

PAIA MANUAL

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

Dispose-IT (Pty) Ltd | Registration 2013/024675/07

Version Update: 26 October 2026

1. Purpose and scope

This manual describes the records held by Dispose-IT (Pty) Ltd, records ordinarily available without a formal PAIA request, access procedures and personal-information processing under PAIA and POPIA. It applies to Dispose-IT alone. Listing a record does not make it available to the public.

This manual applies only to Dispose-IT (Pty) Ltd. Other group companies are separate legal entities. Information may be withheld or redacted where PAIA lawfully requires or permits.

2. Contact details

Contact	Details
Head of private body	Mr Clayton Heldsinger Director
Information Officer	Mr A. Levenstein Director compliance@dispose-it.co.za
Deputy Information Officer	Mr R Lurie General Manager
PAIA and POPIA enquiries	info@dispose-it.co.za +27 10 140 0877
Principal office and postal address	33 6th Street, Wynberg, Sandton, Johannesburg, 2090, South Africa
Website	https://www.dispose-it.co.za
Company registration	Registration number 2013/024675/07

3. The PAIA Guide and requests for access

The Information Regulator publishes a Guide explaining rights under PAIA and POPIA, the request procedure, fees and remedies, at <https://infoeregulator.org.za/paia/>. A copy may be requested from the Information Officer. English and Afrikaans versions can be made available at the principal office during business hours.

Use prescribed Form 2 (Annexure A) to request records not automatically available. Send the completed form to info@dispose-it.co.za or the office address in section 2, providing sufficient detail to identify the record, the requester and the relevant right. The form is also available from <https://infoeregulator.org.za/paia-forms/>.

Access requests are assessed under section 50 of PAIA. Access may be refused or redacted where PAIA protects third-party privacy, commercially confidential records, security-sensitive information or legal professional privilege. Fees may apply. Dissatisfied requesters may complain to the Information Regulator or approach a court, subject to applicable procedures.

4. Records available without a formal PAIA request

The following categories are ordinarily published or provided through general public channels, where applicable:

Category	Examples / means of access
Company and service information	Company profile, contact information, collection coverage and publicly issued service descriptions; website or general enquiries.
Public legal and compliance material	This PAIA manual, published privacy notices and selected public terms or certifications; website.
Public business communications	Published news, service announcements and public marketing content; website or general enquiries.

Customer-specific collection schedules, inventories, chain-of-custody logs, data-wiping or destruction certificates, confidential client records, pricing, internal policies and financial information are not automatically available.

5. Records held in accordance with other legislation

The following laws may apply to records created and held by this private body. Listing these records does not mean they are publicly available:

Legislation	Examples of records
Companies Act 71 of 2008	Incorporation, governance, shareholder/director and statutory records.
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; VAT Act 89 of 1991	Tax returns, accounting, invoices and financial records.
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995	Employment contracts, leave, remuneration and employment relations records.
Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998	Employment equity and staff development records, where applicable.
Unemployment Insurance Act 63 of 2001; COIDA 130 of 1993	Payroll contributions, employee insurance and work-injury records.
Occupational Health and Safety Act 85 of 1993	Safety, training, hazard and incident records.
National Environmental Management: Waste Act 59 of 2008 and regulations	Waste management, recycling, processing, movement and compliance records where applicable.
Second-Hand Goods Act 6 of 2009, where applicable	Relevant acquisition, resale, dealer and transaction registers.
PAIA; POPIA; Electronic Communications and Transactions Act 25 of 2002	Access requests, privacy, electronic agreements and related compliance records.

6. Subjects and categories of records held

Subject	Categories of records
Corporate and governance	Incorporation, governance, resolutions, internal planning and correspondence.
Customers, contracts and instructions	Enquiries, quotations, disposal or buy-back agreements, due diligence, instructions, correspondence and complaints.
Asset collection and custody	Asset inventories, serial numbers, collection notes, transfers, proof of delivery, custody logs, storage and tracking records.
Data sanitisation and destruction	Customer instructions, media identifiers, erasure jobs, destruction, verification and certificate records, incidents and exceptions.
Refurbishment, acquisition and resale	Testing, grading, quotations, valuations, equipment acquisition, refurbishment, buy-backs, second-hand sale and stock records.
E-waste and environmental processes	Material sorting, recycling, downstream vendors, waste movement and environmental compliance records.
Suppliers and procurement	Supplier onboarding, contracts, contractors, purchase orders and service-performance records.
Finance and tax	Invoices, payment transactions, debtor and creditor information, financial reports and tax documents.
Human resources	Recruitment, staff, payroll, benefits, leave, training and employee relations records.
Technology, legal and compliance	System access, IT security, cameras where applicable, disputes, insurance, PAIA/POPIA and legal records.

7. Processing of personal information

7.1 Purposes of processing

Dispose-IT processes personal information to respond to enquiries, conclude and perform agreements, collect and track IT assets, maintain chain of custody, sanitise or destroy data-bearing equipment under customer instructions, issue customer-specific reports and certificates, assess and purchase second-hand goods, refurbish and resell assets, manage lawful recycling and suppliers, administer payments and employees, ensure security and meet legal duties.

7.2 Data subjects and information processed

Data subject	Personal information that may be processed
Customers and their representatives	Names, contacts, signatories, instructions, collection locations, company/transaction records and financial or verification information.
Customer employees and asset users	Names and identifiers, device allocation or collection data, service contact details; residual personal data may be present on customer devices.
Suppliers, sellers, buyers and contractors	Contact, identity, registration, tax, banking, compliance and transaction information where necessary.
Employees and applicants	Identity/contact, qualifications, employment, remuneration, benefit and HR records.
Visitors, prospects and website users	Contact/enquiry data, building access or CCTV records, and website usage information where applicable.

7.3 Recipients of personal information

Information may be supplied, where permitted and necessary, to customer representatives, courier and logistics providers, authorised sanitisation, refurbishment and recycling contractors, downstream processors, purchasers and resale agents, banks, insurers, IT/cloud/CRM providers, employment benefit administrators, authorised group companies, external consultants and advisers and competent public authorities. Information remaining on customer equipment is not made available to third parties merely by listing it in this manual.

7.4 Transborder processing and transfers

Business records may be stored or accessed through overseas-hosted cloud systems or by authorised overseas consultants, professional advisers and service providers. The categories may include business contacts, customer and asset records, supplier and employee information, and support data. Related sharing may also arise in appropriately controlled corporate transactions or due diligence. Relevant transfers must comply with section 72 of POPIA.

7.5 Information security measures

Measures include access restrictions, authentication, custody and movement records, secure storage and transport, documented data sanitisation or physical destruction, endpoint and network controls, backup practices, physical safeguards, contractual confidentiality and incident response. Safeguards are proportionate to the risks and reviewed as necessary.

8. Availability of this manual

This manual is available free of charge at <https://www.dispose-it.co.za>, for inspection at the principal office during working hours, and on request to info@dispose-it.co.za. A prescribed charge may apply to a printed copy where permitted by law. It will be provided to the Information Regulator on request.

9. Updates

Dispose-IT will review and update this manual when reasonably necessary to keep it accurate and compliant.

10. Request procedure, fees and response times

Continuation of the PAIA Manual | Refer to section 3 for contact details.

10.1 How to submit a request

Complete Form 2 in Annexure A and send the signed request to info@dispose-it.co.za or the principal office in section 2. Supply appropriate identification and proof of authority if representing another person. Identify the record and the right to be exercised or protected in sufficient detail.

10.2 Prescribed request and access fees

Fees are charged only where permitted by law. The current Information Regulator schedule for private bodies provides:

Standard PAIA request fee	R140, where applicable
Photocopy or printed A4 page	R2 per page or part thereof
Search and preparation	R145 per hour or part after the first hour, capped at R435
Other copying, media and delivery costs	As prescribed or actual expense, where applicable

Requests about your own personal information: Under section 23 of POPIA, confirmation of whether Dispose-IT holds your personal information is free of charge. Copies or descriptions may be subject to prescribed fees, of which notice will be given in advance.

Where PAIA permits, a deposit for extensive searches may be requested. Requesters will be notified of fees in advance; the applicable current statutory fee schedule takes precedence if amounts change.

10.3 Decisions and timeframes

Dispose-IT will ordinarily decide a valid PAIA request within 30 days, subject to a further extension of up to 30 days where permitted by PAIA. The requester will receive the decision, any fees and applicable remedies in writing, ordinarily on Form 3.



ANNEXURE A | FORM 2

REQUEST FOR ACCESS TO RECORD | [Regulation 7] | Form page 1 of 4

NOTE: 1. Proof of identity must be attached by the requester. 2. If the request is made on behalf of another person, proof of authorisation must be attached to this form.

TO: The Information Officer, Dispose-IT (Pty) Ltd

Address: 33 6th Street, Wynberg, Sandton, Johannesburg, 2090

Email: info@dispose-it.co.za

☐ Request is made in my own name

☐ Request is made on behalf of another person

PERSONAL INFORMATION | REQUESTER DETAILS

Full names	Click here to enter text
Identity number	Click here to enter text
Capacity, if acting for another person	Click here to enter text
Postal address	Click here to enter text
Street address	Click here to enter text
Email address	Click here to enter text
Telephone (business)	Click here to enter text
Facsimile / cellphone	Click here to enter text

PERSON ON WHOSE BEHALF THE REQUEST IS MADE (IF APPLICABLE)

Full names	Click here to enter text
Identity number	Click here to enter text
Postal address	Click here to enter text

**ANNEXURE A | FORM 2 (continued)**

REQUEST FOR ACCESS TO RECORD | Form page 2 of 4

Street address of person represented	Click here to enter text
Email address of person represented	Click here to enter text
Telephone / cellphone / fax	Click here to enter text

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record requested, including any known reference number, so that it can be located. Attach signed extra pages where necessary.

Description of record or relevant part

Click here to enter text

Reference number, if available

Click here to enter text

Any further particulars of the record

Click here to enter text

TYPE OF RECORD (MARK THE APPLICABLE BOX)

- ☐ Record is in written or printed form
- ☐ Record comprises visual images, including photographs, slides, video recordings, computer-generated images or sketches
- ☐ Record consists of recorded words or information reproducible in sound
- ☐ Record is held on a computer or in electronic / machine-readable form

**ANNEXURE A | FORM 2 (continued)**

REQUEST FOR ACCESS TO RECORD | Form page 3 of 4

FORM OF ACCESS (MARK THE APPLICABLE BOX)

- ☐ Printed copy of record (including images, transcriptions and electronic information)
- ☐ Written or printed transcription of visual images
- ☐ Transcription of soundtrack (written or printed document)
- ☐ Copy of record on flash drive (including images and soundtracks)
- ☐ Copy of record on compact disc (including images and soundtracks)
- ☐ Copy of record saved on cloud storage server

MANNER OF ACCESS (MARK THE APPLICABLE BOX)

- ☐ Personal inspection at the registered address of the body
- ☐ Postal service to postal address
- ☐ Postal service to street address
- ☐ Courier to street address
- ☐ Facsimile of written or printed information
- ☐ Email of information (including soundtracks if possible)
- ☐ Cloud share / file transfer

Preferred language	Click here to enter text
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If the record is not available in the preferred language, access may be granted in the language in which the record is available.

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

Indicate which right is to be exercised or protected. Sign any extra pages attached to this form.

Right to be exercised or protected

Click here to enter text

ANNEXURE A | FORM 2 (continued)

REQUEST FOR ACCESS TO RECORD | Form page 4 of 4

Explain why the requested record is required to exercise or protect that right:

Click here to enter text

FEES

- a) A request fee must be paid before the request will be considered, where prescribed.
- b) You will be notified of the access fee.
- c) Fees depend on the form of access and reasonable time required to search for and prepare a record.
- d) If an exemption applies, state the reason.

Reason for exemption (if applicable)

Click here to enter text

You will be notified in writing whether the request has been approved or denied, and of costs if approved. Indicate your preferred correspondence method:

- ☐ Postal address
- ☐ Facsimile
- ☐ Electronic communication

Details for electronic communication	Click here to enter text
Signed at	Click here to enter text
Date	Click here to enter text
Year	Click here to enter text
Signature of requester / authorised representative	Click here to enter text

FOR OFFICIAL USE

Reference number	Click here to enter text
Request received by (name and designation)	Click here to enter text
Date received	Click here to enter text
Access fees	Click here to enter text
Deposit (if any)	Click here to enter text
Signature of Information Officer	Click here to enter text