

PAIA and POPIA Manual

Keystone HQ (Pty) Ltd · Registration number 2026/816541/07 · 30A Morris Shell Drive, Cape Town, Western Cape, 7441

This manual is published under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA). It explains what records Keystone HQ (Pty) Ltd keeps, how to ask for access to them, and how the company processes personal information under the Protection of Personal Information Act 4 of 2013 (POPIA).

Date of compilation: 13 October 2026 · **Version:** 1.0 · **Next review:** October 2027

1. Company details

Item	Details
Company name	Keystone HQ (Pty) Ltd
Registration number	2026/816541/07
Physical and postal address	30A Morris Shell Drive, Cape Town, Western Cape, 7441
Email	ops@keystonehq.co.za
Telephone	+27 71 677 2631
Website	keystonehq.co.za
Business	AI-powered business automation, AI assistants, workflow systems, and related consulting and audit services for small and growing businesses

2. Information Officer

2.1 The head of the company, and therefore its Information Officer under section 1 of PAIA and section 55 of POPIA, is:

Item	Details
Information Officer	Eduan Rohan Prince, Director
Email	ops@keystonehq.co.za (subject line: "PAIA request" or "POPIA request")
Telephone	+27 71 677 2631
Address	30A Morris Shell Drive, Cape Town, Western Cape, 7441

2.2 All requests and queries under this manual must be sent to the Information Officer.

3. The Information Regulator's guide

3.1 The Information Regulator has published a guide on how to use PAIA and POPIA, as required by section 10 of PAIA. It is available in all official languages from the Regulator:

Item	Details
Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Email	enquiries@inforegulator.org.za
Website	inforegulator.org.za

3.2 The Regulator's website also has the prescribed forms referred to in this manual.

4. Records available without a request

4.1 The following information is freely available on the company's website and does not need a formal request: the services and packages offered and their published prices; the Privacy & POPIA notice (keystonehq.co.za/privacy); contact details; and this manual.

4.2 The company has not published a notice under section 52(2) of PAIA. Records not listed here must be requested under section 7.

5. Records kept under other laws

5.1 The company keeps records as required by the following laws, to the extent they apply to it:

- Companies Act 71 of 2008
- Tax Administration Act 28 of 2011
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991 (once the company is registered for VAT)
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008 (where it applies)
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, Unemployment Insurance Act 63 of 2001, Skills Development Levies Act 9 of 1999, and Compensation for Occupational Injuries and Diseases Act 130 of 1993 (once the company has employees)

6. Subjects and categories of records

Subject	Categories of records
Company and governance	Memorandum of Incorporation, CIPC registration documents, securities register, register of directors, beneficial ownership filings, board and shareholder resolutions and minutes, shareholders' agreement, annual returns
Finance and tax	Accounting records (Zoho Books), invoices and quotes, bank statements, payment records (EFT and Yoco card payments), annual financial statements, tax registrations and returns
Clients	Client services agreements, order forms and quotes, audit questionnaires and audit reports, project scopes, workflow documentation, handover notes, support requests, correspondence
Suppliers and contractors	Supplier and subcontractor agreements, non-disclosure agreements, invoices, correspondence
Marketing and enquiries	Website contact-form messages, project-planning ("Plan a project") submissions, audit requests, newsletter subscriber list
Intellectual property	Brand assets, design files, website and application source code, templates, IP assignment
Information technology	System access logs, user accounts, security and backup records, third-party service agreements
Personnel (once applicable)	Employment contracts, payroll and tax records, leave records, disciplinary and training records

The inclusion of a category does not mean that every record in it will be released. Access is subject to the grounds for refusal in PAIA.

7. How to request access to a record

7.1 Form. Use Form 2 (Request for Access to Record) in Annexure A of the PAIA Regulations, 2021, available from the Information Regulator's website or from the Information Officer.

7.2 Submission. Send the completed form to the Information Officer by email, post or hand delivery. Give enough detail for the record to be identified, say how you want to access it (for example, a copy by email), and give your contact details. If you are asking on behalf of someone else, attach proof of your authority.

7.3 Identity. You must provide proof of identity. If you are asking for your own personal information, the company may need to verify your identity before releasing it.

7.4 Fees. A requester (other than one asking for their own personal information) must pay the request fee prescribed in Annexure B of the PAIA Regulations before the request is processed. Access fees for searching, preparing and copying records are charged as prescribed. If searching for and preparing the record will take more than six hours, the company may ask for a deposit of up to one third of the access fee. Records may be withheld until all fees are paid.

7.5 Timing. The Information Officer will tell you within 30 days of receiving a complete request whether access is granted or refused. This period may be extended once by up to 30 days in the circumstances set out in section 57 of PAIA, with written notice to you.

7.6 Refusal. The company may refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, including to protect the privacy of third parties, commercial information of third parties or of the company, confidential information, the safety of individuals and property, privileged legal records, and research information.

7.7 Remedies. If you are not satisfied with a decision, you may lodge a complaint with the Information Regulator or apply to court, within 180 days of the decision.

8. Processing of personal information (POPIA)

8.1 PURPOSES OF PROCESSING

The company processes personal information to: respond to enquiries and audit requests; prepare quotes and enter into agreements; deliver, test and support automation services; invoice and collect payment; send newsletters to people who have subscribed; meet legal, tax and accounting obligations; protect its systems and records; and, as an Operator, process personal information on behalf of its clients and on their instructions.

8.2 CATEGORIES OF DATA SUBJECTS AND INFORMATION

Data subjects	Personal information processed
Prospective and current clients (and their staff)	Names, business details, job titles, contact details, information supplied in questionnaires and project briefs, correspondence, billing details
Clients' customers (processed as Operator)	Information contained in the client's systems and messages that the company's automations handle, such as names, contact details, enquiries, bookings and order or invoice details
Newsletter subscribers	Email address, subscription and unsubscribe records
Suppliers and subcontractors	Names, contact details, company details, banking details, agreements
Directors and shareholders	Identity details, contact details, shareholding records
Employees (once applicable)	Identity, contact, banking, tax, payroll, leave, performance and employment records

8.3 RECIPIENTS

Personal information may be shared with: the company's directors and authorised subcontractors who need it to do their work; service providers that host or process information for the company (such as website hosting and database, email, newsletter, accounting, payment, design and AI providers); professional advisers; banks; and regulators and authorities where the law requires it, such as SARS, CIPC and the Information Regulator.

8.4 TRANSFERS OUTSIDE SOUTH AFRICA

Some of the company's service providers store or process information on servers outside South Africa. The company uses reputable providers that are subject to laws, binding rules or agreements that give adequate protection, as required by section 72 of POPIA. Where the company acts as an Operator, cross-border transfers are made with the client's approval under its client services agreement.

8.5 SECURITY MEASURES

The company protects personal information with reasonable technical and organisational measures, including: least-privilege access to systems and client accounts; multi-factor authentication where available; secure handling and storage of credentials; encrypted connections; database access restricted to server-side processes; regular review of who has access; backups; confidentiality obligations on directors, staff and subcontractors; and a process to notify the Information Regulator and affected people of a security compromise, as required by section 22 of POPIA.

8.6 YOUR RIGHTS UNDER POPIA

You may ask the company to confirm whether it holds personal information about you, to give you access to it, to correct or delete it, or to stop processing it, and you may object to processing or to direct marketing. Contact the Information Officer. Objections and requests to correct or delete information may be made on Forms 1 and 2 of the POPIA Regulations, 2018. You may also lodge a complaint with the Information Regulator.

9. Availability of this manual

9.1 This manual is available on keystonehq.co.za and at the company's address. A copy is free of charge on request; printed copies may carry the prescribed reproduction fee.

9.2 The company will update this manual when its records, processing or contact details change, and at least once a year.