

PAIA MANUAL

Acuity Consultants Privacy Policy

1. Introduction, purpose and definitions

This manual is published by Acuity Consultants in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) . It explains what records Acuity holds, how to request access to them, and how Acuity processes personal information.

Acuity Consultants is a private body. Founded in Cape Town, South Africa in 2009, it is a specialist IT and technology recruitment consultancy offering market intelligence and advisory (Acuity Advise), executive search (Acuity Lead), contractor and payroll services (Acuity Build) and permanent hiring (Acuity Scale). This manual helps the public to:

- see the categories of records available without a formal PAIA request;
- understand how to request access to a record, and what subjects Acuity holds records on;
- know which records are available under other legislation;
- find the contact details of the Information Officer;
- find the Regulator's Guide on how to use PAIA;
- understand why Acuity processes personal information, about whom, and who it may be shared with;
- know whether personal information is transferred outside South Africa; and
- know what security measures protect personal information.

Definitions

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Term	Meaning
Acuity, we, us	Acuity Consultants (Pty) Ltd, Co. Reg. No.2009/006204/07
Data subject	The person to whom personal information relates
Head of body	The Chief Executive Officer of Acuity
Information Officer	The person designated under PAIA and POPIA to deal with requests and compliance
PAIA	Promotion of Access to Information Act 2 of 2000, as amended, and its regulations
POPIA	Protection of Personal Information Act 4 of 2013 and its regulations
Regulator	The Information Regulator (South Africa)
Requester	A person requesting access to a record of Acuity

Terms not defined here have the meaning given to them in the PAIA and POPIA.

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2 Contact particulars

All PAIA and POPIA requests must be addressed to the Information Officer, although our staff will forward misdirected requests. POPIA requests may also use the methods in section 7.

Detail	Acuity Consultants
Registered name	Acuity Consultants (Pty) Ltd
Registration number	Co. Reg. No.2009/006204/07
Physical address	2nd Floor, Dean Street Arcade, Newlands, Cape Town, South Africa 7700
Postal address	2nd Floor, Dean Street Arcade, Newlands, Cape Town, South Africa 7700
Telephone	+27 (0)21 801 5001
General email	hello@acuityconsultants.co.za
Website	acuityconsultants.co.za

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Role	Name	Telephone	Email
Head of body (CEO)	Lindsay Cowan	+27 (0)21 801 5001	Lindsay@acuityconsultants.co.za
Information Officer	Lindsay Cowan	+27 (0)21 801 5001	Lindsay@acuityconsultants.co.za
Deputy Information Officer	Marja Kleynhans	+27 (0)21 801 5001	Marja@acuityconsultants.co.za

3 Guide on how to use PAIA

The Regulator has published an updated Guide on how to use PAIA and POPIA (the Guide) under section 10 of PAIA. It is available in every official language and in braille.

The Guide describes the objects of PAIA and POPIA, the contact details of every Information Officer and Deputy Information Officer, the assistance available from the Regulator, the remedies available (including complaints to the Regulator and court applications), the manual requirements in sections 14 and 51, voluntary disclosure under sections 15 and 52, the fee notices, and the regulations made under section 92.

A copy of the Guide can be obtained:

- from the Regulator's website at info regulator.org.za/paia-guidelines;
- on request from Acuity's Information Officer, using Form O1 (Request for a copy of the Guide); or
- for inspection at Acuity's office during normal business hours.

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Information Regulator (South Africa)

Details	Information Regulator
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Toll free	0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

4 Records automatically available

The following records are available without a formal PAIA request. No section 52 notice has been published.

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Record	How to access
Service information for Acuity Advise, Lead, Build and Scale	Website
Industry insights, market reports and articles	Website
Live job opportunities	Website
Privacy Policy and Cookie Policy	Website
This PAIA manual	Website and office
B-BBEE certificate (Level 2 contributor)	On request

5 Records available under other legislation

Acuity keeps records required by the legislation below, as it applies to a recruitment consultancy and provider of contractor and payroll services. Access to these records may be governed by the relevant Act as well as by PAIA.

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- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Employment Services Act 4 of 2014
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

This list is not exhaustive and is updated as legislation changes.

6 Subjects and categories of records held

Listing a record here does not mean access will be granted. Every request is assessed against the grounds for refusal in Chapter 4 of Part 3 of PAIA.

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Subject	Categories of records
Company and statutory	Memorandum of Incorporation, CIPC records, share register, director and shareholder records, board and management minutes, resolutions
Finance and tax	Annual financial statements, management accounts, budgets, asset register, banking records, invoices, tax, VAT and PAYE returns, audit reports
Human resources	Employment contracts, personnel files, remuneration and leave records, performance reviews, disciplinary records, training records, employment equity reports, HR policies
Candidates and job seekers	CVs, applications, interview notes, assessments, references, qualification and identity verification, candidate consents and communication preferences
Contractors and payroll (Acuity Build)	Contractor agreements, timesheets, payroll records, statutory deductions, UIF and COIDA records, tax certificates
Clients (Acuity Advise, Lead, Scale)	Client agreements and terms of business, vacancy briefs, role profiles, shortlists, placement records, invoices, correspondence
Market intelligence (Acuity Advise)	Market maps, salary benchmarking data, role profiles, hiring pipeline reports, workforce plan and strategy

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Subject	Categories of records
Suppliers and service providers	Supplier agreements, operator agreements, purchase records, correspondence
Marketing and communications	Website content, newsletters, subscriber lists and opt-outs, campaign records, social media content
Information technology	IT policies, system and access logs, software licences, CRM and database records, backup and security records
Legal and compliance	Contracts, litigation and dispute records, POPIA and PAIA compliance records, insurance policies, licences and registrations

7 How to request access

A requester must be given access to a record of a private body if the record is needed to exercise or protect a right, the procedural requirements are met, and no ground for refusal applies (section 50 of PAIA).

Forms

The prescribed forms are available from the Information Officer or at inforegulator.org.za/paia-forms. Requesters must use the latest version published by the Regulator.

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Form	Purpose
PAIA Form 01	Request for a copy of the Guide (Regulation 3)
PAIA Form 02	Request for access to a record (Regulation 7)
PAIA Form 03	Outcome of request and fees payable (Regulation 8)
PAIA Form 05	Complaint to the Information Regulator under PAIA (Regulation 10)
POPIA Form 1	Objection to the processing of personal information
POPIA Form 2	Request to correct or delete personal information

With adequate proof of identity, a data subject may ask Acuity Consultants, free of charge, to confirm whether it holds their personal information, and may request a copy of it (section 23 of POPIA).

POPIA objections and correction or deletion requests are free. Use Forms 1 and 2 respectively, or substantially similar information in an accessible format, by email, post, hand delivery, telephone or another permitted method. We assist where needed, record telephone requests and provide the recording or a transcription free on request. We notify you in writing of the action taken as POPIA requires.

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Procedure

1. Complete Form 02 and send it to the Information Officer by email or to the physical address in section 2.
2. Give enough detail to identify the record, the requester (and proof of capacity/authority if acting for someone else), the form of access wanted, contact details in South Africa, and the right the requester wants to exercise or protect.
3. Where payable, pay the request fee of R140. Acuity Consultants will not process the request until it is paid. Free POPIA confirmation, objection and correction or deletion requests are excluded.
4. Acuity Consultants decides as soon as reasonably possible, and in any event within 30 days, after receiving a complete request (subject to statutory fee, extension and third-party procedures) and notifies the requester on Form 03, including any access fee due.
5. Acuity Consultants may extend the 30 days once, by up to a further 30 days, where section 57 of PAIA allows. Within the initial period, we notify you of the duration, reasons and right to challenge the extension.
6. If the request involves a third party's information, Acuity Consultants notifies the third party within 21 days, and the third party has 21 days to respond. Acuity follows the decision, notification and access timetable in sections 71–73, including applicable waiting periods and challenges.
7. If granted, access is given once any access fee is paid.

If Acuity does not respond within the time allowed, the request is deemed refused (section 58).

8 Prescribed fees

Fees for requests to a private body are prescribed in Annexure B of the PAIA Regulations, 2021 ([Information Regulator fee structure](#)). Acuity Consultants may add VAT as an operating VAT registered vendor. Free POPIA requests remain free.

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Item	Fee ex VAT
Request fee, payable by every requester	R140.00
Photocopy or printed copy, per A4 page	R2.00 per page or part
Transcription of an audio record, per A4 page	R24.00 per A4 page.
Transcription or copy of visual images	Per service provider quotation
Copy in computer-readable form	R40 on a flash drive supplied by the requester; R40 on a CD supplied by the requester; R60 on a CD supplied by Acuity.
Search and preparation, per hour or part, excluding the first hour	R145.00, capped at R435.00
Deposit, where search and preparation exceeds 6 hours	One third of the amount per request calculated under items 2 to 8 of the prescribed private-body tariff.
Postage, email or electronic transfer	Actual expense, if any

If a deposit is paid and the request is later refused, the deposit is refunded. Private bodies cannot grant fee exemptions.

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9 Grounds for refusal and remedies

Acuity Consultants may or must refuse access on the grounds in sections 62 to 69 of PAIA, including where disclosure would:

- unreasonably disclose personal information about a third party who is a natural person (section 63);
- disclose a third party's trade secrets or commercial, financial or technical information (section 64);
- breach a duty of confidence owed to a third party (section 65);
- endanger the life or safety of an individual or the security of property (section 66);
- disclose records privileged from production in legal proceedings (section 67);
- disclose Acuity Consultants own trade secrets or commercial, financial or technical information, or harm its competitive position (section 68); or
- disclose research information of Acuity Consultants or a third party (section 69).

Acuity Consultants must still grant access where section 70 applies: disclosure would reveal a serious contravention of the law or an imminent risk to public safety or the environment, and the public interest clearly outweighs the harm.

Refusal grounds remain subject to their statutory requirements and exceptions. Where protected information can reasonably be separated, Acuity provides the remainder under section 59.

Remedies

Acuity Consultants has no internal appeal procedure. A requester or third party who is unhappy with a decision may, within 180 days of being notified of it, lodge a complaint with the Information Regulator (section 77A of PAIA).

Court relief under section 78 is subject to its procedural requirements, including exhaustion of the applicable complaint procedure and the applicable 180-day deadline. Obtain advice promptly on the procedure and deadline for your case. Complaints about the processing of personal information can be lodged with the Regulator under section 74 of POPIA.

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10 Processing of personal information

Acuity Consultants processes personal information to match technology professionals with the businesses hiring them, to run its contractor payroll, and to meet its legal obligations. It does so in line with the eight conditions for lawful processing in POPIA.

Data subjects, information, purposes and recipients

Data subject	Personal information processed	Purpose	Recipients
Candidates and job seekers	Name, contact details, ID number and copy, address, gender, race (for B-BBEE and employment equity), citizenship, CV, qualifications, employment history, current and desired salary, skills, references, public professional profiles	Recruitment, matching candidates to roles, presenting shortlists to clients, verifying qualifications and identity, informing candidates of relevant roles	Prospective employers (with the candidate's consent), background screening and verification agencies such as V-report and LexisNexis, referees
Contractors on payroll	As for candidates, plus bank details, tax reference number, timesheets, remuneration, statutory deductions	Contracting, payroll, tax and statutory compliance	Clients where the contractor is placed, SARS, UIF, Compensation Fund, banks, PKF Constantiavalley

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Data subject	Personal information processed	Purpose	Recipients
Employees and applicants for internal roles	Identity and contact details, employment and remuneration records, bank and tax details, performance and leave records, demographic data for employment equity	Employment administration, payroll, legal compliance	SARS, UIF, Department of Employment and Labour, benefit providers, auditors
Client contacts	Name, job title, company, business email and telephone	Delivering services, account management, invoicing, sending relevant market insights	Itrix, Mail Chimp, Microsoft 365
Suppliers and service providers	Contact details of representatives, banking and tax details	Procurement, payment, contract management	Banks, auditors
Website visitors and subscribers	Name, company, job title, business email, cookie and usage data, marketing preferences	Responding to enquiries, sending insights and newsletters with consent, improving the website	Wordpress, Elementor, Mail Chimp, Itrix, Radiant Web, Sybaweb, Cloud Flare, Google Analytics, Meta, LinkedIn

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Acuity Consultants may also share personal information with its professional advisers PKF Constantia Valley, STBB, insurers, and regulators or law enforcement where the law requires it. Operators processing information on Acuity Consultants behalf are bound by written agreements under section 21 of POPIA.

Special personal information, such as race, is processed only where POPIA permits, for example with consent or to meet B-BBEE and employment equity obligations.

Transfers outside South Africa

Acuity Consultants places professionals internationally, most often for clients in the UK, Europe and the Middle East, and some of its cloud service providers may store data outside South Africa. Acuity Consultants transfers personal information across borders only where section 72 of POPIA allows: the recipient is subject to laws, binding corporate rules or contractual obligations that provide adequate protection substantially similar to POPIA; the data subject consents to the transfer; or the transfer is necessary to perform a contract with the data subject, take steps they have requested before entering into a contract, or conclude or perform a contract with a third party in their interest, for example in connection with an international role that the data subject has applied for.

Security measures

Acuity Consultants has identified the risks to the personal information it holds and applies reasonable technical and organisational measures under section 19 of POPIA, including:

- access to the candidate database restricted to authorised staff, with individual logins;
- multi-factor authentication, encryption in transit, and secured cloud hosting;
- regular backups and anti-malware protection;
- confidentiality obligations for employees and operators;
- secure disposal of records no longer needed; and
- regular review of safeguards as risks change.

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If Acuity Consultants has reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, it will notify the Regulator and the affected data subjects as soon as reasonably possible (section 22 of POPIA).

Retention

Acuity applies the retention criteria in section 9 of its Privacy Policy. You may request removal or deletion, but particular records may remain where lawfully justified, including for legal obligations or claims. Marketing opt-outs are honoured separately.

11 Availability and updating of this manual

This manual is available:

- on Acuity Consultants website;
- at the Acuity Consultants office in Newlands, Cape Town, for inspection during normal business hours;
- to any person on request, on payment of the prescribed fee for copies; and
- to the Information Regulator on request.

Acuity Consultants reviews this manual at least once a year and whenever its operations or the law change. The latest version is on our website and only this version applies; earlier versions are retained for record-keeping.

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Version	Effective Date	Approved by
1.0	19 October 2026	Lindsay John Cowan, CEO

Signed: _____



Mr. Lindsay John Cowan, Chief Executive Officer