

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT 2 OF 2000**

AND THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

10-BRAVO (PTY) LTD

Registration Number: 2026/145815/07

Version 1.0 | April 2026

1. INTRODUCTION AND PURPOSE

This manual ("Manual") is prepared and published in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and incorporates the disclosure requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA").

PAIA gives effect to section 32 of the Constitution of the Republic of South Africa, 1996, which provides for the right of access to information held by the State and by private bodies, where such information is required for the exercise or protection of any right.

POPIA regulates the processing of personal information and establishes the rights of data subjects in relation to personal information held about them by responsible parties.

This Manual is available free of charge at the registered office of 10-Bravo (Pty) Ltd, on the Company website at <https://10-bravo.com/legal>, and from the office of the Information Regulator upon request. A copy may be obtained on request subject to the prescribed fees.

2. DETAILS OF THE COMPANY

The details of 10-Bravo (Pty) Ltd and its designated Information Officer and Deputy Information Officer are set out below.

Full legal name	10-Bravo (Pty) Ltd
Registration number	2026/145815/07
Business address	Johannesburg, Gauteng, South Africa
Website	https://10-bravo.com
Information Officer	Jan-Carel Coetzee
IO email	jan-carel.c@10-bravo.com
Deputy IO	Themba Ndlovu
DIO email	themba.n@10-bravo.com
General enquiries / PAIA requests	dpo@10-bravo.com

All PAIA access requests and POPIA-related enquiries must be directed to the Information Officer at the contact details above. Where the Information Officer is unavailable, requests may be directed to the Deputy Information Officer.

3. CONTACT DETAILS OF THE INFORMATION REGULATOR

The Information Regulator is an independent institution established under POPIA to promote and enforce PAIA and POPIA. Its contact details are as follows:

Name	The Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Website	https://info regulator.org.za
Email	enquiries@info regulator.org.za
PAIA requests	PAIAComplaints@info regulator.org.za
POPIA complaints	POPIAComplaints@info regulator.org.za

The Information Regulator has published a guide on how to use PAIA as contemplated in section 10 of PAIA. This guide is available from the Information Regulator at the contact details above and at <https://info regulator.org.za>.

4. RECORDS AVAILABLE WITHOUT A PAIA REQUEST

Certain records or categories of information are made available by 10-Bravo (Pty) Ltd without the need for a formal PAIA request. These include:

- This PAIA manual, available on the Company website and at the registered office.
- The Company's Privacy and Data Protection Policy, available at <https://10-bravo.com/legal>.
- The Company's website terms and conditions and legal disclaimer, available at <https://10-bravo.com/legal>.
- General marketing materials and service descriptions published on the Company website.
- Company registration details as published by the Companies and Intellectual Property Commission (CIPC).

All other records must be requested formally in terms of the procedure set out in Section 7 of this Manual.

5. CATEGORIES OF RECORDS HELD BY THE COMPANY

10-Bravo (Pty) Ltd holds records across the following categories in the course of its operations as an IT managed services provider. Access to these records is subject to the provisions of PAIA and must be requested formally in terms of Section 7 of this Manual.

Corporate governance and statutory records

- Memorandum of Incorporation and Shareholders Agreement
- Board resolutions and directors' written resolutions
- Share register and share certificates
- CIPC statutory filings and returns
- Company policies and governance frameworks
- BEE compliance records

Financial and accounting records

- Annual financial statements
- Management accounts and financial reports
- Invoices, quotes and purchase orders
- Banking records and payment records
- Tax records, VAT returns and SARS correspondence
- Expense records and reimbursement documentation

Human resources and employment records

- Employment contracts and contractor agreements
- Employee personal information and identity records
- Payroll and remuneration records
- Leave and attendance records
- Disciplinary and grievance records
- Training and skills development records

Client and commercial records

- Client contracts, Master Services Agreements and Statements of Work
- Project documentation, engagement records and delivery certificates
- Client correspondence and communication records
- Service desk and support ticket records
- Non-disclosure and confidentiality agreements
- Proposals and quotations

Supplier and vendor records

- Supplier and vendor contracts and agreements
- Vendor correspondence and communication records
- Partner programme and reseller agreements
- Purchase orders and procurement records

Information technology and security records

- IT system architecture and configuration documentation
- Network monitoring and system logs
- Software licensing and asset records
- Information security policies and incident records
- Remote monitoring and management platform records
- Data processing and sub-processor records

Legal and compliance records

- Legal correspondence and advice
- Insurance policies
- POPIA compliance register and processing records
- PAIA requests and response records
- Data breach notification records

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

The Company retains records in compliance with the following legislation applicable to its operations. The availability of these records is subject to the provisions of the relevant act and to PAIA.

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993

- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Value Added Tax Act 89 of 1991

7. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

7.1 Who may request access

Any person may submit a request for access to a record held by 10-Bravo (Pty) Ltd in terms of PAIA. A person who is requesting information about themselves as a data subject under POPIA may also submit a data subject access request using the same procedure.

7.2 How to submit a request

- Complete Form 2 (Request for Access to Record of Private Body), which is included as Annexure A to this Manual and available on the Company website.
- Submit the completed form by email to dpo@10-bravo.com, marked for the attention of the Information Officer.
- Attach a certified copy of your identity document (South African ID, passport or other acceptable proof of identity).
- If requesting on behalf of another person or a juristic person, attach proof of your authority to act in that capacity.

7.3 Fees

The following fees apply to PAIA requests, as prescribed in the PAIA Regulations:

Request fee	R140.00 (payable on submission; not applicable where the requester seeks personal information about themselves)
Access fee	Payable if the request is granted; amount depends on the form of access and time required to locate and prepare the record
Deposit	A deposit of up to one-third of the access fee may be required where the search and preparation time exceeds six hours
Exemption	A requester may apply for exemption from fees if they can demonstrate that payment would cause substantial hardship

7.4 Response timeline

The Company will respond to a compliant PAIA request within 30 calendar days of receipt. This period may be extended by a further 30 days in exceptional circumstances, in which case the requester will be notified before the original deadline expires.

7.5 Form of access

The requester may specify the preferred form of access (copy, inspection, electronic record, etc.). The Company will endeavour to provide access in the requested form, subject to availability and to PAIA.

8. GROUNDS FOR REFUSAL OF ACCESS

Access to a record may be refused on the following grounds, as contemplated in PAIA:

- Mandatory protection of the privacy of a third party who is a natural person, where disclosure would constitute an unreasonable invasion of that person's privacy.
- Protection of commercial information of a third party, including trade secrets and confidential financial or business information.
- Protection of confidential information supplied by a third party.
- Protection of safety of individuals.
- Protection of records privileged from production in legal proceedings.
- Records that would prejudice a third party's commercial competition.
- Records relating to research by a third party.
- Records whose disclosure would constitute an offence.
- Records whose disclosure would result in the unlawful processing of personal information as contemplated in POPIA.

The Company will notify the requester in writing of any refusal, the grounds for refusal, and the right to seek internal appeal or external review.

9. REMEDIES AVAILABLE TO A REQUESTER

A requester who is aggrieved by a decision of the Company in respect of a PAIA request has the following remedies:

9.1 Internal appeal

A requester may submit a written internal appeal to the Information Officer within 60 days of receiving the Company's decision. The internal appeal must set out the grounds on which the requester believes the decision was incorrect or unjustified.

9.2 Application to the Information Regulator

A requester may apply to the Information Regulator for a review of the Company's decision in terms of section 56 of PAIA. The application must be submitted within 180 days of receipt of the decision or the deemed refusal (where no response was received). The Information Regulator may, after investigation, require the Company to grant access or take other appropriate steps.

9.3 Application to the High Court

In terms of section 82 of PAIA, a requester or third party may apply to the High Court for relief in respect of a decision made by the Company. Court applications should be considered after exhausting the Information Regulator review process.

9.4 POPIA complaints

A data subject who believes that the Company has processed their personal information in contravention of POPIA may submit a complaint to the Information Regulator at POPIAComplaints@infoeregulator.org.za.

10. PROCESSING OF PERSONAL INFORMATION (POPIA)

10-Bravo (Pty) Ltd is a responsible party as defined in POPIA in respect of personal information it processes in connection with its operations as an IT managed services provider. The Company processes personal information in accordance with the eight conditions for lawful processing set out in POPIA.

10.1 Lawful basis for processing

The Company processes personal information on one or more of the following lawful grounds:

- Consent of the data subject.
- Performance of a contract to which the data subject is party, or to take steps prior to entering into a contract.
- Compliance with a legal obligation applicable to the Company.

- Legitimate interests of the Company or of a third party to whom the information is supplied, except where such interests are overridden by the fundamental rights of the data subject.

10.2 Categories of data subjects and personal information processed

Clients and client employees	Names, contact details, job titles, email addresses, employment information; IT system access credentials managed on behalf of clients; system and device information relevant to service delivery.
Directors, employees and contractors	Names, identity numbers, contact details, employment history, remuneration and banking details, tax information, leave records, disciplinary records.
Prospective clients and leads	Names, business contact details, company information, records of communications and proposals.
Vendors and suppliers	Names, contact details, company registration details, banking details, tax registration numbers.
Website visitors	IP addresses, browser and device information, cookies and usage data collected via the Company website.

10.3 Purposes of processing

- Delivery of IT managed services, including remote monitoring, infrastructure management, helpdesk support, and project-based engagements.
- Client contract management, invoicing, and commercial relationship management.
- Employee and contractor administration, payroll, and human resources management.
- Vendor and supplier management.
- Legal and regulatory compliance, including SARS reporting, CIPC filings, and response to lawful information requests.
- Information security, system monitoring, and incident response.
- Marketing and business development communications, where consent has been obtained or a legitimate interest applies.
- Maintenance of POPIA compliance records and processing of data subject rights requests.

10.4 Recipients of personal information

Personal information may be shared with the following categories of recipients, subject to appropriate confidentiality and data processing obligations:

- Cloud platform and SaaS providers used in service delivery (including Microsoft, remote monitoring and management platforms, and security tooling providers).
- Third-party IT vendors and subcontractors engaged on specific client projects, under confidentiality obligations.
- The Company's accounting, payroll, and professional service providers (auditors, attorneys, tax practitioners).
- Financial institutions and payment processors.
- Regulatory and government authorities, where required by law.
- BoldSign (SynCFusion Inc.), the Company's electronic signature platform, for the processing of signatory data on executed documents.

10.5 Transborder flows of personal information

The Company uses cloud-based platforms and service providers that may process personal information outside the Republic of South Africa. Where personal information is transferred to a foreign jurisdiction, the Company ensures that:

- The recipient is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection substantially similar to POPIA.
- A data processing agreement or equivalent contractual safeguard is in place with the recipient.
- The transfer is otherwise permitted under POPIA.

10.6 Retention of personal information

The Company retains personal information only for as long as is necessary to fulfil the purpose for which it was collected, or as required by law. The following retention periods apply as a minimum:

Client contracts and engagement records	5 years after termination of the client relationship, or as required by applicable law
Financial and accounting records	7 years, in accordance with the Income Tax Act and SARS requirements
Employee records	3 years after termination of employment, or as required by the Basic Conditions of Employment Act
Payroll records	5 years, in accordance with SARS requirements
PAIA request records	3 years from the date of the decision
Data breach records	5 years from the date of the incident
Marketing consent records	Until withdrawal of consent, plus 1 year
Website usage data and logs	12 months from collection

10.7 Security measures

The Company implements the following technical and organisational measures to protect personal information against loss, damage, unauthorised access, disclosure, or processing:

- Encryption of personal information in transit (TLS) and at rest where technically feasible.
- Role-based access controls, limiting access to personal information to authorised personnel who require it for their job function.
- Multi-factor authentication on all systems processing client and employee personal information.
- Remote monitoring and alerting for security events and anomalies.
- Staff awareness of POPIA obligations and data handling responsibilities.
- Vendor and sub-processor due diligence and contractual data processing obligations.
- Documented incident response procedure for suspected or confirmed data breaches.

In the event of a data breach involving personal information, the Company will notify the Information Regulator and affected data subjects as required by section 22 of POPIA, as soon as reasonably possible.

11. DATA SUBJECT RIGHTS

Data subjects whose personal information is processed by the Company have the following rights under POPIA:

Right to be notified	The right to be notified at the time of collection that personal information is being collected and for what purpose (POPIA s18).
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Right of access	The right to request confirmation of whether the Company holds personal information about the data subject, and to request a description of that information (POPIA s23).
Right to correction or deletion	The right to request that inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained personal information be corrected or deleted (POPIA s24).
Right to object	The right to object, on reasonable grounds, to the processing of personal information, including for the purpose of direct marketing (POPIA ss11(3) and 69).
Right to complain	The right to submit a complaint to the Information Regulator if the data subject believes the Company has processed their personal information in contravention of POPIA (POPIA s74).

To exercise any of the above rights, data subjects must submit a written request to the Information Officer at dpo@10-bravo.com. The Company will respond within 30 calendar days.

12. AMENDMENT OF THIS MANUAL

This Manual will be reviewed and updated at least annually, or whenever a material change occurs that affects the accuracy of its contents. The current version is always available on the Company website. The version number and date of publication appear on the cover page of this Manual.

This Manual was first published on 6 April 2026 and constitutes Version 1.0.

ANNEXURE A

FORM 2: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act, 2000 (Act 2 of 2000)

A. DETAILS OF PRIVATE BODY

Name of private body: 10-Bravo (Pty) Ltd

Registration number: 2026/145815/07

Information Officer: Jan-Carel Coetzee

Email: dpo@10-bravo.com

B. DETAILS OF REQUESTER

Full names and surname:

Identity / passport number:

Postal address:

Telephone number:

Email address:

Capacity in which request is made (if not personal):

C. DETAILS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (complete only if applicable)

Full names and surname:

Identity / passport number:

Relationship to requester / proof of authority:

D. PARTICULARS OF RECORD REQUESTED

Description of the record or relevant part:

Reference number (if known):

Any further particulars to assist location of the record:

Right to be exercised or protected by access to this record:

Why the record is required for the exercise or protection of that right:

E. FEES

Request fee of R140 is payable on submission (not applicable for personal information about yourself).

If you qualify for exemption from payment of fees, state the reason below:

Reason for exemption:

F. PREFERRED FORM OF ACCESS TO RECORD

<input type="checkbox"/> Printed copy of record
<input type="checkbox"/> Electronic copy of record
<input type="checkbox"/> Inspection of record at the Company's premises
<input type="checkbox"/> Transcription (if record is audio or visual)
If you require a copy to be posted, indicate here: <input type="checkbox"/> Yes <input type="checkbox"/> No (postage payable)

G. DISABILITY (complete only if applicable)
If you are prevented by a disability from reading, viewing or listening to the record in the standard form of access, state the nature of the disability and the form in which you require the record:
Nature of disability:
Form of access required:

H. DECLARATION
I declare that the information provided in this form is true and correct to the best of my knowledge.
Signed at: _____ Date: _____
Signature of requester / person on whose behalf request is made: _____

SUBMISSION INSTRUCTIONS: Complete all applicable sections and email this form together with a certified copy of your identity document (and proof of authority, if applicable) to dpo@10-bravo.com, marked for the attention of the Information Officer. The Company will acknowledge receipt within 5 business days and respond to the request within 30 calendar days.