Xiquel Group PAIA Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000 (PAIA)
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Security Classification: Public

PAIA MANUAL FOR XIQUEL GROUP (PTY) LTD

Prepared in accordance with Section 51 of PAIA as amended by POPIA

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1. Introduction

This PAIA Manual is published in terms of **Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA)** and applies to **Xiquel Group (Pty) Ltd** ("Xiquel").

The purpose of this Manual is to facilitate the public's right of access to records held by Xiquel, subject to justifiable limitations, and to describe:

- The categories of records held
- The process for requesting records
- The processing of personal information by Xiquel
- The rights of data subjects under **POPIA**
- The contact details of the Information Officer and Deputy Information Officer

This Manual is available for public inspection and may be disclosed externally.

2. Contact Details of Xiquel Group

Information Officer

Name: Kgopotso Riba
Position: Information Officer
Tel: +27 10 447 1542
Email: kriba@xiquelgroup.com

Deputy Information Officer

Name: Laura-Maria Mezzopera
Position: Deputy Information Officer
Tel: +27 10 447 1542
Email: lauram@xiquelgroup.com

Company Information

Registered Name: Xiquel Group (Pty) Ltd
Registration Number: 2013/005238/07
Physical Address: 2nd Floor, Building I, Hertford Office Park, Waterfall, Midrand
Telephone: +27 10 447 1542
Email: info@xiquelgroup.com
Website: www.xiquelgroup.com

3. Guide on How to Use PAIA

The Information Regulator publishes a **PAIA Guide** in terms of Section 10 of PAIA.
The Guide explains:

- How to exercise rights under PAIA
- How to make an information request
- How to lodge complaints

The Guide is available:

- On the Information Regulator's website: https://www.justice.gov.za/inforeg/
- For inspection at the offices of the Information Regulator
- From Xiquel upon request to the Information Officer

4. Categories of Records Automatically Available (No PAIA Request Required)

These records are accessible without submitting a formal PAIA request:

- Company website information
- Public policies or statements published intentionally
- Corporate brochures or service information
- Public-facing privacy statement
- Recruitment advertisements

(All other records require a formal PAIA request.)

5. Records Available via a PAIA Request

Xiquel holds the following records which may be requested in terms of PAIA, subject to applicable grounds for refusal:

5.1 Corporate Governance Records

- Company registration documents
- Memorandum of Incorporation
- Board resolutions
- Shareholder records

5.2 Financial Records

- Annual financial statements
- Tax records
- Audit files
- Bank statements and reconciliations
- Procurement and supplier expenditure records

5.3 Human Resources & Employee Records

- Employment contracts
- HR policies
- Leave records
- Disciplinary records
- Payroll records
- Training and development documentation

5.4 Technology, Security & ISMS Records

(Aligned to ISO 27001 & 27701)

- Information Security Policies
- Risk registers
- Incident response logs
- Change management records
- Access control registers
- Backup/BCMS records

- System architecture and security documentation (limited disclosures only)

5.5 Service Delivery & Operations

- Project documentation
- Statements of Work (SOWs)
- Customer deliverables and reports
- Implementation plans
- SLA performance records
- Outsourcing/subcontractor records

5.6 Legal & Contractual Records

- Customer agreements
- Supplier contracts
- NDAs
- Legal opinions

6. Records Available in Terms of Other Legislation

(Required by PAIA Section 51(1)(d))

- Companies Act 71 of 2008
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Skills Development Act 97 of 1998
- Occupational Health and Safety Act 85 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Income Tax Act 58 of 1962
- Cybercrimes Act 19 of 2020
- POPIA (Act 4 of 2013)
- PAIA (Act 2 of 2000)
- Copyright Act 98 of 1978

7. Purpose of Processing Personal Information (POPIA Requirement)

Xiquel processes personal information for the following purposes:

- Provision of ICT, cloud, consulting, PMO and technical services
- Customer support, licensing administration, and service management
- Recruitment, onboarding, HR and payroll administration
- Vendor and subcontractor management
- Security, access control, and incident response
- Compliance with statutory and audit requirements
- Business continuity and disaster recovery
- Research, analytics, and service optimisation

8. Categories of Data Subjects

- Clients and client personnel
- Employees and job applicants
- Subcontractors, vendors and partners
- Website and platform users
- Consultants and temporary workers
- Members of the public requesting information

9. Categories of Personal Information Processed

Depending on the relationship:

- Identification data
- Contact details
- Employment information
- Financial and tax information
- Access credentials
- System/usage logs

- Project and service information
- Contractual information
- Security and audit logs
- Minimal special personal information where lawful

10. Recipients of Personal Information

Information may be shared with:

- Authorised Xiquel personnel (role-based access)
- Cloud service providers (including Microsoft)
- Payroll and HR service providers
- Subcontractors supporting service delivery
- Auditors and professional advisers
- Regulators and authorities as required by law

All transfers are subject to POPIA compliance and Data Processing Agreements.

11. Planned Transborder Flows

Personal information may be transferred to:

- Microsoft Azure regions
- International cloud hosting environments
- Global partners supporting service delivery

These transfers are protected through:

- POPIA Section 72 safeguards
- Standard Contractual Clauses (SCCs)
- Data Processing Agreements
- ISO 27001/27701-aligned controls

12. Security Measures to Protect Personal Information

Xiquel maintains an **ISO 27001:2022** aligned ISMS including:

- Encryption (in transit and at rest)
- Multi-factor authentication (MFA)
- Role-based access control (RBAC)
- Endpoint security and EDR
- Secure development lifecycle controls
- Vulnerability management
- Network and cloud security controls
- Logging and monitoring
- Backup and resilience controls
- Incident response procedures
- Physical security and access control
- Staff training and awareness

13. How to Make a PAIA Request

Requests must be made using **Form 02** and submitted to the Information Officer at:

Email: kriba@xiquelgroup.com
Alternative: lauram@xiquelgroup.com

Requirements:

- Full name and contact details
- Description of the record requested
- Form of access required
- Proof of identity (mandatory)
- Payment of the prescribed fees

Xiquel will respond within the statutory timelines.

14. POPIA Requests (Correction/Deletion of Personal Information)

Data subjects may use **POPIA Form 2** to request:

- Correction of their personal information

- Deletion or destruction of personal information
- Withdrawal of consent

These requests must be sent to the Information Officer.

15. Availability of the Manual

This Manual is available:

- At Xiquel's offices for inspection
- On request via email
- Free online (if published on website)
- To the Information Regulator upon request

16. Updates to the Manual

The Information Officer will update this Manual as required by law or changes in operations.

17. Approval

Issued by:

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Laura-Maria Mezzopera
Deputy Information Officer
Xiquel Group (Pty) Ltd

Date: January 2026