



INTEGRATED

COMPLIANCE SOLUTIONS

PAIA MANUAL

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

Version 1.0 | Date of Approval: 20 February 2026

Private Body Access to Information and Privacy Governance Document

DOCUMENT CONTROL

This document records the access to information framework of Integrated Compliance Solutions as a private body for purposes of PAIA and related POPIA access rights. It is intended for publication, client use, requester guidance, internal governance and regulatory readiness.

Control Item	Detail
Document Name	Integrated Compliance Solutions PAIA Manual
Entity	Integrated Compliance Solutions
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Approved By	Information Officer
Classification	Client-Facing Access to Information and Privacy Governance Document
Website	www.integratedcompliancesolutions.co.za
General Contact Email	info@integratedcompliancesolutions.co.za

Controlled use: This manual must be read together with PAIA, POPIA and the applicable regulations. It is designed to help requesters understand how to request records from Integrated Compliance Solutions and how personal information is handled within the organisation.



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1. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym / Term	Meaning
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa
Requester	A person requesting access to a record in terms of PAIA
Record	Recorded information regardless of form or medium, where such information is held by or under the control of the body

2. PURPOSE OF THE PAIA MANUAL

This manual gives members of the public, clients, data subjects and other requesters a clear route for requesting access to records held by Integrated Compliance Solutions. It also records how Integrated Compliance Solutions categorises records, manages requests and protects personal information in the ordinary course of business.

The manual is intended to assist a requester to understand:

- the categories of records that may be available without a formal PAIA request;
- the manner and form in which a formal request for access to a record must be submitted;
- the subjects on which Integrated Compliance Solutions holds records and the categories of records held under those subjects;
- the contact details of the Information Officer and any Deputy Information Officer designated by the organisation;
- where the PAIA Guide issued by the Information Regulator may be accessed;
- how Integrated Compliance Solutions processes personal information, including categories of data subjects and recipients;
and
- the availability, updating, fees, refusal and remedies framework applicable to PAIA requests.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Contact Item	Detail
Private Body	Integrated Compliance Solutions
Registration Number	2025/830678/07
Information Officer	Ronald Gwenzi
Information Officer Email	rgwenzi@integratedcompliancesolutions.co.za
General Access to Information Email	info@integratedcompliancesolutions.co.za
Telephone	[Insert Telephone Number]
Deputy Information Officer	[Insert Deputy Information Officer Name, if applicable]
Deputy Information Officer Email	[Insert Deputy Information Officer Email, if applicable]
Registered Office Address	122 Beech Street, Northcliff, Randburg, Gauteng, 2195
Postal Address	122 Beech Street, Northcliff, Randburg, Gauteng, 2195
Website	www.integratedcompliancesolutions.co.za

Requester guidance: PAIA requests should be directed to the Information Officer using the prescribed Form 2. Requesters should attach proof of identity and, where a request is made on behalf of another person, proof of authority to act on that person's behalf.

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator has made available a guide on how to use PAIA. The guide assists persons who wish to exercise rights contemplated in PAIA and POPIA, including rights relating to access to records and access to personal information.

The guide explains, among other things:

- the objects of PAIA and POPIA;
- the contact details of Information Officers and Deputy Information Officers of public and private bodies, where available;
- the form and manner of a request for access to a record;
- the assistance available from Information Officers and from the Information Regulator;
- the legal remedies available where a request is refused or not properly handled;
- the provisions requiring public and private bodies to compile PAIA manuals;
- voluntary disclosure of categories of records; and
- fees and regulations made under PAIA.

Source	How to Access the Guide
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Source	How to Access the Guide
Integrated Compliance Solutions	Request a copy from the Information Officer at rgwenzi@integratedcompliancesolutions.co.za or the general contact address at info@integratedcompliancesolutions.co.za .
Information Regulator	The guide can be obtained from the Information Regulator of South Africa and from the Regulator's official website.
Inspection	A copy may be inspected during ordinary business hours at the registered office of Integrated Compliance Solutions, subject to reasonable access arrangements.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain records may be available without a requester submitting a formal PAIA request, particularly where records are already publicly available, published electronically or ordinarily provided by the organisation in the course of business.

Category of Records	Type / Description	Mode of Access
Company profile and service information	Website, proposal packs or direct request	Website / Upon Request
PAIA Manual	Website or direct request to the Information Officer	Website / Upon Request
PAIA Form 2	Website or direct request to the Information Officer	Website / Upon Request
Public company registration details	CIPC public records or direct request where held	Public Source / Upon Request
Contact details and general business information	Website or direct communication	Website / Upon Request
Client-facing policies or notices approved for publication	Website, onboarding packs or direct request	Website / Upon Request

6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Integrated Compliance Solutions may create, receive and retain records in accordance with legislation applicable to private companies, service providers, employers, contracting parties and responsible parties processing personal information. The categories below are indicative and are subject to the organisation's actual operational activities, retention requirements and lawful grounds for access.

Category of Records	Applicable Legislation / Source
Company incorporation, registration and governance records	Companies Act 71 of 2008
PAIA Manual and access request records	Promotion of Access to Information Act 2 of 2000
Personal information processing records, privacy notices and information security records	Protection of Personal Information Act 4 of 2013
Employment and human resources records, where applicable	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998, where applicable
Financial, accounting and transaction records	Companies Act 71 of 2008 and applicable financial recordkeeping requirements
Client engagement, compliance support and service delivery records	Applicable client contracts, regulatory instructions and industry-specific requirements relevant to the service scope
Electronic communications and website records	Electronic Communications and Transactions Act 25 of 2002, where applicable
FIC, AML/CFT or regulatory support records handled under client engagements	Financial Intelligence Centre Act 38 of 2001 and other applicable financial sector laws, where relevant to the client engagement

7. SUBJECTS AND CATEGORIES OF RECORDS HELD BY INTEGRATED COMPLIANCE SOLUTIONS

The table below describes the principal subjects on which Integrated Compliance Solutions may hold records and the categories of records held under those subjects.

Subject	Categories of Records
Corporate governance and company administration	Registration certificate; company information; governance approvals; resolutions; policies; registers; statutory communications; board or management records where applicable.
Compliance, regulatory support and advisory services	Client engagement documents; compliance monitoring records; regulatory support schedules; compliance checklists; issue logs; remediation trackers; evidence



Subject	Categories of Records
	indexes; reports; regulatory correspondence provided by or for clients.
Client onboarding and engagement management	Proposals; quotations; service level arrangements; statements of work; engagement letters; client contact details; client mandates; risk and scope notes; service delivery records.
Privacy and information governance	Privacy notices; data subject request records; PAIA requests; POPIA assessments; information security records; breach or incident records; data retention and access records.
Finance and administration	Invoices; statements; payment records; supplier records; procurement documentation; internal administrative records; accounting support documents.
Human resources and people records	Employee or contractor records; onboarding records; leave records; performance records; training and development records; disciplinary or grievance records, where applicable.
Suppliers and service providers	Supplier profiles; contracts; service arrangements; due diligence; invoices; correspondence; performance records.
Information technology and security	User access records; security measures; system logs; backup records; technology service provider records; asset records; email and document management records.
Marketing, communications and website	Website content; client-facing materials; brand material; marketing communications; enquiries; consent records where applicable.
Legal and contractual records	Contracts; terms of business; confidentiality undertakings; professional correspondence; dispute records; legal notices; records relating to rights, obligations and risk management.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Integrated Compliance Solutions processes personal information only where there is a lawful basis to do so and where the processing is necessary for a defined business, legal, regulatory, contractual, operational or legitimate purpose.

- to communicate with clients, prospective clients, requesters, suppliers, regulators and other stakeholders;
- to perform compliance, regulatory support, governance, risk and advisory services;
- to onboard clients, assess instructions, manage engagements and maintain records of service delivery;
- to comply with legal, regulatory, accounting, administrative and recordkeeping obligations;
- to manage contracts, invoices, payments, suppliers and business operations;
- to manage employment, contractor, training and people-related matters, where applicable;
- to protect information systems, maintain security and manage access to records;
- to respond to PAIA, POPIA and other lawful requests; and
- to establish, exercise or defend legal rights.



8.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information That May Be Processed
Clients and client representatives	Names; contact details; identity or registration details where required; role and authority; correspondence; engagement records; business information; compliance and regulatory support records supplied by or for the client.
Prospective clients and enquirers	Names; contact details; enquiry details; business profile; communication records; proposal and quotation information.
Employees, contractors and applicants	Names; identity details; contact information; employment history; qualifications; training records; payroll or payment information where applicable; performance and disciplinary records where applicable.
Suppliers and service providers	Names; contact details; registration details; banking or payment details; tax or compliance documentation where lawfully required; contracts; invoices and correspondence.
Regulators and public authorities	Official contact details; regulatory correspondence; submission references; request or case information.
Website users and electronic correspondents	Contact details submitted through forms or email; device, usage or technical information where collected; communication records.
Representatives and key persons reflected in client records	Names; role details; contact details; competence, supervision or regulatory information provided within the scope of a client engagement.

8.3 Recipients or Categories of Recipients of Personal Information

Recipient Category	Purpose / Nature of Disclosure
Internal authorised personnel	Information Officer, authorised staff, contractors or representatives who require access for a legitimate business or compliance purpose.
Clients and authorised client representatives	Personal information included in deliverables, reports, trackers, engagement records or client files, where relevant to the instruction.
Professional advisers	Legal advisers, auditors, accountants, consultants or similar professional advisers where necessary and lawful.
Technology and business support providers	Email, cloud storage, hosting, document management, cyber security, workflow, communications, payment and business administration service providers.
Regulators, supervisory bodies and public authorities	Information may be supplied where required by law, regulatory instruction, court order, lawful process or legitimate regulatory engagement.
Banks and payment service providers	Payment-related information required to process invoices, receipts or refunds.

8.4 Planned Cross-Border Transfers of Personal Information

Integrated Compliance Solutions may use cloud-based, email, security, workflow or business administration systems that involve storage, support or processing infrastructure located outside the Republic of South Africa. Where cross-border processing occurs, Integrated Compliance Solutions will apply appropriate contractual, technical and organisational safeguards and will only transfer personal information where permitted by POPIA or another lawful basis.

Control position: Cross-border processing must be managed on a risk-based basis and aligned to client instructions, lawful processing grounds, contractual safeguards and information security requirements.

8.5 General Description of Information Security Measures

Security Measure	Description
Access control	Role-based access, least privilege, password protection and authorised user management.
Confidentiality controls	Confidential handling of client records, contractual confidentiality arrangements and controlled document access.
Technical safeguards	Use of anti-malware, system security tools, secure devices, secure email and cloud controls where available.
Encryption and secure storage	Encryption or secure storage applied where technically available and appropriate to the sensitivity of the information.
Backup and continuity	Reasonable backup, recovery and continuity measures for business-critical information.
Record retention	Retention of records according to legal, regulatory, contractual and operational requirements, followed by secure disposal where appropriate.
Incident management	Assessment, escalation and response processes for suspected or confirmed information security incidents.
Supplier management	Due diligence and contractual controls for suppliers who may process personal information on behalf of the organisation.
Training and awareness	Awareness of confidentiality, lawful processing, recordkeeping and responsible information handling.

9. AVAILABILITY OF THE MANUAL

A copy of this manual is available:

- on the Integrated Compliance Solutions website at www.integratedcompliancesolutions.co.za, where published;
- at the registered office of Integrated Compliance Solutions at 122 Beech Street, Northcliff, Randburg, Gauteng, 2195, during normal business hours and subject to reasonable access arrangements;
- to any person upon request to the Information Officer, subject to the payment of any prescribed fee where applicable; and
- to the Information Regulator upon request.

Where a copy of the manual is requested in printed form, a reasonable fee may be payable per A4-size copy where permitted by the PAIA regulations.

10. UPDATING OF THE MANUAL

The Information Officer will review this manual periodically and update it where required by changes in law, regulatory guidance, organisational structure, contact details, processing activities, categories of records or operational practice.

Review Item	Detail
Current Version	1.0
Date of Approval	20 February 2026
Next Scheduled Revision	20 February 2027
Trigger Events	Legal or regulatory changes; change in contact details; change in records or processing activities; material change in services; operational or governance changes.

11. REQUEST PROCEDURE

A requester who wishes to access a record held by Integrated Compliance Solutions must complete the prescribed Form 2: Request for Access to Record and submit it to the Information Officer. The requester must provide sufficient detail to enable the record to be identified and located.

1. Complete Form 2 and submit it to the Information Officer at rgwenzi@integratedcompliancesolutions.co.za.
2. Attach proof of identity. If the request is made on behalf of another person, attach proof of authority to act on behalf of that person.
3. Describe the record requested with sufficient detail, including any reference number, date, subject matter, parties involved and the form in which access is requested.
4. State the right that the requester seeks to exercise or protect and explain why the requested record is required for that purpose.
5. Pay the prescribed request fee or access fee where lawfully required and notified by the Information Officer.
6. Await the decision of the Information Officer, which will be communicated in writing, subject to the time periods and procedures prescribed by PAIA.

Assistance: A requester who cannot complete the form because of illiteracy, disability or another reasonable cause may ask the Information Officer for reasonable assistance, where permitted by law.

12. FEES

Fees relating to requests for access to records are governed by PAIA and the applicable regulations. Where a fee is payable, the requester will be notified of the amount, the basis for the fee and the manner of payment. Access to the requested record may be delayed until the prescribed fee, where applicable, has been paid.

Fee Item	Description
Request fee	A request fee may be payable before the request is processed, unless the requester is exempt in terms of PAIA or the regulations.
Access fee	An access fee may be payable for searching, preparing, copying or providing access to the record, depending on the form of access requested.
Deposit	A deposit may be required where the search and preparation time is expected to exceed the prescribed threshold.
Exemption	A requester who believes they qualify for exemption must state the basis for the exemption in the request form.

13. REFUSAL OF ACCESS AND REMEDIES

A request for access may be granted or refused in accordance with PAIA. Access may be refused where a ground for refusal applies, including grounds relating to privacy, confidentiality, commercial information, privileged information, security, legal proceedings or other protections recognised under PAIA.

If a request is refused, the requester will be informed of the decision and the available remedies. Remedies may include lodging a complaint with the Information Regulator or approaching a court, where applicable.

- the decision to grant or refuse access will be communicated in writing;
- where access is refused, the reasons for refusal will be provided to the extent required by law;
- a requester may seek assistance or lodge a complaint with the Information Regulator where permitted; and
- a requester may seek appropriate relief from a court where PAIA permits.



14. SIGNATURE AND APPROVAL

This PAIA Manual is issued by the Information Officer of Integrated Compliance Solutions.

Approval Field	Detail
Issued By	Ronald Gwenzi
Capacity	Information Officer
Entity	Integrated Compliance Solutions
Date of Approval	20 February 2026
Signature	_____

Publication note: This manual is intended for publication and requester use. It should be reviewed at least annually or sooner where there are material changes affecting the information recorded in the manual.