

PAIA Manual
Gradient One (PTY) Ltd
Regulator Registration Number: 2026-000657

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

(as amended)

V1.1_2026

DATE OF COMPILATION: 24 April 2026

Updated: 17 June 2026

TABLE OF CONTENTS

1	List of acronyms and abbreviations	3
2	Purpose of PAIA manual	3
3	Key contact details for access to information of the responsible party	4
4	Guide on how to use PAIA and how to obtain access to the guide	5
5	Categories of records	7
6	Description of records available in accordance with any other legislation	7
7	Description of the subjects on which records are held	8
8	Processing of personal information	8
9	Availability of the manual	11
10	Updating of the manual	12

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	CRM	Client relationship management software system
1.2	IO	Information Officer;
1.3	PAIA	Promotion of Access to Information Act No. 2 of 2000, as Amended;
1.4	POPIA	Protection of Personal Information Act No.4 of 2013;
1.5	Regulator	Information Regulator; and
1.6	Republic	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GRADIENT ONE (PTY) LTD

3.1. Chief Information Officer

NAME	Joan Solms
CONTACT NUMBER	+27 82 876 0618
E-MAIL	joan@gradient.co.za
BUSINESS ADDRESS	The Vineyards Office Estate Barinor's Vineyard North 99 Jip De Jager Drive De Bron Cape Town South Africa

3.2 Business/ Office

PHYSICAL ADDRESS	The Vineyards Office Estate Barinor's Vineyard North 99 Jip De Jager Drive De Bron Cape Town South Africa
POSTAL ADDRESS	The Vineyards Office Estate Barinor's Vineyard North 99 Jip De Jager Drive De Bron Cape Town South Africa
E-MAIL	info@gradient.co.za
WEBSITE	https://gradient.co.za/

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of **PAIA**
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

1 Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

2 Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

3 Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

4 Section 50(1) of PAIA- *A requester must be given access to any record of a private body if:*

- a) that record is required for the exercise or protection of any rights;*
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

5 Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

7 Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

8 Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

9 Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

10 Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11 Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 Afrikaans

4.6.1 English

5. CATEGORIES OF RECORDS OF GRADIENT ONE (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on website	Available upon request
POPIA Manual	Internal manual		X
POPIA – website usage	External policy	X	
PAIA Manual	External policy & manual	X	

6. DESCRIPTION OF THE RECORDS STORED BY GRADIENT ONE (PTY) LTD, WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Manual	Protection of Personal Information Act 4 of 2013
Memorandum of Incorporation	Companies Act 71 of 2008

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE RESPONSIBLE PARTY HOLDS RECORDS, AND CATEGORIES OF EACH SUBJECT

Category of records	Subjects on which the body holds records
Marketing	Name, surname, email, and contact numbers provided by Data Subjects via the Gradient website.
Transactional records	Agreements of sale, financial information, personal information of purchasers.
FIC compliance	All documents and verifications as required in the company Risk Management and Compliance Programme to identify, verify, and screen clients.
Service providers	Agreements and reports.
Human resources	HR policies and procedures Employees records
Taxation	
Business - strategic documents, business plans, and proposals	Annual reports, strategic planning documents, financial information, accounting records, and beneficial ownership.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal information of Data Subjects is obtained and processed for the purpose of:

- 8.1.1 marketing to consumers;
- 8.1.2 conveyancing of immovable property;
- 8.1.3 as required by the Financial Intelligence Centre Act for the identification and verification of clients;
- 8.1.4 servicing contractual obligations with appointed service providers;
- 8.1.5 ensuring compliance with the Companies Act;
- 8.1.6 for the compliant and effective running of the business.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of data	Subjects
Clients	Landowners (Developer): Beneficial ownership information, names, addresses, registration numbers, contracts, and financial information. Property purchasers: Name, address, identification numbers, registration numbers (companies/trusts), contact details, property information regarding the purchase of an immovable property.
Service providers	Name, address, identification numbers, registration numbers (companies), trade secrets and information, banking information, SARS registration numbers, VAT registration numbers, operational information, proposals, and contracts.
Employees	Name, address, identification numbers, contact details, gender, race, banking details, and qualification.

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or categories of recipients to whom the personal information may be supplied
Name, identity number/registration number, address, contract details, and transactional information.	Financial Intelligence Centre
Identity number and names, for criminal checks or police clearance.	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority

8.4 Planned transborder flows of personal information

The organisation utilises cloud-based service providers, including Zoho (CRM and workflow management) and Microsoft SharePoint (document management). These services may store and process personal information in data centres located outside of South Africa, including but not limited to the European Union and the United States, depending on system configuration.

Where possible, data is hosted in South African data centres (in the case of Microsoft 365). Appropriate safeguards are in place to ensure that any cross-border transfer of personal information complies with applicable data protection laws.

8.5 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The organisation implements appropriate, reasonable technical and organisational measures to safeguard personal information and to prevent loss, damage, unauthorised destruction, or unlawful access. These measures include:

8.5.1 Technical Safeguards

8.5.1.1 Data Encryption - Personal information is encrypted both in transit (TLS/SSL) and at rest within cloud platforms utilised by the organisation, including Zoho and Microsoft 365.

8.5.1.2 Access Control and Authentication - Access to systems containing personal information is restricted based on role-based access controls and strong authentication mechanisms, including either two factor or multi-factor authentication where applicable.

8.5.1.3 Network Security - Firewalls, intrusion detection/prevention systems, and secure network configurations are implemented to protect systems from unauthorised access.

8.5.1.4 Endpoint Security - Devices used to access organisational systems are protected by antivirus and anti-malware solutions, regular patching, and security updates.

8.5.1.5 Data Backup and Recovery - Regular automated backups are maintained to ensure data integrity and availability, with tested recovery procedures in place.

8.5.2 Organisational Safeguards

8.5.2.1 Policies and Procedures - The organisation maintains internal information security, data protection, and acceptable use policies governing the handling of personal information.

8.5.2.2 Access Management - User access is granted on a least-privilege basis, and reviewed periodically to ensure continued appropriateness.

8.5.2.3 Training and Awareness - Employees receive ongoing training on data protection, confidentiality, and cybersecurity awareness.

8.5.2.4 Third-Party Management - Service providers such as Zoho and Microsoft are required to adhere to industry-standard security practices and contractual data protection obligations.

8.5.3 Physical Safeguards

8.5.3.1 Secure Infrastructure - Cloud service providers utilise secure, access-controlled data centres with physical security measures such as surveillance, restricted entry, and environmental controls.

8.5.3.2 Office Security - Physical access to organisational premises and devices is controlled to prevent unauthorised access to personal information.

8.5.4 Monitoring and Incident Management

8.5.4.1 System Monitoring - Systems are monitored for suspicious activity and potential security threats.

8.5.4.2 Incident Response - The organisation maintains procedures to identify, report, and respond to data breaches or security incidents, including notification obligations where required by law.

8.5.1.5 Continuous Improvement

Security measures are regularly reviewed and updated to address evolving risks and technological developments.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.gradient.co.za ;

9.1.2 the Gradient One (PTY) Ltd office for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Information Officer for Gradient One (PTY) Ltd will on a regular basis update this manual.

Issued by the Information Officer for Gradient One (PTY) Ltd, on_____.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer