PAIA Manual for Vulatel (Pty) Ltd

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

List of Acronyms and Abbreviations

This manual uses the following acronyms and abbreviations throughout:

Acronym/Abbreviation	Full Meaning
CEO	Chief Executive Officer
CIO	Chief Information Officer
DIO	Deputy Information Officer
ICT	Information and Communications Technology
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

Purpose of PAIA Manual

This PAIA Manual serves multiple compliance and operational purposes for public access to Vulatel's information holdings . The manual enables the public to check categories of records held by Vulatel that are available without submitting a formal PAIA request, and provides sufficient understanding of how to make a request for access to records by describing subjects on which Vulatel holds records and categories of records held on each subject. It provides access to relevant contact details of the Information Officer and Deputy Information Officer who assist the public with records they intend to access, and describes records available in accordance with other legislation [1]. The manual informs whether Vulatel processes personal information, the purpose of such processing, and describes categories of data subjects and information relating thereto . It identifies recipients or categories of recipients to whom personal information may be supplied, discloses if Vulatel has planned to transfer or process personal information outside the Republic of South Africa, and confirms whether Vulatel has appropriate security measures to ensure confidentiality, integrity and availability of personal information to be processed [2].

Key Contact Details for Access to Information

Vulatel has designated key personnel responsible for administering PAIA requests and ensuring compliance with access to information requirements. The Information Officer serves as the primary contact for all PAIA-related matters and is responsible for the overall administration of the Act within Vulatel. The Deputy Information Officer provides additional support and assistance to the public in realizing PAIA objectives, with access and extensive knowledge of Vulatel's records [1]. All requests for information should be addressed to the designated Information Officer or Deputy Information Officer using the contact details provided in the table below.

Position	Name	Telephone	Email	Physical Address
Information Officer	Johan de Necker	+27 (010) 493 5657	Vulatel-PAIA@vulatel.co.za	Ground Floor, Block/Building 8, Woodmead Estate 1 Woodmead Drive, Woodmead

Guide on How to Use PAIA

The Information Regulator has published an official guide in terms of section 10 of PAIA to assist persons wishing to exercise their rights under the Act [1]. This guide is available free of charge and provides comprehensive instructions on how to use PAIA effectively. The guide can be obtained from the Information Regulator's offices located at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, with postal address P.O. Box 31533, Braamfontein, Johannesburg, 2017 . The Information Regulator can be contacted via telephone at +27 (0) 10 023 5200, email at enquiries@inforegulator.org.za, or through their website at https://inforegulator.org.za [3]. The guide provides essential information about the constitutional right to access information, procedures for making requests, prescribed fees, grounds for refusal, and remedies available when access is denied.

Categories of Records Available Without Formal Request

Section 52 of PAIA allows private bodies to make certain categories of records automatically available to the public without requiring a formal access request [1]. Vulatel makes the following categories of records available for inspection and copying at its principal place of business during normal business hours. These records include company registration documents, PAIA Manual (this document), annual financial statements, product and service brochures, standard terms and conditions for telecommunications services, pricing schedules for publicly available services, and regulatory licenses and certifications issued by ICASA (Independent Communications Authority of South Africa). Making these records automatically available promotes transparency and reduces the administrative burden of processing formal PAIA requests for commonly sought information.

Record Category	Description	Access Method	Fees
Company Registration Documents	Certificate of Incorporation, Memorandum of Incorporation, and registered office address	Inspection at principal place of business during business hours (Mon-Fri, 9:00-17:00)	No fee for inspection
PAIA Manual	This document describes PAIA procedures and record categories	Available on the company website (www.vulatel.co.za) and at principal place of business	Free download from the website
Annual Financial Statements	Audited financial statements for the most recent financial year	Available to view upon written request with a valid reason to the Information Officer	No Copies will be made or provided unless explicitly approved by the Directors of the Business
Product and Service Brochures	Marketing materials describing telecommunications products and services offered	Available on the company website and at the principal place of business	Free
Standard Terms and Conditions	Standard contract terms for telecommunications services	Available on the company website and provided with service agreements	Free
Pricing Schedules	Current pricing for publicly available telecommunications services	Available to view upon written request with a valid reason to the Information Officer	No Copies will be made or provided unless explicitly approved by the Directors of the Business
ICASA Licenses and Certifications	Telecommunications licenses and regulatory certifications issued by ICASA	Copies available upon request to the Information Officer	No Copies will be made or provided unless explicitly approved by the Directors of the Business

Records Available Under Other Legislation

Vulatel holds and maintains various records in accordance with South African legislation beyond PAIA. These legislative requirements ensure proper governance, financial accountability, employment compliance, and sector-specific regulatory obligations. Key legislation governing Vulatel's record-keeping includes the Companies Act 71 of 2008 requiring maintenance of company registers, financial records, and director information; the Income Tax Act 58 of 1962 mandating retention of tax records, financial statements, and SARS submissions; the Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995 requiring employee records, contracts, and leave documentation [1]. Telecommunications-specific legislation includes the Electronic Communications Act 36 of 2005 and ICASA Act 13 of 2000, governing telecommunications licenses, network infrastructure records, and regulatory compliance

documentation. Additionally, the Broad-Based Black Economic Empowerment Act 53 of 2003 requires BEE verification certificates and transformation reports.

Legislation	Record Types Required	Retention Period
Companies Act 71 of 2008	Company registers, financial records, director information, shareholder details, annual financial statements, meeting minutes	Indefinite for registers; 7 years for financial records
Income Tax Act 58 of 1962	Tax records, financial statements, SARS submissions, invoices, receipts, supporting documents	5 years from date of submission
Basic Conditions of Employment Act 75 of 1997	Employee records, employment contracts, wage registers, leave records, disciplinary records	3-5 years after termination
Labour Relations Act 66 of 1995	Employment contracts, collective agreements, disciplinary procedures, dispute resolutions	3 years after termination
Electronic Communications Act 36 of 2005	Telecommunications licenses, network infrastructure records, spectrum allocation documentation, service agreements	Duration of license plus 5 years
ICASA Act 13 of 2000	Regulatory compliance documentation, license applications, annual reports to ICASA, interconnection agreements	Duration of license plus 5 years
Broad-Based Black Economic Empowerment Act 53 of 2003	BEE verification certificates, transformation reports, procurement records, skills development records	5 years

Subjects and Categories of Records Held by Vulatel

Section 51(1)(e) of PAIA requires private bodies to provide sufficient detail to facilitate requests for access by describing subjects on which records are held and categories of records held on each subject [1]. Vulatel maintains comprehensive records across multiple operational and administrative domains reflecting its telecommunications and ICT business operations.

Subject Area	Categories of Records Held	Access Restrictions
Corporate Governance	Company registration documents, shareholder information, board resolutions, minutes of meetings, and memorandum of incorporation	Restricted - Board approval required for third-party access
Financial Records	Accounting records, annual financial statements, tax returns, banking	Restricted - CFO authorization required; subject to commercial confidentiality

	records, invoices, payment records, and audit reports	
Human Resources	Employee personal information, employment contracts, payroll records, leave records, disciplinary records, training records, performance evaluations	Highly restricted - HR Director approval required; subject to POPIA and employee privacy
Telecommunications Operations	Network infrastructure documentation, service provision records, customer contracts and accounts, billing records, technical specifications, service level agreements	Restricted - Operations Manager approval required; customer data subject to POPIA
ICT and Information Security	IT policies, system access logs, cybersecurity incident reports, data backup records, disaster recovery plans	Highly restricted - CIO approval required; security-sensitive information
Regulatory and Compliance	ICASA licenses and applications, PAIA and POPIA compliance documentation, BEE certificates, regulatory correspondence	Partially public (licenses), partially restricted (internal compliance records)
Marketing and Commercial	Customer databases, marketing materials, contracts with suppliers and vendors, intellectual property records	Restricted - Marketing Director approval required; subject to trade secret protection

All records are subject to the provisions of PAIA and POPIA, and access requests must be submitted in accordance with the procedures outlined in Section 10 of this manual.

Note: The Information Officer reserves the right to refuse access to records where disclosure would compromise confidentiality, commercial interests, or legal obligations.

Processing of Personal Information (POPIA Compliance)

Section 51(1)(f) of PAIA requires private bodies to disclose information about personal information processing in accordance with the Protection of Personal Information Act (POPIA) [2]. Vulatel processes personal information for specific, explicitly defined, and lawful purposes related to its telecommunications and ICT business operations.

Purposes of Processing

The primary purposes of processing include customer account management and service provision, billing and payment processing, network operations and technical support, marketing and customer relationship management (with consent), compliance with legal and regulatory obligations, including ICASA requirements, and employee administration and human resources management.

Categories of Data Subjects

Categories of data subjects whose personal information Vulatel processes include customers and subscribers of telecommunications services, employees and job applicants, suppliers and vendors, contractors and service providers, and directors and shareholders.

Categories of Personal Information

Categories of personal information processed include identification information (names, ID numbers, passport numbers), contact information (physical addresses, email addresses, telephone numbers), financial information (banking details, payment information, billing records), employment information (job titles, employment history, performance records), telecommunications usage data (call records, data usage, location information for network optimization), and technical information (IP addresses, device identifiers, network access credentials) [4].

Recipients and Transborder Flows of Personal Information

Section 51(1)(f) of PAIA requires disclosure of recipients or categories of recipients to whom personal information may be supplied and planned transboundary flows [2]. Vulatel may supply personal information to specific categories of recipients in accordance with POPIA's lawful processing conditions.

Internal recipients include authorized employees, directors, and contractors requiring access to perform their duties. External recipients include telecommunications service providers and interconnection partners for network operations, payment processors and financial institutions for billing and collections, regulatory authorities including ICASA and the Information Regulator as required by law, legal advisors and auditors for professional services, and IT service providers for system maintenance and cloud services [4].

Regarding transborder flows of personal information, Vulatel may transfer personal information outside the Republic of South Africa only where such transfers comply with Chapter 9 of POPIA [5]. Transfers are limited to jurisdictions providing adequate data protection, transfers pursuant to binding corporate rules, or transfers with data subject consent. Primary transborder transfers involve cloud service providers hosting data in POPIA-compliant jurisdictions and telecommunications interconnection with international carriers for cross-border communications.

Recipient Category	Purpose of Disclosure	Legal Basis	Transborder Transfer
Internal Employees & Contractors	Access is required to perform duties and responsibilities within the organization	POPIA Section 9 - Legitimate interest for business operations	No
Telecommunications Service Providers	Network operations, interconnection services, and	POPIA Section 11 - Necessary for performance of contract	Yes - International carriers

	telecommunications infrastructure		
Payment Processors & Financial Institutions	Billing, collections, payment processing, and financial transaction management	POPIA Section 11 - Necessary for performance of contract	No
Regulatory Authorities (ICASA, Information Regulator)	Compliance with legal and regulatory obligations under PAIA and POPIA	POPIA Section 8 - Processing required by law	No
Legal Advisors & Auditors	Professional legal services, compliance audits, and regulatory advice	POPIA Section 9 - Legitimate interest for legal compliance	No
IT Service Providers & Cloud Services	System maintenance, cloud hosting, data storage, and technical infrastructure	POPIA Section 11 - Necessary for performance of contract	Yes - Cloud providers in POPIA-compliant jurisdictions

Information Security Measures

Section 51(1)(f) of PAIA requires a general description allowing preliminary assessment of the suitability of information security measures implemented to ensure confidentiality, integrity, and availability of personal information [2]. POPIA's Security Safeguards condition mandates that responsible parties implement appropriate technical and organizational measures to protect personal information against unauthorized access, disclosure, modification, or destruction.

Vulatel has implemented comprehensive information security measures aligned with POPIA requirements and telecommunications industry standards. Technical security measures include access controls with role-based permissions restricting access to personal information on a need-to-know basis, encryption of personal information both in transit using TLS/SSL protocols and at rest using industry-standard encryption algorithms, firewalls and intrusion detection systems protecting network perimeter and internal systems, secure authentication mechanisms including multi-factor authentication for critical systems, regular security patching and vulnerability management, and data backup and disaster recovery systems ensuring business continuity.

Organizational security measures include information security policies and procedures governing the handling of personal information, employee training on POPIA compliance and data protection responsibilities, confidentiality agreements for employees and contractors with access to personal information, regular security audits and risk assessments, incident response procedures for data breaches, and a designated Information Officer responsible for POPIA compliance oversight [5]. Vulatel continuously monitors and updates security measures to address evolving threats and maintain compliance with regulatory requirements.

Procedure for Requesting Access to Records

Any person wishing to request access to records held by Vulatel must follow the prescribed procedure set out in PAIA. Requests must be made on the official Form C prescribed in Government Notice R187 and addressed to Vulatel's Information Officer at the contact details provided in Section 4 of this manual. The request must provide sufficient detail to enable the Information Officer to identify the record and the requester, specify the form of access required (inspection, copy, or other form), indicate if requester wishes to be informed of the decision in a particular manner, identify the right the requester is seeking to exercise or protect and provide explanation of why the record is required for exercise or protection of that right, and include proof of identity of the requester.

Upon receipt of a request, Vulatel will within 30 days decide whether to grant or refuse the request and notify the requester of the decision. If the request is granted, access will be provided in the form requested unless another form is more appropriate and cost-effective. If the request is refused, Vulatel will provide reasons for refusal and inform the requester of remedies available including internal appeal and application to court.

Prescribed fees apply for reproduction and search time as set out in PAIA regulations, and requesters may be required to pay a deposit before processing the request [1].

Availability and Updating of the Manual

Section 51(2) and (3) of PAIA requires that this manual be updated regularly and made available through multiple channels to ensure public access. Vulatel's Information Officer is responsible for ensuring the manual remains current and accurately reflects the organization's record holdings and PAIA procedures. The manual will be reviewed and updated at least annually or more frequently if material changes occur to Vulatel's structure, operations, record categories, or legislative requirements. Updated versions will include the revision date on the cover page to distinguish from previous versions.

This PAIA Manual is made available on Vulatel's website at **www.vulatel.co.za**, at Vulatel's principal place of business located at ***Ground Floor, Block/Building 8 ,Woodmead Estate***

1 Woodmead Drive, Woodmead for public inspection during normal business hours (Monday to Friday, 08:00 to 17:00 excluding public holidays), to any person upon request and upon payment of a reasonable fee not exceeding the prescribed reproduction costs, and to the Information Regulator upon request [1].

Members of the public may request a copy of the manual by contacting the Information Officer using the contact details provided in Section 4. Vulatel is committed to transparency and ensuring this manual serves as an effective tool for exercising constitutional rights of access to information.

References

[1] Section 51 | Manual - PAIA

[2] PAIA MANUAL

[3] SECTION 14 MANUAL: PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (PAIA)

[4] South Africa Data Privacy Laws: Complete POPIA Guide (2026)

[5] South African Privacy Laws: Complete POPI Act Compliance Handbook