



VIRTUAL FORCE (PTY) LTD

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

**Prepared in terms of Section 51 of the
Promotion of Access to Information Act,
2000 (Act No. 2 of 2000)**

Company Name:

Virtual Force (Pty) Ltd

Registration Number:

2024/387922/07

Last Updated:

24 August 2025

ABOUT THIS MANUAL

The Promotion of Access to Information Act, 2000 ("PAIA") gives effect to the constitutional right of access to information held by public and private bodies where such information is required for the exercise or protection of any rights.

As a private body, Virtual Force (Pty) Ltd has prepared this Manual in accordance with Section 51 of PAIA.

This Manual provides information regarding:

- the Company and its contact details;
- the Information Officer;
- the categories of records held by the Company;
- the procedure for requesting access to records; and
- the Company's approach to the processing and protection of personal information.

This Manual should be read together with any applicable privacy notices, contractual terms, and other policies published or made available by the Company.

COMMITMENT

Virtual Force is committed to conducting its business responsibly, respecting the confidentiality of information entrusted to it, and processing personal information in accordance with applicable South African legislation.

The Company recognises the importance of transparency, accountability and responsible information management and has adopted appropriate governance measures to support these principles.

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1. INTRODUCTION

Virtual Force (Pty) Ltd ("Virtual Force" or "the Company") is a South African private company providing technology-enabled business solutions to organisations across various industries.

The Company is committed to conducting its business in a transparent, ethical and responsible manner. As part of this commitment, Virtual Force has prepared this Manual in accordance with Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA").

This Manual explains the categories of records maintained by the Company, the process for requesting access to those records where permitted by PAIA, and the Company's general approach to the processing and protection of personal information.

Nothing contained in this Manual limits any rights or obligations created by PAIA, the Protection of Personal Information Act, 2013 ("POPIA"), or any other applicable legislation.

2. COMPANY PARTICULARS

Registered Name	Virtual Force (Pty) Ltd
Registration Number	2024/387922/07
Physical Address	27 New Forest Crescent, Table View Cape Town, Western Cape, 7441, South Africa
Postal Address	27 New Forest Crescent, Table View Cape Town, Western Cape, 7441, South Africa
Telephone	(072) 901-2975
Email	carika@virtualforce.co.za

Website	www.virtualforce.co.za
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3. INFORMATION OFFICER

In terms of Section 55 of the Protection of Personal Information Act, 2013 ("POPIA"), the head of a private body is the Information Officer by default, unless otherwise provided for in law.

The Information Officer is responsible for, amongst other things:

- encouraging compliance with PAIA and POPIA;
- dealing with requests for access to records;
- overseeing the Company's information governance practices;
- responding to enquiries relating to this Manual; and
- assisting with matters relating to the protection of personal information.

Requests for access to records and enquiries regarding this Manual should be directed to the Information Officer using the details below.

Information Officer	Carika Grobler
Position	Director & Information Officer
Email Address	carika@virtualforce.co.za
Telephone Number	(072) 901-2975

At the date of publication of this Manual, no Deputy Information Officer has been appointed.

4. PURPOSE OF THIS MANUAL

The purpose of this Manual is to:

- provide information regarding the structure and operations of Virtual Force for purposes of PAIA;
- identify the categories of records held by the Company;
- explain how a requester may request access to records held by the Company;
- provide contact details of the Information Officer;
- describe, at a high level, how the Company manages personal information; and
- promote transparency and accountability in the Company's information management practices.

This Manual is intended to assist clients, suppliers, service providers, employees, regulators and members of the public who wish to request access to information held by Virtual Force in accordance with PAIA.

5. GUIDE ON THE PROMOTION OF ACCESS TO INFORMATION ACT

In terms of Section 10 of the Promotion of Access to Information Act, the Information Regulator has compiled a guide to assist persons in understanding their rights under PAIA and the procedures to request access to records.

The guide provides information relating to, amongst other things:

- the purpose of PAIA;
- how to request access to records held by public and private bodies;
- the forms to be completed when submitting a request;
- the remedies available where access to information is refused; and
- the contact details of the Information Regulator.

The latest version of the guide is available from the Information Regulator.

6. RECORDS HELD BY VIRTUAL FORCE

Virtual Force maintains records required for the effective administration and operation of its business.

The categories listed below provide an indication of the types of records that may be held by the Company. The inclusion of a category in this Manual does not mean that a requester is automatically entitled to access those records. Access will be considered in accordance with PAIA and any applicable grounds for refusal.

6.1 Company Records

Virtual Force may maintain records relating to the administration and operation of the Company, including:

- Company registration documents;
- Memorandum of Incorporation;
- director information;
- statutory records required in terms of applicable legislation;
- internal policies and procedures; and
- general business administration records.

6.2 Financial Records

The Company may maintain records relating to:

- accounting records;
- annual financial statements;
- tax records;
- invoices;
- payment records;
- banking information; and
- asset registers.

6.3 Human Resources Records

Where applicable, the Company may maintain records relating to:

- employment contracts;
- payroll records;
- leave records;
- training records;
- contractor agreements; and
- personnel administration.

6.4 Client and Supplier Records

The Company may maintain records relating to:

- service agreements;
- quotations;
- statements of work;
- correspondence;
- invoices;
- supplier agreements;
- procurement records; and
- service delivery records.

6.5 Operational Records

The Company may maintain records relating to its business operations, including:

- project documentation;
- quality assurance records;
- operational procedures;
- business reports;
- communications;
- operational records required for the management and delivery of services; and
- other records reasonably required for the administration of the Company's activities.

6.6 Information Technology Records

The Company may maintain records relating to:

- system documentation;
- software licensing;
- security documentation;
- access control records;
- audit logs;
- backup records; and
- technical documentation.

6.7 Legal and Compliance Records

The Company may maintain records relating to:

- legal agreements;
- compliance records;
- PAIA documentation;
- POPIA documentation;
- internal policies and governance records; and
- regulatory correspondence where applicable.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Virtual Force maintains records in accordance with applicable South African legislation. Access to these records will be subject to the provisions of the relevant legislation and PAIA.

Depending on the nature of the records requested, the following legislation may apply:

- Companies Act, 2008 (Act No. 71 of 2008)
- Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)
- Income Tax Act, 1962 (Act No. 58 of 1962)
- Value-Added Tax Act, 1991 (Act No. 89 of 1991), where applicable
- Protection of Personal Information Act, 2013 (Act No. 4 of 2013)
- Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

The above list is not exhaustive and may be updated from time to time where required by changes in legislation or the Company's business operations.

8. PROCESSING OF PERSONAL INFORMATION

Virtual Force recognises the importance of protecting personal information and is committed to processing such information responsibly, lawfully and in accordance with the Protection of Personal Information Act, 2013 ("POPIA").

The Company processes personal information only where it is necessary for legitimate business purposes, the performance of contractual obligations, compliance with legal obligations, or another lawful basis recognised under applicable legislation.

In carrying out its business activities, Virtual Force endeavours to:

- process personal information fairly and lawfully;
- collect only personal information that is relevant and reasonably necessary for the purpose for which it is processed;
- maintain the accuracy of personal information where reasonably practicable;
- implement appropriate safeguards to protect personal information against loss, unauthorised access, misuse, disclosure or alteration;
- retain personal information only for as long as reasonably necessary or as required by law; and
- respect the rights of data subjects as provided for under applicable legislation.

The Company reviews its information management practices periodically to support ongoing compliance with applicable legal and regulatory requirements.

9. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION

In the ordinary course of its business, Virtual Force may process personal information relating to various categories of data subjects. The categories of personal information processed will depend on the nature of the relationship with the relevant individual or organisation and the services being provided.

Category of Data Subject	Examples of Personal Information
Clients and client representatives	Name, surname, business name, contact details, position, correspondence, billing information
Prospective clients	Name, contact details, business information, communication records
Suppliers and service providers	Contact details, company information, banking details, contractual information

Employees and contractors (where applicable)	Identification information, contact details, employment information, payroll information
Website users	Information submitted through website contact us form
Consumers	Personal information voluntarily provided during an engagement, where relevant to the services being delivered and where processed in accordance with applicable legislation

The categories above are intended to provide a general indication of the types of personal information that may be processed and do not represent an exhaustive list.

10. PURPOSES FOR WHICH PERSONAL INFORMATION MAY BE PROCESSED

Virtual Force may process personal information for purposes including, but not limited to:

- providing and administering its products and services;
- communicating with clients, suppliers and other business contacts;
- responding to enquiries and requests;
- managing contractual relationships;
- delivering customer engagement and related business services;
- maintaining business records;
- quality assurance and service improvement;
- managing supplier relationships;
- complying with legal, regulatory and contractual obligations;
- protecting the Company's legal rights and interests; and
- any other lawful purpose reasonably related to the Company's business activities.

Personal information will not be processed for purposes that are incompatible with the purpose for which it was originally collected, unless permitted or required by law.

11. RECIPIENTS OF PERSONAL INFORMATION

Virtual Force may disclose or make personal information available where it is necessary for the provision of its services, the fulfilment of contractual obligations, compliance with applicable legislation, or where disclosure is otherwise authorised or required by law.

Depending on the nature of the services provided, personal information may be shared with:

- clients of Virtual Force;
- authorised employees and contractors of the Company;
- service providers who support the Company's business operations;
- professional advisers, including legal, accounting and auditing professionals;
- regulatory or governmental authorities where required by law; and
- any other party where disclosure is authorised by the relevant data subject or permitted under applicable legislation.

Where third parties process personal information on behalf of Virtual Force, the Company takes reasonable steps to ensure that appropriate contractual obligations and safeguards are in place to protect such information.

12. INFORMATION SECURITY MEASURES

Virtual Force is committed to protecting the confidentiality, integrity and availability of information under its control.

The Company implements reasonable technical and organisational measures appropriate to the nature of the information processed and the risks associated with its processing.

Such measures may include:

- restricting access to authorised personnel on a need-to-know basis;
- authentication and access control mechanisms;
- password protection and user account management;
- secure storage of electronic and physical records;
- monitoring of information systems where appropriate;
- confidentiality obligations applicable to employees and service providers; and
- procedures for the secure disposal or destruction of information when it is no longer required.

Virtual Force reviews its information security practices periodically and implements improvements where reasonably necessary to support the ongoing protection of information under its control.

13. REQUESTING ACCESS TO RECORDS

A requester seeking access to a record held by Virtual Force must submit a written request to the Information Officer.

The request should contain sufficient detail to enable the Company to:

- identify the requester;
- identify the record being requested;
- determine the form of access requested, where applicable; and
- communicate with the requester regarding the request.

Where a request is made on behalf of another person, the requester may be required to provide proof of the capacity in which the request is made.

Upon receipt of a request, the Information Officer will consider the request in accordance with the provisions of PAIA and notify the requester of the outcome within the applicable timeframes prescribed by the Act.

Access to records may be granted, refused, or granted subject to applicable conditions as provided for in PAIA.

14. FEES PAYABLE

Requests for access to records may be subject to the payment of the prescribed fees in terms of PAIA.

Where applicable, the Information Officer will notify the requester of:

- any request fee that is payable before the request is processed;
- any access fee payable prior to the release of the requested record; and
- the method of payment.

No fees will be charged where PAIA provides that access must be granted without payment of a fee.

15. GROUNDS FOR REFUSAL OF ACCESS

Virtual Force will consider every request for access to information on its own merits and in accordance with PAIA.

Access to a requested record may be refused where permitted by PAIA, including where disclosure may:

- unreasonably disclose the personal information of another individual;
- reveal confidential commercial information;
- prejudice contractual obligations or legal proceedings;
- compromise the security of information, systems or infrastructure;
- disclose information protected by legal privilege; or
- otherwise fall within any ground for refusal provided for in PAIA.

Where access is refused, the requester will be informed of the decision and, where applicable, the reasons for the refusal in accordance with PAIA.

16. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available:

- from the Information Officer upon written request;
- on the Company's website at **www.virtualforce.co.za**, where published; and
- at the Company's registered office during normal business hours by prior arrangement.

This Manual may be amended from time to time to reflect changes in legislation, regulatory requirements, or the Company's business operations.