



A Spot of Innovation (Pty) Ltd

PAIA MANUAL

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

DATE OF COMPILATION: 01/11/2025

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“IO”	Information Officer;
1.3	“Minister”	Minister of Justice and Correctional Services;
1.4	“PAIA”	Promotion of Access to Information Act No. 2 of 2000, as Amended;
1.5	“POPIA”	Protection of Personal Information Act No. 4 of 2013;
1.6	“Regulator”	Information Regulator;
1.7	“Republic”	Republic of South Africa; and
1.8	“Spot”	A Spot of Innovation (Pty) Ltd.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by Spot 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 Spot, by providing a description of the subjects on which Spot holds records and the categories of records held on each subject;
- 2.3 know the description of the records of Spot which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the 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 Spot 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 Spot 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 Spot 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 SPOT

3.1. Chief Information Officer

Name: Claudine Gliddon
Tel: 087 012 6453
Email: privacy@spotsettlements.co.za

3.2. Access to information general contacts

Email: claims@spotsettlements.co.za

3.3. Head Office

Postal Address: PostNet Suite #39

Private Bag X18
Rondebosch
Cape Town
7701

Physical Address: 2nd Floor
Ebden House
Belmont Office Park
Belmont Road
Rondebosch
Cape Town
7700

Telephone: 087 012 6453

Email: claims@spotsettlements.co.za

Website: www.spotsettlements.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, *inter alia*, the description of:

4.3.1. the objects of PAIA and POPIA;

4.3.2. the manner and form of a request for:

4.3.2.1. access to a record of a public body contemplated in section 11 of PAIA; and

- 4.3.2.2. access to a record of a private body contemplated in section 50 of PAIA;
 - 4.3.3. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.4. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.5. 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-
 - 4.3.5.1. an internal appeal;
 - 4.3.5.2. a complaint to the Regulator; and
 - 4.3.5.3. 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; and
 - 4.3.6. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access to records of public and private bodies, respectively.
 - 4.4. Members of the public can inspect or make copies of the Guide from the offices of 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; or
 - 4.5.2. from the website of the Regulator (https://info regulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf).
 - 4.6. As per section 50(1) of PAIA, Spot is only required to give a requester access to its records if:

- 4.6.1. that record is required for the exercise or protection of any rights;
- 4.6.2. the requester complies with the procedural requirements in PAIA relating to a request for access to that record; and
- 4.6.3. access to the record is not refused in terms of any ground for refusal contemplated in Part 3, Chapter 4 of PAIA.¹

5. CATEGORIES OF RECORDS OF SPOT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Corporate Governance	Company Directorships		X
	Company Registrations		X
Finance and Tax	VAT Registration		X
	Insurance: <ul style="list-style-type: none"> • Cyber liability • Commercial crime • Professional indemnity 		X
Information Technology	Website privacy policy	X	
	Website terms of use	X	

6. INDICATION OF OTHER LEGISLATION IN TERMS OF WHICH THE RECORDS OF SPOT ARE AVAILABLE

- 6.1. Basic Conditions of Employment Act 75 of 1997;
- 6.2. Broad-Based Black Economic Empowerment Act 53 of 2003;
- 6.3. Companies Act 71 of 2008;
- 6.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;

¹ Sections 62 to 70 of PAIA.

- 6.5. Electronic Communications and Transactions Act 25 of 2002;
- 6.6. Employment Equity Act 55 of 1998;
- 6.7. Financial Intelligence Centre Act 38 of 2001;
- 6.8. Income Tax Act 58 of 1962;
- 6.9. Labour Relations Act 66 of 1995;
- 6.10. Occupational Health and Safety Act 85 of 1993;
- 6.11. Promotion of Access to Information Act 2 of 2000;
- 6.12. Protection of Personal Information Act 4 of 2013;
- 6.13. Unemployment Insurance Contributions Act 4 of 2002;
- 6.14. Unemployment Insurance Act 30 of 1996; and
- 6.15. Value Added Tax Act 89 of 1991.

6. DESCRIPTION OF THE SUBJECTS ON WHICH SPOT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SPOT

This section sets out the subjects in respect of which Spot holds records and the categories of records held on each subject, including records which are created and available in accordance with any of the South African legislation. These records are not freely available but can be requested in terms of Form 2 The inclusion of any subject of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

Subjects on which Spot holds records	Categories of records
Company Secretarial	<ul style="list-style-type: none">• Company documents including the memorandum of incorporation• Statutory returns• Share certificates

Company Authorisation and Licence	<ul style="list-style-type: none"> • CIPC Registration • Employer Registration • VAT Registration • Taxpayer Registration
Financial	<ul style="list-style-type: none"> • Financial Statements • Financial and Tax Records (Company & Employees) • Asset Register • Management Accounts • Bank statements • Debtors/Creditors statements and invoices
Human Resources	<ul style="list-style-type: none"> • Policies and procedures • Employee information • Employment contracts • Training Records
Legal Services	<ul style="list-style-type: none"> • Agreements with customers, suppliers, service providers and other parties.
Legal Proceedings in which Spot performs a notice and/or claims administration or distribution role as authorised by court order, trust deeds or other legal authorisations.	<p>The information kept depends on the specific court order, agreement or trust deed, and the specific legal process.</p> <ul style="list-style-type: none"> • Names • Email Addresses • Physical Addresses • Phone numbers • Company registration numbers • Identity numbers • Employment status • Banking details

	<ul style="list-style-type: none"> • Vehicle ownership details • Vehicle identification numbers
Movable and immovable property	<ul style="list-style-type: none"> • Lease agreements • Ordinary sale agreements
Marketing	<ul style="list-style-type: none"> • Product Brochures • Sales Records • Customer Database
Intellectual Property	<ul style="list-style-type: none"> • Software • Trademarks, patents, designs • Templates
Administration and Information Technology	<ul style="list-style-type: none"> • Intranet and shared drives • Correspondence with internal and external parties • Systems documentation and manuals
Operations	<ul style="list-style-type: none"> • Policies and Procedures • Disaster recovery and implementation plans
Compliance Delivery	<ul style="list-style-type: none"> • Correspondence with regulators and customers • Implementation records
Website	<ul style="list-style-type: none"> • Privacy Policy • Terms of Use • Areas of Service and Expertise • Claimant portal

7. PROCESSING OF PERSONAL INFORMATION

7.1. Purpose of Processing Personal Information

The purpose of processing the information contained in the records listed above is:

- 7.1.1 In relation to the business/internal records: for good corporate governance and to comply with business and tax legislation
- 7.1.2 In relation to employees: for retention of employment records as legislated and execution of employer/employee agreements and labour legislation.
- 7.1.3 In relation to potential Class Members under the Vehicle Claim Settlement: Spot has been appointed pursuant to a settlement made an order of court ("the court order"), to administer the process of identifying and communicating with potential class members, verifying and processing personal information relating to such claims, administering prospective and successful claims, and facilitating effecting pay-out processes, where claims are found to be valid. Spot will use the personal information collected to
 - 7.1.3.1 communicate with potential class members on potential claims, updates on processes and the like,
 - 7.1.3.2 administer claims, including assessment of eligibility, interaction on disputes or assessment by a Panel,
 - 7.1.3.3 verify potential class members' identity, vehicle- and bank details,
 - 7.1.3.4 administer and communicate on settlements,
 - 7.1.3.5 comply with legal obligations, including the court order and manage site functionality including website functionality, fraud detection and analytics.
- 7.1.4 In relation to suppliers and service providers: for record retention as legislated and for the execution of the supplier and service level agreements.

7.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Service Providers (juristic entity)	Name, company registration number, VAT numbers, address, trade secrets, bank details, contact details
Employees	Name, identity numbers, address, qualifications, gender, race, banking details, contact information
Third-party independent	Name, identity number, login usernames, address,

contractors	qualifications, gender, race, contact information, banking details
Potential or actual claimants in settled or finalised legal proceedings in which potential or actual claimants are entitled to payment	Name, address, email address, contact details, registration numbers or identity numbers, employment status, bank details, vehicle ownership details, vehicle identification numbers

7.3. 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
Names, identity numbers, Banking details	Banks
Vehicle identification numbers	Road Traffic Management Corporation
Names, identity numbers, email addresses, contact numbers, physical addresses, vehicle ownership history	Law firms advising parties to legal proceedings in which potential or actual claimants are entitled to payment. The High Court of South Africa and the case manager pursuant to the court order
Names, identity numbers, email addresses, contact numbers and physical addresses	Independent third-party information verification service providers

7.4. Planned transborder flows of personal information

7.4.1. Where law firms located outside of South Africa are providing consulting services to law firms representing parties to legal proceedings in which potential or actual claimants are entitled to payment, such firms may be provided access to limited personal information for the purposes of advising their clients.

- 7.4.2. Spot's dedicated physical servers are privately hosted in South Africa with strict access control.
- 7.4.3. Spot uses the South African instance of Microsoft365 and has elected the African region for hosting.

7.5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- 7.5.1. **Physical Security** – off-site dedicated, privately hosted servers are guarded 24/7 by armed security and monitored constantly. No unauthorized access is allowed.
- 7.5.2. **Access Control & User Management** – Spot's systems are centrally controlled by the IT administrator. Employees and contractors of Spot are allowed role-based access by the IT administrator. All usage is tracked in audit logs. Access to the information database is linked to an approved IP address with a uniquely generated password and two-factor authentication, limiting unauthorized sign-in. Laptops are issued by Spot and password protected.
- 7.5.3. **Data Security & Integrity** – In the event of a stolen laptop, the IT administrator has safeguards to block sign-in into any system. All user activity is tracked in audit logs and reviewed.
- 7.5.4. **Network & System Security** – The network level security consists of three components: (1) DDOS mitigation, (2) VLAN reverse path forwarding protection and (3) Juniper firewalls. All servers are equipped with anti-virus which is scanned daily and updated regularly. Server passwords are generated as unique keys. Backups of the entire system are done on multiple servers weekly. All personal information is encrypted.
- 7.5.5. **Operational Security** – The operational IT systems and software application are segregated. Personal information is stored on the server and cannot be accessed through the application without an encryption key. Business IT (such as Microsoft) is segregated from the software application.
- 7.5.6. **Monitoring & Incident Management** – Audit trails are reviewed to identify any malicious action. In addition, any data breach identified by employees is reported to the Information Officer immediately who follows channels for reporting to the Information Regulator. A review of the breach is undertaken and safeguards are put into place to ensure avoidance of the incident in future.
- 7.5.7. **Training & Awareness** – Ongoing education of employees on information security, confidentiality, and compliance obligations. All employees undergo regular POPIA compliance training with a certified service provider.

7.5.8. **Compliance & Audit** – Regular reviews, audits, and assessments to ensure alignment with legal and policy requirements.

8. AVAILABILITY OF THE MANUAL

8.1. A copy of this PAIA Manual is available:

8.1.1. On www.spotsettlements.co.za;

8.1.2. head office of Spot for public inspection during normal business hours;

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

8.1.4. to the Information Regulator upon request.

8.2. A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

9. UPDATING OF THE MANUAL

The Information Officer of Spot will update this manual on a regular basis.

Issued by

Claudine Gliddon
Director of Finance
Information Officer

ANNEXURE A

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
A Spot of Innovation (Pty) Ltd
2nd Floor
Ebdon House
Belmont Office Park
Belmont Road
Rondebosch
Cape Town
7700

E-mail address: privacy@spotsettlements.co.za

Mark with an "X"

☐

Request is made in my own name
person.

☐

Request is made on behalf of another

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:
	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		
<p align="center">PARTICULARS OF RECORD REQUESTED</p> <p><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></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p>TYPE OF RECORD (Mark the applicable box with an "X")</p>			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
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: (Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

ANNEXURE B
FEES IN RESPECT OF RECORDS REQUESTED FROM PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9 (2) (c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11 (1) are as follows:

	R
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on—	
(i) stiffy disc	7,50
(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R50,00.