



ACCESS TO INFORMATION

PAIA Manual

Section 51 manual under the Promotion of Access to Information Act.

Version 1.1 — Effective 22 June 2026

Promotion of Access to Information Act 2 of 2000 — Section 51 Manual of SiteActive (Pty) Ltd | read with the Protection of Personal Information Act 4 of 2013 This Manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”). It explains the records held by SiteActive (Pty) Ltd and how a requester may seek access to them. It also describes how SiteActive Processes personal information in terms of the Protection of Personal Information Act 4 of 2013 (“POPIA”), as required following the 2021 amendments to the PAIA Regulations.

1. PARTICULARS OF THE PRIVATE BODY

Name of private body SiteActive (Pty) Ltd Registration number 2026/298206/07 CSD number MAAA1719797 Tax reference number 9088954293 Registered and physical address 131 707 Road, Montford, Durban, 4092 Postal address 131 707 Road, Montford, Durban, 4092 Email info@siteactive.co.za Website siteactive.co.za | app.siteactive.co.za

2. INFORMATION OFFICER

All requests for access to information and all enquiries regarding this Manual must be directed to the Information Officer. Information Officer Caleb Kilion Reddy Appointment date 11 April 2026 Regulator registration 2026-024071 (registered with the Information Regulator on 5 June 2026) Email info@siteactive.co.za Deputy Information Officer None appointed The Information Officer is the head of the private body and has been registered with the Information Regulator. Deputy Information Officers may be designated to assist as the body grows.

3. THE INFORMATION REGULATOR

Requesters may lodge complaints with, and obtain guidance from, the Information Regulator (South Africa): Physical address JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 Postal address P.O. Box 31533, Braamfontein, Johannesburg, 2017 General enquiries enquiries@inforegulator.org.za PAIA complaints PAIAComplaints@inforegulator.org.za POPIA complaints POPIAComplaints@inforegulator.org.za Telephone +27 (0)10 023 5200 Website inforegulator.org.za

4. THE PAIA GUIDE

The Information Regulator has compiled a guide, in terms of section 10 of PAIA, containing information to assist a person who wishes to exercise a right of access to information. The guide is available in each official language from the Information Regulator at the contact details in clause 3, and on its website.

5. CATEGORIES OF RECORDS HELD

5.1 Records held in terms of other legislation. SiteActive holds records in terms of, among others: the Companies Act 71 of 2008; the Income Tax Act 58 of 1962 and the Value-Added Tax Act 89 of 1991; the Tax Administration Act 28 of 2011; the Labour Relations Act 66 of 1995 and the Basic Conditions of Employment Act 75 of 1997; the Protection of Personal Information Act 4 of 2013; and the Occupational Health and Safety Act 85 of 1993.

5.2 Categories of records held by SiteActive. Subject to the grounds for refusal in clause 8, the following categories of records may be held: company and statutory records (registration documents, statutory

registers, B-BBEE certificate, CSD registration, tax records); financial records (management accounts, invoices, banking and payment records, audit records); customer and contract records (customer agreements, pilot agreements, correspondence, support records); operational and platform records (account records, configuration data, system and audit logs, compliance records and SHE File data hosted on behalf of customers); employee and personnel records (employment contracts, payroll, statutory employee records); supplier and operator records (agreements with service providers and operators, data-processing arrangements); marketing records (marketing material, mailing lists, website content); and intellectual property records (software, designs, technical documentation, patent and filing records).

5.3 Customer-hosted compliance records and SHE File data are Processed by SiteActive as an Operator on behalf of the relevant customer. Requests for access to such records should ordinarily be directed to the relevant customer as Responsible Party.

6. RECORDS AUTOMATICALLY AVAILABLE

The following records are available without a formal PAIA request, on the website or on request: published marketing material, the public-facing description of the Platform and pricing, this Manual, the Legal Notice, and the SiteActive Privacy Notice.

7. HOW TO REQUEST ACCESS TO A RECORD

7.1 A requester must complete the prescribed Request for Access to Record Form (Form 02 of the Regulations made under PAIA), available from the Information Officer or the Information Regulator's website.

7.2 The completed form must be submitted to the Information Officer at the contact details in clause 2, and must: (a) provide sufficient detail to identify the record and the requester; (b) identify the right the requester seeks to exercise or protect and explain why the record is required for that purpose; and (c) state the form of access and the manner in which the requester wishes to be informed of the decision.

7.3 Where the request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made.

7.4 The Information Officer will decide the request within 30 days of receipt and notify the requester of the decision and any fees payable. This period may be extended in the circumstances permitted by PAIA, on written notice.

7.5 If a request is made in terms of POPIA for access to or correction of personal information of the requester, the relevant POPIA forms and procedures apply, and no request fee is payable for a record containing the requester's own personal information.

8. GROUNDS FOR REFUSAL

Access to a record may or must be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including: mandatory protection of the privacy of a third party who is a natural person; mandatory protection of the commercial information of a third party; mandatory protection of certain confidential information of a third party; mandatory protection of the safety of individuals and the protection of property; mandatory protection of records privileged from production in legal proceedings; protection of the commercial information of SiteActive; and requests that are manifestly frivolous or vexatious, or that would involve an unreasonable diversion of resources.

9. FEES

9.1 The fees payable are those prescribed for private bodies in Annexure B to the PAIA Regulations published in Regulation Gazette No. 11329 of 27 August 2021, as amended from time to time. A requester (other than a personal requester) must pay the request fee before the request is processed. Access fees are payable before access is given.

9.2 The prescribed fees for private bodies are: request fee R140.00; photocopy of an A4-size page R2.00 per page or part thereof; printed copy of an A4-size page R2.00 per page or part thereof; copy in computer-readable form on a flash drive provided by the requester R40.00; copy on compact disc provided by the requester R40.00, or provided to the requester R60.00; transcription of visual images per A4-size page, and copies of visual images, on quotation from an outsourced service provider; search for and preparation of a record for disclosure, R145.00 for each hour or part of an hour, excluding the first hour, reasonably required, subject to the prescribed maximum; and postage, email or other electronic transfer at the actual expense, if any.

9.3 Where more than six hours are reasonably required to search for and prepare a record for disclosure, a deposit of one third of the applicable access fee is payable before the search commences.

10. REMEDIES

PAIA does not provide for an internal appeal against the decision of a private body. A requester who is dissatisfied with a decision may, in terms of PAIA: (a) lodge a complaint with the Information Regulator; or (b) apply to a competent court for appropriate relief, within the periods prescribed by PAIA.

11. PROCESSING OF PERSONAL INFORMATION (POPIA)

In accordance with the PAIA Regulations and POPIA, the following describes SiteActive's Processing of personal information. Full detail is set out in the SiteActive Privacy Notice.

11.1 Purpose of Processing: providing and supporting the Platform; account administration; compliance management; billing; communications; legal compliance; security and improvement of the Platform.

11.2 Categories of data subjects: account administrators and users; customers and prospective customers; workers, contractors and personnel whose records are uploaded by customers; suppliers; employees of SiteActive.

11.3 Categories of personal information: identity and contact details; account and authentication data; organisation and role data; compliance documents and SHE File content (which may include special personal information such as medical fitness certificates); payment-related data; usage and log data.

11.4 Recipients and operators: hosting, database and infrastructure provider; transactional email provider; payment processor; AI document-validation provider; frontend hosting provider; and the customer organisations to whom relevant compliance records relate.

11.5 Cross-border transfers: personal information is lawfully Processed on infrastructure located outside South Africa (in the European Union), under conditions providing protection substantially similar to POPIA in terms of section 72. POPIA does not require personal information to be stored within South Africa.

11.6 Security measures: appropriate, reasonable technical and organisational safeguards as described in clause 11 of the Privacy Notice, in accordance with section 19 of POPIA.

12. AVAILABILITY AND UPDATING OF THIS MANUAL

This Manual is available on request from the Information Officer, on the SiteActive website, and from the Information Regulator. It will be reviewed and updated as necessary. This version is effective from 22 June 2026.

Acknowledgement (paper option)

Your acceptance is recorded digitally on your status page. This copy is provided only if you additionally require a signed paper record.

Name: _____ Designation: _____

Signature: _____ Date: _____