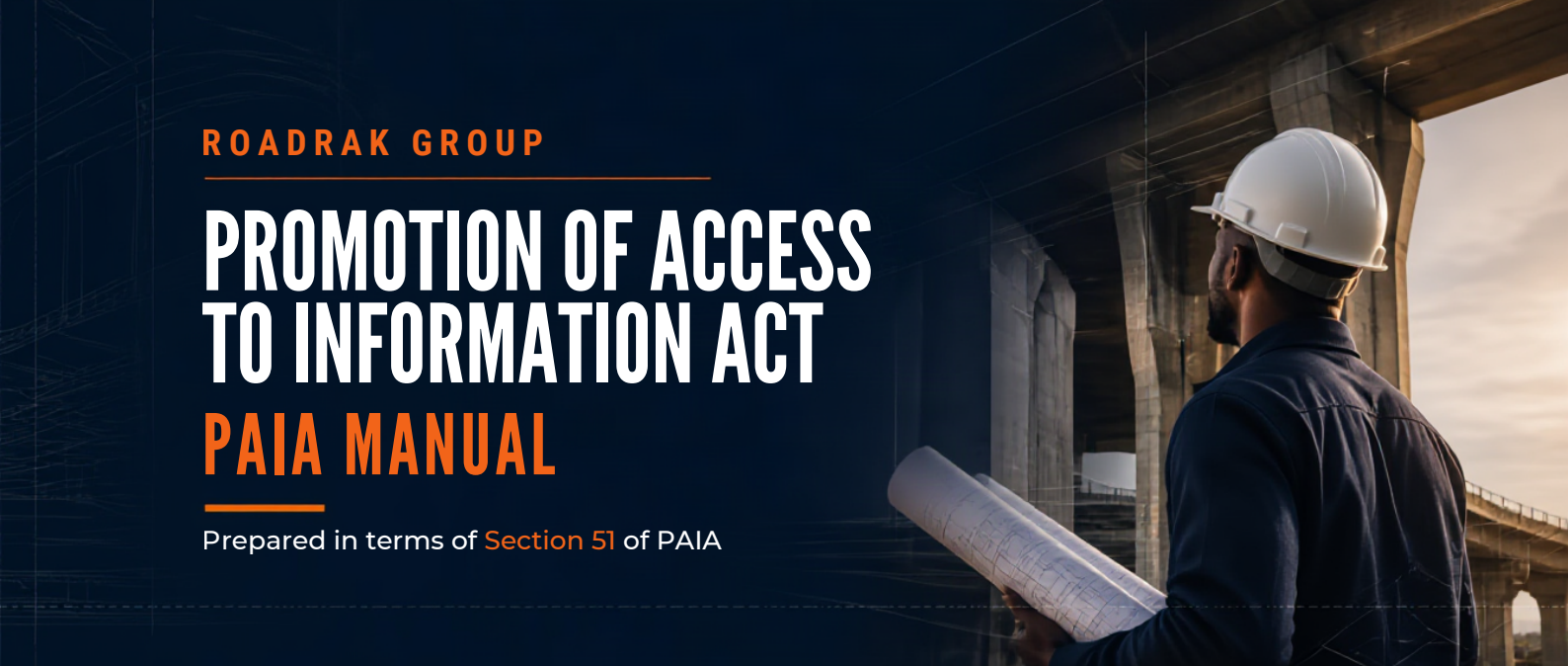




ROADRAK GROUP

PROMOTION OF ACCESS TO INFORMATION ACT

PAIA MANUAL

Prepared in terms of **Section 51** of PAIA

ROADRAK GROUP – PROMOTION OF ACCESS TO INFORMATION ACT – PAIA MANUAL

Prepared in terms of Section 51 of PAIA

ROADRAK GROUP (Pty) Ltd

Malamulele, Limpopo, South Africa

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Corporate compliance manual

For clients, suppliers, regulators, stakeholders and members of the public

Document Control & Legal Review

Control item	Details
Document	PAIA Manual
Company	ROADRAK GROUP (Pty) Ltd
Document Type	PAIA Manual
Applicable Legislation	PAIA 2 of 2000
Related Legislation	POPIA 4 of 2013
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Information Officer	[INSERT INFORMATION OFFICER NAME]
Status	DRAFT – PENDING FORMAL APPROVAL

Legal review required: This manual is a corporate compliance document and should be reviewed by an appropriately qualified South African legal/compliance professional before formal adoption and publication.

Legislative position and source verification: intended for review as at September 2026 and before formal adoption.

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1 Introduction and Purpose

The Constitution of the Republic of South Africa recognises the importance of access to information in an open and accountable society. PAIA gives effect to that principle by establishing mechanisms through which a requester may seek access to records held by public and private bodies, subject to the Act's requirements and limitations.

This manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as applicable to private bodies. It explains how a person may request records from ROADRAK GROUP (Pty) Ltd and describes relevant record categories, privacy considerations, possible refusal grounds and practical contact arrangements.

The manual is intended for clients, suppliers, regulators, stakeholders and members of the public. It should be read with current PAIA, POPIA, applicable regulations and official guidance. General legal explanations in this manual must be distinguished from the limited ROADRAK-specific facts supplied for publication.

How to use this manual

Start with the request process on page 11, review the information and fee requirements on page 12, and use the contact and placeholder fields only after they have been confirmed for formal publication.

This manual does not provide legal advice. Legal and regulatory positions should be verified against current official sources before adoption.

2 About ROADRAK Group

ROADRAK GROUP (Pty) Ltd is a South African construction and infrastructure company operating across the built environment. The capability areas below are the company facts used for this manual.

Built-environment capability	Scope label
Civil Construction	Construction capability
Building Construction	Construction capability
Facilities Management	Built-environment capability
Materials Supply	Supply capability
Roads & Infrastructure	Infrastructure capability
Road Marking	Infrastructure capability

Scope discipline

This profile intentionally does not state company scale, track record, clients, projects, certifications, awards, licences, subsidiaries or additional locations.

3 Company Contact Details & 4 Information Officer

Contact item	ROADRAK detail
Company	ROADRAK GROUP (Pty) Ltd
Location	Malamulele, Limpopo, South Africa
Website	www.roadrak.co.za
Email	info@roadrak.co.za
Telephone	+27 (0)15 110 1640
Mobile	+27 (0)76 168 9513

Information Officer details to be confirmed

Name: [INSERT INFORMATION OFFICER NAME]

Title: [INSERT INFORMATION OFFICER TITLE]

Designated request address or fax details: [INSERT DESIGNATED REQUEST ADDRESS OR FAX DETAILS]

The Information Officer's role may include receiving and coordinating access requests, supporting information governance, communicating with requesters and supporting privacy compliance under PAIA and POPIA. No person is named in this draft.

5 Information Regulator and PAIA Guide

The Information Regulator South Africa is an independent regulatory authority with responsibilities under PAIA and POPIA. At a high level, its work includes monitoring compliance, issuing guidance, supporting enforcement, receiving complaints and providing information about available remedies.

Requesters should consult the current official Information Regulator resources for PAIA manuals, templates, prescribed forms, complaint processes and eServices. The Department of Justice also maintains PAIA information and guidance resources. Official links and resources should be checked for currency before use.

Official resource	Reference
Information Regulator South Africa	https://www.inforegulator.org.za/
Department of Justice PAIA resources	https://www.justice.gov.za/paia/paia.htm

Practical caution

Use the latest official form and guidance available when submitting a request. This manual does not replace an official form or current regulator instruction.

6 Records That May Be Made Available Without a Formal Request

ROADRAK may publish selected information without requiring a formal PAIA request. Depending on what is actually published at the relevant time, this may include:

- **Company information** and public corporate descriptions.
- **Website content** and information about the company's capability areas.
- **Public announcements** and news or media information where published.
- **Public corporate information** and published policies where applicable.
- **Marketing materials** made available by ROADRAK for public use.

Availability is not automatic

The existence of a category in this manual does not mean that a record is automatically available. Actual availability depends on records ROADRAK publishes, the current version of the information and applicable law.

7 Records Held by ROADRAK Group

CATEGORY	EXAMPLES OF RECORDS	AVAILABILITY & NOTES
Corporate & Governance	Policies, governance records, company information and internal administrative records.	May be subject to confidentiality, privacy and statutory limits.
Financial	Accounting, financial administration, invoices, payment and related business records.	Commercial sensitivity and legal restrictions may apply.
Human Resources	Employment, recruitment, personnel and workplace administration records.	Personal information protections are likely to apply.
Procurement & Supplier	Supplier records, quotations, orders, evaluations and procurement correspondence.	Third-party and commercial interests require consideration.
Client & Commercial	Client correspondence, agreements, proposals and commercial administration.	Confidentiality, privacy and third-party rights may limit access.
Operational	Operational administration, service records and capability-related information.	Availability depends on the specific record and lawful grounds.
Legal & Compliance	Legal correspondence, compliance records and regulatory communications.	Privilege and other statutory protections may apply.
Information Technology	IT administration, information management and technology-related records.	Security, privacy and system-protection considerations may apply.
Marketing & Communications	Published materials, communications and public-facing content.	Public availability depends on what ROADRAK publishes.

Important: The existence of a category does not guarantee access. Access is subject to PAIA, POPIA, confidentiality, third-party rights, commercial sensitivity and lawful grounds for refusal.

8 Records Available Under Other Legislation

To the extent applicable to ROADRAK GROUP, records may be created or maintained in response to requirements under other legislation. Relevant legal areas may include:

- **Companies legislation** and corporate administration requirements.
- **Tax legislation** and financial record-keeping requirements.
- **Labour and employment legislation** and workplace administration.
- **Occupational health and safety legislation** and related duties.
- **Construction-related legislation** and requirements applicable to activities undertaken.
- **Environmental legislation** where relevant to operations or records.
- **Financial and accounting requirements** applicable to business records.
- **POPIA and PAIA** in relation to personal information and access to records.

Reference to a law does not confirm that every category applies to ROADRAK, that a particular record exists or that every record is accessible. The applicable law and the specific record must be considered.

9 Requesting Access to Records

A requester should use the current prescribed process and provide enough information for ROADRAK to understand and assess the request.

1. **Identify the record** or record category sought.
2. **Complete the applicable prescribed PAIA request form.**
3. **Describe the record sufficiently** to enable identification.
4. **Provide requester details** and a preferred notification method.
5. **Explain the right being exercised or protected** where required.
6. **Submit the request** using the designated ROADRAK contact details once confirmed.
7. **ROADRAK considers the request** under PAIA and other applicable law.

Important: Submitting a request does not guarantee access. ROADRAK may need to consult third parties, assess exemptions, consider privacy and confidentiality, and apply the statutory process.

10 Request Requirements and Fees

Section 53 of PAIA concerns requests for records of a private body. A request should use the prescribed form and provide sufficient particulars to identify the record and the requester. It should also state the requested form of access and include the information required by the current law and form.

Information to prepare	Purpose
Full name and contact details	Enables communication and notification.
Sufficient particulars of the record	Allows the record to be identified and located.
Preferred form of access	Clarifies how access is requested.
Relevant right and explanation	Explains the right being exercised or protected where required.
Prescribed form and supporting information	Supports a procedurally complete request.
Proof of authority	Required where a requester acts for another person, where applicable.
Republic postal address or fax number	May be required as prescribed by PAIA and applicable regulations.

Section 54 addresses prescribed request fees where applicable. Request, access, reproduction or other prescribed fees may apply in accordance with PAIA and applicable regulations. ROADRAK fees are not stated in this draft; the requester should be informed where required.

11 Grounds for Refusal

PAIA contains lawful grounds on which access to a record may be refused, in whole or in part. The specific ground depends on the record, the information contained in it and the applicable statutory requirements.

- **Personal information** relating to another person, subject to applicable exceptions.
- **Commercial information** where disclosure could affect protected business interests.
- **Confidential information** supplied or held under a duty of confidence.
- **Third-party information** where consultation, notification or protection is required.
- **Privileged information** protected by legal privilege where applicable.
- **Safety or property interests** where a relevant statutory ground applies.
- **Other statutory grounds** created by PAIA or another applicable law.

Where the law allows, ROADRAK may need to consider whether parts of a record can be separated from protected information and released. This is not a promise of access. No arbitrary refusal is intended; decisions must be grounded in applicable law and current official guidance.

12 Third-Party Information and Remedies

A record requested from ROADRAK may contain information supplied by, relating to or affecting a third party. Depending on the circumstances, PAIA may require consultation with that third party and/or notification before a decision is made.

Third-party considerations may include personal information, confidential information, commercial interests, contractual duties and other protected interests. Consultation does not itself determine the outcome; ROADRAK must apply the relevant statutory framework to the request.

Remedies and further steps

PAIA provides remedies for certain refusal, delay and process issues. Requesters should consult current Information Regulator South Africa guidance and applicable legal procedures for the available route in the circumstances. This manual does not create or assert a specific internal appeal route for ROADRAK.

General legal information

The explanations on this page are general. They do not replace current legislation, official guidance or advice from an appropriately qualified South African legal professional.

13 POPIA and Protection of Personal Information

The Protection of Personal Information Act 4 of 2013 regulates the processing of personal information. PAIA access rights and POPIA privacy obligations should be read together: access to information is not unrestricted where disclosure would conflict with privacy or another lawful protection.

Data subjects may include employees, prospective employees, clients, prospective clients, suppliers, contractors, professional advisers, business partners, website users and persons communicating with ROADRAK.

Possible information category	Illustrative context
Identification information	Information used to identify a person where lawful and necessary.
Contact information	Communication and relationship administration.
Employment information	Recruitment, employment and workplace administration.
Contractual information	Management of agreements and business relationships.
Financial information	Business administration and payment-related processes where applicable.
Correspondence	Communications received from or sent to a person.
Other necessary information	Information required for lawful business purposes.

This page does not assert that ROADRAK processes every listed category in every circumstance. Processing must be considered against POPIA and other applicable law.

14 Purposes of Processing

Where lawful and necessary, ROADRAK may process personal information for purposes connected with its business and legal responsibilities, including:

- **Business administration** and management of company activities.
- **Client and supplier management** and relationship administration.
- **Recruitment and employment administration** where relevant.
- **Contracts** and the performance or administration of agreements.
- **Regulatory and legal obligations** applicable to the company.
- **Communication** with persons and organisations in a business context.
- **Service delivery** connected with ROADRAK's capability areas where applicable.
- **Record keeping** for lawful operational, contractual or regulatory needs.

Responsible processing principle

Personal information should be processed responsibly and only as permitted by applicable law, with appropriate regard for purpose, necessity, fairness and privacy.

15 Recipients and Cross-Border Transfers

Where lawful and necessary, personal information may be shared with authorised recipients for legitimate business, contractual, operational or legal purposes.

Potential recipient category	Reason for possible sharing
Authorised employees	Business administration and service-related duties.
Service providers	Support for authorised operational or administrative activities.
Professional advisers	Professional, legal, accounting or compliance support where applicable.
Regulators and government authorities	Compliance with lawful requests and obligations.
Financial institutions	Payment, financial administration or related business processes.
Technology providers	Technology-related services where lawful and necessary.
Other authorised recipients	Specific lawful, contractual or operational purposes.

ROADRAK does not claim in this manual that it currently makes international transfers. If information is transferred outside South Africa, ROADRAK will seek to comply with POPIA where applicable and where lawful.

16 Information Security and Retention

ROADRAK seeks to maintain reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised access, interference, modification, disclosure or destruction. This statement does not identify or claim any specific security technology, certification or control.

The nature and level of protection required may depend on the information, the processing activity, the risk of harm, the legal framework and the circumstances in which the information is held or used.

Retention approach

Retention periods are determined by legal, contractual, operational, regulatory and legitimate business needs. ROADRAK does not state invented retention periods in this manual. Information may be retained for as long as reasonably necessary for the applicable purpose, subject to lawful deletion, disposal or archival requirements.

Publication boundary

This manual describes a governance approach, not a technical specification. Detailed security arrangements should not be inferred from this general wording.

17 Manual Availability, Review and Updates

This manual is intended to be made available on www.roadrak.co.za and may also be available from the company upon request, subject to applicable requirements. The supplied company location is Malamulele, Limpopo, South Africa; no additional office inspection arrangement is asserted.

The manual should be reviewed periodically and after material changes to company information, legislation, governance, contact details, record categories, privacy practices or Information Officer details. Legal and regulatory positions should be verified against current official sources before adoption and whenever this manual is updated.

Publication checklist

- ☐ Confirm final approval and approving authority.
- ☐ Check current official PAIA and POPIA links, forms, regulations and guidance.
- ☐ Insert the named Information Officer and title.
- ☐ Insert designated request address or fax details where required.
- ☐ Confirm final effective date and review date.
- ☐ Confirm final page numbering after typesetting.

18 Declaration and Approval

Approval field	Entry
Company	ROADRAK GROUP (Pty) Ltd
Document	PAIA Manual
Prepared by	[NAME]
Reviewed by	[NAME]
Approved by	[NAME]
Position	[TITLE]
Effective Date	[DATE]
Review Date	[DATE]
Signature	_____

The fields above are placeholders. This page does not imply formal approval or adoption.

19 Contact

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+27 (0)76 168 9513

info@roadrak.co.za

www.roadrak.co.za

20 References

Readers should verify current official editions, forms, regulations, guidance and eServices before relying on any source.

- **Promotion of Access to Information Act 2 of 2000** (PAIA), as amended.
- **Protection of Personal Information Act 4 of 2013** (POPIA), as amended.
- **Information Regulator South Africa** and its current PAIA and POPIA guidance, templates and eServices: <https://www.inforegulator.org.za/>
- **Department of Justice PAIA resources**, including official PAIA guidance and the PAIA Guide: <https://www.justice.gov.za/paia/paia.htm>
- **PAIA regulations**, including the 2006 PAIA regulations as amended and the 2021 PAIA regulations listed by the Department of Justice.
- **Government POPIA resource**: <https://www.gov.za/documents/protection-personal-information-act>

Legal review required: This manual is a corporate compliance document and should be reviewed by an appropriately qualified South African legal/compliance professional before formal adoption and publication.

Legal and regulatory positions should be verified against current official sources before adoption. This manual does not reproduce copyrighted source text and does not provide legal advice.

End of manual