

PAIA Manual

SINCLAIR PRESS (PTY) LTD t/a THE SILENT AUTHORITY | Prepared under section 51 of PAIA

Date of compilation: 27 September 2026. Date of next review: on material change or at least annually.

1. Acronyms and abbreviations

Term	Meaning
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)

2. Purpose of this Manual

This Manual helps members of the public understand the categories of records held by Sinclair Press, how to request access to a record, the contact details for access-to-information matters, the PAIA Guide, the Company's processing of personal information, recipients and cross-border processing, and the general security measures used to protect information.

3. Key contact details

Field	Details
Private body	SINCLAIR PRESS (PTY) LTD t/a THE SILENT AUTHORITY
Registration number	2026/763617/07
Information Officer / Head of private body	Mpho Lucky Ramapatsi
IO registration reference	2026-067702
PAIA/privacy email	evelyn@sinclairpress.co.za
Telephone	071 405 2832
Physical/principal place of business	996A Matlala Street, Naledi, Soweto, Gauteng, 1868, South Africa
Website	https://sinclairpress.co.za
Postal address	996A Matlala Street, Naledi, Soweto, Gauteng, 1868, South Africa

No Deputy Information Officer is designated at this time because of the current size and structure of the Company. This will be reviewed as the Company grows or where accessibility requires designation.

4. Guide on how to use PAIA

The Information Regulator publishes the Guide on how to use PAIA, including official forms, procedures, available remedies and contact information. The Guide is available through the Information Regulator website (inforegulator.org.za), including in the official languages and accessible formats made available by the Regulator.

Form 2 (Request for Access to Record) must be used for a formal request to a private body. A requester must identify the right to be exercised or protected and explain why the requested record is required for that purpose, subject to PAIA.

5. Records available without formal PAIA request

Category	Examples / access
Public website records	Published Terms, Privacy Policy, PAIA Manual, product descriptions, public newsroom/resources and approved public notices - available on the website.
Corporate public information	Certain CIPC registration information and B-BBEE status documentation - available from CIPC or on request where appropriate.
Customer-provided transaction records	Account/receipt/transaction information available to the relevant customer through account/support channels, subject to verification and retention.

6. Records available under other legislation

Record category	Applicable legislation (where applicable)
Company incorporation, governance and beneficial ownership records	Companies Act 71 of 2008 and related regulations
Tax/accounting records	Income Tax Act, Tax Administration Act and other applicable tax legislation
Consumer/e-commerce records	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002
Privacy records	POPIA; PAIA
Copyright/licensing records	Copyright Act 98 of 1978
Trade mark records	Trade Marks Act 194 of 1993, where filings/registrations exist
Employment/contractor records	Applicable labour/tax legislation, where the Company has employees/contractors

7. Subjects and categories of records held

Subject	Categories
Corporate/governance	MOI, CIPC records, resolutions, ownership/beneficial ownership records, registers, compliance records.
Finance/tax	Banking, accounting, invoices, payment records, budgets, tax registrations/returns, financial statements/management accounts.
Customers/accounts	Account/contact data, subscription/transaction records, support and complaint records.
Product/technology	Source snapshots, technical documentation, security records, product requirements, release history, vendor records.
IP/licensing	IP Register, licences, NDAs, assignments, contractor terms, provenance evidence, disclosure log.
Marketing/sales	Campaigns, consent records, lead records, proposals, private-partner records, outreach and analytics.

Institutional services	Pilot/licence agreements, implementation records, DPA/operator documents, authorised configuration records.
Privacy/PAIA	Privacy requests, PAIA requests, IO records, breach/incident records, retention schedules and vendor/operator assessments.

8. Processing of personal information

8.1 Purposes

- Provide and secure accounts, subscriptions and digital products.
- Administer payments, support, complaints and legal obligations.
- Deliver requested resources and optional marketing.
- Operate authorised institutional services under customer instructions.
- Maintain security, prevent abuse and preserve legal/compliance records.

8.2 Categories of data subjects and information

Data subjects	Information
Customers/users	Name, email/contact details, account/auth identifiers, subscription/transaction history, support/complaint records, marketing preferences.
Prospects/leads	Business/contact details, consent/source records, communications.
Service providers/contractors	Identity/business details, contracts, payment/tax details, access/security records.
Institutional contacts	Professional contact details, role, contract/implementation communications.
Learners/guardians	Only where lawfully entered in authorised local or institutional workflows; identity/contact/incident information limited to the relevant purpose.

8.3 Recipients

Recipients may include authorised Company personnel/contractors, payment providers, hosting/database providers, email/support providers, professional advisers, regulators/law-enforcement where lawfully required, and institutional customers where disclosure is authorised and necessary. Learner information is not used for unrelated marketing.

8.4 Planned cross-border flows

Some cloud/service providers may process data outside South Africa. Current infrastructure includes or may include providers with processing in jurisdictions outside South Africa, including Supabase infrastructure in the European Union. Cross-border transfers are subject to POPIA section 72 and the Company's vendor/operator controls. Live institutional learner data remains separately gated until the applicable processing location and safeguards are approved.

8.5 Security measures

Measures may include HTTPS, authentication/access controls, protected local storage for individual-teacher case records, server-side secret management, least-privilege access, logging limitations, incident response, vendor controls, backup/availability processes where appropriate, and periodic technical/security review. The Company does not claim that any system is absolutely secure.

9. Making a request

Use the current official PAIA Form 2 and send it to the contact details in section 3. The requester must provide sufficient detail to identify the record and comply with PAIA, including identifying the right to be exercised or protected and explaining why the record is required. Prescribed request and access fees may apply. Sinclair Press may refuse access only on grounds permitted by PAIA and will communicate the outcome and reasons as

required. Where applicable, a requester may lodge a complaint with the Information Regulator using the prescribed Form 5 or seek other remedies available under PAIA.

10. Availability of this Manual

A copy is available on the Sinclair Press website and at the principal place of business for public inspection during normal business hours, to any person upon request subject to any prescribed copy fee, and to the Information Regulator upon request. The Company maintains this English version and may provide additional language versions where appropriate.

11. Updating the Manual

The Information Officer will review this Manual when material records, processing, contact details, services, law or the Company structure change.

Issued by

Mpho Lucky Ramapatsi - Information Officer / Head of Private Body

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