



Pink Elephant South Africa IT Management (Pty) Ltd
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PAIA Manual

*Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000 (as amended) (Called "PAIA")*

1. Purpose of this Manual

This PAIA Manual provides information to the public to facilitate the access to information records held by Pink Elephant South Africa IT Management (Pty) Ltd (referred to in this manual as the "Pink Elephant"). The Manual provides the following:

- 1.1. The process to be followed to request access to information records held by the Pink Elephant, in accordance with PAIA;
- 1.2. The categories of information records held by the Pink Elephant that are available for access without a person having to submit a formal PAIA request;
- 1.3. The topics on which the Pink Elephant holds information records, and the categories of records held on each topic;
- 1.4. The topics of information records held by the Pink Elephant that are available in accordance with other legislation;
- 1.5. Descriptions of the personal information that Pink Elephant will process, and the purpose of processing such information;
- 1.6. The data subjects or categories of data subjects of Pink Elephant, and the personal information or categories of personal information that are held relating to these data subjects;
- 1.7. The recipients or categories of recipients to whom personal information may be supplied;
- 1.8. A description of the personal information that Pink Elephant may transfer or process outside the Republic of South Africa, the circumstances under which such transfer or processing would take place, and the recipients or categories of recipients to whom such personal information may be supplied;
- 1.9. A summary description of the security measures that Pink Elephant has put in place to ensure the confidentiality, integrity and availability of the personal information that is processed. Information is processed and managed with Pink Elephant's certified use of the ISO 27001 Information Security Management System Standard. The security of personal information is taken very seriously. While Pink Elephant will strive to use commercially acceptable means and ISO 27001 compliant standards to protect Personal Information, absolute security cannot be guaranteed, as no method of transmission over the Internet, or method of electronic storage is 100% secure; and



- 1.10. The relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the information records they wish to access and a Guide on how to use PAIA, published by the Information Regulator, and how to obtain a copy of the Guide.

2. Information Records held by Pink Elephant

The information records held by Pink Elephant are set out in Annexures A to C, as follows:

2.1. Information Records that are Available without a Specific Request

The categories of information records set out in Annexure A are available without the need for a specific request. Copies of these records are available on the website of Pink Elephant at <https://www.pinkelephant.co.za/> or from the head office of Pink Elephant.

2.2. Information Records Available in accordance with other Legislation

The categories of records set out in Annexure B are available in terms of other legislation.

2.3. Topics and Categories of Information Records Held

The categories of information records set out in Annexure C are held by the Pink Elephant.

3. Personal Information

Personal Information means information relating to an identified or identifiable living individual. It does not include data where the identity of the individual to whom it relates has been removed (anonymous data).

Our Privacy Policy covers the collection, use and storage of Personal Information and is available here: <https://www.pinkelephant.co.za/privacy-policy>

Under the Privacy Policy, Pink Elephant may collect, use, store and transfer different kinds of personal information from different data subjects, such as clients, customers, potential customers, employees, contractors or service providers, which personal information has been grouped together as follows:

3.1. Identity Data

Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, photographs, vehicle registration number(s), age, and gender.

3.2. Contact Data

Includes billing address, residential address, delivery address, email address, social media handles and telephone numbers.

3.3. Financial Data

Includes bank account and payment card details.

3.4. Transaction Data

Includes details about payments to and from Suppliers and Customers and other details of products and services purchased from us or by Pink Elephant.

3.5. Technical Data



Includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, full 'Uniform Resource Locators' which clickstream to, through and from the Pink Elephant Website (including date and time) and other technology on the devices data subjects use to access the Pink Elephant website.

3.6. Profile Data

Includes username(s) and password(s), purchases or orders made by Customers, Customer progress in training activities, Customer interests, preferences, relationships held with other data subjects, feedback and survey responses, products viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, mouse-overs and methods used to browse away from the page).

3.7. Usage Data

Includes information about how Customers use the Pink Elephant website, products, and services.

3.8. Marketing and Communications Data

Includes data subject preferences in receiving marketing from Pink Elephant, affiliated third parties and Customer communication preferences.

3.9. Aggregated Data

Pink Elephant also collects, uses, and shares Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from personal information but is not considered personal information in law as this information does not directly or indirectly relate to an identified or identifiable living individual, in other words it is not possible to tie it to a specific data subject. For example, Pink Elephant may aggregate a data subject's Usage Data to calculate the percentage of users accessing a specific website feature. However, if Pink Elephant combines or connects Aggregated Data with data subject personal information so that it can directly or indirectly identify a data subject, Pink Elephant will treat the combined data as personal information which will be used in accordance with the Privacy Policy.

3.10. Purposes for Processing Personal Information

- Fulfilling statutory obligations in terms of applicable legislation;
- Verifying information provided to Pink Elephant;
- Obtaining information necessary to provide contractually agreed services to clients;
- Monitoring, maintaining and managing contractual obligations to clients, suppliers, service providers, employees, and directors;
- Marketing and advertising;
- Resolving and tracking complaints;
- Monitoring and securing the assets, employees and visitors to the premises of Pink Elephant through recordings and video footage;
- Verification of attendance, scores, results and progress in training courses; and
- Historical record keeping, research and recording statistics necessary for fulfilling business objectives.

3.11. Lawful Processing Basis



Pink Elephant will process personal information for the above purposes on the basis of the data subject's consent, where necessary to perform a contract, where the processing is required by law, or to protect Pink Elephant's, the data subject's, or a third party's legitimate interests.

3.12. Data Subject Rights

Data subjects have the right, using the Privacy Policy and using this Manual, to:

- Object to processing on reasonable grounds relating to the data subject's particular situation;
- Object to processing for purposes of direct marketing;
- Query and verify the accuracy of personal information held by Pink Elephant;
- Request that the personal information be transferred to another responsible party;
- Lodge a complaint with the Information Regulator, using the Information Regulator's processes; and
- Any other lawful right or process under the Protection of Personal Information Act, No.4 of 2013.

3.13. Retention Principles

Records of personal information will not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless retention of the record is required by law or Pink Elephant's lawful purposes, is required by a contract, or is retained with the consent of the data subject. Records may also be retained for historical, statistical or research purposes, where appropriate. Pink Elephant will destroy or delete a record of personal information or de-identify it as soon as reasonably practicable after authorisation to retain the record has ended. Destruction or deletion of personal information will be done in a manner that prevents its reconstruction in an intelligible form.

3.14. Breach: Notice and Process

If a Data Subject becomes aware of an information security breach (such as unauthorised access to information, or the loss of information), or suspects that an information security breach may have occurred, the data subject is requested to notify Pink Elephant. The notification must contain information to enable Pink Elephant, as far as possible, to limit the consequences of the information security breach. The notification should therefore include a summary description of the breach and the approximate time that it took place or was discovered. If data subjects take any measures to handle the breach, these should be described. Pink Elephant will take steps to notify data subjects of an information security breach, measures taken to contain and communicate details surrounding the breach, where it affects or is likely to affect the personal information of a data subject.

4. The Information Regulator's Guide to PAIA

The Information Regulator has, in terms of section 10(1) of PAIA as amended, made available a Guide on how to use PAIA. It is intended for use by anyone who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The Guide contains descriptions of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of:



- the Information Officer of every public body, and
- every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for:
 - access to a record of a public body contemplated in section 11; and
 - access to a record of a private body contemplated in section 50;
- the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- the assistance available from the Information Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - an internal appeal;
 - a complaint to the Information Regulator; and
 - an application to a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

Members of the public can inspect or make copies of the Guide from the office of the Information Regulator, during normal working hours.

The Guide can be obtained from the website of the Information Regulator available here:

[\[https://info regulator.org.za/paia/\]](https://info regulator.org.za/paia/)

5. Pink Elephant PAIA Manual

5.1. Availability of the PAIA Manual

A copy of the Pink Elephant PAIA Manual is available:

- on the Pink Elephant website [\[https://www.pinkelephant.co.za/\]](https://www.pinkelephant.co.za/)
- at the offices of Pink Elephant, in Woodmead, Johannesburg, for public inspection during normal business hours;
- to any person upon request and upon the payment of the prescribed fee; and



- to the Information Regulator upon request.

A fee for a copy of the Pink Elephant PAIA Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

5.2. Updating the Pink Elephant PAIA Manual

The Information Officer of Pink Elephant will update this manual on a regular basis as may be required.

6. Requesting Access to Information Records

6.1. Procedure to Follow

The procedure to follow to request access to an information record of Pink Elephant is set out in the Information Regulator's *Guide: How to use PAIA* (see section 4 above). The procedure is summarised on pages 55 and 56 of the Guide (section 25).

The first step of the procedure is to complete and then submit to Pink Elephant the prescribed *Form 2: Request for Access to Record*. A copy of Form 2 is available on the Information Regulator's website:

[\[https://info regulator.org.za/paia/\]](https://info regulator.org.za/paia/)

Requests under the Pink Elephant Privacy Policy may also be directed to our Information Officers using the Contact Details below.

Contact Details for Pink Elephant

Request for Access to an Information Record, and General:

Email: info.africa@pinkelephant.co.za

Information Officer

Name: Ms. Leith Collyer

Tel: 011 656 0020

Email: info.africa@pinkelephant.co.za

Deputy Information Officer

Name: Denise Pretorius

Tel: 011 656 0020

Email: info.africa@pinkelephant.co.za

Secondary Email: d.pretorius@pinkelephant.co.za

Head Office

Physical Address: Country Club Estate
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Website: <https://www.pinkelephant.co.za/>

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Document Review

Date of Next Scheduled Review
February 2028

Distribution

Name	Title
Staff	

Approval of Revisions

Name	Position	Signature	Date
Leith Collyer	Managing Director		20/02/2026



Annexure A: Information Records that are Available without a Specific Request

Information available on the Pink Elephant Website: <https://www.pinkelephant.co.za/>

- Marketing Information;
- News and other Promotional Information;
- Service Provisions Information;
- Case Studies;
- Contact Information;
- Social Media links;
- Training and Certification Information;
- Course Schedules and Training Catalogues;
- Blogs, advice and insights in the ITSM industry;
- Technology Solutions;
- Privacy Policy; and
- Website Terms and Conditions.

Annexure B: Information Records Available in accordance with other Legislation

A

Arbitration Act, 42 of 1965

B

Basic Conditions of Employment Act, 75 of 1997

C

Companies Act, 71 of 2008

Compensation for Occupational Injuries Act, 130 of 1993

Competition Act, 89 of 1998

Constitution of South Africa, 108 of 1996

Consumer Protection Act, 68 of 2008

Copyright Act, 98 of 1987

Cybercrimes Act, 19 of 2020

D

Debt Collectors Act, 114 of 1998

E

Electronic Communications and Transactions Act, 25 of 2002

Employment Equity Act, 55 of 1998

F

Financial Intelligence Centre Act, 38 of 2001

Firearms Control Act, 60 of 2000

G

H

I



Income Tax Act, 58 of 1962

Insolvency Act, 24 of 1936

J

K

L

Labour Relations Act, 66 of 1995

M

N

National Credit Act, 34 of 2005

National Qualifications Framework Act, 67 of 2008

Non Profit Organisations Act, 71 of 1997

O

Occupational Health and Safety Act, No. 85 of 1993

P

Pension Funds Act, 24 of 1956

Promotion of Access to Information Act No. 2 of 2000 (as amended)

Protection of Personal Information Act No.4 of 2013

Q

R

Regulation of Interception of Communications and Provision of Communication Related Information Act, 70 of 2002

S

Short Term Insurance Act, 53 of 1998

Skills Development Act, 97 of 1998

Skills Development Levies Act, 9 of 1999

South African Revenue Service Act, 34 of 1997

Statistics Act, 6 of 1999

T

Tax on Retirement Funds Act, No 38 of 1996

Tax Administration Act, No. 28 of 2011

Telecommunications Act, 103 of 1996;

U

Unemployment Insurance Act, 63 of 2001

V

Value Added Tax Act, 89 of 1991

W

X

Y

Z



Annexure C: Topics and Categories of Information Records Held

Information Topic	Categories of Records
Academic and Training records	<ul style="list-style-type: none"> • Records of students and course attendance • Curriculum and programme material and accreditations • Teaching and learning materials
Administration	<ul style="list-style-type: none"> • Governance structures and personal data of governance office-bearers • Internal rules, regulations and policies, minutes of meetings • Financial records • Contracts, partnerships, service providers, clients • Employment equity data • Statutory and other licenses • General correspondence (emails)
Corporate Affairs and Investor Relations / Communications	<ul style="list-style-type: none"> • Media releases • Newsletters and publications • Corporate Social Investment • Public corporate records
Corporate Secretariat and Governance	<ul style="list-style-type: none"> • Applicable statutory documents • Annual reports • Board of directors and Board Committee Terms of Reference • Codes of Conduct • Executive committee meeting minutes • Legal compliance records • Memoranda of Incorporation • Minutes of Board of Directors and Board Committee meetings • Minutes of shareholders' meetings • Group policies and procedures • Share certificates and Share registers • Shareholder agreements • Strategic plans • Statutory returns to relevant authorities
Finance and taxation	<ul style="list-style-type: none"> • Policies and procedures • Accounting records • Annual financial statements • Audit reports



	<ul style="list-style-type: none">• Capital expenditure records• Investment Records• Invoices and statements• Management reports• Purchasing records• Sale and supply records• Tax records and returns• Transactional records• Asset Register• Budgets• Insurance information
Human Resources	<ul style="list-style-type: none">• Education and training records• Employee benefit records• Employment contracts• Employment Equity records• Employee information• Policies and procedures• Group life information• Leave records• Medical records and Medical Aid information• Pension and retirement funding records• Study assistance schemes• Tax certificates of employees• UIF Returns• Advertised posts• Health and safety regulations• Performance appraisals• Remuneration records• Staff recruitment policies• Staff Policies• Contractor Information
Information Technology	<ul style="list-style-type: none">• Contracts• Disaster recovery plans• Policies and procedures• Licenses• Network diagrams• Manuals• Technical Information
Intellectual Property	<ul style="list-style-type: none">• Trademark applications and trademarks



	<ul style="list-style-type: none">• Agreements relating to intellectual property• Copyright information
Legal	<ul style="list-style-type: none">• Complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation• Material licenses, permits and authorisations• Contracts, and Terms and Conditions
Reporting	<p>Other Types of Information where Pink Elephant has a legal obligation to report:</p> <ul style="list-style-type: none">• South African Police Services – for criminal check and reports of criminal activity• South African Qualifications Authority – for qualification verification• Credit Bureaux – for credit check• Accreditation – for course attendance and examination results
Sales, marketing and communication	<ul style="list-style-type: none">• Brochures, newsletters and advertising material• Client information• Marketing brochures• Marketing strategies• Product brochures• Policies and procedures