MANUAL

Prepared in terms of Section 51 of the

Promotion of Access to Information Act, 2 of 2000 (“PAIA”)

NAROKO

Naroko (Pty) Ltd · Registration number 2025/812074/07

(“the Company” / “the private body”)

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1. Introduction

This Manual is published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), read together with the Protection of Personal Information Act, 4 of 2013 ("POPIA").

PAIA gives effect to the constitutional right of access to information that is held by another person and that is required for the exercise or protection of any right. This Manual is intended to assist a requester in identifying the records held by the Company and the procedure to follow in requesting access to them.

This Manual is made freely available on the Company's website at https://naroko.co.za and at the Company's principal place of business for inspection during normal business hours. It does not need to be submitted to the Information Regulator but is furnished on request.

Note on size and scope: The Company is a small private body. The categories of records listed in this Manual are described at a general level for the purpose of PAIA. Listing a category does not mean that any record will automatically be released; every request is assessed against the grounds for refusal in Chapter 4 of PAIA and the Company's obligations under POPIA and other legislation.

2. Particulars of the private body

The details of the Company and its Information Officer are set out below. The Head of the private body is, by operation of law, the Information Officer unless a duly registered delegate is appointed.

Name of private body	Naroko (Pty) Ltd
Type of entity	Private company
Registration number	2025/812074/07
VAT number	Not registered for VAT
Nature of business	Artificial-intelligence consulting and bespoke software development.
Information Officer	David Cohen
Deputy Information Officer	Not appointed
Physical / registered address	4 Seacliff Road, Bantry Bay, Cape Town, 8005
Postal address	As above
Telephone	074 143 1030
Email (PAIA requests)	david@naroko.co.za
Website	https://naroko.co.za

3. The Information Regulator and its Guide

The Information Regulator ("the Regulator") has, in terms of section 10 of PAIA, compiled a Guide on how to use PAIA. The Guide contains information to help a person exercise their rights under PAIA and POPIA. It is available in each of South Africa's official languages from the Regulator, free of charge.

The Regulator's contact details are:

Office	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
Website	https://inforegulator.org.za

4. Categories of records held by the Company

The records held by the Company are grouped into the broad categories set out below. These descriptions are general and are not an undertaking that any particular record exists or will be released. Subject categories that contain personal information are also governed by POPIA (see section 8).

Category	Examples of records in this category
Statutory & corporate	Incorporation documents, memorandum of incorporation, share register, statutory registers and resolutions.
Financial & accounting	Management accounts, accounting records (maintained in the Company's accounting system), invoices, bank records and tax records.
Client & engagement	Client contracts, proposals, statements of work, project records and correspondence.
Supplier & vendor	Supplier agreements, service-provider records and related correspondence.
Employment & HR	Employment contracts, payroll records and personnel files (where applicable).
Operational & technical	Internal policies, project and software-development documentation, and general business correspondence.
Marketing & website	Website content, marketing material and enquiry records.

5. Records held in terms of other legislation

Records are also held, and may be accessible, in terms of (amongst others) the following legislation. Access in terms of another law is not access in terms of PAIA, and requests under those laws follow their own procedures.

- Companies Act, 71 of 2008
- Income Tax Act, 58 of 1962, and Value-Added Tax Act, 89 of 1991
- Tax Administration Act, 28 of 2011
- Basic Conditions of Employment Act, 75 of 1997, and Labour Relations Act, 66 of 1995
- Unemployment Insurance Act, 63 of 2001
- Protection of Personal Information Act, 4 of 2013
- Other legislation applicable to the Company's business from time to time.

6. Records available without a PAIA request

Certain information is published or made available without the need for a formal PAIA request, for example general information on the Company's website and marketing material. The availability of such information does not extend to records that are confidential, contain personal information of third parties, or are otherwise protected.

7. How to request access to a record

7.1 The request form

A requester must complete the prescribed PAIA request form (Form 2 of the PAIA Regulations) and submit it to the Information Officer at the contact details in section 2. The form must:

- provide sufficient particulars to enable the Information Officer to identify the record and the requester;
- identify the right the requester seeks to exercise or protect, and explain why the record is required for that right;
- specify the form of access required; and
- specify a postal address, fax or email in the Republic, and indicate how the requester wishes to be informed of the decision.

7.2 Fees

Two types of fee may be payable, as prescribed in the PAIA Regulations: a request fee (payable before the request is processed) and an access fee (calculated on reproduction, search and preparation time, and any postage). The Company applies the fees prescribed from time to time in the Regulations; the prevailing prescribed tariff will be made available on request. A requester may lodge a complaint or apply to court if dissatisfied with a fee.

7.3 Decision

The Information Officer will decide on the request, and notify the requester, within 30 days of receipt (which period may be extended in the limited circumstances allowed by PAIA). The notice will state the decision, any fees payable, and the requester's right to lodge an internal appeal or a complaint with the Regulator.

8. Processing of personal information (POPIA)

This section is included in terms of section 51(1)(e) of PAIA and Regulation 4(1)(e) of the POPIA Regulations. The Company processes personal information as a responsible party in the ordinary course of its business and is committed to processing it lawfully and in accordance with the conditions for lawful processing under POPIA.

8.1 Purpose of processing

- Providing consulting and software-development services to clients;
- Managing client, supplier and employee relationships and contracts;
- Administration, accounting, invoicing and tax compliance;
- Marketing the Company's services and responding to enquiries; and
- Complying with legal and regulatory obligations.

8.2 Categories of data subjects and of personal information

The Company may process personal information relating to clients and their representatives, prospective clients, suppliers and service providers, employees and contractors, and website/enquiry contacts. Depending on the category, this may include names, contact details, business and contractual details, and – in the case of personnel – employment and payroll information.

8.3 Recipients of personal information

Personal information may be shared with the Company's operators and service providers (for example accounting, IT and cloud-service providers) under appropriate confidentiality and security obligations, and with regulators, courts or other parties where required by law.

8.4 Trans-border flows of personal information

The Company uses cloud-based service providers and, as a result, personal information may be processed or stored on servers located outside South Africa. Any such transfer is carried out in accordance with section 72 of POPIA. In particular, the Company relies on binding agreements with its service providers (such as data-processing agreements incorporating standard contractual clauses) that provide an adequate level of protection substantially similar to the conditions for lawful processing under POPIA and that restrict the further transfer of personal information. Where reasonably practicable, the Company may also elect to host personal information in a South African data-centre region.

8.5 Security safeguards

The Company maintains appropriate, reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised access and unlawful processing, and reviews these measures from time to time.

9. Remedies and complaints

A requester who is dissatisfied with a decision of the Information Officer may, after exhausting any internal remedy where applicable, lodge a complaint with the Information Regulator in terms of section 77A of PAIA, or apply to a court in terms of PAIA. A complaint to the Regulator must

generally be lodged within 180 days, using the prescribed complaint form, at the Regulator's contact details in section 3.

10. Availability of this Manual

This Manual is available:

- on the Company's website at https://naroko.co.za
- at the Company's principal place of business for inspection during normal business hours;
- from the Information Officer on request (a fee may be charged for copies); and
- from the Information Regulator on request.

This Manual is reviewed and updated on a regular basis, and whenever there is a material change to the Company's particulars or operations.

11. Annexures

The following forms apply and are available from the Information Regulator's website or from the Information Officer on request:

- Form 2 – Request for access to record of private body (PAIA Regulations);
- Form 5 – Outcome of request and of fees payable; and
- Prescribed PAIA fees schedule (as amended from time to time).

— End of Manual —

David Cohen

David Cohen
Information Officer

17 June 2026

Date