



SYNERGY WEB

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body 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
- 2.10 know whether the body 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 SYNERGY WEB

3.1. Chief Information Officer

Name:	Sean Matthew Garridigan
Tel:	+27 64 593 6453
Email:	sean@synergyweb.co.za
Fax number:	N/A

3.2. Deputy Information Officer

Name:	N/A
Tel:	N/A
Email:	N/A
Fax Number:	N/A

3.3 Access to information general contacts

Email: *info@synergyweb.co.za*

3.4 National or Head Office

Postal Address: 5/7 Lukshmi Road, Rose Park
Ladysmith, Kwa-Zulu Natal 3370

Physical Address: 5/7 Lukshmi Road, Rose Park
Ladysmith, Kwa-Zulu Natal 3370

Telephone: +27 67 923 4172 / +27 81 271 3004

Email: info@synergyweb.co.za

Website: www.synergyweb.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

- 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeq/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and IsiZulu

5. CATEGORIES OF RECORDS OF THE SYNERGY WEB WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Types of Records	Available on Website	Available upon Request
Financial Records	<ul style="list-style-type: none"> Annual Financial Statements Integrated Reports 		X
Policy Documents	<ul style="list-style-type: none"> Privacy Policy Code of Conduct Continuous Development Policy Terms of Service 	X	
Corporate Records	<ul style="list-style-type: none"> Information Regulation Certificate 	X	
Financial Records	<ul style="list-style-type: none"> Annual Financial Statements Integrated Reports 		X

6. DESCRIPTION OF THE RECORDS OF SYNERGY WEB WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Personal Information Records	Protection of Personal Information Act (POPIA) 4 of 2013

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE SYNERGY WEB

Subject	Categories of Records Held
Finance	Invoices, Receipts, Proof of Payments, Bank Statements
Clients / Projects	Contract Proposals, Project Briefs, Correspondence (emails and other tele-communication)
Marketing / Portfolio	Portfolio Samples, Service/Price Lists, Company Profile
Legal / Compliance	PAIA Manual, POPI-related Records, Copies of ID Documents

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Synergy Web processes personal information for the following purposes:

- Client communication – to correspond with clients regarding services, projects and queries
- Service delivery – to perform and complete the work or services agreed upon in contracts or project briefs
- Invoicing and payments – to prepare invoices, receive payments and maintain financial records
- Legal and compliance – to comply with the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA)
- Record keeping – to maintain proper records of agreements, completed projects and financial transactions
- Marketing – to share a portfolio of the work or testimonials (with client consent)

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Names, Surnames, Contact Details (email, phone, address), Identification Details (only if required for invoicing/contracts), Project/Service Requirements, Payment Information
Suppliers / Service Providers	Names, Contact Details, Bank Account Details, Service Agreements
Contractors	Names, Contact Details, Payment Details, Work Agreements
Website Visitors / Marketing Leads	Names, Email Addresses, Contacted Details (submitted via enquiry form/newsletter signup)

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Client Identification & Contact Information	Shared with Accountant/Bookkeeper
Financial Records	SARS or other regulatory authorities
Communication & Project Records	Cloud Service Providers
Any Personal Information	Disclosed only with client's explicit consent, or as required by law

8.4 Planned transborder flows of personal information

Synergy Web has planned transborder flows of personal information. Some personal information may be stored in cloud servers outside the Republic. The storage locations and categories of personal information are as follows:

Country	Categories of Personal Information Stored
South Africa	Names, email addresses, phone numbers, website data, login credentials, email files
Australia / US / EU	Names, email addresses, phone numbers, IP addresses, designs, ad campaign data

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Synergy Web uses measures to ensure that only authorized individuals have access personal information:

- **Data Encryption:** All client personal data, including contact details and project specifications, is stored on encrypted hard drives and cloud storage. Data transmitted between Synergy Web's devices and web services are secured using SSL/TLS encryption to prevent unauthorized interception.
- **Access Control:** Access to sensitive client data is strictly limited. We use strong, unique passwords and multi-factor authentication on accounts and devices, including web hosting control panels to prevent unauthorized access.
- **Secure Work Environment:** Synergy Web's office and devices are physically secure. All devices, including laptops and external drives, are password-protected.

We implement measures to ensure the accuracy and completeness of personal information:

- **Anti-virus and Anti-malware Solutions:** Synergy Web uses reputable anti-virus and anti-malware software with real time protection to scan all system and files for threats. This prevents malicious software from altering or deleting data.

- Regular Backups: Synergy Web performs regular backups of all client data and business systems. These backups are stored securely and encrypted to allow for data recovery in case of loss or corruption.
- Software Updates: Synergy Web ensures all operating systems, applications and server software are regularly updated with the latest security patches to fix vulnerabilities that could compromise data integrity.

We take steps to ensure that personal financial information is accessible when needed by authorized individuals:

- Disaster Recovery Plan: Synergy Web maintains a basic disaster recovery plan that includes regular backups and physical storage devices to ensure that in an event of a system failure, natural disaster or cyber-attack, our business operations and client data can be restored quickly.
- Service Provider Security: For web hosting, we make use of a reputable third-party provider that guarantees high uptime and has their own robust security measures in place to ensure the availability of client websites and data.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On www.synergyweb.co.za, if any;

9.1.2 head office of Synergy Web for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

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

10. UPDATING OF THE MANUAL

The head of Synergy Web will on a regular basis update this manual.

Issued by

SM Garridigan

Sean Matthew Garridigan (Information Officer Synergy Web)
Chief Executive Officer