PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT OF 2000 (AS AMENDED) (PAIA) AND THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (POPIA)

Silicon Enterprise NA LLC

2116 Pecos St., Mission, TX, 78572, United States

SiliconCapital (Pty) Ltd

Suite 1 Constantia House, 10 Silverwood Close, Steenberg Office Park, Tokai, Western Cape, South Africa

Version 5
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1 List of Acronyms and Abbreviations

- CEO – Chief Executive Officer
- Constitution – Constitution of the Republic of South Africa, Act No. 108 of 1996
- DIO – Deputy Information Officer
- IO – Information Officer
- Members – Members of the Information Regulator
- Minister – Minister of Justice and Correctional Services
- PAIA – Promotion of Administrative Justice Act, 2000
- POPIA – Protection of Personal Information Act No. 4 of 2013
- Regulator – Information Regulator
- SAHRC – South African Human Rights Commission

2 Purpose of PAIA Manual

This manual contains information required to request access to records held by Silicon Enterprise NA LLC (Silicon Enterprise) and its subsidiary SiliconCapital (Pty) Ltd.

This PAIA Manual is useful for the public to:

1. check the nature of the records which may already be available at Silicon Enterprise, without the need for submitting a formal PAIA request;
2. have an understanding of how to make a request for access to a record of Silicon Enterprise;
3. access all the relevant contact details of the persons who will assist the public with the records they intend to access;
4. know all the remedies available from Silicon Enterprise regarding request for access to the records, before approaching the Regulator or the Courts;
5. the description of the services available to members of the public from Silicon Enterprise, and how to gain access to those services;
6. a description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
7. 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;
8. know if Silicon Enterprise 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
9. know whether Silicon Enterprise 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 Silicon Enterprise

Information Officer:

- Name: Eric Chowles
- Email: eric.chowles@siliconenterprise.com

Access to information general contacts:

- Email: compliance@siliconenterprise.com

Head Office:

- Address: Suite 1 Constantia House, 10 Silverwood Close, Steenberg Office Park, Tokai, Western Cape, South Africa
- Website: www.siliconenterprise.com

4 Guide on How to Use PAIA and How to Obtain Access to the Regulator's Guide

The Regulator has, in terms of section 10(1) of PAIA, 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.

The Guide is available in each of the official languages.

The aforesaid Guide contains the description of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of
    - the Information Officer of every public body, and
    - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for:
    - access to a record of a public body contemplated in section 11; and
    - access to a record of a private body contemplated in section 50;
- the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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
    - an internal appeal;

- a complaint to the Regulator; and
- 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;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

- Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours.
- The Guide can also be obtained:
  - upon request to the Information Officer;
  - from the website of the Regulator (www.justice.gov.za/inforeg/).
- A copy of the Guide is available in English, Sesotho and Afrikaans for public inspection during normal office hours.
- To request access to a record, please complete "*Form 02: Request for Access to Record [Regulation 7]"* which is available from https://inforegulator.org.za/paia-forms/

5 Categories of Records of Silicon Enterprise Which Are Available Without a Person Having to Request Access

In terms of Section 52 of PAIA, the following categories of Silicon Enterprise records are available without a person having to request access:

Category of records	**Type of record**	**Availability**
Product information	Information relating to our products and services	Freely available
Public facing policies and notices	Privacy Policy, Cookie Policy, Terms and Conditions, Copyright notice, PAIA Manual	Freely available

6 Description of Records of Silicon Enterprise Which Are Available in Accordance With Any Other Legislation

Category of records	**Type of record**
Memorandum of incorporation	Companies Act 71 of 2008

Public facing policies and notices	Promotion of Access to Information Act 2 of 2000

7 Description of The Subject on Which Silicon Enterprise Holds Records and Categories of Records Held on Each Subject

Subject	**Categories of Records**
Human Resources	HR policies and procedures Employee Payroll Training Disciplinary
Business Development	BD policies and procedures Client Project
Software and System Development	SD and IS policies and procedures SDLC QA UAT System configuration
Governance, Risk, and Compliance	GRC policies and procedures Risk assessments and risk registers Incident management Asset management Access control Change control ISO 27001 Information Security Management System ISO 9001 Quality Management System FICA POPIA PCI DSS Internal audit External audit Certification Management review
Supplier Management and Procurement	SMP policies and procedures Approved suppliers Supplier due diligence Supplier evaluation

8 Processing of Personal Information

8.1 Purpose of Processing Personal Information

The purposes for which we process personal information includes but is not limited to:

- to communicate with you regarding the products or services you have requested information on
- to perform Client Due Diligence to verify your identity before entering into a business relationship.
- to engage with you and provide services to you as per a contractual arrangement

- to engage with you, receive services and compensate you for said services as per a contractual arrangement
- to employ you and facilitate your working arrangement with us and to fulfil our contractual obligations to you in this regard
- to review and consider you as a candidate for employment or as service provider to us
- to better manage our business and our relationship with you
- to provide customer support for the services you have engaged us to provide to you
- to conduct administrative and business functions
- to verify that payments for our services have been processed
- to update our records and keep your Personal Information up to date
- to improve our products and services, and to develop new products and services
- to notify you about benefits and changes to the features of our products and services
- to respond to your enquiries or customer service requests
- to resolve any disputes or respond to any complaints
- to prevent fraudulent or unauthorised use of our products and services
- to enable you to effectively use our website
- to compile website usage statistics
- to assess the performance of our website and to improve its operation

Where necessary to protect our legal rights and interests, or the interests of others, we may also use Personal Information in relation to legal claims, compliance with other local regulations or regulations in other countries or jurisdictions, audits, risk management, law enforcement processes, and other regulatory functions.

8.2 Personal Information Categories

- Contact information, such as contact numbers, email addresses, and physical addresses
- Personal details, such as names and date of birth
- Identifying information, such as ID numbers or passport numbers
- Account numbers
- Background information
- Screening information
- Employment information
- Education information
- Contract information
- Recipient information
- Device information

8.3 Data Subject Categories

General Process or Department	Categories of Records
Human Resources	HR policies and procedures Employee Payroll Training Disciplinary
Business Development	BD policies and procedures Client Project
Software and System Development	SD and IS policies and procedures SDLC QA UAT System configuration
Governance, Risk, and Compliance	GRC policies and procedures Risk assessments and risk registers Incident management Asset management Access control Change control ISO 27001 Information Security Management System ISO 9001 Quality Management System FICA POPIA PCI DSS Internal audit External audit Certification Management review
Supplier Management and Procurement	SMP policies and procedures Approved suppliers Supplier due diligence Supplier evaluation

8.4 Planned Recipients of Personal Information

We may share Personal Information with the following recipients, only if there is a valid job-related need or legal requirement to do so:

- any person that works for Silicon Enterprise, either full-time or part time - we follow the approach of least privileges necessary
- any business partner that is under contract to Silicon Enterprise to assist with the provision of our services
- any business partner that has contracted Silicon Enterprise as an Operator to assist with the provision of services
- companies, organisations and entities that provide services to us, including in relation to technical infrastructure, marketing and analytics, and web development

- third party service providers that assist us with fulfilling transactions and services that you have requested and consented to or form part of our contractual obligations with you
- suppliers, affiliates, partners or agents in order to provide you with our products and/or services
- our professional advisers, consultants and other similar services
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights
- any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against and the prevention of threats to public security

We will otherwise treat your Personal Information as private and confidential and will not share it with other parties except:

- Where you have given permission
- Where we believe that it is reasonably necessary to comply with any law or regulation, legal process or governmental request, or to protect the rights, property or safety of us, our customers, or others

When we engage with business partners, third party service providers or affiliates that process your Personal Information in order to provide services to you or to facilitate the procurement of a product or service that you have requested from us, these entities will:

- be subject to binding contractual obligations to only process such Personal Information in accordance with our prior written instructions or contractual agreement with them
- use appropriate measures to protect the confidentiality, integrity and availability of such Personal Information entrusted to them
- comply with our privacy principles and practices when we outsource any services to them
- advise us as soon as possible after the detection of any incidents relating to the Personal Information of our Data Subjects, including unauthorised access to, exfiltration, alteration, destruction or loss of any of the Personal Information, so that we may act swiftly, appropriately and in accordance with our Data Breaches statement below

8.5 Planned Trans-Border Flows of Personal Information

We may transfer your Personal Information to recipients, business partners, entities, third party service providers or affiliates outside of the Republic of South Africa, as outlined in this Privacy Policy, in order to provide our services to you.

- Our Privacy Policy is to meet local country requirements for the flow of information and comply with the Data Protection, Privacy and other related laws and codes of conduct that apply in the countries where we transfer Personal Information to.
- Personal Information may be transferred to a third party outside of the Republic of South Africa provided that the third party is subject to a law, binding corporate rules or a binding agreement that seeks to protect the Personal Information in line with this Privacy Policy and the transfer is necessary in order to provide the services that are required by you.

- We will take reasonable actions to make sure that appropriate security measures are in place before we transfer your Personal Information to other countries if the transfer is necessary to provide services to you.
- You may withdraw your consent to us processing or transferring your Personal Information across borders, however, this may mean that we are no longer able to offer our services to you.

9 Security

Silicon Enterprise ensures the confidentiality, integrity and availability of all Personal Information in our possession.

Reasonable and appropriate security measures have been implemented, which include technical, administrative, and physical security measures, to protect all Personal Information.

Silicon Enterprise has undertaken the following steps to ensure that all Personal Information collected, stored, and shared by the organisation is protected in an appropriate manner:

- Implemented Privacy By Design and Security By Default principles as a priority in all systems that process Personal Information.
- Implemented policies, processes, and procedures to protect against unlawful or unauthorised accessing or processing of Personal Information in our possession, as well as the accidental loss of, damage to, or illegal destruction or alteration of Personal Information.
- Ensured appropriate organisational security measures are implemented, such as Human Resource Security, Security Awareness Training, Information Classification, Access Control, and Change Control policies and procedures to protect Personal Information and ensure only the authorised persons in the organisation may view or amend Personal Information.
- Ensured appropriate technical security measures are implemented, such as Encryption, Anti-Virus, Backups, Logging and Monitoring, Vulnerability Management, Network Security, Software Development, and System Configuration policies and procedures to secure Personal Information at all times.
- Ensured that third party providers who store or process Personal Information on our behalf implement the appropriate administrative, technical, and organisational measures and that they can assist us with upholding the POPIA principles and requirements.
- Ensured that Personal Information is shared with third parties is the minimal amount necessary to reduce the impact to the organisation and its Data Subjects should any breaches occur.
- Implemented an Incident Management process which has been communicated to appropriate third parties and staff of the organisation so that should any issues, incidents or breaches of Personal Information occur these are escalated timeously to allow the organisation to address the issue, resolve the issue, and communicate any incidents to the required regulatory bodies, third parties and Data Subjects as required by the law.
- Implemented ISO 27001 Information Security Management System (ISMS) standards.
- Implemented ISO 9001 Quality Management System (QMS) standards.
- Implemented Payment Card Industry Data Security Standards (PCI DSS).
- Appointed a dedicated Compliance Officer to ensure security safeguards and compliance programs are upheld and continually improved.

10 Availability of the Manual

A copy of the Manual is available:

- On www.siliconenterprise.com
- at the head office of Silicon Enterprise for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

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

11 How to Request Access to Records

1) Requestors are to complete the prescribed Form 2. See Annexure A for Form 2.
2) The completed Form 2 may be posted or emailed to the Silicon Enterprise Information Officer at the following addresses:
    a. compliance@siliconenterprise.com
    b. Suite 1 Constantia House, 10 Silverwood Close, Steenberg Office Park, Tokai, Western Cape, South Africa
3) The Information Officer will process the request and inform the requestor of the fees, (if any) that he/she has to pay and of the further steps that will follow in the processing of the request.

Note: Access to certain records may be denied on the grounds set out in PAIA.

12 Manual Updates

The Information Officer will on a regular basis update this manual.

Issued by the Silicon Enterprise Information Officer – Eric Chowles
Version 5, 14 July 2026
For public distribution