

# CYTOLUX

S E C U R I T Y

Reg: 2012/050246/07 | PSIRA: 2515162 | VAT: 4880283694  
PAYE: 7300795954 | Income Tax: 9189477186



Stand No 20229

Ntsima Village

DIKGALE

0721



087 808 6717

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086 617 3504



admin@cytoluxsecurity.co.za

## PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

*(Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 as amended by Act 54 of 2002)*

### 1. Introduction

This manual is compiled in terms of Section 51 of the Promotion of Access to Information Act, 2000 (PAIA). It provides guidance on how to request access to records held by **Cytolux Security (Pty) Ltd** ("the Company").

The purpose of PAIA is to promote the constitutional right of access to information held by private bodies and public bodies, subject to justifiable limitations, such as the protection of privacy, commercial confidentiality, and effective, efficient, and good governance.

This manual also aligns with the **Protection of Personal Information Act, 2013 (POPIA)** which requires responsible parties to process personal information lawfully and transparently.

### 2. Company Details

- **Company Name:** Cytolux Security (Pty) Ltd
- **Registration Number:** 2012/050246/07
- **Physical Address:** Stand No. 20229, Ntsima Vilklage, Dikgale, 0721
- **Telephone:** +27 87 808 6717
- **Email:** info@cytoluxsecurity.co.za
- **Website:** www.cytoluxsecurity.co.za

### 3. Information Officer Details

In terms of PAIA and POPIA, the head of the private body (CEO/MD) is deemed to be the Information Officer, unless another person has been designated.

**Information Officer:** Onkarabile Mojapelo

**Position:** Compliance Officer

**Contact Details:** Telephone: +27 81 360 9192

**Email:** onkarabile@cytoluxsecurity.co.za

### 4. South African Human Rights Commission (SAHRC) Guide

The South African Human Rights Commission (SAHRC) has compiled a guide to assist persons in understanding their rights under PAIA and the process to request access to information.

- **Website:** www.sahrc.org.za
- **Tel:** +27 11 877 3600
- **Email:** PAIA@sahrc.org.za

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## 5. Categories of Records Held by Cytolux Security

### 5.1 Records available without a request (automatically available):

- Company profile and brochures
- Publicly available marketing material
- Certain policies published on the company website

### 5.2 Records held in terms of legislation

Cytolux Security maintains records in accordance with legislation, including but not limited to:

- Companies Act, 2008
- Income Tax Act, 1962
- Basic Conditions of Employment Act, 1997
- Labour Relations Act, 1995
- Employment Equity Act, 1998
- Skills Development Act, 1998
- Occupational Health and Safety Act, 1993
- Compensation for Occupational Injuries and Diseases Act, 1993
- Protection of Personal Information Act, 2013 (POPIA)
- Private Security Industry Regulation Act, 2001

### 5.3 Records in the possession of Cytolux Security

- **Statutory Records:** Incorporation documents, share registers, director information.
- **Financial Records:** Annual financial statements, invoices, receipts, tax submissions, audit reports.
- **HR & Employment Records:** Employee contracts, personal details, payroll, leave records, disciplinary proceedings.
- **Client Records:** Security service agreements, invoices, correspondence, operational reports.
- **Operational Records:** Security incident logs, CCTV monitoring records, patrol registers, rostering.
- **Supplier Records:** Supplier contracts, invoices, service agreements.
- **IT Records:** System usage logs, access control data.



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## 6. Procedure to Request Access to Records

1. A request must be made in writing on the prescribed **Form C** (available at [www.sahrc.org.za](http://www.sahrc.org.za)).
2. The completed form must be sent to the Information Officer at the address, fax number, or email provided.

The requester must provide sufficient detail to enable the Company to identify:

- The record(s) requested
  - The identity of the requester
  - Which form of access is required
  - The postal address or email address of the requester
4. The requester must state the right being exercised or protected and explain why the requested record is required to exercise or protect that right.
  5. A **request fee** (if applicable) must be paid before the request will be processed.

## 7. Grounds for Refusal of Access

Access to records may be refused on reasonable grounds as set out in PAIA, including:

- Protection of personal information of third parties
- Protection of commercial information of the company or third parties
- Protection of confidential research information
- Protection of safety and security measures
- Privileged legal proceedings

## 8. Remedies Available if Access is Denied

If a request is refused, the requester may:

- Lodge an internal appeal (if applicable)
- Refer the matter to the Information Regulator or SAHRC
- Approach a court of law

## 9. Fees

The fees are prescribed in terms of the PAIA regulations:

- A request fee is payable when submitting a request for information.
- If a search or reproduction of a record is required, further prescribed fees will apply.
- A requester will be notified of the payable amount before the request is processed.

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## 10. POPIA Compliance – Processing of Personal Information

Cytolux Security processes personal information as a responsible party in terms of POPIA.

### 10.1 Purpose of Processing

- To recruit, employ, and manage staff
- To provide security services to clients
- To manage client and supplier relationships
- To comply with legal obligations
- To secure company premises and assets

### 10.2 Categories of Data Subjects

- Employees
- Clients
- Suppliers / Contractors
- Visitors

### 10.3 Categories of Personal Information

- Names, identity numbers, and contact details
- Employment history and HR records
- Financial and banking details
- Security incident records, CCTV footage, access logs

### 10.4 Recipients of Personal Information

- Statutory bodies (SARS, PSIRA, UIF, etc.)
- Service providers and contractors
- Clients (where necessary for services)

### 10.5 Security Safeguards

Cytolux Security implements appropriate technical and organizational security measures, including access controls, encryption where appropriate, confidentiality agreements, and staff training.



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## 11. Availability of the Manual

This manual is available:

- At the registered offices of Cytolux Security (Pty) Ltd
- On the company's website [www.cytoluxsecurity.co.za](http://www.cytoluxsecurity.co.za)
- Upon request from the Information Officer

## 12. Updates to the Manual

This manual will be reviewed regularly and updated where necessary in line with changes to legislation or company operations.

**Approved by:** Onkarabile Mojapelo

**Designation:** Information Officer

**Date:** 22 March 2025

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