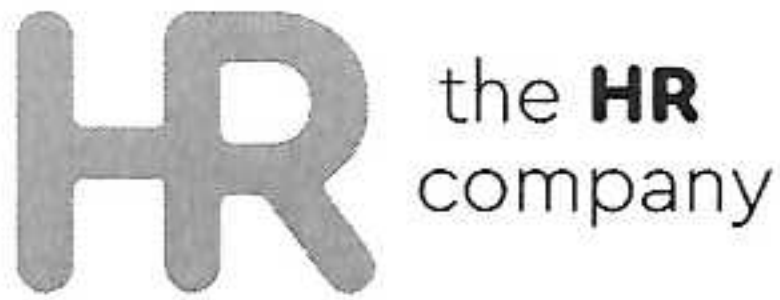




PAIA Manual

Privacy and personal information

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, with information on processing under the Protection of Personal Information Act 4 of 2013.

Document control	Details
Business	The HR Company — recruitment and HR consultancy
Legal status	Sole proprietorship
Legal owner	S Murphy trading as The HR Company
Document number	THRC PAIA 01
Version and date	Draft v1.0 — 20 October 2026
Approval and effective date	20 October 2026 (latest update)
Next review	Within 24 months of approval, or earlier if circumstances change

About this manual

This manual explains what records The HR Company holds, how to request access and how personal information is used in our recruitment and HR consultancy services. It is intended for candidates, clients, employees, referees, suppliers and members of the public.

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1 Definitions and business structure

“The HR Company”, “we”, “us” and “our” mean S Murphy trading as The HR Company. The business is a sole proprietorship and is not a separate incorporated company. References to business records mean records relating to the proprietor’s recruitment and HR consultancy activities.

Term	Meaning
PAIA	Promotion of Access to Information Act 2 of 2000, as amended.
POPIA	Protection of Personal Information Act 4 of 2013.
Information Officer	The proprietor as head of the private body, or a duly authorised person as permitted by law.
Regulator	The Information Regulator of South Africa.
Personal information	Information relating to an identifiable living person or, where applicable, an identifiable existing juristic person.
Data subject	The person to whom personal information relates.

2 Contact details

Please direct PAIA requests and privacy enquiries to the Information Officer. The same contact may assist a requester who needs help completing a request.

Contact	Details to complete
Proprietor’s full legal name	Susan Murphy
Information Officer’s full name and capacity	Susan Murphy
Deputy Information Officer	Not appointed
Telephone	0318237900
PAIA and privacy email	sue@thehrco.co.za
Physical business address	222 Cato Road, Glenwood, Durban 4001
Postal address	222 Cato Road, Glenwood, Durban, 4001
Website	www.thehrco.co.za

3 Guide on how to use PAIA

The Regulator’s Guide explains how to exercise access rights, obtain assistance, complete requests and use available remedies. It is available in the official languages and in braille. It may be inspected or requested from the Information Officer, or obtained from the Regulator at <https://inforegulator.org.za>.

Regulator enquiries: enquiries@inforegulator.org.za | Telephone: 010 023 5200. The current Guide, forms and contact channels are available on the Regulator’s website.

4 Records available without a formal request

The following material may be obtained through ordinary enquiries, or from our website where published, without submitting PAIA Form 2. Availability is limited to material intended for public distribution; confidential or personal records are excluded.

Category	Examples and ordinary access route
Business information	Business profile, service descriptions and contact details — request from the office or view where published.
Recruitment information	Public vacancy advertisements and general candidate guidance — view on the relevant advertising platform or request from the office.
PAIA and privacy information	This manual and public privacy notices — request from the Information Officer or view where published.
Standard terms	Standard recruitment terms and application requirements intended for prospective clients or candidates — request from the office.

CVs, candidate lists, references, client briefs, remuneration details and employee records are not publicly available merely because their categories appear in this manual. Any access must follow the applicable law and confidentiality requirements.

5 Records held under other legislation

Records may be kept under the legislation below where applicable to the business. Listing legislation does not make all related records freely available; access depends on that legislation, PAIA and any lawful restrictions.

Record category	Relevant legislation
Information access and privacy	PAIA 2 of 2000; POPIA 4 of 2013
Employment and labour relations	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
Tax, accounting and payroll	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991, if VAT registered
Unemployment insurance and levies	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Levies Act 9 of 1999, where applicable
Workplace safety and occupational injuries	Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Employment services and electronic dealings	Employment Services Act 4 of 2014, where applicable; Electronic Communications and Transactions Act 25 of 2002
Empowerment records	Broad-Based Black Economic Empowerment Act 53 of 2003, where applicable

As a sole proprietorship, the business does not have a memorandum of incorporation, company directors' register or company incorporation number in its own right.

6 Subjects and categories of records

Records may exist electronically or on paper. This list describes the categories that may be held in the course of our work; it does not confirm that a particular record exists or confer an automatic right of access.

Subject	Categories of records
Business administration	Business registrations where applicable, policies, procedures, insurance, contracts, equipment records and correspondence.
Candidates and recruitment	CVs, application forms, contact details, employment history, qualifications, interview notes, vacancy matching, candidate communications, remuneration expectations and placement records.
References and verification	Referee details, reference reports, qualification and employment verification, consent records and other relevant lawful checks.
Clients and assignments	Client contact information, vacancy briefs, job descriptions, fee agreements, mandates, shortlists, interview arrangements, offers, invoices and placement guarantees.
HR consultancy	Client instructions, advice, project records and workforce information supplied for an agreed HR assignment.
Employees and contractors	Employment or service agreements, identity and qualification records, payroll, leave, performance, disciplinary and training records.
Finance and tax	Accounting records, banking information, invoices, receipts, tax returns, payroll submissions and financial reports.
Suppliers and service providers	Supplier contact details, quotations, agreements, invoices, payment information and data processing arrangements.
Business development and marketing	Client and prospect contacts, enquiries, mailshot records, consent and objection records, unsubscribe lists and published material.
Information governance and IT	Access requests, privacy complaints, processing notices, security incident records, access permissions, system and backup records, where held.

Recruitment confidentiality

We assess access requests individually. Records can include personal information about other candidates, confidential client information and protected third party material. Where PAIA permits access to part of a record, protected content may be removed and the remainder disclosed. Confidentiality alone does not override a statutory right of access.

7 Processing of personal information

7.1 Why we process information

We process information to assess and match candidates to vacancies; conduct interviews, references and relevant verification checks; present suitable candidates to clients; arrange interviews and offers; administer placements, fees and guarantees; and provide agreed HR advice. We also process information to manage staff, suppliers, accounts, enquiries, business development and legal obligations.

Processing must have a lawful basis under POPIA. Depending on the circumstances, this may be consent, steps towards or performance of a contract, compliance with law, or protection of a legitimate interest. We do not treat participation in recruitment as unlimited consent for unrelated uses.

7.2 People and information involved

Data subjects	Personal information that may be processed
Candidates and prospective candidates	Names and contact details, location, CVs, employment history, qualifications, skills, interview records, remuneration, availability, references and relevant verification results. Identity and work authorisation details only where necessary.
Referees	Name, position, employer, contact details, relationship to the candidate and reference feedback.
Clients, prospective clients and their representatives	Business and contact details, positions, correspondence, vacancy requirements, agreements and billing details.
Employees and contractors	Identity and contact details, dependants where necessary, banking and tax details, qualifications, employment, payroll, leave and performance records.
Suppliers and advisers	Business and contact information, agreements, tax and banking details and payment records.
Website visitors and enquirers	Information submitted through enquiries and technical information collected by the website, where applicable and disclosed in the relevant notice.

7.3 Sensitive information

Race, health, disability, criminal behaviour and other special personal information are processed only when relevant and permitted under POPIA and applicable employment law. Additional safeguards and any required authorisation or consent must be in place. Verification checks must be appropriate to the role; credit checks are not routine for every candidate. We do not request unnecessary sensitive information.

7 4 Sources and provision of information

Information may come directly from candidates, clients, staff and suppliers; from referrals, referees and authorised verification providers; and from recruitment platforms, professional networks or public business sources. Public availability does not remove POPIA obligations. Where information is collected indirectly, we provide the required notice unless a lawful exception applies.

Providing information is generally voluntary, except where required by law. Without relevant information we may be unable to assess an application, perform a check, provide a service or meet an obligation. We explain mandatory requirements and consequences in the relevant application or collection process.

7 5 Sharing personal information

Recipient category	Purpose and limits
Prospective employers and authorised client contacts	Relevant candidate information for an agreed recruitment opportunity. Before an identifiable CV or profile is submitted, the candidate must be informed and an appropriate lawful basis established.
Referees and verification providers	Only information needed to obtain relevant references or perform authorised checks.
Assessment providers	Information needed for an agreed assessment, where used and lawfully permitted.
Staff and contracted service providers	Information needed for their assigned recruitment, HR, administrative or support duties.
IT, recruitment platform, cloud and mailshot providers	Hosting, database management, communications, backup and related services under appropriate data protection arrangements.
Accountants, professional advisers and authorities	Accounting, advice, compliance, legal claims or disclosures required or authorised by law.

Recipients must receive only information appropriate to the purpose. Clients may act as independent responsible parties for information they receive and must meet their own privacy obligations. We do not sell candidate databases or marketing lists.

7 6 Transfers outside South Africa

Information may be processed outside South Africa through email, cloud storage, recruitment systems, marketing tools or an international recruitment assignment. Such transfers must satisfy section 72 of POPIA, for example through adequate legal or contractual protection, valid consent, or another permitted ground. Special personal information and children's information may require prior authorisation for certain foreign transfers.

Non South African Providers are : Avast Network virus protector, Brevo email, Dropbox, Chat GPT.

Reasonable technical and organisational measures must protect confidentiality, integrity and availability. Appropriate measures include restricted access according to duties, secure passwords, device protection, staff confidentiality obligations, secure transmission, backups, controlled paper storage and secure disposal. Operators processing on our behalf must be subject to written security obligations.

Only the proprietor and administrators have access to these providers. All are cloud based and password protected and operate on company owned and controlled digital devices.

Where there are reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, notifications to the Regulator and affected data subjects will be made as required by section 22 of POPIA, using the prescribed channels and subject to lawful exceptions or delays.

7 8 Direct marketing

Electronic marketing is sent only on a basis permitted by section 69 of POPIA, including valid consent or the limited existing customer exception where its conditions are met. A person may be approached once for

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consent in the prescribed manner if they have not previously refused. Publicly available business contact details do not, by themselves, constitute consent.

Marketing communications identify the sender and provide a simple means to stop further marketing. Objections and unsubscribe requests are recorded and honoured. A limited suppression record may be retained to prevent further marketing. Candidate information must not be included in promotional material without appropriate permission and safeguards.

7 9 Website and cookies

Any website collection, cookies, analytics and third party tracking must be explained in an accurate website privacy or cookie notice. Users may contact the Information Officer about website information. Browser settings may restrict cookies, although this can affect functionality. The HR Company Cookie policy is attached.

7 10 Retention and disposal

Information is retained only as long as permitted by POPIA: for its purpose, a lawful contractual requirement, a legal retention obligation, an appropriate consent or another permitted basis. Candidate database records are reviewed for continued relevance and accuracy. A candidate may ask to leave the active database, subject to any lawful need to retain a limited record.

Different periods apply to recruitment, employment, tax and contractual records. Relevant records may be retained while a dispute or legal claim is pending. When retention is no longer justified, information is securely destroyed, deleted or de-identified. Backup copies are managed through the applicable retention and overwrite process. The information is security maintained in our cloud software CRM programme Placement Partners.

Retention Periods

Candidates information - until they request removal

Client information – until they request removal

Financial Records – 10 years

Supplier Records – 10 years

Staff Information – 5 years after a staff member leaves the employ of The HR Company

8 Requests for access and fees

8 1 Submitting a PAIA request

Use the current PAIA Form 2 available at <https://inforegulator.org.za/paia-forms/> or request a copy from the Information Officer. Submit it to the contact in section 2. Identify the requested record sufficiently, provide contact details and indicate the preferred form of access. Identify the right to be exercised or protected and explain why the record is required for that purpose, as required for access to a private body's records under section 50 of PAIA.

Provide reasonable proof of identity and, if acting for someone else, proof of authority. Identity verification must be proportionate. A person unable to complete the form because of disability or illiteracy may ask the Information Officer for assistance.

8 2 Decisions and restrictions

We will notify the requester of the decision as soon as reasonably possible and ordinarily within 30 days after receipt of the request or required particulars. PAIA permits an extension of up to a further 30 days in specified circumstances; notice must explain the reason and available remedies. Third party notification procedures may apply. Failure to decide within the applicable period is treated as a refusal.

Requests are assessed under PAIA, including protection of third party privacy, confidential commercial information, legally privileged records and other statutory grounds. Any applicable public interest override must be considered. The written outcome will give reasons for refusal, or explain access arrangements and applicable fees. PAIA Form 3 is used for the prescribed outcome and fee notification.

8.3 Fees

Prescribed request, reproduction, search, preparation and delivery fees may apply. The current private body schedule is available at <https://info regulator.org.za/paia-fees-structure-2/>. Any applicable statutory exemption will be respected. Confirmation of whether we hold a data subject's personal information under section 23(1)(a) of POPIA is free of charge. Fees for copies or further access are assessed under the applicable law.

We will notify the requester of payable fees and any permitted deposit before charging them, and provide an estimate where required. Payment details are supplied directly by the Information Officer. A requester may challenge a fee or deposit using the remedies below.

9 Privacy rights and complaints

Data subjects may request confirmation and access to their personal information, information about relevant third party recipients, and correction or deletion of information that is inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained. They may request destruction of a record we are no longer authorised to retain. Deletion is subject to lawful retention duties.

A data subject may object to processing on grounds permitted by POPIA, object to direct marketing, or withdraw consent where consent is the basis for processing. Withdrawal does not retrospectively invalidate lawful processing. Contact the Information Officer; current POPIA Form 1 concerns objections and Form 2 concerns correction or deletion, available at <https://info regulator.org.za/popia-forms/>. Assistance will be provided where required.

9.1 Escalating a complaint

Please raise concerns with the Information Officer using section 2. This does not prevent you from exercising statutory remedies. As a private body, we have no statutory internal PAIA appeal procedure.

A PAIA complaint may be submitted to the Regulator using PAIA Form 5, ordinarily within 180 days of the relevant decision or deemed refusal, subject to the applicable condonation provisions. PAIA also provides for court applications under section 78, subject to its procedural requirements and time limits. Requesters may challenge refusals, fees, extensions and forms of access as permitted by PAIA.

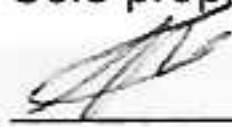
Matter	Regulator contact
PAIA complaint	PAIAComplaints@inforegulator.org.za Current Form 5 and online options: https://inforegulator.org.za/paia-forms/
POPIA complaint	POPIAComplaints@inforegulator.org.za Current complaint forms and guidance: https://inforegulator.org.za/complaints/
General assistance	010 023 5200 enquiries@inforegulator.org.za https://inforegulator.org.za

10 Availability of the manual

After approval, this manual will be available for inspection free of charge at our principal place of business during normal business hours, on our website if we have one, and to the Regulator on request. Copies may be requested from the Information Officer. Any charge for a printed copy is limited to the prescribed reproduction fee. An electronic copy may be requested by email.

11 Review and approval

The proprietor is responsible for keeping this manual up to date. It will be reviewed at least annually and when contact details, processing activities, systems or relevant legal requirements change.

Approval	Complete on adoption
Approved by	S Murphy
Capacity	Sole proprietor trading as The HR Company
Signature	
Date and effective date	<u>20 October 2026</u>

Reference material

Prepared with reference to the supplied QSystems manual, the Regulator's private body PAIA manual template, current PAIA forms, fees page and POPIA forms. Official reference material: <https://inforegulator.org.za/paia/> and <https://inforegulator.org.za/popia/>. These sources support the statutory framework; the business must verify its own operational details.