

PAIA Manual

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1. Definitions, Acronyms and Abbreviations

For purposes of this Manual, unless the context indicates otherwise, the following terms apply.

Term	Meaning
Access request	A request for access to a record made in terms of PAIA.
CEO	Chief Executive Officer.
COO	Chief Operating Officer.
Data subject	The person to whom personal information relates.
Deputy Information Officer / DIO	A person designated to assist the Information Officer with duties under PAIA and POPIA.
Head of Private Body	The person who is responsible for a private body for purposes of PAIA. In the case of a company, this is usually the Chief Executive Officer or equivalent head of the company.
Information Officer / IO	The person responsible for ensuring compliance with PAIA and POPIA obligations. For Boxfusion, this role is held by Xolile Ndlangana – CEO.
Manual	This PAIA Manual prepared in terms of section 51 of PAIA.
Operator	A person or organisation that processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.
PAIA	Promotion of Access to Information Act, 2 of 2000, as amended.
PAIA Guide	The Guide on how to use PAIA, made available by the Information Regulator.
Personal information	Information relating to an identifiable, living natural person, and where applicable an identifiable juristic person, as defined in POPIA.
POPIA	Protection of Personal Information Act, 4 of 2013.
Private body	A natural person, partnership, company or juristic person carrying on trade, business or profession.
Processing	Any operation or activity concerning personal information, including collecting, receiving, recording, storing, updating, using, sharing, distributing, deleting or destroying information.
Record	Any recorded information, regardless of form or medium, in the possession or under the control of Boxfusion.
Requester	Any person, including a public body or official, making a request for access to a record in terms of PAIA.
Responsible party	The person or organisation that determines the purpose of and means for processing personal information.
Regulator	The Information Regulator established in terms of POPIA.
Special personal information	Sensitive categories of personal information as recognised under POPIA, including information relating to health, biometric information, children’s information, criminal behaviour, religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion or sex life.
Third party	Any person or organisation other than the requester or Boxfusion.

2. Purpose of this PAIA Manual

The purpose of this Manual is to assist members of the public, clients, employees, suppliers, regulators and other requesters to understand how to request access to records held by Boxfusion in terms of PAIA.

This Manual provides information about:

- the contact details of Boxfusion’s Information Officer and Deputy Information Officer(s);
- how to access the PAIA Guide issued by the Information Regulator;
- the categories of records held by Boxfusion;
- records that may be available without a formal PAIA request;
- records that may be available in accordance with other South African legislation;
- the process to request access to records;
- the types of personal information processed by Boxfusion;
- the categories of data subjects whose personal information may be processed;
- the categories of recipients to whom personal information may be supplied;
- possible cross-border flows of personal information;
- the general information security measures used by Boxfusion;
- the grounds on which access to records may be refused; and
- the remedies available to requesters.

Boxfusion is a software and technology company that provides systems and related services to government and other clients. As part of its business, Boxfusion may hold company records, employee records, supplier records, client records, software system records, project records, support records and certain records relating to software systems used by or on behalf of government clients.

Some records may include personal information, citizen information, government employee information, employee information, children’s information, system logs, support tickets, screenshots, reports, exports, contracts, tenders or confidential client information. For this reason, Boxfusion assesses all requests carefully before any record is released.

3. Key Contact Details for Access to Information

The contact details below must be used for PAIA requests, POPIA-related requests and access-to-information queries.

3.1 Information Officer

Item	Detail
Information Officer / Head of Private Body	Xolile Ndlangana
Role / designation	CEO
Email address	Privacy@boxfusion.io

Telephone number	012 940 1300
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3.2 Deputy Information Officer(s)

Area	Deputy Information Officer	Contact details
HR / Operations	Elizma Els – COO/ Head of HR	Privacy@boxfusion.io

3.3 General PAIA Contact Details

Item	Detail
PAIA request email	Privacy@boxfusion.io
POPIA / privacy email	Privacy@boxfusion.io
General contact email	Info@boxfusion.io
Physical address	International Business Gateway, New Rd, Midridge Park, Midrand, 1685
Telephone number	012 940 1300
Website	https://boxfusion.io/

All PAIA requests should be sent to the PAIA request email address so that they can be logged, assessed, assigned and responded to through the correct process. Employees, clients, suppliers or third parties should not send PAIA requests to individual employees unless specifically instructed to do so.

4. Guide on how to use PAIA

The Information Regulator has made available a Guide on how to use PAIA. The Guide is intended to assist any person who wishes to exercise a right under PAIA or POPIA.

The Guide includes information about:

- the purpose of PAIA and POPIA;
- how to make a request for access to a record;
- the assistance available from Information Officers;
- the remedies available if access to information is refused;
- the forms that must be used;
- the fees that may be payable;
- how to contact the Information Regulator; and
- how to lodge a complaint.

The Guide may be obtained from the Information Regulator or accessed through the Information Regulator's website.

Information Regulator website: <https://infoeregulator.org.za/>

PAIA Guide link: https://infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

PAIA forms link: <https://infoeregulator.org.za/paia-forms/>

A copy of the Guide may also be requested from Boxfusion's Information Officer using the contact details provided in this Manual, during office hours.

5. Categories of Records Automatically Available

Certain records may be available without a formal PAIA request. These records may be available on Boxfusion's website, from public sources, or upon request from Boxfusion.

The availability of a record listed below does not mean that all information within that record will automatically be disclosed. Boxfusion may still need to assess whether the record contains personal information, confidential information, client information, security-sensitive information, third-party information or information that may be refused in terms of PAIA or protected in terms of POPIA.

Category of record	Available on website	Available upon request	Notes
Company profile	Yes	Yes	Public company overview and service offering
Public product brochures	Yes	Yes	Only approved public-facing material
Public service descriptions	Yes	Yes	Only non-confidential descriptions
PAIA Manual	Yes	Yes	Latest approved version
Privacy Policy	Yes	Yes	Latest approved version
Website Terms of Use	Yes	Yes	Latest approved version
Public contact details	Yes	Yes	General contact channels only
B-BBEE certificate / affidavit	No	Yes	May be shared for supplier or tender purposes
CSD supplier number / confirmation	No	Yes, where required	Usually shared for government supplier verification
SARS Tax Compliance Status PIN	No	Yes, where required	Shared where required for tenders or onboarding
General company registration information	No / Public source	Yes, where appropriate	Subject to company approval
Public vacancies	Yes	Yes	Where vacancies are advertised
Approved press releases or public announcements	Yes	Yes	Only approved public communications
Public training or marketing material	Yes / Where published	Yes	Only approved public versions

Records not listed above may require a formal PAIA request.

Boxfusion will not disclose internal records, client records, employee records, citizen information, children's information, system information, security records, contracts, tenders, pricing, support tickets, project records or confidential information without proper assessment.

6. Records available in accordance with other Legislation

Boxfusion may keep certain records in accordance with South African legislation and regulatory requirements. Access to these records may be subject to the relevant legislation, PAIA, POPIA, confidentiality obligations, contractual restrictions and applicable grounds for refusal.

The table below provides examples of records that may be maintained by Boxfusion in accordance with other legislation.

Legislation / legal area	Examples of records that may be held
Companies Act, 71 of 2008	Company registration documents, Memorandum of Incorporation, statutory registers, director records, shareholder records, beneficial ownership records, board and shareholder resolutions, annual returns, annual financial statements
Companies Regulations	Public Interest Score calculations, financial accountability records, audit or independent review records where applicable
Income Tax Act	Income tax records, tax calculations, tax returns, supporting financial records
Tax Administration Act	Tax submissions, assessments, SARS correspondence, tax compliance records, supporting tax documents
Value-Added Tax Act	VAT registration records, VAT returns, VAT reconciliations, tax invoices, credit notes, input and output VAT records
Skills Development Levies Act	SDL registration, payroll levy records, EMP201 submissions, skills levy records
Unemployment Insurance legislation	UIF registration, UIF declarations, contribution records, employee UIF information
Basic Conditions of Employment Act	Employment contracts, payslips, leave records, attendance records, working-time records, certificates of service
Labour Relations Act	Disciplinary records, grievance records, performance records, retrenchment records, employment relations documents
Employment Equity Act	EEA1 declarations, workforce profile, Employment Equity Plan, EEA2 reports, EEA4 reports, consultation records, income differential records
Skills Development Act	Workplace Skills Plan, Annual Training Report, training records, SETA submissions, learner records
Broad-Based Black Economic	B-BBEE certificate or affidavit, verification records, ownership records, management control records, skills

Empowerment Act and Codes	development evidence, enterprise and supplier development records, preferential procurement records
Protection of Personal Information Act	Privacy notices, processing registers, data subject request records, consent records where applicable, breach records, operator agreements, data protection impact assessments, access control evidence
Promotion of Access to Information Act	PAIA Manual, PAIA request register, PAIA request forms, response records, annual PAIA reporting evidence
Electronic Communications and Transactions Act	Website terms, electronic communications records, online transaction records where applicable
Cybercrimes Act	Cyber incident records, security incident reports, investigation records, evidence-preservation records where applicable
Consumer Protection Act	Customer complaints, service descriptions, marketing records, refund/cancellation records where applicable
Competition Act	Competition law compliance records, competitor interaction records, merger assessment records where applicable
Prevention and Combating of Corrupt Activities Act	Anti-corruption records, gifts and hospitality register, conflict of interest declarations, investigation records
Protected Disclosures Act	Whistleblowing records, protected disclosure reports, investigation records, anti-victimisation records
Public procurement and tender requirements	Government tender submissions, SBD/MBD forms, CSD records, TCS PIN evidence, B-BBEE documents, bid declarations, pricing schedules, technical proposals, contract award records
Contract law	Client contracts, master services agreements, statements of work, service level agreements, addendums, variation orders, renewal records
Other applicable laws and regulations	Any other records required by law, contract, regulator, court order, client obligation or internal governance requirement

This list is not exhaustive. Boxfusion may maintain additional records depending on the nature of its operations, client contracts, products, systems, employees, suppliers and legal obligations. Access to any record remains subject to PAIA, POPIA and any applicable legal or contractual restrictions.

7. Subjects and Categories of Records Held by Boxfusion

Boxfusion may hold records across different business areas. The categories below are provided to help requesters understand the types of records that may exist. The inclusion of a category in this Manual does not mean that access to those records will automatically be granted. Each request will be assessed in accordance with PAIA, POPIA, confidentiality obligations, client obligations and applicable grounds for refusal.

7.1 Company and Governance Records

Boxfusion may hold records relating to company governance and administration, including:

- company registration documents;
- Memorandum of Incorporation;
- CIPC records;
- beneficial ownership records;
- shareholder records;
- director records;
- board and shareholder resolutions;
- EXCO or MANCO records;
- delegation of authority records;
- company policies;
- governance frameworks;
- risk registers;
- compliance registers;
- statutory registers;
- annual returns;
- audit and assurance records;
- legal and regulatory correspondence.

7.2 Finance, Tax and Accounting Records

Boxfusion may hold financial and accounting records, including:

- annual financial statements;
- management accounts;
- invoices;
- credit notes;
- supplier invoices;
- purchase orders;
- payment records;
- bank records;
- tax returns;
- VAT records;
- PAYE, UIF and SDL records;
- SARS correspondence;
- tax compliance records;
- payroll-related financial records;
- budget records;
- financial approvals;
- procurement records;
- expense and reimbursement records.

7.3 Human Resources and Employee Records

Boxfusion may hold HR and employee records, including:

- employee contracts;
- job descriptions;
- employee personal details;
- employee ID and tax records;
- payroll information;
- bank details;
- leave records;
- attendance records;
- performance records;
- training records;
- disciplinary records;
- grievance records;
- recruitment records;
- CVs;
- interview notes;
- reference checks;
- onboarding records;
- offboarding records;
- medical certificates;
- medical aid and retirement documentation;
- beneficiary and dependant information;
- Employment Equity records;
- employee survey records;
- exit interview records;
- HR policies and procedures.

Some HR records may contain personal information, special personal information, financial information, medical information, children's or dependant information, or confidential employment information.

7.4 Sales, Tender and Client Contract Records

Boxfusion may hold sales, tender and contract records, including:

- client contracts;
- master services agreements;
- service level agreements;
- statements of work;
- work orders;
- addendums;
- variation orders;
- renewal records;
- tender submissions;
- bid packs;
- SBD and MBD forms;

- pricing schedules;
- technical proposals;
- B-BBEE evidence;
- CSD records;
- SARS Tax Compliance Status records;
- client onboarding records;
- client correspondence;
- contract registers;
- records of client approvals;
- confidentiality agreements;
- data protection clauses;
- POPIA operator clauses;
- audit rights clauses;
- breach notification clauses.

Certain sales and tender records may contain confidential commercial information, pricing information, client information or government procurement records.

7.5 Marketing and Communications Records

Boxfusion may hold marketing and communications records, including:

- company profiles;
- product brochures;
- service descriptions;
- website content;
- website terms;
- privacy notices;
- marketing campaigns;
- communication plans;
- campaign approval records;
- mailing lists;
- consent records;
- opt-out and unsubscribe records;
- event records;
- webinar records;
- public announcements;
- brand material;
- social media content;
- public relations records.

Marketing records may include personal information such as contact details, communication preferences, event attendance and consent records.

7.6 Product and Software Module Records

Boxfusion may hold product and software records, including:

- product roadmaps;
- product specifications;
- module descriptions;
- module data registers;
- user role matrices;
- permission models;
- user stories;
- product requirements;
- feature specifications;
- export and reporting specifications;
- audit log specifications;
- retention and deletion requirements;
- product release notes;
- product risk records;
- privacy-by-design assessments;
- product compliance records.

For government-facing systems, product records may indicate whether a module processes citizen information, government employee information, children's information, special personal information, system logs, reports or exports.

7.7 Business Analysis Records

Boxfusion may hold business analysis records, including:

- business requirement specifications;
- functional specifications;
- process maps;
- workflow diagrams;
- data flow diagrams;
- stakeholder requirements;
- client-approved requirements;
- use cases;
- acceptance criteria;
- report requirements;
- integration requirements;
- access requirements;
- data field lists;
- data ownership notes;
- gap analysis documents;
- decision logs.

These records may include references to client processes, government processes, data categories, user roles and system functionality.

7.8 Software Engineering, Architecture and Technical Records

Boxfusion may hold technical records, including:

- system architecture documents;
- infrastructure diagrams;
- API documentation;
- integration records;
- database design documents;
- source code repositories;
- release records;
- change records;
- deployment records;
- environment configuration records;
- authentication and access control records;
- encryption records;
- audit log records;
- error logs;
- vulnerability records;
- penetration testing records;
- incident records;
- backup and disaster recovery records;
- technical support records.

Some technical records may be security-sensitive and may not be disclosed if disclosure could compromise system security, client confidentiality, personal information, government systems or company operations.

7.9 Data and AI Records

Boxfusion may hold data and AI-related records, including:

- dataset inventories;
- data source records;
- analytics records;
- dashboards;
- reports;
- data models;
- AI use case records;
- model output records;
- data approval records;
- data anonymisation or masking records;
- data quality records;
- data access records;
- data retention records;
- data processing assessments;
- data sharing records.

Data and AI records may include aggregated, anonymised, pseudonymised or identifiable data. Where such records include personal information, client data, citizen information, children's information or special personal information, access will be assessed carefully.

7.10 Testing and Quality Assurance Records

Boxfusion may hold testing and quality assurance records, including:

- test strategies;
- test plans;
- test cases;
- test results;
- UAT records;
- client sign-offs;
- defect records;
- screenshots;
- test data records;
- test environment records;
- masking or anonymisation records;
- regression test records;
- security and privacy test cases;
- quality assurance reports.

Testing records may contain screenshots, logs, user data, client data or system information and may require redaction or restriction before disclosure.

7.11 Delivery, Implementation and Project Records

Boxfusion may hold delivery and project records, including:

- project plans;
- implementation plans;
- migration plans;
- data migration records;
- data import and export records;
- go-live checklists;
- client sign-offs;
- acceptance records;
- status reports;
- project risk registers;
- issue logs;
- decision logs;
- meeting minutes;
- steering committee packs;
- handover documents;
- support transition records;
- implementation configuration records;

- training handover records.

Project records may contain client information, government records, citizen information, system data, decisions, risks or confidential client instructions.

7.12 Training Records

Boxfusion may hold training records, including:

- training material;
- training schedules;
- attendance registers;
- training recordings where applicable;
- training feedback;
- training environment information;
- demo data records;
- client training records;
- employee training records;
- compliance training records;
- system training guides.

Training records may include employee information, client information, user details or screenshots. Live personal or client data should not be used in training unless authorised and controlled.

7.13 Customer Service and Support Records

Boxfusion may hold customer service and support records, including:

- support tickets;
- client requests;
- user queries;
- screenshots;
- attachments;
- support logs;
- incident escalations;
- access requests;
- support communication;
- call notes;
- resolution records;
- SLA records;
- root cause analysis records;
- client feedback;
- service reports.

Support records may contain personal information, citizen information, government employee information, children's information, client data, screenshots, logs or confidential system information.

7.14 Government Client and Citizen-Related Records

Where Boxfusion provides software systems or services to government clients, certain records may relate to government client systems or data.

These may include:

- government client contracts;
- government project records;
- government system configuration records;
- government user records;
- system role and access records;
- government employee user records;
- citizen records within client systems;
- children's information where applicable;
- case, application, service request or engagement records;
- audit logs;
- system reports;
- exports;
- support records;
- implementation and migration records.

In many cases, government client records and citizen records may be owned or controlled by the relevant government client. Boxfusion may act as an operator or service provider. Requests for such records may need to be referred to, or assessed with, the relevant government client before any disclosure is made.

7.15 Security and Incident Records

Boxfusion may hold security and incident records, including:

- security policies;
- access control records;
- privileged access records;
- access review records;
- incident reports;
- breach records;
- vulnerability reports;
- penetration testing reports;
- audit logs;
- monitoring records;
- backup records;
- disaster recovery records;
- endpoint security records;
- security awareness records;
- cyber incident response records.

Security records may be restricted where disclosure could expose vulnerabilities, compromise systems, reveal confidential safeguards or increase risk to Boxfusion, clients, government systems or data subjects.

7.16 Compliance, Legal and Risk Records

Boxfusion may hold compliance, legal and risk records, including:

- POPIA policy records;
- PAIA records;
- PAIA request register;
- PAIA annual report evidence;
- data subject request records;
- privacy notices;
- breach notification records;
- legal opinions;
- contract review records;
- risk registers;
- compliance dashboards;
- audit records;
- internal investigation records;
- whistleblowing records;
- conflict of interest declarations;
- gifts and hospitality records;
- regulatory correspondence.

Some legal and compliance records may be privileged, confidential or restricted from disclosure.

8. Processing of Personal Information in terms of POPIA

Boxfusion processes personal information in the ordinary course of its business operations and in the delivery of software systems, technology services, implementation services, support services and related professional services. Boxfusion processes personal information only where there is a lawful basis to do so, and only for specific, legitimate and necessary business, contractual, operational, legal or compliance purposes.

Personal information may be processed for the purposes listed below.

8.1 Purposes for Processing Personal Information

Boxfusion may process personal information for the following purposes:

8.1.1 Employment and HR Administration

Boxfusion processes employee, candidate and contractor information for:

- recruitment and selection;
- interview scheduling;
- reference checks;
- employment contracting;
- onboarding;

- payroll administration;
- tax administration;
- employee benefits administration;
- medical aid and retirement fund administration;
- leave management;
- performance management;
- training and development;
- disciplinary and grievance processes;
- employee engagement surveys;
- exit interviews;
- employment equity reporting;
- skills development reporting;
- offboarding;
- legal and labour compliance.

8.1.2 Client Relationship and Contract Management

Boxfusion processes client and client-contact information for:

- sales engagements;
- proposal and tender submissions;
- contract negotiation;
- service delivery;
- account management;
- client communication;
- project delivery;
- invoicing and billing;
- service level management;
- client reporting;
- contract renewals;
- client support;
- compliance with contractual obligations.

8.1.3 Government Client Software Services

Boxfusion provides software systems and related services to government and other clients. In this context, Boxfusion may process or have access to personal information contained in client systems.

This may include:

- government employee user information;
- citizen information;
- children's information in certain systems;
- system user information;
- service request information;
- application records;
- case or workflow records;

- audit logs;
- reports;
- exports;
- support tickets;
- migration records;
- configuration records.

In many cases, Boxfusion processes this information on behalf of the relevant government client and in accordance with the applicable contract, statement of work, service level agreement, data processing arrangement or client instruction.

8.1.4 Software Development, Implementation and Support

Boxfusion may process personal information for:

- business analysis;
- requirements gathering;
- software design;
- configuration;
- system implementation;
- data migration;
- data import and export;
- testing;
- user acceptance testing;
- training;
- go-live support;
- helpdesk and customer support;
- troubleshooting;
- incident management;
- maintenance;
- change management;
- system administration;
- audit logging;
- reporting.

Where possible, Boxfusion aims to use demo, synthetic, masked or anonymised data for testing, training and development activities.

8.1.5 System Access, Security and Monitoring

Boxfusion may process personal information for information security and system administration purposes, including:

- user account creation;
- identity and access management;
- role-based access control;
- authentication;

- multi-factor authentication;
- audit logging;
- access monitoring;
- privileged access control;
- cyber incident response;
- vulnerability management;
- backup and recovery;
- system availability;
- fraud prevention;
- investigation of unauthorised access or misuse.

8.1.6 Finance, Procurement and Supplier Management

Boxfusion may process supplier, vendor and finance-related personal information for:

- supplier onboarding;
- vendor due diligence;
- procurement;
- purchase orders;
- invoicing;
- payments;
- bank verification;
- tax compliance;
- audit purposes;
- contract management;
- B-BBEE and supplier reporting;
- legal and regulatory compliance.

8.1.7 Marketing and Communications

Boxfusion may process personal information for:

- responding to enquiries;
- managing website contact forms;
- managing client communications;
- sending approved communications;
- event or webinar administration;
- maintaining marketing contact records;
- managing consent and opt-outs;
- publishing approved public communications;
- managing website analytics and communication preferences.

Direct marketing will be managed in accordance with applicable consent, opt-out and lawful communication requirements.

8.1.8 Legal, Compliance and Risk Management

Boxfusion may process personal information for:

- POPIA compliance;
- PAIA compliance;
- data subject request handling;
- PAIA request handling;
- breach and incident response;
- regulatory reporting;
- litigation and dispute management;
- legal advice;
- internal investigations;
- audit and assurance;
- risk management;
- whistleblowing and protected disclosures;
- anti-corruption controls;
- conflict of interest management;
- governance reporting.

9. Categories of Data Subjects and Personal Information Processed

Boxfusion may process personal information relating to the categories of data subjects listed below. The specific personal information processed will depend on the relationship with the data subject, the relevant system, contract, business process, legal requirement or client instruction.

9.1 Employees

Boxfusion may process employee information, including:

- name and surname;
- ID number or passport number;
- contact details;
- residential address;
- work email address;
- personal email address;
- cellphone number;
- emergency contact details;
- employment contract details;
- job title;
- department;
- reporting line;
- employee number;
- tax number;
- bank details;
- salary and payroll information;
- leave records;
- attendance records;

- performance records;
- training records;
- disciplinary records;
- grievance records;
- medical certificates;
- medical aid information;
- retirement fund information;
- beneficiary and dependant information;
- Employment Equity information;
- skills development information;
- offboarding records.

Some employee records may include special personal information, financial information, medical information or dependant / children's information and will be treated as restricted.

9.2 Job Applicants and Candidates

Boxfusion may process candidate information, including:

- name and surname;
- contact details;
- CV;
- qualifications;
- employment history;
- references;
- interview notes;
- assessment results;
- salary expectations;
- recruitment correspondence;
- background verification information, where applicable;
- work permit or right-to-work information, where applicable;
- appointment or rejection records.

Candidate information is used only for recruitment, selection, verification and related HR purposes, unless another lawful basis applies.

9.3 Contractors, Consultants and Temporary Workers

Boxfusion may process contractor and consultant information, including:

- name and surname;
- contact details;
- identity or company information;
- contract details;
- role and project allocation;
- access permissions;
- payment details;

- timesheets;
- performance or delivery records;
- confidentiality and security acknowledgements;
- system access records;
- offboarding records.

9.4 Clients and Client Contacts

Boxfusion may process client-contact information, including:

- name and surname;
- job title;
- department;
- work contact details;
- organisation details;
- contract details;
- communication records;
- meeting records;
- support records;
- project involvement;
- approval records;
- user account details where applicable.

9.5 Government Employees and System Users

Where Boxfusion provides systems or services to government clients, Boxfusion may process or have access to government employee or system user information, including:

- name and surname;
- work email address;
- work contact number;
- job title;
- department;
- role or user profile;
- system username;
- access permissions;
- login records;
- audit logs;
- workflow actions;
- approvals;
- user activity records;
- support requests.

9.6 Citizens and Members of the Public

In certain government-facing systems, Boxfusion may process or have access to citizen information on behalf of government clients.

This may include:

- name and surname;
- ID number;
- contact details;
- address details;
- application details;
- service request details;
- case or workflow information;
- supporting documents;
- status updates;
- communication history;
- system-generated reference numbers;
- audit logs;
- reports or exports.

The exact categories depend on the relevant government client system, module and contract.

9.7 Children

Certain systems or projects may contain information relating to children.

This may include:

- child or learner name;
- date of birth;
- identity number or reference number;
- school or education information;
- guardian or parent details;
- application or service records;
- supporting documents;
- case or workflow records;
- health, welfare or special category information where applicable.

Children's information is treated as high-risk and must be subject to additional safeguards, access restrictions and legal review where applicable.

9.8 Suppliers, Vendors and Service Providers

Boxfusion may process supplier and vendor information, including:

- contact person details;
- company information;
- registration information;
- tax information;
- banking details;
- B-BBEE information;
- contracts;
- invoices;

- payment records;
- procurement records;
- due diligence records;
- service delivery records.

9.9 Website Users and Enquirers

Boxfusion may process information relating to website visitors, enquirers or people who complete website forms, including:

- name and surname;
- email address;
- phone number;
- organisation;
- enquiry details;
- communication preferences;
- IP address;
- cookies or analytics information, where applicable.

This information is used to respond to enquiries, manage communications, improve services and comply with applicable legal requirements.

10. Recipients or Categories of Recipients of Personal Information

Boxfusion may share personal information with authorised recipients where necessary and lawful.

Personal information will only be shared where there is a valid business, legal, contractual, operational or compliance reason to do so.

10.1 Internal Recipients

Personal information may be shared internally with authorised persons or teams, including:

- HR;
- Payroll;
- Finance;
- Legal / Compliance;
- COO Office;
- Information Officer and Deputy Information Officers;
- IT / Security;
- Software Engineering;
- Product;
- Business Analysis;
- Delivery;
- Implementation;
- Training;
- Customer Service / Support;

- relevant line managers;
- EXCO or MANCO, where required;
- authorised project teams.

Internal access must be limited to employees or contractors who need the information for their role.

10.2 External Recipients

Personal information may be shared with external recipients where necessary, including:

- government clients;
- private-sector clients;
- authorised client representatives;
- payroll providers;
- medical aid brokers;
- retirement fund administrators;
- insurance providers;
- recruitment service providers;
- background screening providers;
- training providers;
- auditors;
- legal advisors;
- tax advisors;
- banks;
- SARS;
- Department of Employment and Labour;
- SETAs;
- B-BBEE verification agencies;
- regulators;
- courts or law enforcement where required by law;
- hosting providers;
- cloud service providers;
- software vendors;
- IT service providers;
- security service providers;
- approved subcontractors or implementation partners.

10.3 Government Client Records

Where personal information relates to government client systems, Boxfusion may share or disclose such information only in accordance with:

- the relevant contract;
- client instructions;
- applicable law;
- POPIA;

- PAIA;
- confidentiality obligations;
- security requirements;
- approved support, implementation or reporting processes.

Where Boxfusion receives a request for records that appear to belong to or relate to a government client, Boxfusion may need to consult or escalate the request to the relevant government client before any disclosure is made.

10.4 Broker and Benefits Administration Recipients

For HR and employee benefits purposes, Boxfusion may share employee, dependant or beneficiary information with:

- medical aid brokers;
- medical schemes;
- retirement fund administrators;
- benefit providers;
- payroll administrators;
- insurers;
- financial service providers linked to employee benefits.

Only information necessary for the relevant benefit process should be shared, and appropriate confidentiality and data protection controls must apply.

11. Planned Transborder Flows of Personal Information

Boxfusion may use cloud services, software platforms, support services, hosting providers or technology vendors that may involve storage, access or processing of information outside South Africa.

Possible transborder flows may arise through:

- cloud hosting;
- cloud backups;
- disaster recovery services;
- Microsoft 365 or other productivity platforms;
- CRM tools;
- HR systems;
- ticketing or support systems;
- development tools;
- analytics platforms;
- AI tools, where approved;
- vendor support access;
- offshore technical support;
- international data centres;
- global software service providers.

Where personal information is transferred outside South Africa, Boxfusion will take reasonable steps to ensure that appropriate safeguards are in place, which may include:

- contractual protections;
- data processing agreements;
- confidentiality obligations;
- security controls;
- access restrictions;
- client approval where required;
- assessment of the destination country or service provider;
- assessment of whether the transfer is permitted under POPIA;
- review of hosting regions and backup locations.

For government client data, any cross-border flow must also be assessed against the relevant client contract, statement of work, data processing agreement, hosting arrangement and client instruction.

12. General Security Measures to Protect Personal Information

Boxfusion applies appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised access, unlawful processing, unauthorised disclosure and misuse. The specific safeguards may depend on the system, department, client, contract, data category and risk level.

Boxfusion's general safeguards may include:

12.1 Access Control

Boxfusion uses access controls to limit access to personal information.

Controls may include:

- role-based access control;
- least-privilege access;
- named user accounts;
- password controls;
- multi-factor authentication;
- privileged access restrictions;
- joiner-mover-leaver access processes;
- periodic access reviews;
- removal of access when no longer required.

12.2 Information Security Controls

Boxfusion may use information security controls such as:

- encryption in transit;
- encryption at rest where applicable;
- secure backup processes;

- endpoint protection;
- malware protection;
- firewall and network controls;
- secure configuration;
- vulnerability management;
- patch management;
- monitoring and alerting;
- incident response procedures.

12.3 Secure Software Development

For software systems, Boxfusion may apply secure development and change-management practices, including:

- code reviews;
- release approval processes;
- separation of development, test and production environments;
- testing before deployment;
- security and privacy test cases;
- access restrictions for production systems;
- secure API practices;
- secrets management;
- vulnerability remediation;
- change records and rollback planning.

12.4 Audit Logs and Monitoring

Where appropriate, Boxfusion may maintain audit logs and monitoring records relating to:

- user logins;
- access to systems;
- access to records;
- changes to records;
- exports;
- administrative actions;
- failed access attempts;
- support access;
- security events.

Audit logs may themselves contain personal information or security-sensitive information and will be protected accordingly.

12.5 Data Minimisation and Masking

Boxfusion aims to process only the information necessary for the relevant purpose. Where possible, Boxfusion may use:

- data minimisation;

- masking;
- pseudonymisation;
- anonymisation;
- aggregation;
- demo data;
- synthetic data;
- restricted screenshots;
- redaction of unnecessary information.

Live personal information should not be used for testing, training, demonstrations or AI purposes unless authorised and controlled.

12.6 Secure Document Handling

Boxfusion may apply document-handling controls, including:

- restricted SharePoint or OneDrive folders;
- access permissions;
- version control;
- secure links rather than uncontrolled attachments;
- password protection or encryption for sensitive documents;
- separate communication of passwords;
- retention and deletion rules;
- restricted printing;
- secure disposal;
- approved naming and storage conventions.

12.7 Confidentiality and Staff Training

Boxfusion may require employees, contractors and service providers to:

- sign confidentiality undertakings;
- follow internal policies;
- complete POPIA and PAIA awareness training;
- follow information security rules;
- escalate suspected incidents;
- avoid unauthorised disclosure;
- protect company, client and personal information.

12.8 Incident Response

Boxfusion maintains processes to identify, escalate, investigate and respond to security incidents or possible personal information compromises.

Where required, Boxfusion may notify:

- affected data subjects;
- the Information Regulator;
- relevant clients;
- relevant government clients;

- regulators;
- law enforcement;
- other parties as required by law or contract.

12.9 Vendor and Operator Controls

Where Boxfusion uses third parties to process personal information, Boxfusion aims to ensure that appropriate contractual, confidentiality and security obligations are in place.

This may include:

- service agreements;
- data processing agreements;
- operator clauses;
- confidentiality clauses;
- breach notification obligations;
- access restrictions;
- return or deletion obligations;
- subcontractor controls;
- audit or assurance rights where appropriate.

12.10 Protection of Children's and Special Personal Information

Children's information and special personal information will be handled with additional care.

Controls may include:

- restricted access;
- documented lawful basis;
- client or legal approval where applicable;
- minimisation of processing;
- avoidance of unnecessary sharing;
- masking or anonymisation where possible;
- careful handling of PAIA or POPIA requests;
- escalation to Legal / Compliance and the Information Officer where needed.

13. Request Procedure under PAIA

Any person who wishes to request access to a record held by Boxfusion must follow the process set out in this section.

A request for access to a record does not mean that access will automatically be granted. Each request will be assessed in accordance with PAIA, POPIA, applicable contracts, confidentiality obligations, client obligations, third-party rights and any applicable grounds for refusal.

13.1 How to Submit a Request

A requester must submit a request for access to a record by completing the prescribed PAIA request form 02. The request must be sent to Boxfusion's PAIA contact details – which is a combined PAIA and POPIA mailbox:

Item	Detail
PAIA request email	privacy@boxfusion.io
Physical address	International Business Gateway, New Rd, Midridge Park, Midrand, 1685
Information Officer	Xolile Ndlangana - CEO
Deputy Information Officer	Elizma Els - COO

The request should be marked clearly as:

PAIA Request for Access to Record

13.2 Required Request Form

The requester should use the prescribed **Form 02: Request for Access to Record**. The form must be completed fully and must provide enough detail for Boxfusion to identify:

- the requester;
- the record requested;
- the form of access required;
- the right the requester wishes to exercise or protect;
- why the record is required for the exercise or protection of that right;
- whether the requester is acting on behalf of another person;
- the requester's contact details;
- the preferred method of communication;
- any special format or accessibility needs.

If a requester is acting on behalf of another person, Boxfusion may request proof of authority before processing the request.

13.3 Assistance to Requesters

Where a requester is unsure how to complete a PAIA request, Boxfusion may provide reasonable assistance or direct the requester to the Information Regulator's PAIA Guide and prescribed forms. Boxfusion may request additional information where the request is unclear, incomplete or does not sufficiently identify the record requested.

13.4 Verification of Identity and Authority

Before granting access to records, Boxfusion may verify:

- the identity of the requester;
- the authority of the requester to act on behalf of another person;
- whether the requester is entitled to receive the requested record;

- whether the record contains personal information relating to the requester or another person;
- whether the record relates to Boxfusion, a client, a government client, a third party or another record owner.

Boxfusion may refuse to process or finalise a request until the required verification information has been provided.

13.5 Internal Logging of Requests

All PAIA requests received by Boxfusion must be logged in the PAIA Request Register.

The register must record, where applicable:

- request reference number;
- date received;
- requester name and contact details;
- department or channel where the request was received;
- description of the record requested;
- whether the request relates to Boxfusion records, client records or government client records;
- whether the request includes personal information;
- whether the request includes children's information;
- whether the request includes third-party information;
- whether a fee applies;
- due date for response;
- whether an extension is required;
- outcome of the request;
- grounds for refusal, if applicable;
- date response was sent;
- whether a complaint, regulator review or court process followed.

13.6 Assessment of the Request

Once a request is received, Boxfusion will assess:

- whether the request was submitted in the prescribed form;
- whether the requester has provided sufficient detail;
- whether the requester has provided proof of identity or authority where required;
- whether Boxfusion holds or controls the requested record;
- whether the record belongs to Boxfusion or to a client / government client;
- whether the record contains personal information;
- whether the record contains third-party information;
- whether the record contains confidential, commercial, legal, security or privileged information;
- whether any grounds for refusal apply;

- whether partial access or redaction is possible;
- whether any third party must be consulted;
- whether any government client must be consulted;
- whether fees apply.

13.7 Government Client Records

Where a request relates to records, data or information held in systems used by or on behalf of a government client, Boxfusion will assess whether the record is:

- owned by Boxfusion;
- owned by the government client;
- jointly held;
- processed by Boxfusion as an operator or service provider;
- subject to a client contract, statement of work, service level agreement or data processing arrangement.

Boxfusion may need to notify, consult or refer the request to the relevant government client before any information is released. Boxfusion will not disclose government client records, citizen information, government employee information or children's information without proper assessment and, where required, client instruction or legal review.

13.8 Requests Received by Employees or Departments

Any Boxfusion employee who receives a request for access to records, documents, personal information, system data, client data, employee data, citizen information or company information must not respond directly or share the information informally.

The employee must immediately escalate the request to:

- the PAIA request email;
- the PAIA Process Owner;
- the Information Officer or Deputy Information Officer;
- the COO Office, where applicable.

This applies to requests received by email, Teams, support tickets, client meetings, phone calls, HR channels, tenders or any informal route.

13.9 Fees

Prescribed fees may be payable in relation to a PAIA request.

Where applicable, Boxfusion may notify the requester of:

- any request fee;
- any access fee;
- any deposit required;
- the method of payment;
- the amount payable before access is provided.

Where fees apply, access to the requested record may only be provided once the required fee has been paid. Any fees payable will be calculated in accordance with the prescribed PAIA Regulations and applicable fee schedule in force at the time of the request.

13.10 Form of Access

Where a request is granted, Boxfusion may provide access in an appropriate form, depending on the nature of the record and what is legally and practically possible.

Access may be provided by:

- inspection of a record;
- electronic copy;
- printed copy;
- extract;
- transcript;
- redacted copy;
- another reasonable format.

Boxfusion may refuse a requested form of access if that form would unreasonably interfere with operations, damage a record, compromise security or infringe the rights of another person.

13.11 Timeframes

Boxfusion will process PAIA requests within the timeframes required by PAIA. Where a request is complex, involves a large volume of records, requires consultation, requires a search across multiple locations, involves government client records or involves third-party information, Boxfusion may extend the response period where PAIA permits this. The requester will be notified where an extension is required.

13.12 Extension of Time

Boxfusion may extend the period for responding to a request where permitted by PAIA.

Reasons for extension may include:

- the request is for a large number of records;
- the request requires a search through many records;
- the records are stored in more than one location;
- consultation with another person, client, government client or third party is required;
- more time is needed to make a proper decision;
- the requester agrees to an extension.

Where an extension is applied, Boxfusion will notify the requester and provide reasons for the extension.

13.13 Third-Party Consultation

Where a requested record contains information about a third party, Boxfusion may need to notify that third party and allow them an opportunity to make representations before a decision is made.

Third-party information may include:

- personal information of another person;
- supplier information;
- client information;
- government client information;
- confidential commercial information;
- contractual information;
- intellectual property;
- research information;
- security-sensitive information.

Boxfusion will consider third-party representations before deciding whether access may be granted, refused or partially granted.

13.14 Redaction and Partial Access

Where a record contains both disclosable and non-disclosable information, Boxfusion may provide access to the part of the record that may lawfully be disclosed and redact the part that may not be disclosed.

Redactions may be applied to protect:

- personal information;
- children's information;
- third-party information;
- confidential information;
- commercial information;
- legally privileged information;
- security-sensitive information;
- government client information;
- information that may compromise systems, clients or individuals.

13.15 Outcome of Request

Boxfusion will inform the requester of the outcome of the request.

The outcome may be:

- access granted;
- access partially granted;
- access refused;
- record not found or does not exist;

- request transferred or referred, where applicable;
- request requiring clarification;
- request requiring payment of fees;
- request requiring third-party consultation;
- request requiring an extension.

Where applicable, Boxfusion will use the prescribed outcome and fee form.

14. Grounds for Refusal of Access to Records

Access to records may be refused where PAIA permits or requires refusal. The fact that Boxfusion holds a record does not mean that the record must automatically be disclosed. Boxfusion may refuse access to a record, in whole or in part, where disclosure would be unlawful, unreasonable, harmful, confidential, restricted by contract, restricted by PAIA, restricted by POPIA or otherwise not permitted.

14.1 Protection of Personal Information of Third Parties

Boxfusion may refuse access where disclosure would involve the unreasonable disclosure of personal information about a third party.

This may include information relating to:

- employees;
- candidates;
- clients;
- citizens;
- children;
- suppliers;
- contractors;
- government employees;
- system users;
- members of the public.

Where possible, Boxfusion may consider whether redaction or partial disclosure is appropriate.

14.2 Protection of Children's Information

Boxfusion will treat children's information as high-risk. Access may be refused, restricted or escalated where a record contains information about a child, unless disclosure is lawful, properly authorised and appropriately safeguarded. Where a request involves children's information in a government client system, Boxfusion may need to consult the relevant government client and Legal / Compliance before any decision is made.

14.3 Protection of Special Personal Information

Boxfusion may refuse or restrict access where the record contains special personal information, including information relating to:

- health;
- disability;
- biometric data;
- race or ethnic origin;
- criminal behaviour;
- trade union membership;
- religious or philosophical beliefs;
- political persuasion;
- sex life;
- children's information.

Such information will only be disclosed where lawful and appropriate.

14.4 Protection of Third-Party Commercial Information

Boxfusion may refuse access to a record containing commercial information of a third party where disclosure may harm that third party's commercial or financial interests.

This may include:

- trade secrets;
- financial information;
- pricing;
- technical information;
- commercial strategy;
- supplier information;
- contract terms;
- confidential proposals;
- intellectual property.

14.5 Protection of Confidential Information

Boxfusion may refuse access where disclosure would breach a duty of confidence owed to a third party, client, government client, supplier, employee or other person.

This may include information received under:

- confidentiality agreements;
- client contracts;
- tender rules;
- non-disclosure agreements;
- employment obligations;
- supplier contracts;
- legal or professional obligations.

14.6 Protection of Boxfusion's Commercial Information

Boxfusion may refuse access to its own commercial information where disclosure may harm its commercial or financial interests.

This may include:

- trade secrets;
- pricing models;
- bid strategies;
- tender submissions;
- product strategies;
- source code;
- technical designs;
- commercial proposals;
- financial records;
- business plans;
- intellectual property;
- client strategies;
- internal methodologies.

14.7 Protection of Safety, Security and Systems

Boxfusion may refuse access where disclosure could reasonably be expected to endanger the safety of a person, compromise property, compromise information systems or expose security controls.

This may include:

- vulnerability reports;
- penetration test reports;
- incident reports;
- architecture diagrams;
- firewall rules;
- security configurations;
- access control records;
- privileged user details;
- audit logs;
- system credentials;
- API keys;
- incident response records;
- disaster recovery details;
- infrastructure diagrams.

Boxfusion will not disclose information that could increase the risk of cybercrime, unauthorised access, data loss, fraud or harm to Boxfusion, clients, government systems or data subjects.

14.8 Legal Privilege

Boxfusion may refuse access to records protected by legal professional privilege. This may include:

- legal advice;
- correspondence with legal advisors;
- litigation strategy;
- legal opinions;
- dispute records;
- privileged investigation records.

14.9 Research and Development Information

Boxfusion may refuse access to research, development, product, technical or innovation-related records where disclosure could prejudice Boxfusion, a client, a government client or a third party.

This may include:

- product roadmaps;
- prototypes;
- technical designs;
- research findings;
- data models;
- AI models;
- analytics methods;
- experimental systems;
- unpublished technical or business information.

14.10 Government Client Records

Where a requested record relates to a government client, citizen data, government employee data, public-sector system or government-owned process, Boxfusion may refuse, restrict, refer or delay disclosure until the correct ownership, authority and legal position have been confirmed. Boxfusion may need to consult the relevant government client before disclosing such records.

14.11 Records Not Found or Not in Existence

If Boxfusion cannot find the requested record or the record does not exist, Boxfusion will inform the requester. Where required, Boxfusion may provide a statement explaining the steps taken to search for the record.

14.12 Requests That Are Unclear or Insufficient

Boxfusion may request clarification where a request does not provide enough detail to identify the record. If the requester does not provide the necessary clarification, Boxfusion may be unable to process the request.

14.13 Public Interest Override

In certain circumstances, PAIA may require disclosure despite a ground of refusal if the public interest in disclosure outweighs the harm protected by the refusal ground. Boxfusion will assess any possible public interest override carefully and may obtain legal advice before making a decision.

15. Remedies Available to Requesters

If a requester is dissatisfied with Boxfusion's decision on a PAIA request, the requester may use the remedies available under PAIA. Submit Form 05: Complaint Form.

15.1 Request for Reasons or Clarification

A requester may ask Boxfusion for clarification regarding the outcome of a request, the reasons for refusal, the fees payable, the form of access or the process followed. Such requests should be directed to the PAIA request email address.

15.2 Complaint to the Information Regulator

A requester may lodge a complaint with the Information Regulator if they are dissatisfied with the outcome of a PAIA request or believe the request was not handled correctly.

Complaints may relate to, for example:

- refusal of access;
- partial refusal;
- deemed refusal;
- unreasonable fees;
- extension of time;
- failure to respond;
- failure to assist;
- form of access granted;
- any other PAIA-related concern.

The requester may use the prescribed complaint form made available by the Information Regulator.

15.3 Court Application

A requester may also approach a court where PAIA permits this. Boxfusion recommends that requesters obtain independent legal advice where they wish to pursue a court application.

15.4 Information Regulator Contact Details

The Information Regulator may be contacted through its official contact channels.

Item	Detail
Information Regulator website	https://inforegulator.org.za/

Complaints email	PAIAComplaints@inforegulator.org.za
PAIA forms page	https://inforegulator.org.za/paia-forms/
PAIA Guide	https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

16. Availability of this Manual

This Manual is available:

- on Boxfusion’s website;
- at Boxfusion’s principal place of business during normal office hours;
- upon request from the Information Officer or Deputy Information Officer;
- to the Information Regulator upon request.

A copy of this Manual may be provided electronically or in another reasonable format, subject to applicable fees where permitted.

Website location:

Internal storage location:

Physical inspection location: International Business Gateway, New Rd, Midridge Park, Midrand, 1685

17. Updating of this Manual

Boxfusion will review and update this Manual regularly.

This Manual may be updated when there are changes to:

- company details;
- Information Officer or Deputy Information Officer details;
- PAIA request contact details;
- records held by Boxfusion;
- business activities;
- products or modules;
- government client systems;
- personal information processing activities;
- cross-border data flows;
- security measures;
- applicable laws or regulations;
- Information Regulator guidance;
- internal policies;
- client or contractual obligations.

The Information Officer or delegated PAIA / POPIA owner is responsible for ensuring that the Manual remains accurate, current and available.

18. Approval

This Manual has been reviewed and approved by Boxfusion.

Role	Name	Signature	Date
Information Officer / Head of Private Body	Xolile Ndlangana		
Deputy Information Officer	Elizma Els		

19. Version History

Version	Date	Description of change	Approved by
1.0	05 June 2026	First approved version	Elizma Els - COO

20. Annexures

The following annexures may be attached to or referenced in this Manual:

Annexure	Description
Annexure A	Boxfusion Record Categories and Ownership Matrix

Annexure A

Boxfusion Record Categories and Ownership Matrix

This Record Categories and Ownership Matrix supports the Boxfusion PAIA Manual by identifying the main categories of records held by Boxfusion, the likely internal record owners, the nature of the records, and the usual approach to PAIA, POPIA and access-to-information handling.

This matrix is intended to help Boxfusion identify the correct internal owner when a request for access to records is received.

The inclusion of a record category in this matrix does not mean that access to such records will automatically be granted. All requests must be assessed in accordance with PAIA, POPIA, applicable contracts, confidentiality obligations, client obligations and lawful grounds for refusal.

For security, privacy and confidentiality reasons, this matrix should not include live SharePoint links, system access paths, client-sensitive configuration details, security details, passwords, architecture details or personal information.

1. Record Ownership Matrix

Record category / subject	Examples of records	Primary internal owner	Supporting department(s)	Likely record owner / controller	Personal information risk	Normal access position	PAIA / POPIA handling notes
Company and governance records	CIPC records, MOI, statutory registers, director records, shareholder records, beneficial ownership records, board	CEO / COO Office	Finance, Legal/Compliance, Operations	Boxfusion	Medium	Restricted internal / some records may be publicly available	Requests must be routed to PAIA owner. Governance, board, risk and legal records require executive/legal

	resolutions, EXCO/MANCO records, governance frameworks, policies, risk registers						review before disclosure.
Finance, tax and accounting records	Annual financial statements, management accounts, invoices, supplier invoices, purchase orders, payment records, tax returns, VAT, PAYE, UIF, SDL, SARS correspondence, budgets	Finance	COO Office, Auditors, Legal/Compliance	Boxfusion	High	Restricted	Financial and tax records are confidential. External disclosure requires Finance, Legal and PAIA owner review.
Human Resources and employee records	Employee files, contracts, job descriptions, ID/tax/bank details, payroll records, leave, attendance, performance, training, disciplinary, grievance, medical certificates, benefits, EE records, exit interviews	HR	COO Office, Finance/Payroll, Legal/Compliance	Boxfusion	Very High	Highly restricted	HR records contain personal, financial, medical and employment information. Employee access requests must be logged and handled through HR and PAIA/POPIA owner.
Recruitment and candidate records	CVs, applications, interview notes, assessments, references, background checks, recruitment correspondence, appointment/rejection records	HR	Hiring Managers, Department HODs	Boxfusion	High	Restricted	Candidate requests to access, correct or delete information must be logged as POPIA/data subject requests. Do not share CVs or interview notes informally.
Sales, tender and client contract records	Client contracts, MSAs, SLAs, SOWs, work orders, tender packs, SBD/MBD forms, pricing schedules, bid declarations, CSD/TCS evidence, B-BBEE evidence, proposals	Sales	Legal/Compliance, Finance, Delivery, COO Office	Boxfusion / Client / Government client, depending on document	High	Restricted / some supplier compliance records may be shared	Public supplier documents may be shared if approved. Contracts, pricing, tenders and bid records require Sales, Legal and PAIA owner review.
Marketing and communications records	Company profile, brochures, website content, privacy notices, website terms, campaigns, mailing lists, consent records, opt-outs, event records, social media, press releases	Marketing and Communications	Sales, Legal/Compliance, COO Office	Boxfusion	Medium to High	Public for approved material; restricted for contact lists and consent records	Approved public material may be shared. Mailing lists, consent records and campaign data are personal information and must not be shared casually.

Product and software module records	Product roadmaps, module descriptions, user stories, specifications, role matrices, permission models, export/reporting specifications, audit log requirements, product risk records	Product	BA, Engineering, Testing, Data, Delivery	Boxfusion / Client, depending on product/client context	High	Restricted	Product records may reveal data fields, access permissions, exports and system functionality. Requests require Product and PAIA/POPIA review.
Business analysis records	Business requirements, functional specifications, process maps, workflows, data flow diagrams, client-approved requirements, use cases, access requirements, report requirements, decision logs	Business Analysis	Product, Delivery, Client Teams, Engineering	Client / Boxfusion / Joint, depending on project	High	Restricted	BA records may show client processes, data flows and system access. Do not share externally without project owner, client owner and PAIA review.
Software engineering, architecture and technical records	Architecture diagrams, API documents, integrations, database design, source code, release/change records, deployment records, environment records, access controls, encryption records, error logs	Software Engineering	IT/Security, Product, Testing, Delivery	Boxfusion / Client, depending on system	High to Very High	Highly restricted	Technical records may be security-sensitive. Requests require Engineering, IT/Security, Legal and PAIA owner review.
Data and AI records	Dataset inventories, data sources, dashboards, analytics, reports, data models, AI use cases, model outputs, data approvals, masking/anonymisation records, data sharing records	Data Team	Product, Engineering, Operations, HR, Client Teams	Boxfusion / Client / Government client, depending on dataset	High to Very High	Restricted	Raw datasets, AI inputs/outputs and identifiable data must not be shared without approval. Aggregated/anonymised reports may still require review.
Testing and quality assurance records	Test strategies, test plans, test cases, test results, UAT records, defects, screenshots, test data, masking records, test environment records, QA reports	Testing / Product	Engineering, BA, Delivery, Client Teams	Boxfusion / Client, depending on project	High	Restricted	Test records may contain screenshots, logs or personal data. Use masked/synthetic data where possible. Requests require Testing/Product review.
Delivery and project	Project plans, implementation	Delivery / Project	Implementation, BA,	Boxfusion / Client /	High	Restricted	Project records may contain

management records	plans, migration plans, go-live checklists, status reports, project risk registers, issue logs, decision logs, minutes, steering packs, sign-offs, handover records	Management	Product, Client Teams, Operations	Government client			client decisions, risks, issues and data movement details. Requests require Delivery and PAIA owner review.
Implementation records	Migration records, data import/export records, configuration records, user setup lists, setup checklists, handover records, implementation sign-offs, temporary data files	Implementation	Delivery, Engineering, Product, Client Teams	Client / Government client / Boxfusion, depending on project	Very High	Highly restricted	Migration files, exports and configuration records are high risk. Requests must be escalated urgently and may require client consultation.
Training records	Training materials, schedules, attendance registers, recordings, training feedback, demo data, client training records, employee training records, compliance training records	Training	HR, Delivery, Product, Client Teams, Operations	Boxfusion / Client, depending on training	Medium to High	Mixed: public/approved training content may be shared; attendance and recordings restricted	Training material must not expose live client, citizen, employee or children's data. Attendance and recordings contain personal information.
Change management records	Change plans, stakeholder lists, impact assessments, communication packs, adoption surveys, readiness reports, client feedback, change risks	Change Management	Delivery, Training, Client Teams, HR, Operations	Boxfusion / Client, depending on project	High	Restricted	Stakeholder lists and survey data may contain personal information. Raw survey data should be restricted and anonymised where possible.
Customer service and support records	Support tickets, client requests, screenshots, attachments, support logs, incident escalations, access requests, resolution records, SLA records, RCA records, service reports	Customer Support	IT/Security, Engineering, Product, Delivery, Client Teams	Client / Government client / Boxfusion, depending on ticket	Very High	Restricted	Support tickets may contain screenshots, citizen data, logs and personal information. Do not share outside approved support process.
Government client and citizen-related records	Government system records, citizen records, government employee user records, case/application/service request records, system reports, exports,	Client Owner / Delivery / Product	Support, Engineering, Implementation, Data, Legal/Compliance	Usually government client, with Boxfusion acting as operator/service provider	Very High	Highly restricted	Requests may need to be referred to or assessed with the relevant government client. Do not disclose without client/legal review.

	audit logs, implementation/ support records						
Children's information records	Child or learner details, guardian information, school/education records, child-related application records, case records, supporting documents	Relevant Client/System Owner	Product, Delivery, Support, Data, Legal/Compliance	Usually government client / Boxfusion where applicable	Very High	Highly restricted	Children's information requires additional safeguards. Escalate to Information Officer, Legal/Compliance and relevant client owner before any disclosure.
Security and incident records	Security policies, access records, privileged access, access reviews, incident reports, breach records, vulnerability reports, penetration tests, audit logs, monitoring, backups, DR records	IT/Security	Engineering, Operations, Legal/Compliance, COO Office	Boxfusion / Client, depending on system	Very High	Highly restricted	Security records must not be disclosed if disclosure could expose vulnerabilities or compromise systems. Legal/IT/Security review required.
Compliance, legal and risk records	POPIA/PAIA records, request registers, annual PAIA evidence, data subject requests, breach notifications, legal opinions, risk registers, audits, investigations, whistleblowing records	COO Office / Legal/Compliance	Information Officer, DIOs, Operations, HR, IT/Security	Boxfusion	High to Very High	Restricted	Some records may be privileged or confidential. Public disclosure must be legally reviewed. Internal registers must not be published.
Supplier, vendor and operator records	Supplier contracts, vendor due diligence, service agreements, operator agreements, data processing agreements, confidentiality clauses, breach obligations, audit rights	Operations / Finance / Legal	IT/Security, HR, Business Owners	Boxfusion / Supplier / Operator	Medium to High	Restricted	Supplier and operator records may contain commercial, banking, tax or data protection information. Requests require owner and PAIA review.
Website users and enquiry records	Website contact forms, enquiry details, cookies/analytics records, communication preferences, website user contact details	Marketing and Communications	IT, Sales, Legal/Compliance	Boxfusion	Medium	Restricted	Website enquiry and analytics data may contain personal information. POPIA requests must be logged and handled through privacy process.

2. Ownership Categories

For purposes of this matrix, record ownership may fall into one of the following categories:

Ownership category	Meaning
Boxfusion-owned record	A record created, owned or controlled by Boxfusion for its own business, governance, employment, finance, operations or compliance purposes.
Client-owned record	A record created or held in relation to a client project, where the client may own or control the underlying information.
Government client-owned record	A record relating to a government client system, citizen information, government employee information or public-sector process, where the relevant government client may be the owner or responsible party.
Joint / shared record	A record that may include Boxfusion content and client content, such as project records, implementation documents, sign-offs, support records or meeting minutes.
Third-party record	A record that belongs to or contains information about a supplier, vendor, subcontractor, employee, citizen, candidate or other third party.

3. Access Handling Rules

Rule	Requirement
Public or approved records	May be shared only if the latest approved version is used.
Internal records	May only be shared internally with people who need the record for their role.
Confidential records	Must not be shared without the record owner's approval.
Personal information	Must be assessed under POPIA before sharing.
Children's information	Must be escalated to the Information Officer / PAIA-POPIA owner and Legal/Compliance.
Government client records	Must be assessed with the relevant client owner and, where required, the government client.
Security records	Must be reviewed by IT/Security and Legal/Compliance before any disclosure.
Legal records	Must be reviewed by Legal/Compliance because privilege or confidentiality may apply.
PAIA requests	Must be logged in the PAIA Request Register.
POPIA/data subject requests	Must be logged in the Data Subject Request Register.

4. Minimum Internal Evidence to Maintain

The following internal evidence should support this matrix:

Evidence item	Owner
Department record index	Each HOD
Product / Module Data Register	Product / BA / Engineering / Data
PAIA Request Register	PAIA Process Owner / COO Office
Data Subject Request Register	POPIA Owner / COO Office
Access Review Register	IT/Security and HODs
Security Compromise / Breach Register	IT/Security / POPIA Owner
Sub-Processor / Vendor Register	Operations / Legal / IT

Cross-Border Transfer Register	IT / Legal / POPIA Owner
Training Register	HR / Operations
Records Retention Schedule	COO Office / Legal / HR / Finance

5. Important Note

This Annexure is a high-level record ownership guide. Detailed system names, client-specific data fields, module-level data fields, SharePoint links, security details, access lists, audit logs, internal registers and PAIA request records should be kept in internal controlled registers and should not be published with the public PAIA Manual.

All access requests must be assessed through the approved PAIA / POPIA process before any record is released.