LABOURDRIVE

PAIA MANUAL

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

Effective date: 01 October 2026

This policy may be updated from time to time & is therefore subject to amendments, variations or adjustments, including deletions, additions & withdrawal or substitution as LabourDrive or its licensed provider deems fit.

1. Introduction

LabourDrive Proprietary Limited, registration number 2015/430580/07, trading as LabourDrive (or its licensed affiliate), is a South African digital software company that provides an Employee Relations management and compliance digital Platform and related services.

This Manual is prepared to facilitate requests for access to records held by LabourDrive (or its licensed affiliate) in accordance with PAIA and to describe certain processing of personal information as required by PAIA read with POPIA.

Availability of a category in this Manual does not mean that a particular record exists or that access will automatically be granted. Every request is considered within its context, under PAIA, POPIA and other applicable laws.

2. Company and Information Officer details

Item	Details
Private body	LabourDrive Proprietary Limited (trading as LabourDrive)
Registration number	2015/430580/07
Physical / registered office address	Shop 1, 39 Ashley Avenue, Glen Ashley, Durban North, KwaZulu-Natal, 4051, South Africa
Website	www.labourdrive.com
Chief Executive / privacy contact	chris@labourdrive.com
Deputy Information Officer	jason@labourdrive.com | +27 (0)79 877 2379
General enquiries	enquiries@labourdrive.com

The formal Information Officer and Deputy Information Officer registrations should be kept aligned with the Information Regulator's eServices records. If a designation changes, this Manual should be updated.

3. The Information Regulator's PAIA Guide

The Information Regulator publishes a Guide explaining how to use PAIA, including how to make access requests, available remedies and how to access personal information under section 23 of POPIA. The Guide and prescribed PAIA forms are available from the Information Regulator and its website/eServices facilities.

Current Regulator contact details should be verified at the time of a request. At the date of this Manual, the Information Regulator publishes its offices and general enquiry channels on its official website.

4. Records that may be held by LabourDrive

The following categories describe records that LabourDrive may hold. Some categories may not apply at all times.

Category	Examples
Corporate and governance	Memorandum of Incorporation; CIPC records; directors and shareholders records; resolutions; governance policies; statutory registers; company secretarial records.
Financial, tax and accounting	Accounting records; invoices; statements; budgets; tax records; VAT records; bank and payment administration; audit or accounting records.
Personnel and contractor records	Employment and contractor agreements; payroll/remuneration administration; leave and performance records; training; disciplinary records; recruitment records; policies; statutory employment records.
Subscriber and customer records	Subscriber registrations; Order Forms; contracts; subscription plans; billing; support records; customer communications; account and user administration; service requests.
Platform and Subscriber Content	Platform account records; Subscriber-uploaded or generated ER documents; workflow and audit-trail records; employee-user records; communication records; Doc-Issue, Docu-Process and Docu-Cycle records, subject to confidentiality, POPIA and the Subscriber's rights.
Technology and software	Platform architecture and technical documentation; software and source-code records; development records; licences; infrastructure; system configurations; change

	records; disaster recovery and business continuity records.
Cybersecurity and privacy	Security policies; access-control records; vulnerability and penetration-test records; risk assessments; security incidents; breach records; privacy assessments; processing registers; operator agreements; training records.
AI Interface governance	Approved knowledge-base and system-governance records; AI configuration and safeguards; testing and support records; AI usage logs where retained; supplier agreements, subject to confidentiality and intellectual-property protections.
Integrations and APIs	Integration agreements; API specifications; credentials-management records; data mappings; migration records; sandbox/testing records; integration support records.
Communications and messaging	Email/SMS/WhatsApp service records; approved message templates; delivery/status information; opt-in/opt-out records where applicable; communications-provider contracts.
Intellectual property	Patents; trade marks; copyright materials; Template Forms; user guides; licences; confidentiality agreements; development and IP agreements; disputes concerning IP.
Suppliers and service providers	Contracts; due diligence; invoices; contact details; confidentiality/security terms; performance and support records.
Sales, marketing and public materials	Website content; brochures; proposals; campaign records; customer enquiries; public communications; lawful marketing databases.
Insurance and risk	Insurance policies; applications; claims; broker communications; cyber/public/professional liability records where applicable.
Legal and dispute records	Legal advice and privileged records; litigation; arbitration; regulatory correspondence; complaints; settlement agreements; legal notices.
PAIA and POPIA compliance	PAIA requests and outcomes; PAIA annual reporting; Information Officer records; POPIA requests; objections; corrections; complaints; Regulator correspondence.

5. Records available without a PAIA request

Public website content, published privacy notices, published policies, public marketing material and other information expressly made freely available by LabourDrive may be accessed without a formal PAIA request.

Corporate records that legislation makes open to inspection remain available subject to the applicable legislation and prescribed procedure. LabourDrive may publish a notice of automatically available records where required or appropriate.

6. Records available under other legislation

Where applicable to LabourDrive's operations, records may be created or retained under legislation including the Companies Act 71 of 2008; Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Electronic Communications and Transactions Act 25 of 2002; Consumer Protection Act 68 of 2008 where applicable; Copyright Act 98 of 1978; Trade Marks Act 194 of 1993; Patents Act 57 of 1978; Cybercrimes Act 19 of 2020; POPIA; and PAIA.

Inclusion in this list does not imply that every statute applies to every LabourDrive activity or that records are automatically accessible. Access remains subject to the applicable statute and PAIA.

7. How to request access

A requester should use the prescribed PAIA Form 02 (Request for Access to Record) or any successor form prescribed by the Information Regulator and submit it to LabourDrive's Information Officer at the contact details in this Manual.

The request must contain sufficient particulars to identify the requester, the requested record, the form of access, the right the requester seeks to exercise or protect, and why the requested record is required for that purpose. Proof of identity and authority may be required.

Prescribed request and access fees, where lawfully applicable, may be required. LabourDrive will communicate the outcome and any applicable fees in the manner required by PAIA.

8. Grounds on which access may be refused

Access is not automatic. PAIA contains mandatory and discretionary grounds of refusal. Depending on the record, LabourDrive may be required or permitted to refuse access to protect, among other things, the privacy of third parties; confidential commercial information; trade secrets; safety and security; privileged legal material; research information; intellectual property; confidential information supplied by third parties; and other interests protected by PAIA.

LabourDrive's role as host or operator of Subscriber employee records does not create an unrestricted right for third parties to obtain those records from LabourDrive. Subscriber confidentiality, employee privacy, POPIA, contractual obligations and PAIA grounds of refusal will be considered.

9. Remedies and complaints

If a requester is dissatisfied with a decision of a private body, the remedies available under PAIA may include a complaint to the Information Regulator and/or an application to a competent court, subject to PAIA's requirements and time periods. The Information Regulator's current Guide and prescribed complaint form should be consulted.

10. Processing of personal information under POPIA

LabourDrive processes personal information both as a responsible party for its own corporate and service-management purposes and, for much Subscriber-controlled employee information, as an operator on behalf of the Subscriber.

The detailed public explanation appears in the LabourDrive Platform Privacy Policy, and the governance framework appears in the LabourDrive POPIA Compliance & Data Protection Policy.

Data subject / category	Information / purpose	Recipients
Subscribers and authorised users	Identity/contact, account, contract, billing, support and security information to provide and administer services.	Authorised LabourDrive personnel; hosting/support/payment/professional providers as necessary.
Subscriber employees / employee users	ER, contact, document, workflow and communication information to provide Platform functionality on Subscriber instructions.	Subscriber-authorised users; LabourDrive and approved operators only as necessary for service/support; lawful authorities where required.
LabourDrive personnel and applicants	HR, recruitment, remuneration, performance and statutory records.	Authorised management; payroll/benefit/professional providers; authorities as required.
Suppliers / contractors	Contact, contract, billing, due-diligence and service records.	Authorised personnel; professional/payment providers; authorities as required.
Website / prospective customers	Contact enquiries, lawful marketing preferences and technical information.	Authorised sales/support/website providers as necessary.

11. Cross-border processing

Where LabourDrive transfers personal information to a third party in another country, it will seek to ensure that the transfer satisfies section 72 of POPIA or another applicable legal requirement. This may arise in connection with cloud hosting, communications, AI, cybersecurity or integration providers.

12. Security safeguards

LabourDrive applies reasonable technical and organisational safeguards appropriate to the information and risks involved. Further detail is contained in the Platform Privacy Policy and POPIA Compliance & Data Protection Policy. Security-sensitive technical records may themselves be protected from disclosure where PAIA permits or requires.

13. Availability and languages

This Manual should be made available on LabourDrive's website and at its office as required by law. LabourDrive will comply with applicable requirements concerning the languages in which the Manual must be made available and will review the Information Regulator's current requirements when publishing updated versions.

14. Version control

This Manual should be reviewed at least annually and when there is a material change to LabourDrive's Information Officer details, business activities, record categories, processing activities or PAIA/POPIA requirements.

Annexure A – Request Process Checklist

1. Obtain the current prescribed PAIA Form 02 from the Information Regulator.
2. Identify the record precisely and the right to be exercised or protected.
3. Complete the form and attach proof of identity/authority where required.
4. Submit to LabourDrive at chris@labourdrive.com and/or the current registered Information Officer channel.
5. Pay any prescribed fee if lawfully required after notification.
6. Await the formal outcome. If dissatisfied, consult the Information Regulator's PAIA Guide regarding complaint and court remedies.

Annexure B – POPIA Request Routing

A request concerning personal information for which LabourDrive is the responsible party will be handled by LabourDrive. A request concerning employee information that LabourDrive holds solely as operator will ordinarily be referred to the relevant Subscriber, with reasonable assistance by LabourDrive.