

BRAIN INDUSTRIES (PTY) LTD
("BRAIN")

PAIA MANUAL

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

DATE OF COMPILATION: 23/06/2026

DATE OF REVISION: 23/06/2027

TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS.....	3
2.	PURPOSE OF PAIA MANUAL.....	3
4	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE...	5
6.	DESCRIPTION OF THE RECORDS OF BRAIN WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	8
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BRAIN	9
8.	PROCESSING OF PERSONAL INFORMATION.....	10
9.	AVAILABILITY OF THE MANUAL	14

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “Minister” | Minister of Justice and Correctional Services; |
| 1.2 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.3 | “Person” | Natural or juristic person, as the case may be; |
| 1.4 | “POPIA” | Protection of Personal Information Act No. 4 of 2013; and |
| 1.5 | “Regulator” | Information Regulator. |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 Access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 Know if the body will process personal information and the purpose of processing of personal information;

- 2.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 Know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF BRAIN

3.1 Information Officer

Name: Ferdie Lochner

Tel: 0844443643

Email: popi@indevaldi.co.za

3.2 Access to information general contacts

Email: popi@indevaldi.co.za

3.3 National or Head Office

Postal Address: 402 Julius Jeppe Street, Waterkloof, Pretoria, 0181

Physical Address: Julius Jeppe Street, Waterkloof, Pretoria, 0181

Telephone: +27 (0) 836791069

Email: jonathanm@imagine.co.za

Website: <https://www.brainindustriessa.com/>

4 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

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

4.3 The aforesaid Guide contains the description of-

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

4.3.3 the manner and form of a request for-

4.3.3.1 access to a record of a public body contemplated in section 11³; and

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
- 4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 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-
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92¹¹.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained-

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available for public inspection during normal office hours.

5 CATEGORIES OF RECORDS OF BRAIN WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Company information	Company overview	X	
Services and products	Services and product pages relating to hazardous area	X	

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

	classifications, electrical and earthing audits, electrical and hazardous area installations, certificates of compliance, explosion-proof products, auto bindicators, safety roto reflectors and LED lighting		
Promotional information	Public company profile	X	
Contact information	General contact details published on the website	X	
Corporate policies and internal records	legal, technical, HR, project and compliance records		X

6. DESCRIPTION OF THE RECORDS OF BRAIN WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Personal information	Protection of Personal Information Act 4 of 2013
Employee records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
Health and safety records	Occupational Health and Safety Act 85 of 1993
Hazardous-area and equipment-related records	Applicable occupational health and safety legislation, standards and codes governing hazardous locations, installations and equipment
Tax and accounting records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011

List of products, services and prices	Consumer Protection Act 68 of 2008
---------------------------------------	------------------------------------

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BRAIN

Subjects on which the body holds records	Categories of records
Corporate governance and legal	Incorporation documents, statutory registers, resolutions, governance records, contracts, legal opinions, litigation and dispute records, compliance records
Finance and administration	Accounting records, invoices, tax records, budgets, financial statements, banking records, procurement records
Human resources	HR policies and procedures, employee records, recruitment records, payroll records, leave records, training records
Customers and projects	Client agreements, project files, site records, work orders, inspection reports, audit reports, installation records, maintenance records, certificates of compliance, commissioning records
Suppliers and service providers	Supplier agreements, procurement records, due diligence records, product records, invoices, delivery records, service records
Technical services and field operations	Hazardous area classification records, earthing and electrical audit records, installation records, explosion-proof product records, bindicator records, safety equipment records, LED lighting records, inspection and testing records
Digital products and inspection systems	Records relating to solar maps, satellite-derived data, on-site solar measurements, albedo studies, SCADA monitoring stations, PV module testing and inspection, meteorological calibration and thermographic inspections

Subjects on which the body holds records	Categories of records
Information technology and website	Website content, user access records, system logs, security records, backups, incident records, website enquiries and analytics

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 Brain processes personal information for the following reasons-

- 8.1.1.1 To provide electrical services and products, including hazardous area classifications, electrical and earthing audits, electrical and hazardous area installations, compliance-related services and product supply;
- 8.1.1.2 To conduct and administer inspection, audit, installation, maintenance and certification work for clients;
- 8.1.1.3 To operate and support INSPECT X and related digital inspection and reporting solutions;
- 8.1.1.4 To manage customer, supplier, contractor and business-partner relationships;
- 8.1.1.5 To manage recruitment, employment, contractor administration and health-and-safety obligations;
- 8.1.1.6 To operate, secure and administer its business systems, websites, technical records and communications;
- 8.1.1.7 To comply with legal, regulatory, contractual, tax, accounting, labour and safety obligations; and

- 8.1.1.8 To market its services and products, respond to enquiries and maintain business-development records.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Brain employees, directors and applicants	Names, surnames, identity/passport numbers, contact details, addresses, CVs, qualifications, employment history, payroll data, tax numbers, banking details, performance and disciplinary records, health information where lawfully required
Client representatives and users	Names, work contact details, positions, correspondence, project information, contracts, access credentials, support records, billing information
Supplier and partner representatives	Names, company affiliation, positions, contact details, compliance records, bank details, contracts, invoices, correspondence
Website visitors, subscribers and marketing leads	Names, email addresses, phone numbers, organisation details, enquiry content, cookies, analytics information and IP-related usage data
INSPECT X users and inspection participants	INSPECT X users and inspection participants
Visitors to premises or project sites	Identification details, access logs, vehicle details, CCTV footage where applicable, health and safety records

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipient or category of recipient	Purpose / lawful basis (for context, optional column)
Identity number and names of employees / candidates / directors	South African Police Service (SAPS)	Criminal record checks and vetting where permitted by law, for purposes of recruitment, employment and risk management.
Names, identity numbers, qualifications and related details	South African Qualifications Authority (SAQA) and/or other recognised verification service providers	Verification of academic and professional qualifications of employees and candidates.
Identity number, names account numbers, payroll and tax information	South African Revenue Service (SARS)	Tax administration and statutory reporting, including PAYE, VAT and other tax obligations.
Technical, operational and project information containing personal data	Contractors, subcontractors, project partners and service providers	Project delivery, support, testing or inspection services

8.4 Transborder flows of personal information

8.4.1 Brain may transfer personal information outside South Africa where this is necessary for cloud hosting, email, digital inspection platforms, document storage, system support, backup, analytics, communications or collaboration with international service providers. Such transfers will be subject to appropriate contractual, organisational and technical safeguards as required by POPIA.

8.4.3 Brain ensures that the personal information of its Data Subjects processed by its Operators (including, where applicable, Microsoft and other cloud

service providers) is processed in full compliance with the Protection of Personal Information Act 4 of 2013.

- 8.4.4 For these purposes, Brain relies on written contracts with its Operators, requiring them to establish and maintain the security measures referred to in section 19 of POPIA, including appropriate technical and organisational safeguards to protect the integrity and confidentiality of the personal information they process on behalf of Brain.
- 8.4.5 Brain requires its Operators to notify it without undue delay where there are reasonable grounds to believe that the personal information of Brain Data Subjects has been accessed or acquired by any unauthorised person. Such notification must be made as soon as reasonably possible after discovery of the compromise, taking into account the legitimate needs of law enforcement and any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the information system.
- 8.4.6 Brain monitors and enforces Operator compliance with these contractual and statutory security obligations and requires Operators to accept accountability for security breaches falling within their control, thereby supporting the protection of the rights and interests of Brain Data Subjects under POPIA.
- 8.4.7 Brain is subscribed to Microsoft 365 and agrees to the cross-border transfer and storage arrangements Microsoft implements for tenant content, subject to POPIA. Further information is available in Microsoft's privacy statement (currently published at the URL notified by Microsoft from time to time).

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Brain fully complies with the stated security measures on integrity and confidentiality of personal information provided for in Section 19 of the Protection of Personal Information Act 4 of 2013. Among others, the following policies and practices apply:

- 8.5.1 Brain makes use of reputable cloud service providers (including Microsoft 365) for email, document storage and collaboration, and implements the security controls they provide.
- 8.5.2 Brain has implemented a Protection of Personal Information Policy, which will be provided on request.
- 8.5.3 Emails and data stored in cloud services are protected through appropriate access controls, including multifactor authentication, to prevent unauthorised access.
- 8.5.4 All computing devices used to access Brain systems have security tools installed to protect the device and its contents.
- 8.5.5 Device-level encryption is enabled on company-managed devices to reduce the risk of data exposure in the event of loss or theft.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 at the head office of Brain for public inspection during normal business hours;
- 9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.3 to the Information Regulator upon request.

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

10. UPDATING OF THE MANUAL

The head of Brain will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to read 'F. Lochner', written in a cursive style.

Name & surname:

Ferdie Lochner

Position:

Information Officer

Date:

23 June 2026