



RecruitAGraduate (Pty) Ltd
Registration Number: 2018/591350/07
Trading as RAG Talent

PAIA MANUAL

**Prepared in accordance with Section 51 of the Promotion of Access to
Information Act, Number 2 of 2000 (as Amended)**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1. "CEO"	Chief Executive Officer
1.2. "DIO"	Deputy Information Officer
1.3. "IO"	Information Officer
1.4. "Minister"	Minister of Justice and Correctional Services
1.5. "PAIA"	Promotion of Access to Information Act, No. 2 of 2000 (as Amended)
1.6. "PAIA Manual"	Promotion of Access to Information Act Manual
1.7. "POPIA"	Protection of Personal Information Act No.4 of 2013
1.8. "RAG Talent"	Trading name of RecruitAGraduate (Pty) Ltd
1.9. "Regulator"	Information Regulator
1.10. "Republic"	Republic of South Africa

2. INTRODUCTION

The Promotion of Access to Information Act, 2000 (referred to as "PAIA"), became effective on 9 March 2001. PAIA's primary objective is to uphold the Constitutional right to access any information held by the State or other entities. This access is necessary for the safeguarding or exercise of various rights. Both individuals and legal entities are granted the privilege of accessing records held by public or private entities. However, this right is subject to specific limitations aimed at facilitating the exercise and protection of these rights.

In cases where a request for information is made to a private entity under the provisions of PAIA, the private entity is required to disclose the requested information if the requester can demonstrate that the information is needed to protect or exercise certain rights. This disclosure is permitted as long as none of the refusal grounds outlined in PAIA are applicable. The legislation further outlines the procedures and processes related to information requests.

Under Section 51 of PAIA, private entities are mandated to create a manual that outlines how individuals can access information held by that entity. This manual must meet certain minimum requirements as specified in the legislation.

This document serves as RAG Talent's PAIA manual. It has been formulated in compliance with Section 51 of PAIA, as amended by the Protection of Personal Information Act, 2013 (referred to as "POPIA"). POPIA is designed to uphold every individual's Constitutional right to privacy. It emphasises the protection of personal

information handled by both public and private entities. This involves establishing specific conditions that set the baseline for the handling of personal information.

POPIA introduces changes to certain provisions of PAIA, striking a balance between ensuring access to information and safeguarding personal data. This balance is achieved through the creation of an Information Regulator, tasked with exercising specific powers and duties outlined in both POPIA and PAIA. Additionally, POPIA introduces mechanisms such as codes of conduct and grants rights to individuals concerning unsolicited electronic communications and automated decision-making. These mechanisms work together to regulate the flow of personal information and address related matters.

In addition to its primary focus, this PAIA manual also covers information regarding the submission of objections to the processing of personal information and requests for the deletion or destruction of personal information or associated records, all in accordance with the stipulations of POPIA.

3. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2. 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;
- 3.3. know the description of the records of the body which are available in accordance with any other legislation;
- 3.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8. know the recipients or categories of recipients to whom the personal information may be supplied;

- 3.9. 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
- 3.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. ABOUT RAG TALENT

RAG Talent works in the recruitment/employment sector. We are registered under the Labour Relations Act 66 of 1995 and are subject to the rules and regulations of the South African Department of Labour.

RAG Talent is a South African online graduate recruitment agency that sources, interviews and shortlists top graduate talent. We exist to make a positive impact by making it easy for employers to hire graduates and interns.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF RAG TALENT

5.1. Founder & CEO

Phillipa Lee Geard

5.2. Chief Information Officer

Phillipa Lee Geard, (+27)10 880 7583

5.3. Deputy Information Officers

Ms H du Plessis, (+27)10 880 7583

Ms B Trenti, (+27)10 880 7583

5.4. Access to information general contacts

Email Address: info@rag-talent.co.za

5.5. Head Office

Physical Address: Dummer Street, Parel Vallei, Somerset West, 7130

Postal Address: Dummer Street, Parel Vallei, Somerset West, 7130

Contact Number: (+27)10 880 7583

Email Address: info@rag-talent.co.za

Website Address: www.recruitagraduate.co.za

6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 6.1. 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.
- 6.2. The Guide is available in each of the official languages and in braille.
- 6.3. The aforesaid Guide contains the description of-
 - 6.3.1. the objects of PAIA and POPIA;
 - 6.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 6.3.2.1. the Information Officer of every public body and
 - 6.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 6.3.3. the manner and form of a request for-
 - 6.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 6.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 6.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

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 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.*

- 6.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 6.3.6. 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-
 - 6.3.6.1. an internal appeal;
 - 6.3.6.2. a complaint to the Regulator; and
 - 6.3.6.3. 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;
- 6.3.7. 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;
- 6.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 6.3.10. the regulations made in terms of section 92¹¹.

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

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.”

- 6.4. 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.
- 6.5. The Guide can also be obtained-
 - 6.5.1. upon request to the Information Officer;
 - 6.5.2. from the website of the Regulator (<https://info regulator.org.za/>).
- 6.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 6.6.1. English and Afrikaans

7. CATEGORIES OF RECORDS OF RAG TALENT 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	What Makes Us Unique What We Offer These Employers Trust Us Our Awards What We Offer Employers Job Intake Form What We Offer Job Seekers Job Seeker Registration Form Current Jobs Available Testimonials Additional Services Blog Posts FAQs Terms & Conditions Privacy Notice Cookie Policy PAIA Manual Contact Information	X	X
Publications	Advertising Information Documents Marketing Material Newsletters Presentations Press Releases Social Media Videos Websites & Content	X	X

8. DESCRIPTION OF THE RECORDS OF RAG TALENT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

8.1. The records reflected in the table below are available, in accordance with legislation.

Category of Records	Applicable Legislation
Company information	Companies Act 71 of 2008
Communications information	Electronic Communications Act 36 of 2005 Electronic Communications and Transactions Act 25 of 2002 Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002
Competition information	Competition Act 89 of 1998
Copyright information	Copyright Act 98 of 1978 Trade Marks Act 194 of 1993
Credit information	Credit Rating Services Act 24 of 2012 National Credit Act 34 of 2005

Employment information	Basic Conditions of Employment Act 75 of 1997 Broad-Based Black Economic Empowerment Act 53 of 2003 Employment Equity Act 55 of 1998 Labour Relations Act 66 of 1995 Skills Development Act 97 of 1998 Unemployment Insurance Act 63 of 2001 Arbitration Act 42 of 1965
Exchange control information	Currency and Exchanges Act 9 of 1933
Financial crime information	Criminal Procedure Act 51 of 1977 Financial Intelligence Centre Act 38 of 2001 Prevention and Combating of Corrupt Activities Act 12 of 2004 Prevention of Organised Crime Act 121 of 1998 Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
Health information	Occupational Health and Safety Act 85 of 1993
Security information	Promotion of Access to Information Act 2 of 2000 Protected Disclosures Act 26 of 2000 Protection of Personal Information Act 4 of 2013
Legal information	Interpretation Act 33 of 1957

	Justices of the Peace and Commissioner of Oaths Act 16 of 1963 Promotion of Administrative Justice Act 3 of 2000 Small Claims Courts Act 61 of 1984
People information	Civil Union Act 17 of 2006 Consumer Protection Act 68 of 2008 Constitution of the Republic of South Africa (as amended) Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Tax information	Employment Tax Incentive Act 26 of 2013 Income Tax Act 58 of 1962 Income Tax Act 95 of 1967 Skills Development Levies Act 9 of 1999 Tax Administration Act 28 of 2011 Unemployment Insurance Contributions Act 4 of 2002 Value Added Tax Act 89 of 1991

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY RAG TALENT

9.1. The information presented in the table below can be formally requested according to the PAIA (Promotion of Access to Information Act). However, certain portions or the entirety of the information might be subject to the criteria for denying access to records. Please consult the Guide on how to utilise the PAIA for more information.

9.2. RAG Talent maintains the right to decline access to records if processing the information would significantly and unreasonably drain its resources.

9.3. RAG Talent retains the authority to withhold access to records connected with the obligatory safeguarding of:

9.3.1. The privacy of a third party, who is an individual and revealing their personal information unreasonably.

9.3.2. Commercial data of a third party, encompassing trade secrets, financial, commercial, or technical data that, if disclosed, could harm the financial or commercial interests of the third party. Additionally, it includes information disclosed by a third party to RAG Talent in confidence, where disclosure could disadvantage the third party.

9.3.3. Confidential information of a third party, if it's protected by an agreement or legislation.

9.3.4. The safety of individuals and property.

9.3.5. Information considered privileged in legal proceedings.

9.3.6. Records categorised as personal information under the POPIA (Protection of Personal Information Act).

9.3.7. RAG Talent's commercial activities, including trade secrets, financial, commercial, or technical data and software platforms or programs exclusively developed for RAG Talent.

9.4. Access requests that are frivolous and/or vexatious will be declined by RAG Talent.

9.5. The Information Officer (IO) or Deputy Information Officer (DIO) holds the authority to grant access to a record if its disclosure would expose evidence of a significant violation or failure to comply with the law. In such cases, the public interest in revealing the record must outweigh the harm outlined in the relevant grounds for refusing access to records.

Subjects on which the body holds records	Categories of records
Company records	Guidelines and Protocols Incorporation Papers Legal Compliance Records Policies and Procedures
Accounting and finance records	Accounting records Annual financial statements Asset register Audit reports Banking records Financial administration records Financial forecasting reports Intellectual property Invoices and credit notes Service agreements Supporting schedules and documents
Tax records	Pay As You Earn (PAYE) Skills Development Levies (SDL) Tax related correspondence Tax returns as filed with the South African Revenue Services Unemployment Insurance Fund (UIF) levies Value Added Tax (VAT)
Legal records	Agreements, contracts and schedules General legal correspondence Licences, permits, authorisations and consents
Employee records	Code of conduct Confidentiality agreements Disciplinary records and internal evaluations

Subjects on which the body holds records	Categories of records
	Documents provided by employees Documents provided by third parties Employee personal details Employment conditions and policies Employment contracts Employment equity plan Employment policies and procedures Income tax (PAYE/SDL/UIF) submissions for employees Internal correspondence Leave Operating manuals Performance records Remuneration and benefits Restraint of trade agreements Training schedules and material Verification reports (credit, criminal, employment, identity, qualification)
Job Seeker records	Job Seeker agreements and forms Job Seeker database Job Seeker documents and information Job Seeker queries/requests Transactions and supporting information Verification reports (credit, criminal, employment, identity, qualification)
Client records	Client agreements and forms Client database Client documents and information Client queries/requests Transactions and supporting information
Service provider and third party records	Code of conduct Conflicts of interest Requests for information

Subjects on which the body holds records	Categories of records
	Service level and/or third party agreements/contracts Service provider and third party database Terms and conditions for dealing with suppliers Transactions and supporting information
Information technology	Back-ups Custodian information Operations information Service level agreements Service requests System event logs System development life cycle documents System performance logs
Publications	Marketing material Newsletters Presentations Press releases Social media Videos Websites and content
Strategic planning records	Operational and strategic plans Research information

10. PROCESSING OF PERSONAL INFORMATION

10.1. Purpose of Processing Personal Information:

RAG Talent processes the personal information for the following purposes:

10.1.1. Administering the Service.

10.1.2. Administering employees and potential employees.

10.1.3. Executing and/or fulfilling its statutory obligations in terms of the PAIA and/or the POPIA.

- 10.1.4. Executing and/or fulfilling its statutory obligations in terms of other applicable legislation.
 - 10.1.5. Executing and/or fulfilling its contractual obligations.
 - 10.1.6. To support the operation of the Service, such as for billing, account maintenance, and record-keeping purposes.
 - 10.1.7. To distribute communications relevant to the use of the Service.
- 10.2. 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
Clients	Full names of contact persons; contact details (contact numbers; email addresses); registered, and trade, names of entities; physical addresses; postal addresses; unique identifier; identity/registration numbers; confidential correspondence; order information (job specifications); banking details; tax related information; company information; testimonials; service/performance reviews; information required in terms of the FAIS Act and the FICA (and other relevant legislation)
Candidates	Full names; contact details (contact numbers; email addresses); gender; race; age; language; education information (qualifications); employment history; identity/passport numbers; physical addresses; postal addresses; credit record; criminal record; nationality; health; disability; biometric information; professional affiliation; references; CVs/resumes; motivational letters; stories; testimonials; service/performance reviews; confidential correspondence; order information (jobs applied for); banking details; tax related information; information required in terms of the FAIS Act and the FICA (and other relevant legislation)

Categories of Data Subjects	Personal Information that may be processed
Partners	Full names of contact persons; full names of directors; registered and trade names of entities; physical addresses; postal addresses; contact details (contact numbers, email addresses); confidential correspondence; financial information; registration numbers; tax related information; authorised signatories' information; broad-based black economic empowerment (B-BBEE) status; associated entities; business strategies; information required in terms of the FAIS Act and the FICA (and other relevant information)
Service Providers; Customers	Full names of contact persons; registered, and trade names of entities; physical addresses; postal addresses; contact details (contact numbers, email addresses); confidential correspondence; financial information; registration numbers; tax related information; information required in terms of the FAIS Act and the FICA (and other relevant information)
Employees	Full names; contact details (contact numbers; email addresses); gender; marital status; race; age; language; education information (qualifications); employment history; identity/passport numbers; physical addresses; postal addresses; banking details; tax related information; credit record; criminal record; well-being and family members; nationality; health; disability; biometric information; professional affiliation; references; CVs/resumes; motivational letters; stories; testimonials; service/performance reviews; confidential correspondence; information required in terms of the FAIS Act and the FICA (and other relevant legislation)

10.3. The recipients or categories of recipients to whom the personal information may be supplied:

10.3.1. RAG Talent may supply the personal information of data subjects to service suppliers, who provide the following services:

- 10.3.1.1. Administration
- 10.3.1.2. Accounting
- 10.3.1.3. Capturing, and organising, personal information
- 10.3.1.4. Compliance
- 10.3.1.5. Due diligence reviews
- 10.3.1.6. Information and communication technologies (ICT)
- 10.3.1.7. Storing of personal information
- 10.3.1.8. Verification checks (for example, credit (and payment history), criminal, employment history, FAIS related, financial sanctions, identity, qualifications, terrorism)

10.3.2. RAG Talent may supply the personal information of data subjects to:

- 10.3.2.1. Courts, in terms of matters taken on judicial review
- 10.3.2.2. Enforcement agencies, for criminal investigation (for example, National Prosecuting Authority, South African Police Service)
- 10.3.2.3. People against whom complaints have been lodged
- 10.3.2.4. Regulators, ombuds, or tribunals, in terms of matters that fall under their jurisdiction

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity/passport/registration numbers, dates of birth, dates of incorporation, names	Clients; Candidates; Department of Labour; Financial Intelligence Centre; South African Police Services; Verification providers
Qualifications	Clients; Verification providers

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Credit and payment history	Clients; Verification providers
Tax information	South African Revenue Service

10.4. Planned transborder flows of personal information:

10.4.1. RAG Talent uses servers based in South Africa and the United Kingdom. Any information provided to us may be transferred to and processed in South Africa, the United Kingdom or other countries around the world where we do business.

10.4.2. RAG Talent will ensure that the person (both legal and natural) to whom the personal information will be transferred is subject to a law, binding company rules, and/or binding agreements, which provide a suitable level of protection, and the third party agrees to treat the personal information with the same level of protection as RAG Talent is required to provide, in terms of the POPIA.

10.4.3. The cross border transfer of personal information will be done with the data subject's consent. However, if it is not reasonably practicable to obtain the data subject's consent, RAG Talent will transfer the personal information if it will be for the data subject's benefit, and the data subject would have provided consent, if it had been reasonably practicable to obtain the consent.

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

10.5.1. RAG Talent has established, and maintains, suitable technical, and operational, measures to prevent loss of, damage to, or unauthorised destruction of, personal information, and unlawful access to, or processing of, personal information.

10.5.2. The suitable measures that RAG Talent has taken includes, but is not limited to:

10.5.2.1. Access control

- 10.5.2.2. Agreements with operators, to ensure that they implement, and maintain suitable security controls
- 10.5.2.3. Anti-virus software
- 10.5.2.4. Anti-malware software
- 10.5.2.5. Awareness training and vigilance of users
- 10.5.2.6. Data back-ups
- 10.5.2.7. Data encryption
- 10.5.2.8. Defensive measures
- 10.5.3. The suitable measures are in place to ensure that RAG Talent:
 - 10.5.3.1. Identifies the risks (both internal and external) to the personal information that is in its possession and/or under its control
 - 10.5.3.2. Establishes, and maintains, suitable safeguards against the risks identified
 - 10.5.3.3. Regularly verifies that the safeguards are effectively implemented
 - 10.5.3.4. Updates the safeguards when new risks are identified, and when existing safeguards are found to be deficient

11. AVAILABILITY OF THE MANUAL

- 11.1. A copy of the Manual is available-
 - 11.1.1. on www.recruitagraduate.co.za;
 - 11.1.2. head office of RAG Talent for public inspection during normal business hours;
 - 11.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 11.1.4. to the Information Regulator upon request.
- 11.2. 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.

12. UPDATING OF THE MANUAL

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

Issued by

A handwritten signature in black ink, appearing to read 'P. Geard', with a long horizontal stroke extending to the right.

Phillipa Geard
Founder & CEO