



PAIA MANUAL

DHD Information Security (Pty) Ltd

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000

Registered Name: DHD Information Security (Pty) Ltd

Registration Number: 2026/209612/07

Information Officer: Damian Pfister

Effective Date: 27 May 2026

1. Introduction

This manual is published in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA").

The purpose of this manual is to:

- Describe the categories of records held by DHD Information Security (Pty) Ltd.
- Explain how requests for access to records may be submitted.
- Describe the manner in which personal information is processed in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA").
- Provide contact details for the Information Officer.

This manual applies to DHD Information Security (Pty) Ltd and all records held by the company in relation to its business operations.

2. Company Details

DHD Information Security (Pty) Ltd

Registration Number: 2026/209612/07

Business Address:

5 Dolerite Crescent

Middelburg

1050

South Africa

Telephone: +27 13 880 2252

Email: admin@dhdinfosec.com

Website: <https://dhdinfosec.com>

3. Information Officer Details

The Information Officer responsible for compliance with PAIA and POPIA is:

Damian Pfister
Information Officer
Email: damian@dhdinfosec.com
Telephone: +27 13 880 2252

4. Guide on How to Use PAIA

A guide on how to use PAIA is available from the Information Regulator.

The guide contains information regarding:

- The purpose of PAIA.
- How to request access to records.
- Assistance available from the Information Regulator.
- Remedies available where access is refused.
- Prescribed forms and fees.

The guide may be obtained from:

Information Regulator (South Africa)
Website: <https://info regulator.org.za>
Email: enquiries@info regulator.org.za
Telephone: 0800 017 160

5. Applicable Legislation

DHD Information Security (Pty) Ltd may maintain records in accordance with legislation including, but not limited to:

- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Companies Act 71 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Occupational Health and Safety Act 85 of 1993
- Consumer Protection Act 68 of 2008

The above list is not exhaustive.

6. Categories of Records Held

The following categories of records may be held by DHD Information Security (Pty) Ltd:

6.1 Company and Corporate Records

- Company registration records
- Statutory company records
- Tax and financial records
- Accounting and invoicing records
- Insurance records
- Internal policies and procedures

6.2 Client and Service Records

- Client contact information
- Quotations and invoices
- Service agreements and related correspondence
- Monitoring reports and alert summaries
- Technical onboarding records
- Service-related communications

6.3 Website and Marketing Records

- Website content
- Contact form submissions
- Website security and analytics logs
- Marketing and communication records

6.4 Human Resources Records

- Employment records
- Payroll records
- Leave records
- Recruitment records

6.5 Information Technology Records

- System access logs
- System and operational records
- Device and infrastructure records
- Operational and audit records

The inclusion of any category above does not automatically mean that a requester will be granted access to such records. Access will be considered in accordance with PAIA and other applicable law.

7. Processing of Personal Information in Terms of POPIA

7.1 Purpose of Processing

DHD Information Security (Pty) Ltd processes personal information for purposes including:

- Providing cybersecurity and related business services.
- Client onboarding and administration.
- Billing and financial administration.
- Communication with clients and prospective clients.
- Website administration and security.
- Compliance with legal and regulatory obligations.
- Employment and human resources administration.

7.2 Categories of Data Subjects

Categories of data subjects whose personal information may be processed include:

- Clients and prospective clients
- Website users
- Suppliers and service providers
- Employees and contractors
- Business contacts

7.3 Categories of Personal Information

Categories of personal information processed may include:

- Names and surnames
- Contact details
- Business information
- Billing information
- Technical and security-related information
- Employment-related information
- Website usage and communication records

7.4 Recipients of Personal Information

Personal information may be shared with third-party service providers where reasonably necessary for business operations and service delivery.

These may include:

- Huntress Labs Inc.
- Xero Ltd
- Cloudflare Inc.
- Absolute Hosting (Pty) Ltd
- Microsoft Ireland Operations Ltd (Microsoft Exchange Online)
- Proton AG (Proton Drive)
- Professional advisors, accountants, insurers, or legal representatives where required.

7.5 Cross-Border Transfers

Certain third-party service providers used by DHD Information Security may process information outside South Africa.

Where personal information is transferred internationally, reasonable steps are taken to ensure appropriate safeguards consistent with POPIA.

7.6 Security Measures

DHD Information Security implements reasonable technical and organisational measures to protect personal information against unauthorised access, misuse, loss, or disclosure.

Further information regarding personal information processing, third-party operators, retention periods, cross-border transfers, and security safeguards is contained in the company Privacy Policy available at:

<https://dhdinfosec.com/privacy>

8. Requests for Access to Records

Requests for access to records must be made in writing using the prescribed PAIA request form where applicable.

Requests should be submitted to the Information Officer using the contact details contained in this manual.

The request should contain sufficient detail to:

- Identify the record requested.
- Identify the requester.
- Specify the form of access required.
- Indicate the requester's contact details.
- Specify the right the requester seeks to exercise or protect and explain why the requested record is required.

Proof of identity may be required before access is granted.

A requester may also be required to pay the prescribed request fee and access fee where applicable.

9. Grounds for Refusal of Access

Access to records may be refused on grounds permitted by PAIA, including where:

- Disclosure would involve unreasonable disclosure of personal information.
- Disclosure would reveal confidential commercial information.
- Disclosure would compromise security measures or systems.
- The record is privileged or protected by law.
- The request is manifestly frivolous or vexatious.
- The requester has failed to comply with procedural requirements.

DHD Information Security reserves all rights available under PAIA in relation to requests for access to records.

10. Prescribed Fees

Fees for requests for access to records are determined in accordance with PAIA and applicable regulations.

Requesters will be informed of any applicable fees before processing proceeds.

11. Availability of This Manual

This manual is:

- Available on the DHD Information Security website.
 - Available for inspection at the company's business premises during reasonable business hours.
 - Electronic copies are available on request from the Information Officer.
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Website: <https://dhdinfosec.com>

12. Updates to This Manual

DHD Information Security may update this manual from time to time.

The latest version will be published on the company website.

13. Complaints

Any person who believes that their rights under PAIA or POPIA have been infringed may contact the Information Officer.

Complaints may also be directed to the Information Regulator:

Information Regulator (South Africa)

Website: <https://infoeregulator.org.za>

Email: enquiries@infoeregulator.org.za

POPIA Complaints: POPIAComplaints@infoeregulator.org.za

Telephone: 0800 017 160

Prepared by:

Damian Pfister

Information Officer

DHD Information Security (Pty) Ltd