment Contracts

8.10 General Correspondeses

8.11 Personnel Guidelines, Policies and Procedures

8.12 Remuneration Records and Policies

8.13 Skills Requirements

8.14 Training Records

8.15 Information relating to Health and Safety Regulation

8.16 Contracts

8.17 Information relating to Employee Sales Performance

8.18 Sales Records

8.19 Marketing and Future Strategies

8.20 Banking Records

8.21 Asset Register

8.22 Purchase and Order Information

8.23 Stock Records

8.24 IT Policies and Procedures

8.25 Network architecture diagrams (where applicable)

8.26 Internal Audit Records

8.27 Management Accounts

8.28 Client Information

8.29 User Manuals

9. **SUBJECTS AND CATEGORIES OF PERSONAL RECORDS HELD AT PHYSICAL ADDRESS BY SIMPLE ETERNITY HOLDINGS**

9.1 Identity Numbers

9.2 Date of birth

9.3 FICA Docs

9.4 Telephone numbers

9.5 Email addresses

9.6 Addresses

9.7 Banking details

9.8 License numbers

9.9 Registration numbers

9.10 BEE Certificates

9.11 Tender documents

9.12 Invoices

10. **IT PRACTICES BY SIMPLE ETERNITY HOLDINGS**

10.1 Password controls

10.2 Network security controls

10.3 Physical security

10.4 Software updates

10.5 Disaster Recovery and back-up policy

10.6 Virus and Malware protection

11. **EMPLOYEE INFORMATION RECEIVED BY SIMPLE ETERNITY HOLDINGS**

11. 1 Credit bureaux

11.2 Physical Address

11.3 Cellphone Number

11.4 Identity Number

11.5 Passport Number(If Applicable)

11.6 Social Media Profile

12. **INFORMATION RECEIVED AS SIMPLE ETERNITY HOLDINGS**

12.1 Records held by third parties

12.2 Product records

12.3 Internal Policies and Procedures

12.4 Marketing records

13. REQUEST PROCEDURE IN TERMS OF SECTION 51 (e)

13.1 Procedural Requirements

13.1.1 All procedural requirements contained in the Act relating to the request for access to a record must be complied with by the requestor.

13.1.2 The requestor must complete the prescribed form enclosed herein and submit together with a request fee, to the appointed information officer.

13.1.3 The prescribed form must be filled in with sufficient information to;

13.1.3.1 Provide sufficient information to enable the information officer to identify the record(s) requested and to identify the requester.

13.1.3.2 Specify the correct requester seeking to exercise or protect their rights.

13.1.3.3 Submit an explanation of why the requested information is required for the protection of such right.

13.1.3.4 If the request is made on behalf of another person, to submit proof of capacity in which the requestor is making the request, to the reasonable satisfaction of the information officer(s) or appointed bodies.

13.1.4 Simple Eternity Holdings will process the request within 30 (thirty) days, unless the requestor has stated special reasons to the satisfaction of the Information Officer that, indeed the above time periods not to be complied with.

13.1.5 The requestor shall be advised in writing whether access is granted or denied. If, in addition, the requestor requires the reasons for the decision taken in any other manner, the requestor shall be obliged to state the manner and particulars required.

13.1.6 If an individual is unable to complete the prescribed due to illiteracy or disability, such a person may make the request orally.

14. REFUSAL OF ACCESS TO RECORDS

14.1 Grounds to Refuse Access to Information

14.1.1 As per the Act, a private body such as Simple Eternity Holdings is entitled to refuse access to information.

14.1.2 The main grounds for Simple Eternity Holdings to refuse a request for information relates to;

14.1.2.1 Mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic, as included in the Protection of Personal Information Act 4 of 2013.

14.1.2.2 Mandatory protection of the commercial information of a third party (section 64), if any of the record contains:

14.1.2.3 Financial, commercial, scientific, technical or classified information which disclosure could possibly cause harm to the commercial/financial interests of the third party;

14.1.2.4 Trade secrets of the third party;

14.1.2.5 Information disclosed in confidence by a third party to Simple Eternity Holdings

14.1.2.6 A software computer program owned by Simple Eternity Holdings, and which is protected by copyright;

14.1.2.7 Research information (section 69) of Simple Eternity Holdings or a third party, if such disclosure would disclose the identity of Simple Eternity Holdings Personnel

14.1.2.8 All requests will be assessed individually with respect to its own merits in accordance with the applicable legal principles and legislation.

14.1.2.9 If a requested record cannot be found or if the record does not exist, the Information Officer shall inform the requestor that it is not possible to give access to the requested record in the form of an affidavit or affirmation. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act. If the record is later found, the requestor will receive access to the record in the manner stipulated by the requestor in the prescribed form. Unless access is still not granted by the Information Officer and therefore access will be subsequently refused.

15. **THE SIX LEGAL BASES FOR PROCESSING**

15.1. Consent - Must be: Freely given, Specific, Informed, Unambiguous

15.1.1 Contractual Necessity- Processing necessary to fulfil a contract

15.1.2 Legal Obligation - Required by South African or applicable law

15.1.3 Vital Interests - To protect someone's life

15.1.4 Public Task - In the public interest/official authority

15.1.5 Legitimate Interest - Requires documented Legitimate Interests Assessment (LIA)

15.2 All processing activities must be mapped to a specific legal basis in this manual

16. **SPECIAL CATEGORY DATA PROCESSING**

16.1 Processing of special personal information (health, biometrics, religion, etc.,) is strictly prohibited unless:

16.1.1 Explicit consent obtained

16.1.2 Necessary for employment law obligations

16.1.3 Legitimate activities of foundations/associations

16.1.4 Data manifestly made public by the data subject

16.1.5 Legal claims establishment/exercise/defence

17. **DATA SUBJECT RIGHTS PROCEDURE**

17.1.1 The Eight Fundamental Rights

17.1.2 Right to be informed

17.1.3 Right of Access

17.1.4 Right to Deletion or Destruction of Personal Information

17.1.5 Right to Restrict Processing

17.1.6 Right to Data Portability

17.1.7 Right to Object

17.1.8 Rights related to Automated Decision

18. **REQUEST HANDLING PROCESS FLOW**

18.1.1 Screening - Does a Data Protection Impact Assessment(DPIA) need to be conducted?

18.1.2 Consultation - Internal and external stakeholders

18.1.3 Assessment - Necessity and proportionality

18.1.4 Mitigation - Identify and reduce risks

18.1.5 Sign off - Information Officer approval

18.1.6 Reviews - Periodic reviews while processing continues

19. **INTERNATIONAL DATA TRANSFER**

19.1 Transfer Mechanism Decision Tree

TRANSFER REQUIRED ➡ IS DESTINATION "ADEQUATE"? | → YES → PROCEED

⬇ If No

ACCESS DENIED

International transfers of information/data will only occur where the recipient is subject to laws, binding corporate rules, or contractual safeguards that provide an adequate level of protection as required under section 72 of POPIA.

20. **DATA BREACH RESPONSE PROTOCOL**

20.1.1 Immediate Actions (First 24 Hours)

20.1.1.1 Containment → Isolate affected systems → Preserve forensic evidence → change credentials if compromised

20.1.1.2 Assessment → Determine scope and data subjects affected → Assess risk level using breach severity matrix → Document all findings

20.1.1.3 Notification Decision

20.1.1.3.1 High Risk → Notify Regulator within 72 Hours

20.1.1.3.2 Medium Risk → Document Internally → Notify regulator if required by law

20.1.1.3.3 Low Risk → Internal documentation only

21. **ANNUAL COMPLIANCE CALENDAR**

21. 1 Annual Compliance Calendar

21.1.1 **Q1**: Annual Privacy Training Refresh

21.1.2 **Q2**: Third-Party Vendor Reviews

21.1.3 **Q3**: Policy Framework Review

21.1.4 **Q4**: Internal Audit & Board Reporting

22. **DIGITAL COMPLIANCE**

22.1 Cookie Consent Management

22.1.1 Compliant cookie banner has been implemented

22.1.2 Cookie preference center available

22.1.3 Regular cookie audits conducted

22.1.4 Vendor management for tracking technologies

22.2 **DIRECT MARKETING RULES**

22.2.1 Existing Customers: Soft opt-in allowed

22.2.2 New Prospect: Explicit consent required

22.2.3 One chance consent request before marketing

23. REFERENCE TO PAIA FORM 2

23.1 Prescribed Request Form (Form 2)

23.1.1 Section 13 of this Guide requests for access to records held by Simple Eternity Holdings (Pty) Ltd t/a Business Hustle must be made on the prescribed PAIA Form 2, as set out in the Regulations to the Promotion of Access to Information Act, 2000.

23.1.2 The prescribed Form 2 is available from:

23.1.2.1 The office of the Information Officer;

23.1.2.2 The website of the Information Regulator; or

23.1.2.3 Upon written request to the Information Officer.

23.1.3 All requests submitted must be sufficiently detailed to enable the Information Officer to identify:

23.1.3.1 The record requested;

23.1.3.2 The identity of the requester; and

23.1.3.3 The right the requester seeks to exercise or protect.

24. REQUEST FEES & DEPOSITS

24.1 Request Fees and Deposits

A requester seeking access to records held by Simple Eternity Holdings (Pty) Ltd t/a Business Hustle may be required to pay a request fee, as prescribed by the regulations to the Promotion of Access to Information Act, 2000.

24.1.2 The Information Officer may require the requester to pay a deposit where:

24.1.3 The search for the record is expected to exceed the time prescribed by regulation; or

24.1.4 The preparation of the record will involve significant reproduction or compilation costs.

24.1.5 The requester will be notified in writing of:

24.1.5.1 The amount of the request fee and/or deposit payable;

24.1.5.2 The basis on which the fee or deposit has been calculated; and

24.1.5.3 The requirement that payment be made prior to further processing of the request.

24.1.5.4 Access to the requested record will be granted only once all applicable fees have been paid in full.

24.1.5.5 The prescribed fees are determined in accordance with the regulations issued under PAIA and may be amended from time to time.

EXEMPLAR PAIA FORM 2

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53 of the Promotion of Access to Information Act, 2000)

A. PARTICULARS OF PRIVATE BODY

A. Name of Private Body:

Simple Eternity Holdings (Pty) Ltd t/a Business Hustle

B. **Information Officer:**

The Information Officer

C. Email Address:

team@businesshustle.co.za

D. **PARTICULARS OF REQUESTER**

Full Name and Surname:.....

Identity Number / Registration Number:.....

Postal Address:.....

Telephone Number:.....

Email Address:.....

E. **PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE**

(Complete only if applicable)

Full Name and Surname:.....

Relationship to Requester:.....

Proof of Capacity Attached:

□ Yes □ No

EXEMPLAR PAIA FORM 2

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53 of the Promotion of Access to Information Act, 2000)

F. PARTICULARS OF RECORD REQUESTED

Description of Record:.....

.....

.....

.....

Reference Number (if known):.....

Preferred Form of Access:

□ Inspection

□ Copy (electronic)

□ Copy (hard copy)

G. **GROUNDS FOR REQUEST**

Please state the right you seek to exercise or protect and explain why the requested record is required for the exercise or protection of that right:

.....

.....

.....

H. **NOTIFICATION OF DECISION**

Preferred Method of Communication:

□ Email □ Post □ Telephone

I. **SIGNATURE**

Signature of Requester:.....

Date:...../...../.....

This PAIA Manual and the prescribed request form are available on the Business Hustle website or upon request from the Information Officer.