LEGAL & COMPLIANCE

PAIA Manual

Section 51 manual for access to records and POPIA processing information.

EFFECTIVE DATE	6 October 2026
PRIVATE BODY	**Jacques Smit trading as Stellarix Systems**
STRUCTURE	Sole proprietor / unincorporated business
INFORMATION OFFICER	**Jacques Ivan Smit**
REGULATOR REGISTRATION	2026-068558
LEGAL BASIS	Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, including the personal-information disclosures required by section 51 following the Protection of Personal Information Act 4 of 2013 (POPIA).

This Manual is a public compliance document. It explains the records held by Stellarix Systems, how access requests are made, the applicable statutory process and fees, and the high-level manner in which personal information is processed. It does not create a right of access beyond PAIA or require disclosure where PAIA permits or requires access to be refused.

This Manual should be read with the current Stellarix website privacy notice and, where relevant, any client-specific agreement or POPIA Data Processing Addendum. Those documents may provide more specific information about a particular service or processing activity.

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1. Purpose, legal framework and interpretation

1.1 Purpose

The purpose of this Manual is to enable members of the public to understand what records Stellarix holds, which records may be available without a formal request, how to make a request under PAIA, and how Stellarix processes personal information at a high level for purposes of section 51 of PAIA.

1.2 Legal framework

PAIA gives effect to the constitutional right of access to information. For a private body, access is governed principally by sections 50 to 73 of PAIA and the Regulations relating to the Promotion of Access to Information, 2021. POPIA amended section 51 of PAIA so that a private body's manual must also describe specified aspects of its processing of personal information.

1.3 Private-body access test

Under section 50 of PAIA, a requester is entitled to access a record of a private body where the record is required for the exercise or protection of a right, the procedural requirements of PAIA are met, and access is not refused under a lawful ground of refusal. A PAIA request is a request for an existing record; it does not require Stellarix to create a new record, answer general questions or provide an explanation that is not already recorded.

1.4 Interpretation

Terms defined in PAIA or POPIA have their statutory meanings where used in that context. "Stellarix" and "Stellarix Systems" in this Manual mean Jacques Smit trading as Stellarix Systems. "Regulator" means the Information Regulator (South Africa).

2. Private body and Information Officer details

Stellarix Systems is a sole proprietorship. It is not a separate company or juristic person from its proprietor. The private body for PAIA purposes is Jacques Smit carrying on business under the trading name Stellarix Systems.

LEGAL CONTRACTING PARTY	Jacques Smit trading as Stellarix Systems
TRADING NAME	**Stellarix Systems**
STRUCTURE	Sole proprietorship / unincorporated business
PRINCIPAL PLACE OF BUSINESS	**45 Nassau St, Bothasig, Cape Town, Western Cape, South Africa**
POSTAL ADDRESS	45 Nassau St, Bothasig, Cape Town, Western Cape, South Africa
TELEPHONE	021 001 0630
FAX	086 284 1987
EMAIL / PAIA REQUESTS	jacques@stellarix.co.za
WEBSITE	www.stellarix.co.za
INFORMATION OFFICER / HEAD	Jacques Ivan Smit
INFORMATION REGULATOR REGISTRATION NO.	2026-068558
RESIDENTIAL ADDRESS	The principal place of business is also the proprietor's residential address and is not a public office, shopfront or walk-in premises. Where in-person inspection is required by PAIA, please arrange attendance in advance. This does not limit a lawful right to public inspection during normal business hours.

3. Guide on how to use PAIA

3.1 Information Regulator Guide

The Information Regulator has published a Guide under section 10 of PAIA to assist persons who wish to exercise rights under PAIA and POPIA. The Guide explains the objects of the legislation, how requests are made, available assistance and remedies, applicable fees, and related procedures. The Regulator makes the Guide available in multiple official languages and accessible formats. In accordance with regulation 3 of the 2021 PAIA Regulations, the Information Officer keeps copies of the Guide in at least two official languages available for public inspection and will provide a requested copy of the Guide without charge on a written request substantially corresponding with Form 1.

The current Guide and PAIA resources are available from the Information Regulator at https://inforegulator.org.za/paia-guidelines/.

3.2 Information Regulator contact details

PHYSICAL ADDRESS	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
POSTAL ADDRESS	**P.O. Box 31533, Braamfontein, Johannesburg, 2017**
TELEPHONE	010 023 5200
TOLL-FREE	**0800 017 160**
GENERAL ENQUIRIES	enquiries@inforegulator.org.za
PAIA COMPLAINTS	PAIAComplaints@inforegulator.org.za
WEBSITE	www.inforegulator.org.za
ESERVICES	eservices.inforegulator.org.za

4. Records available without a formal PAIA request

Stellarix may make selected records available voluntarily or automatically without requiring a formal PAIA request. The fact that a category is listed below does not mean that every record within that category is public or unrestricted; only the records actually published or expressly made available are automatically accessible.

CATEGORY	TYPICAL ACCESS METHOD	PAIA REQUEST
This PAIA Manual	Website; electronic copy on request	No formal request required
Current website privacy notice	Website	No formal request required
Public website content and contact information	Website	No formal request required
Publicly published service descriptions, plan information and pricing	Website or published collateral, where current	No formal request required
Policies, notices or legal documents expressly published for public access	Website or electronic copy, where published	No formal request required
Public portfolio, case-study or marketing material	Website or published collateral, where applicable	No formal request required

A requester may ask Stellarix whether a specific record is already publicly available before submitting Form 2. Records that are not automatically available must be requested through PAIA where applicable.

5. Records available under other legislation

The following legislation may require Stellarix to create, retain or make particular records available to persons entitled to them. The list is not exhaustive and applies only to the extent that the legislation and the relevant record apply to Stellarix or the circumstances. Listing legislation does not mean that every record is publicly accessible; disclosure remains subject to the applicable statute, PAIA and lawful confidentiality or refusal grounds.

LEGISLATION	RECORDS / RELEVANCE
Promotion of Access to Information Act 2 of 2000	PAIA Manual; PAIA request, decision and access records.
Protection of Personal Information Act 4 of 2013	Personal-information records and data-subject access/correction records; Information Officer and privacy-compliance records, where applicable.
Tax Administration Act 28 of 2011 and Income Tax Act 58 of 1962	Tax, accounting and supporting business records required for tax administration.
Consumer Protection Act 68 of 2008	Transaction, sales and service records where the Act applies to the transaction.
Electronic Communications and Transactions Act 25 of 2002	Electronic transaction, communication and website-related records or disclosures where applicable.
Basic Conditions of Employment Act 75 of 1997 and related employment legislation	Personnel, remuneration, leave and employment records if and to the extent Stellarix employs staff.
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Compensation for Occupational Injuries and Diseases Act 130 of 1993	Employment contribution, declaration and incident records if and to the extent applicable.

6. Subjects and categories of records held

Stellarix is a technology and digital-services business. Records may exist in electronic or physical form and may be held in business systems, email, communication tools, project repositories, cloud or local storage, hosted environments, backups and archives. The principal subjects and record categories include the following:

SUBJECT	CATEGORIES OF RECORDS
Business administration and ownership	Business profile; trading information; Information Officer registration; internal policies and procedures; compliance records; correspondence; business planning and administrative records.
Enquiries and client relationships	Enquiry forms and messages; emails and correspondence; contact details; meeting notes; discovery information; quotations and proposals; approvals and instructions.
Contracts and commercial records	Standard terms; master services agreements; service schedules; statements of work; data processing addenda; accepted quotations; change requests; renewals; cancellations; notices; client-specific variations.
Projects and service delivery	Requirements; briefs; designs; content and client materials; project plans; deliverables; source code and technical documentation; testing and acceptance records; deployment and handover records; support history.
Website care, hosting and technical operations	Hosting and infrastructure records; domain and DNS administration; SSL records; monitoring; backups; maintenance; update requests; support records; service configurations and operational logs.
Information security and website operation	Access-control records; security and abuse-prevention logs; technical request information; incident records; audit or monitoring information; configuration and security-management records.
Finance and tax	Invoices; payment records; receipts; supplier costs; banking transaction records; accounting records; tax records and supporting documentation.
Suppliers and third-party services	Supplier and service-provider agreements; invoices; business contact details; licences; subscriptions; account records; service configurations and support correspondence.
Intellectual property and licensing	Project-specific deliverables; Background IP records; licences; third-party and open-source licence information; design assets; technical documentation; authorship and rights records where applicable.
Privacy, POPIA and PAIA	Privacy notices; Data Processing Addenda; processing records; data-subject requests; PAIA requests and decisions; security-compromise records; complaints; Regulator correspondence; compliance assessments and related documentation.
Marketing and public communications	Website content; published service information; portfolio and case-study material; brand and marketing assets; public notices and communications.
Personnel and contractors, if applicable	Contractor or personnel agreements; contact and payment information; role and access records; qualifications or compliance information; employment records where applicable.
ACCESS IS RECORD-SPECIFIC	A category appearing in this Manual is not a promise that a record exists, that it is held for a particular period, or that it will be disclosed. Each request is assessed against the records actually held and the requirements of PAIA.

7. How to request access to a record

7.1 Use of Form 2

A request for access must be made on a form that corresponds substantially with Form 2 prescribed by regulation 7 of the 2021 PAIA Regulations. The current official Form 2 is available from the Information Regulator and may also be requested from Stellarix.

7.2 Information required

The request should provide enough detail to identify the requester, the requested record and the form of access sought. Because Stellarix is a private body, the requester must identify the right to be exercised or protected and explain why the requested record is required for the exercise or protection of that right. Where a request is made on behalf of another person, reasonable proof of the authority or capacity to act must be provided.

- full name and contact details of the requester;
- identity or other information reasonably necessary to verify the requester where appropriate;
- if acting for another person, that person's details and proof of authority or capacity;
- a sufficiently precise description of the record or category of record;
- the preferred form of access and any relevant language preference;
- the right to be exercised or protected and why the record is required for that purpose; and
- how the requester wishes to receive notices concerning the request.

7.3 Submission

Requests may be submitted to the Information Officer by email at jacques@stellarix.co.za or delivered or posted to 45 Nassau St, Bothasig, Cape Town, Western Cape, South Africa. Email is the preferred method for efficient administration. A requester should retain proof of submission.

7.4 Assistance

Stellarix will provide reasonable assistance with an access request as required by regulation 7. If a requester cannot complete the prescribed form because of illiteracy or a disability, the requester may make the request orally and the Information Officer will reduce the request to writing in a Form 2-equivalent form and provide a copy to the requester.

7.5 Identity and security

Stellarix may request proportionate proof of identity, authority or entitlement before disclosing a record where this is reasonably necessary to protect personal, confidential or commercially sensitive information. Verification will be limited to what is reasonably necessary for the request.

8. Fees

PAIA permits prescribed fees to be charged. The current private-body fee schedule published by the Information Regulator is reproduced in Annexure A. If the prescribed fees change, the legally prescribed amounts in force at the time of the request will apply.

CURRENT REQUEST FEE	As at 6 October 2026, the prescribed request fee for a private body is R140.00 and is payable by every requester when required by notice under section 54(1) of PAIA. Access, reproduction, search and preparation fees may also apply if access is granted or if the search exceeds the prescribed threshold.

If search and preparation is expected to exceed six hours, Stellarix may require the prescribed deposit before continuing. A record may be withheld until fees lawfully due have been paid. Stellarix will not charge a fee other than one authorised by PAIA and the applicable Regulations.

A data subject who asks only for confirmation whether Stellarix holds personal information about that data subject has the separate POPIA right to that confirmation free of charge. A request for the record or a description of the personal information may be subject to the prescribed fee, if any, in accordance with POPIA and PAIA.

9. Decision-making, access and refusal

9.1 Decision period

Stellarix will decide a properly submitted request as soon as reasonably possible and, subject to PAIA, within 30 days after receipt. PAIA permits an extension of up to a further 30 days in specified circumstances, including certain large or complex searches. If an extension is used, the requester will be notified as required by PAIA.

9.2 Outcome and access

The outcome will be communicated on a notice that corresponds substantially with Form 3 prescribed by regulation 8. If access is granted, the notice will state the applicable fees, if any, and the manner in which access will be provided. Access may be provided by inspection, copy, electronic transfer or another lawful form appropriate to the record and the request.

9.3 Third-party information

Where a request concerns information of a third party, PAIA may require that third party to be notified and given an opportunity to make representations. This may affect the timing and form of the decision. Stellarix will follow the third-party procedures in PAIA where they apply.

9.4 Severability

Where only part of a record is protected by a lawful refusal ground and the protected portion can reasonably be severed, Stellarix will consider giving access to the remainder in accordance with PAIA.

9.5 Grounds for refusal

PAIA contains mandatory and discretionary grounds on which access to private-body records must or may be refused. Depending on the record, these include:

- protection of the privacy of a third party who is a natural person (section 63);
- protection of commercial information of a third party (section 64);
- protection of confidential information owed to a third party (section 65);
- protection of the safety of individuals and certain property or security interests (section 66);
- legal professional privilege and records privileged from production in legal proceedings (section 67);
- commercial information of the private body, including trade secrets and certain commercially sensitive information (section 68); and
- protection of qualifying research information (section 69).

Section 70 of PAIA contains a public-interest override in the circumstances specified by that section. A refusal will be based on PAIA and reasons will be given to the extent required by law.

10. Complaints and remedies

10.1 No internal appeal within Stellarix

PAIA does not provide an internal appeal procedure against a decision of the head of a private body. A requester or third party who is aggrieved by a relevant Stellarix decision, or by a failure to respond within the applicable period, may use the complaint procedure provided by PAIA.

10.2 Complaint to the Information Regulator

A complaint must be lodged in the prescribed manner, ordinarily using Form 5. Under section 77A of PAIA, a requester aggrieved by a relevant decision of the head of a private body may lodge a complaint with the Information Regulator within 180 days of the decision. The Regulator's published guidance also addresses complaints where a private body has not responded within the statutory period.

Complaints may be submitted through the Information Regulator eServices portal or by the channels published by the Regulator. Current PAIA complaint email: PAIAComplaints@inforegulator.org.za.

10.3 Court proceedings

After the applicable complaints procedure has been exhausted, PAIA permits a requester or third party to apply to a court for appropriate relief in the circumstances and periods set out in section 78. This Manual does not limit any remedy available under PAIA or another applicable law.

11. Processing of personal information under POPIA

11.1 Role of Stellarix

For personal information processed for Stellarix's own enquiries, business administration, billing, contractual relationships, website operation and legal compliance, Jacques Smit trading as Stellarix Systems acts as the Responsible Party under POPIA. Where Stellarix processes personal information on behalf of a client in delivering agreed services, the client will generally act as Responsible Party and Stellarix as Operator to the extent determined by the facts and the applicable written arrangement. Stellarix may also process its own business records independently from any Operator Processing.

11.2 Purposes of processing

Stellarix may process personal information for the following business and service purposes, where applicable:

- receiving and responding to enquiries and communications;
- preparing quotations, proposals, contracts and service arrangements;
- providing website, software, hosting, maintenance, support, domain, migration and related technology services;
- administering projects, approvals, access, support and client relationships;
- issuing invoices, receiving payments, maintaining accounting and tax records and managing supplier costs;
- operating, securing and protecting websites, systems and communications, including spam, abuse and security prevention;
- maintaining reasonable business records, backups, continuity records and evidence of transactions or instructions;
- complying with legal and regulatory obligations and establishing, exercising or defending legal rights;
- managing technology, professional and other service providers reasonably required for business operations or service delivery; and
- processing personal information on a client's documented instructions where Stellarix acts as an Operator.

11.3 Categories of data subjects and personal information

DATA SUBJECT CATEGORY	PERSONAL INFORMATION THAT MAY BE PROCESSED
Prospective clients and enquirers	Name; email; telephone number; business contact information; service interests; enquiry content; correspondence; quotation and scope information; relevant technical information; website request data such as IP address, browser, device and request metadata where processed for security or operation.
Clients, client contacts and representatives	Identity and contact information; organisation and authority details; contracts; instructions; approvals; project and support communications; billing and payment records; service configuration, access or credential information where reasonably necessary; technical and operational information relating to the engagement.
Client end-users or other persons whose data is processed for a client	Categories determined by the relevant client, service and documented instructions. Ordinary personal information may be processed where required for the service. Special personal information or children's personal information is not automatically authorised and is processed only where the relevant engagement expressly requires it and a lawful basis or authorisation exists.
Website users and visitors	Network and technical information such as IP address, request headers, browser/device information, security identifiers, abuse-prevention records and operational logs; any information voluntarily submitted through contact or communication channels.
Suppliers, contractors, advisers and service-provider contacts	Names; contact and business details; contract and account information; invoices; payment or banking details where applicable; tax or compliance information; support and service correspondence.
PAIA/POPIA requesters, complainants and other correspondents	Identity and contact information; request or complaint content; proof of authority or identity where reasonably required; correspondence; decisions and supporting records.
Personnel or independent contractors, if applicable	Identity and contact information; contractual and payment information; role and access information; qualifications and tax or statutory records to the extent required by the relationship and law.

11.4 Recipients or categories of recipients

Personal information may be supplied to the following categories of recipients where necessary and lawful for the relevant purpose:

- clients, data subjects and authorised representatives in connection with the relevant service or request;
- authorised persons assisting Stellarix and subcontractors where access is reasonably necessary and subject to appropriate confidentiality and data-protection obligations;
- technology providers used for hosting, cloud infrastructure, email, communications, storage, backups, security, monitoring, domains, software, APIs and related business or service functions;
- professional advisers, accountants, tax advisers or other advisers engaged for legitimate business, compliance or legal purposes;
- banks, payment-service or financial institutions where necessary for payments or business administration; and
- regulators, public authorities, law-enforcement bodies or courts where disclosure is required or permitted by law or reasonably necessary for legal rights.

11.5 Planned transborder flows

Stellarix uses technology and service infrastructure that may process, transmit or store personal information outside South Africa. Cross-border processing may occur through categories of providers such as hosting, cloud, email, communications, storage, backup, security, software and support providers. The categories of personal information involved may include contact and business information, correspondence, client or project information, billing or service-administration records, and technical or security information. Destination countries or regions are provider-

and service-dependent and may change where the underlying infrastructure or service configuration changes. Stellarix does not promise South African data residency unless expressly agreed for a particular service.

A cross-border transfer must satisfy section 72 of POPIA or another lawful basis applicable to the transfer. Where Stellarix acts as an Operator for a client, material cross-border arrangements may also be addressed in the applicable Data Processing Addendum or other written instructions.

11.6 Information security measures

Stellarix maintains appropriate and reasonable technical and organisational safeguards having regard to the nature of the information, the service and reasonably foreseeable risks. Depending on the circumstances, these measures may include:

- access controls, authentication and least-privilege access;
- encrypted connections and encryption or protected storage where appropriate and available;
- credential management, system configuration, software updates and reasonable hardening;
- security, abuse-prevention, logging or monitoring controls where appropriate;
- backup and recovery protections where backups form part of the relevant service or business process;
- reasonable due diligence and configuration of third-party providers;
- confidentiality and need-to-know restrictions for persons who require access;
- incident identification, containment, response and statutory notification processes; and
- retention, deletion or de-identification controls appropriate to the purpose and applicable legal requirements.

Security obligations are risk-based duties of reasonable protection. No internet, cloud or technology system can guarantee absolute security, uninterrupted availability, the absence of all vulnerabilities or successful recovery in every circumstance.

11.7 Retention and minimisation

Stellarix keeps enquiries, correspondence, contractual, billing, project, support, legal and compliance records for as long as reasonably required for their purpose, applicable record-keeping duties or a lawful dispute or evidentiary need. There is no single retention period for every record. When retention is no longer justified, information should be deleted, destroyed or de-identified as appropriate. Provider logs, email systems, hosted systems and backups may have separate retention arrangements.

11.8 Data-subject requests

A data subject may request confirmation of whether Stellarix holds personal information about that data subject and may request access, correction or deletion where provided by POPIA and other applicable law. Access to a personal-information record is handled through the PAIA/POPIA access framework and may require identity verification. Correction, deletion or objection requests may use the applicable POPIA forms published by the Information Regulator.

12. Availability and updating

12.1 Availability of this Manual

In accordance with section 51(3) of PAIA, the current version of this Manual is made available:

- on the Stellarix website at www.stellarix.co.za;
- at the principal place of business for public inspection during normal business hours, with prior arrangement requested because the address is also a residential premises;
- to any person on request, subject to any amount lawfully chargeable for a copy; and
- to the Information Regulator on request.

12.2 Updating

The Information Officer will review this Manual on a regular basis and update it when material information changes, including changes to the business identity or contact details, record categories, material processing activities, cross-border arrangements, prescribed fees, or legal requirements relevant to section 51.

ANNEXURE A Current prescribed fees for private bodies

The following fees are the private-body fees published by the Information Regulator and current as at 6 October 2026. If the statutory fee schedule changes, the prescribed fees in force at the time of the request will apply.

A.1 Request and document-copy fees

ITEM	DESCRIPTION	AMOUNT
1	Request fee, payable by every requester	**R140.00**
2	Photocopy or printed black-and-white copy of an A4 page or part of a page	**R2.00 per page or part**
3	Printed copy of an A4-size page	**R2.00 per page or part**
4(a)	Copy in computer-readable form on a flash drive provided by the requester	**R40.00**
4(b)	Copy in computer-readable form on a compact disc provided by the requester	**R40.00**
4(c)	Copy in computer-readable form on a compact disc provided to the requester	**R60.00**

A.2 Visual and audio-record fees

ITEM	DESCRIPTION	AMOUNT
5	Transcription of visual images, per A4 page or part	**Outsourced; provider quotation**
6	Copy of visual images	**Outsourced; provider quotation**
7	Transcription of an audio record, per A4-size page	**R24.00**
8(a)	Copy of an audio record on a flash drive provided by the requester	**R40.00**
8(b)	Copy of an audio record on a compact disc provided by the requester	**R40.00**
8(c)	Copy of an audio record on a compact disc provided to the requester	**R60.00**

A.3 Search, preparation, deposit and transfer fees

ITEM	DESCRIPTION	AMOUNT
9	Search and preparation for disclosure, for each hour or part after the first hour	**R145.00 per hour or part; maximum R435.00**
10	Deposit if search and preparation is expected to exceed six hours	**One third of the applicable access fee calculated as prescribed**
11	Postage, email or other electronic transfer	**Actual expense, if any**

The first hour of search and preparation is excluded from the hourly search-and-preparation fee. The prescribed deposit mechanism applies when the search is expected to exceed six hours. Stellarix will notify the requester of fees and any deposit in the manner required by PAIA and the Regulations.

ANNEXURE B Official PAIA forms and resources

Use the current versions published by the Information Regulator. The Regulations permit a request or notice on a form that corresponds substantially with the prescribed form, but using the current official form reduces administrative errors.

RESOURCE	PURPOSE	OFFICIAL LOCATION
Form 1	Request for a Copy of the Guide from an Information Officer - Regulation 3	https://inforegulator.org.za/paia/
Form 2	Request for Access to Record - Regulation 7	https://inforegulator.org.za/paia/
Form 3	Outcome of request and fees payable - Regulation 8	https://inforegulator.org.za/paia/
Form 5	Complaint Form - Regulation 10	https://inforegulator.org.za/paia/
PAIA Guide	Guide on how to use PAIA	https://inforegulator.org.za/paia-guidelines/
PAIA fee structure	Current public and private body fee schedule	https://inforegulator.org.za/paia-fees-structure-2/
Information Regulator eServices	Complaints, support and other eServices	https://eservices.inforegulator.org.za/
PRIMARY PAIA CONTACT	Submit Stellarix PAIA requests to Jacques Ivan Smit, Information Officer, at jacques@stellarix.co.za or to the postal / street address stated in section 2 of this Manual.	