

PAIA Manual

SouthLine Digital Development (Pty) Ltd

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

Company	SouthLine Digital Development (Pty) Ltd
Trading as	SouthLine Digital
Registration number	2026/764804/07
Date of compilation	30 September 2026
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1. List of acronyms and abbreviations

TERM	MEANING
"Company"	SouthLine Digital Development (Pty) Ltd
"IO"	Information Officer
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator
"Republic"	Republic of South Africa

2. Purpose of this manual

This manual helps the public understand what records the Company holds and how to request access to them. It is useful for anyone who wants to:

1. Check which categories of records the Company holds, and which are available without a formal request.
2. Understand how to make a request for access to a record.
3. Know the contact details of the Information Officer who will help with a request.
4. Know the description of the PAIA Guide published by the Regulator and how to get it.
5. Understand whether the Company processes personal information, the purpose of processing, and the categories of data subjects and information involved.
6. Know the recipients to whom personal information may be supplied.
7. Know whether the Company plans to send personal information outside the Republic.

8. Know whether the Company has security measures in place to protect the personal information it processes.

3. Key contact details for access to information

All requests go to the Information Officer. The Company has not appointed a Deputy Information Officer.

Information Officer	Chris Kretschmann (Director)
Email	info@southline.co.za
Telephone	071 992 6448
Physical address	2 Inglenook Place, Nahoon Valley, East London, Eastern Cape, 5241
Postal address	As above
Website	southline.co.za
IO registration reference	2026-067591

4. Guide on how to use PAIA

The Regulator has published a Guide, in each official language, to help people exercise their rights under PAIA and POPIA. The Guide explains:

- The objects of PAIA and POPIA.
- The contact details of Information Officers and Deputy Information Officers of public and private bodies.
- How to request access to a record of a public or private body.
- The help available from Information Officers and from the Regulator.
- The remedies available, including complaints to the Regulator and applications to court.
- The fees payable for requests.
- The regulations made under PAIA.

A copy of the Guide is available for inspection at the Company's principal place of business by prior arrangement, or by email from the Information Officer on request. The Guide can also be obtained from the Regulator:

Website	inforegulator.org.za
Email	enquiries@inforegulator.org.za
Telephone	010 023 5200
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

5. Records available without a request

These records can be viewed or downloaded without a formal PAIA request.

CATEGORY	TYPE OF RECORD	AVAILABLE ON WEBSITE	AVAILABLE ON REQUEST
Legal notices	Privacy Policy	Yes	Yes
Legal notices	Cookie Policy	Yes	Yes
Legal notices	Website Terms of Use	Yes	Yes
Legal notices	This PAIA Manual	Yes	Yes
Company information	Services, contact details and company information published on the website	Yes	Yes
Company information	Blog posts and marketing material	Yes	Yes
Company information	B-BBEE certificate issued by CIPC (sent to clients and prospective clients on request)	No	Yes

6. Records kept in terms of other legislation

The Company keeps records as required by the laws below. Where a law gives a right of access, access is handled under that law and this manual.

LEGISLATION	RECORDS KEPT
Companies Act 71 of 2008	Memorandum of Incorporation, registration documents, director details, share register, minutes and resolutions
Tax Administration Act 28 of 2011	Tax returns, supporting documents and correspondence with SARS
Income Tax Act 58 of 1962	Financial records and supporting documents for tax purposes
Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE certificate issued by CIPC
Electronic Communications and Transactions Act 25 of 2002	Website disclosures and records of electronic transactions
Consumer Protection Act 68 of 2008	Client agreements, quotes and records of services supplied
Protection of Personal Information Act 4 of 2013	Records of processing, consents, Information Officer registration

LEGISLATION	RECORDS KEPT
Promotion of Access to Information Act 2 of 2000	This manual and records of requests received
Basic Conditions of Employment Act 75 of 1997	Employee records (if and when the Company employs staff)
Labour Relations Act 66 of 1995	Employee records (if and when the Company employs staff)
Unemployment Insurance Act 63 of 2001	UIF records (if and when the Company employs staff)

7. Records held by subject

The Company holds the following records. Access to them requires a formal request (section 9 below).

SUBJECT	RECORDS
Company and statutory	Incorporation documents, CIPC records, director records, resolutions
Finance and tax	Invoices, quotes, bank statements, accounting records, SARS returns
Clients	Proposals, quotes, agreements, project briefs, correspondence, website and hosting access details, content supplied by clients
Client projects	Website files, designs, SEO reports, analytics reports, automation and chatbot configurations
Marketing and enquiries	Contact form submissions, chatbot conversations, free guide subscribers, outreach correspondence
Suppliers and service providers	Agreements, invoices and correspondence with hosting, software and subcontracting providers
Compliance	POPIA records, Information Officer registration, PAIA requests, B-BBEE certificate, CSD registration
IT and security	Account records, access logs, backup records, security settings
Human resources	Contracts and records of employees or contractors (if and when engaged)

8. Processing of personal information

8.1 Purpose of processing

The Company processes personal information to:

- Respond to enquiries and prepare quotes and proposals.
- Deliver web design, development, SEO, AI automation and chatbot services to clients.

- Invoice clients, keep financial records and meet tax obligations.
- Manage relationships with suppliers and service providers.
- Send marketing communication to people who have opted in, or to existing clients about similar services.
- Keep its systems and data secure.
- Comply with the law.

8.2 Categories of data subjects and their personal information

DATA SUBJECT	PERSONAL INFORMATION PROCESSED
Clients (companies and their contact people)	Names, job titles, email addresses, phone numbers, company details, registration and VAT numbers, billing details, correspondence
Prospective clients and website visitors	Names, contact details, company details, enquiry content, chatbot conversations, IP addresses, cookie and analytics data
End users of client websites and chatbots	Information submitted through forms or chatbots that the Company builds or manages for clients (processed as an operator on the client's behalf)
Suppliers and service providers	Names, contact details, company details, banking details, agreements
Employees and contractors (if engaged)	Names, ID numbers, contact details, banking details, tax numbers, qualifications, employment records

8.3 Recipients of personal information

CATEGORY OF INFORMATION	RECIPIENTS
Client and financial information	SARS, auditors or accountants, banks
Information needed to deliver services	Hosting, domain, email, CRM and software providers the Company uses to deliver services
Information required by law	Law enforcement, courts and regulators, when legally required

The Company does not sell personal information.

8.4 Transborder flows of personal information

Some of the Company's service providers store data outside the Republic, including in the European Union and United States. These include our email, website hosting, analytics, chatbot and automation providers. The Company only uses providers bound by laws, agreements or policies that give protection substantially similar to POPIA, as required by section 72 of POPIA.

8.5 Security measures

The Company protects personal information using:

- Strong, unique passwords and two-factor authentication on business accounts.
- Access limited to people who need it.
- Encrypted connections (SSL/TLS) on websites and forms.
- Regular software, plugin and security updates.
- Firewall and malware protection.
- Regular backups stored securely.
- Secure deletion of personal information when it is no longer needed.
- A process for reporting security compromises to the Regulator and affected people, as required by section 22 of POPIA.

9. How to request access

1. Complete Form 2 (Request for Access to Record) from the PAIA Regulations. It is available on the Regulator's website or from the Information Officer.
2. Email the completed form to info@southline.co.za, or deliver it to the Company's address.
3. Give enough detail to identify the record, the form of access you want, and the right you want to exercise or protect.
4. Pay the request fee, where it applies. Fees are set out in the fee schedule of the PAIA Regulations. No request fee applies when you ask for your own personal information.
5. The Information Officer will decide within 30 days. This may be extended once by up to 30 days, with written reasons.

Grounds for refusal

The Company may refuse access on the grounds in sections 63 to 69 of PAIA, including:

- Protecting the privacy of a third party.
- Protecting the commercial information of a third party or of the Company.
- Protecting confidential information of a third party.
- Protecting the safety of individuals and property.
- Protecting records privileged from production in legal proceedings.
- Protecting research information.

Remedies

The Company has no internal appeal process. If a request is refused, or you are unhappy with a decision, you may lodge a complaint with the Regulator within 180 days, or apply to court.

10. Availability and updating of this manual

This manual is available:

- On the Company's website at southline.co.za/paia-manual.
- At the Company's principal place of business (see section 3) for public inspection during normal business hours, by prior arrangement with the Information Officer.

- To any person on request, by email free of charge, or as a printed copy at the prescribed reproduction fee.
- To the Regulator, on request.

The Company will review and update this manual at least once a year, and whenever its details or processing activities change.

Issued by

Name	Chris Kretschmann
Title	Information Officer and Director
Company	SouthLine Digital Development (Pty) Ltd
Signature	 _____
Date	30 September 2026