PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Bridging Technologies South Africa (Pty) Ltd (BT-SA)

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

Document control	Detail
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1. Purpose and scope

This manual explains what records BT-SA holds, how access may be requested, and how BT-SA processes personal information. It applies to the company's operations and records, including its ICT infrastructure, data-centre solutions and related support activities. Access remains subject to PAIA, POPIA and applicable confidentiality obligations.

2. Company and Information Officer details

Item	Details
Legal entity	Bridging Technologies South Africa (Pty) Ltd
Trading name	BT-SA
Physical address	59 Lechwe Street, Corporate Park South, Midrand, Gauteng, South Africa
Postal address	P.o. Box 50468, Randjes Park, 1685
Telephone	+27 11 314 0601/2/3
Website	https://www.bt-sa.co.za
Information Officer / Head of private body	JFJ Jordaan
Information Officer email	privacy@bt-sa.co.za

3. Guide issued by the Information Regulator

The Information Regulator publishes a guide explaining how to exercise rights under PAIA and POPIA, including request procedures, fees and remedies. The guide and prescribed request forms are accessible from https://inforegulator.org.za/paia/ and may be requested from BT-SA's Information Officer.

4. Records available without a formal PAIA request

Subject to publication and availability, the following information may be accessed without a PAIA application: public company profile and service descriptions; published website content; publicly issued privacy notices; and this PAIA Manual. This description is not a claim that BT-SA has published a section 52 notice. No such notice has been confirmed.

5. Records available in terms of other legislation

BT-SA may maintain records required under applicable South African legislation, including the Companies Act 71 of 2008, Income Tax Act 58 of 1962, Tax Administration Act 28 of 2011, 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, Compensation for Occupational Injuries and Diseases Act 130 of 1993, Unemployment Insurance Act 63 of 2001, Electronic Communications and Transactions Act 25 of 2002, and POPIA 4 of 2013, where relevant. The fact that a record is retained under legislation does not mean it is automatically publicly accessible.

6. Subjects and categories of records held

Subject	Examples of records
Corporate and governance	Registration documents; shareholder and director records; board minutes; governance policies; contracts
Finance, procurement and tax	Invoices; orders; budgets; payments; banking and tax records; supplier onboarding
Human resources	Recruitment; employment; payroll; benefits; performance; training and disciplinary records
Customers and projects	Contracts; tenders; quotations; work orders; project plans; acceptance documentation; service tickets
Technical and operations	Network diagrams; installation records; support records; maintenance schedules; equipment information
Health, safety and facilities	Risk assessments; incident and inspection records; contractor and facility documentation
Information technology and security	Asset registers; access records; Microsoft 365 administration; security and incident logs
Legal and compliance	Policies; privacy records; legal correspondence; insurance; regulatory compliance records

7. Procedure to request access to records

- Submit the prescribed PAIA Form 2 to the Information Officer using the verified contact details in section 2. The current form is available from the Information Regulator website.
- Describe the requested record sufficiently to allow it to be located, provide proof of identity/authority, preferred form of access and contact details, and explain the right to be exercised or protected and why the record is required.
- BT-SA will acknowledge and consider the request under PAIA; where applicable, statutory fees will be notified using the prevailing prescribed tariff.
- BT-SA normally has 30 days to decide a request, subject to the permitted extension of up to 30 additional days and other applicable provisions.
- Access may be granted in whole or in part, or refused on lawful grounds (including confidential third-party information, privacy, legal privilege and commercial confidentiality). Reasons and available remedies will be communicated.

8. Fees and remedies

Prescribed request and access fees (where applicable) are governed by the current PAIA Regulations and must not be invented or substituted with an internal BT-SA tariff. A person dissatisfied with a private-body decision may lodge a complaint with the Information Regulator or seek an appropriate court remedy, subject to the relevant statutory procedures and time limits. Information Regulator: https://inforegulator.org.za/.

9. Processing of personal information under POPIA

9.1 Purposes of processing

BT-SA processes personal information as reasonably required to manage employment and recruitment; supply ICT solutions and support services; administer customers and suppliers; perform contracts; issue quotations and invoices; meet statutory, tax and safety obligations; secure systems and premises; and respond to legitimate enquiries and disputes.

9.2 Categories of data subjects and information

Data subjects	Categories of information
Employees, applicants and contractors	Identity and contact information; employment/payroll/banking information; qualifications; attendance and lawful HR records
Customer and supplier contacts	Names; business contact details; role; contract, order, invoice and correspondence information
Visitors and service personnel	Names; organisation; site-access and relevant safety/security information
Other correspondents	Contact details and information voluntarily provided for requests, queries or disputes

9.3 Recipients or categories of recipients

Personal information may be shared, where lawful and necessary, with authorised BT-SA personnel; customers or contractors involved in service delivery; banks and payment providers; payroll and professional advisers; insurers; relevant government bodies and regulators; and contracted IT/cloud service providers, subject to appropriate agreements or safeguards.

9.4 Cross-border transfers

BT-SA primarily uses Microsoft 365 services with a South African data-residency configuration. Some supporting services or processing functions may involve international infrastructure or providers. Any cross-border transfer must be assessed and managed under section 72 of POPIA.

9.5 General information security safeguards

BT-SA applies organisational and technical safeguards appropriate to its information processing, including controlled user access, Microsoft 365 tenant management, endpoint and perimeter protection, backup/business-continuity arrangements, and internal security and confidentiality policies. Security measures are periodically reviewed; this manual does not certify compliance with ISO 27001 or imply that independently audited controls are in place.

9.6 Rights of data subjects

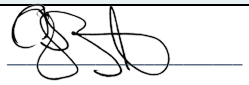
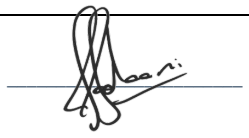
Where applicable, individuals may request access, correction or deletion of personal information, object to processing, or exercise other rights in accordance with POPIA. Requests should be addressed to the Information Officer and may require identity verification.

10. Availability and maintenance of this manual

Once approved, this manual will be made available on the BT-SA website, at BT-SA's principal place of business for public inspection during normal business hours, to the Information Regulator when required, and to requesters in accordance with PAIA. BT-SA will review it annually and whenever company information, processing activities or legislation materially changes. An additional language version should be prepared before publication in accordance with the Regulator's availability guidance.

11. Approval

This manual becomes an issued controlled document only after approval by both directors.

Director	Signature	Date
AG Strydom Director		16 November 2026
JFJ Jordaan Director		16 November 2026