PAIA MANUAL

TRUSTCORE RISK SOLUTIONS (PTY) LTD

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1. DEFINITIONS AND INTERPRETATIONS

For purposes of this Manual, the following definitions apply:

1.1 Definitions

"Access fee" A fee prescribed for the purposes of sections 22(6) or 54(6) of PAIA.

"Data subject" The person to whom personal information relates.

"Deputy Information Officer (DIO)" A designated individual responsible for assisting the Information Officer with PAIA and POPIA compliance.

"Guide" The official PAIA Guide issued by the Information Regulator in terms of section 10 of PAIA.

"Head of a Private Body / Information Officer" The CEO or equivalent officer of TrustCore Risk Solutions (Pty) Ltd, or any duly authorised person acting in that capacity.

"Information Regulator" The Information Regulator established in terms of section 39 of POPIA.

"Person" A natural or juristic person.

"Personal Information" Information relating to an identifiable natural person, including but not limited to:

- Identity details
- Contact details
- Employment history
- Financial information
- Criminal behaviour indicators
- Opinions, views, or preferences
- Correspondence of a private or confidential nature
- Biometric information

"Private Body" A natural or juristic person carrying on any trade, business, or profession, excluding public bodies.

"Public Body" Any department of state, administration, municipality, or institution exercising public powers or performing public functions.

"Record" Any recorded information, regardless of form or medium, in the possession or under the control of TrustCore.

"Requester" Any person requesting access to a record of TrustCore in terms of section 50 of PAIA.

"Responsible Party" TrustCore Risk Solutions (Pty) Ltd, which determines the purpose and means for processing personal information.

"Third Party" Any person other than the requester or TrustCore.

"The Act" The Promotion of Access to Information Act 2 of 2000, as amended.

1.2 Interpretations

- References to legislation include amendments and replacements.
- If a definition contains a substantive provision, it must be interpreted as such.
- The word "including" does not limit general meaning.
- If there is a conflict between this Manual and PAIA, **PAIA prevails**.
- This Manual does not replace the need to consult PAIA directly.

2. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
CEO	Chief Executive Officer
IO	Information Officer
DIO	Deputy 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 (South Africa)
RSA	Republic of South Africa
DPA	Data Processing Agreement
MFA	Multi-Factor Authentication
SOP	Standard Operating Procedure
SAPS	South African Police Service
SAQA	South African Qualifications Authority
VPN	Virtual Private Network

Acronym	Meaning
HSM	Hardware Security Module
EU	European Union
GDPR	General Data Protection Regulation
API	Application Programming Interface
PII	Personally Identifiable Information
SOC 2	Service Organisation Control Type II Certification
ISO 27001	International Information Security Standard

3. INTRODUCTION

TrustCore Risk Solutions (Pty) Ltd ("TrustCore") has prepared this PAIA Manual in accordance with **Section 51 of PAIA** and the mandatory disclosures required under **Section 51(1)(c)(iv) and (v)**.

This Manual also incorporates TrustCore's obligations under **POPIA**, including Sections **23** and **24** relating to access, correction, deletion, and notification.

TrustCore is committed to transparency, accountability, and lawful processing of personal information.

4. PURPOSE OF THE PAIA MANUAL

This Manual enables members of the public to:

- Identify records held by TrustCore
- Understand how to request access
- Access contact details of the Information Officer
- Understand TrustCore's processing of personal information
- Know categories of data subjects and personal information processed
- Understand transborder flows and security safeguards
- Know remedies available under PAIA and POPIA

5. OVERVIEW OF TRUSTCORE RISK SOLUTIONS (PTY) LTD

TrustCore Risk Solutions (Pty) Ltd is a national forensic, polygraph, and workplace-integrity services provider. TrustCore conducts:

- Polygraph examinations
- Workplace integrity assessments (SOUTH AFRICAN WORKPLACE INTEGRITY DATABASE)
- Consent-based integrity verification

- Risk management support
- POPIA-aligned data processing

TrustCore is committed to lawful, transparent, and secure processing of personal information.

6. GOVERNANCE AND OPERATIONAL STRUCTURE

TrustCore's governance structure includes:

- Information Officer
- Deputy Information Officer(s)
- Internal compliance and security oversight
- Operational divisions for polygraph services and integrity systems

7. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Information Officer: Mr Barend Petrus (Bennie) van der Merwe

Email: bennie@trustcore.co.za

Telephone: 082 322 5020

Physical Address: 10 Vereniging Street, Moorreesburg, Western Cape

General PAIA enquiries: disputes@trustcore.co.za OR hello@trustcore.co.za

8. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN THE GUIDE

The PAIA Guide is available from the Information Regulator:

Website: www.inforegulator.org.za Email: PAIAComplaints@inforegulator.org.za

9. CATEGORIES OF RECORDS HELD BY TRUSTCORE

- Company records
- Client contracts
- POPIA compliance documents
- Internal policies
- Retention policies
- Information security frameworks
- Financial records (limited)
- Operational records
- Investigation records (subject to consent and privilege)
- Polygraph records (subject to consent)
- Integrity-related information (consent-based)

10. RECORDS AUTOMATICALLY AVAILABLE

- Company profile
- Services offered
- General business information

11. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Examples:

Category	Legislation
Company registration documents	Companies Act 71 of 2008
PAIA Manual	PAIA Section 51
Tax records	Income Tax Act

12. PROCEDURE FOR ACCESS TO RECORDS

Requests must be submitted:

- In writing
- On the prescribed PAIA Form
- To the Information Officer
- With sufficient detail to identify the record

TrustCore may require:

- Proof of identity
- Proof of consent (where applicable)
- Payment of prescribed fees (where applicable)

Access may be refused where records are:

- Legally privileged
- Confidential
- Contain third-party information
- Restricted under POPIA

13. REMEDIES AVAILABLE IF PAIA PROVISIONS ARE NOT COMPLIED WITH

Requesters may:

- Lodge a complaint with the Information Regulator
- Approach a court for relief

14. SERVICES AVAILABLE TO THE PUBLIC

TrustCore provides:

- Polygraph examinations
- Workplace investigations
- Integrity assessments
- Verification services (consent-based)

15. PROCESSING OF PERSONAL INFORMATION (POPIA COMPLIANCE)

TrustCore processes personal information for:

- Polygraph examinations
- Investigations
- Integrity assessments
- Administration and reporting
- Legal compliance
- Risk management

16. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION PROCESSED

Data subjects include:

- Employees
- Job applicants
- Clients
- Client employees
- Individuals undergoing polygraph examinations
- Individuals involved in investigations
- Individuals listed in the Workplace Integrity Database

Personal information includes:

- Identification details
- Contact details
- Employment information
- Polygraph-related information
- Investigation-related information
- Integrity-related information
- Special personal information (lawful basis required)

17. RECIPIENTS OF PERSONAL INFORMATION

Information may be shared with:

- The data subject
- The requesting employer (after secure digital or written consent)
- Authorised TrustCore personnel
- Regulatory bodies

Consent is obtained through secure digital mechanisms or verified written consent.

18. TRANSBORDER FLOWS OF PERSONAL INFORMATION (SECTION 51(1)(c)(iv))

TrustCore transfers personal information to:

Supabase Pte. Ltd (Singapore) Hosting region: **Frankfurt, Germany (EU)**

Transfers comply with POPIA Section 72(1)(a).

19. INFORMATION SECURITY MEASURES (SECTION 51(1)(c)(v))

TrustCore implements:

- Encryption in transit and at rest
- Per-record encryption enabling cryptographic erasure
- MFA and role-based access control
- Append-only audit logs
- Segregated storage
- SOC 2 Type II and ISO 27001 certified hosting
- Incident response procedures
- Secure destruction of records

20. WORKPLACE INTEGRITY DATABASE – SYSTEM STATUS

TrustCore confirms that the Workplace Integrity Database is now **activated and operating in a live production environment**, following the granting of **Prior Authorisation** by the Information Regulator in terms of POPIA Section 57.

The production system:

- Processes **real personal information** strictly in accordance with POPIA
- Operates within the authorised **Supabase EU hosting region (Frankfurt)**
- Implements full encryption, MFA, role-based access, and audit logging
- Restricts access to **contracted employers only**
- Requires **secure digital consent or written consent** from every data subject before any disclosure

- Provides full dispute, correction, and deletion mechanisms
- Maintains strict operator and sub-processor controls under the DPA
- Logs all access, queries, and disclosures for accountability and audit purposes

Key Compliance Principles

- No public access
- No employer access without a signed service agreement
- No information released without valid, authenticated digital or written consent
- All processing governed by POPIA Sections 9–25
- All high-risk processing authorised under Prior Authorisation
- Full data subject rights enforced
- All disclosures logged and auditable
- All operators and sub-processors contractually bound to POPIA-aligned safeguards

21. DISPUTE, CORRECTION, AND OBJECTION PROCEDURES

Data subjects may:

- Dispute accuracy
- Request correction
- Request deletion
- Object to processing
- Challenge integrity-related records

All disputes must be submitted to:

disputes@trustcore.co.za

TrustCore will:

- Acknowledge the dispute
- Request supporting documentation
- Conduct verification
- Provide a written outcome
- Notify third parties where applicable

22. PRESCRIBED FEES

Fees may apply as per PAIA Regulations.

23. AVAILABILITY OF THE MANUAL

This Manual is available:

- Electronically via email
- In hard copy at TrustCore's office
- On TrustCore's website

24. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

TrustCore will notify the requester in writing.

25. DISPOSAL OF RECORDS

Records are disposed of in accordance with:

- POPIA
- Internal retention schedules
- Secure destruction protocols

26. UPDATING OF THE MANUAL

This Manual will be updated:

- Annually
- When legislation changes
- When TrustCore's operations change
- When directed by the Information Regulator