

NOSCOTEK

Promotion of Access to Information Act Manual

Noscotek (Pty) Ltd

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

STATUS: REVISED DRAFT

Attorney review notes have been incorporated. Complete the remaining factual fields marked TO COMPLETE before publication.

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Contents

1. List of acronyms
2. Purpose of this manual
3. Contact details
4. Guide on how to use PAIA
5. Records available without a request
6. Records available in terms of other legislation
7. Subjects and categories of records
8. Processing of personal information
9. How to request a record
10. Fees
11. Grounds on which access may be refused
12. Remedies
13. Availability of this manual
14. Updating this manual
- A. Annexure A - Prescribed PAIA fees

1. List of acronyms

Short form	Meaning
DIO	Deputy Information Officer
IO	Information Officer
Nova	The Nostello Nova software platform, signed in to at https://nova.nostello.com/
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator of South Africa

2. Purpose of this manual

This manual assists a person who wants to request a record from the private body identified in section 3. It explains who to contact, which records may be available without a formal request, the subjects and categories of records held, how personal information is processed, and how to make a request under PAIA.

Noscotek (Pty) Ltd trades as Noscotek and operates the Nostello Nova software platform. Nostello Nova is treated in this manual as a product or division operated by Noscotek, not as a separate private body. If a separate juristic entity is subsequently identified as owning or operating any relevant service, its PAIA obligations must be considered separately.

Related services include document processing, workflow automation, digital signing, integrations and hosting, to the extent that Noscotek actually provides those services.

For most records inside a customer's Nova environment, the customer is the responsible party under POPIA and Noscotek acts as operator. Requests involving those records are handled as set out in section 9.

3. Contact details

Item	Detail
Registered name	Noscotek (Pty) Ltd
Registration number	2012/169456/07
Trading name	Noscotek
Product name	Nostello Nova
Head of the private body / Information Officer	Sheldon Halgreen
Deputy Information Officer	None designated at the date of this draft. The manual must be updated if a Deputy Information Officer is appointed.
Street address / principal place of business	Noscotek House, 1 Coral Drive, Betty's Bay, Western Cape, South Africa
Postal address	Noscotek House, 1 Coral Drive, Betty's Bay, Western Cape, South Africa
Telephone	011 100 4678
Fax	Not applicable
Email for PAIA and privacy requests	privacy@noscotek.co.za
Email for security reports	security@noscotek.co.za
General email	info@noscotek.co.za
Company website	https://noscotek.co.za/
Nova sign-in	https://nova.nostello.com/
Business hours for inspection	Monday to Friday, 08:00 to 16:30, excluding South African public holidays

The Information Officer is registered on the Information Regulator eServices portal. The company's registration confirmation should be retained internally and need not be published with this manual.

A monitored role mailbox may be used for PAIA and privacy requests, provided the named Information Officer is identified above. The privacy@noscotek.co.za mailbox is the published request channel; security@noscotek.co.za is reserved for security incidents and vulnerability reports.

4. Guide on how to use PAIA

The Information Regulator has published a guide contemplated in section 10 of PAIA explaining how to use PAIA and POPIA. The guide is available free of charge from the Information Regulator and is published in the official languages.

Information Regulator	(South Africa)
Website:	https://infoeregulator.org.za/
Email:	enquiries@infoeregulator.org.za
PAIA complaints:	PAIAComplaints@infoeregulator.org.za
POPIA complaints:	POPIAComplaints@infoeregulator.org.za

A copy of the guide may also be requested from Noscotek's Information Officer at privacy@noscotek.co.za.

5. Records available without a request

Noscotek has not designated categories of records as automatically available in terms of section 52(1) of PAIA. The records listed below are nevertheless available without a formal PAIA request where indicated.

- Information already published on <https://noscotek.co.za/>.
- This manual, once approved and published.
- The privacy notice, once approved and published.
- Product and service information that Noscotek chooses to make public.

6. Records available in terms of other legislation

Where another law requires Noscotek to keep or make a record available, that law applies. The following legislation may be relevant to records held by the company; the list is not exhaustive and does not mean that every provision applies to every activity.

Legislation	Records that may be held
Companies Act 71 of 2008	Incorporation documents, share register, director records, minutes and resolutions
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991	Tax returns, assessments, VAT, PAYE and related tax records
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Skills Development Act 97 of 1998	Employment contracts, payroll, leave and related employee records
Occupational Health and Safety Act 85 of 1993	Workplace health and safety records, where applicable
Protection of Personal Information Act 4 of 2013	Privacy notices, operator agreements, data-subject request and complaint records
Promotion of Access to Information Act 2 of 2000	This manual and access-request records
Electronic Communications and Transactions Act 25 of 2002	Electronic records and signature records created in the course of business
Cybercrimes Act 19 of 2020	Incident and evidence records, where applicable
Copyright Act 98 of 1978; Trade Marks Act 194 of 1993	Software, trade marks and licence records
Consumer Protection Act 68 of 2008	Consumer contracts and related records, where applicable
National Credit Act 34 of 2005; Financial Intelligence Centre Act 38 of 2001	Records processed on behalf of customers where applicable to their activities

7. Subjects and categories of records

Noscotek holds records on the subjects below. Being listed does not mean that a record will be disclosed. Access depends on a valid request and the applicable provisions of PAIA. Electronic records are records for this purpose.

Subject	Categories of records
Company and governance	Incorporation documents, share register, director details, minutes, resolutions and statutory returns
Finance and tax	Annual financial statements, management accounts, invoices, banking records, VAT, PAYE and income tax records
Employees and applicants	Contracts, curriculum vitae, payroll, leave, performance and disciplinary records
Clients and contracts	Proposals, master services agreements, statements of work, tenant contracts and support correspondence
Nova platform, as operator	Tenant configuration and records a customer asks Noscotek to process, which may include applications, member or customer records, messages and documents. These are processed on the customer's instruction.
Website and marketing	Demo requests, contact-form enquiries and business-contact details
Information security	Policies, access logs, incident records and backup records
Suppliers	Contracts with hosting, messaging, payment, artificial-intelligence, signature and other service providers
Intellectual property	Source code, trade marks and licence agreements
Insurance	Policy schedules and claims correspondence

8. Processing of personal information

8.1 Two roles

Noscotek is the responsible party for personal information about its own staff, directors, suppliers and people who contact it directly, including through <https://noscotek.co.za/>.

Noscotek is usually the operator for personal information inside a customer's Nova environment. The customer determines why that information is processed. A person whose information was collected by a customer should ordinarily approach that customer, while Noscotek will assist the customer as required by the applicable operator arrangement.

8.2 Why personal information is processed

- To employ staff and run the company.
- To answer enquiries and to sell and support Noscotek's services.
- To operate Nova and related services on a customer's instruction.
- To secure systems, prevent fraud, keep legally required records and respond to regulators or other lawful authorities.

8.3 Categories of data subjects and information

Data subject	Information that may be processed
Employees, applicants and directors	Identity and contact details, employment records, banking details for pay and professional history
Business contacts and website enquirers	Name, role, employer, email, telephone and the content of the enquiry
Customer staff who use Nova	Name, work email, role and sign-in history
People whose information a customer stores in Nova	Information submitted by the customer, which may include identity numbers, contact details, financial information and documents. Noscotek processes this information as operator.
Suppliers and advisers	Contact details, bank details and contract records

8.4 Recipients

Personal information may be shared with employees who need it for their work, professional advisers, the customer on whose instruction it is processed, and service providers that host, transmit, sign, pay, monitor or otherwise support the service. It may also be shared with the Information Regulator, the South African Revenue Service or another authority where the law requires it.

Information about relevant service providers and operators may be requested from the Information Officer, subject to applicable confidentiality and security considerations.

8.5 Cross-border processing

Some service providers may process personal information outside South Africa where a company system or customer configuration requires it. Noscotek is reviewing relevant cross-border processing against section 72 of POPIA and associated contractual and technical safeguards. This manual does not state that every transfer has already been assessed or that every safeguard is complete.

8.6 General description of security measures

Noscotek uses administrative, technical and physical measures appropriate to the information it holds. These include unique user accounts, role-based access, encrypted HTTPS connections to its websites and Nova, platform access logging and backups. A programme to encrypt selected personal-information fields at rest is in progress.

This description is general. It is not a warranty, certification or statement that every control is complete.

8.7 Other POPIA requests

These are not PAIA access requests and use different prescribed forms:

- Objection to processing: an objection under section 11(3) of POPIA using the prescribed POPIA form. Requests may be sent to privacy@noscotek.co.za.
- Correction or deletion of personal information: a request under section 24 of POPIA using POPIA Form 2. POPIA Form 2 is not the same document as PAIA Form 2.
- Direct marketing: marketing communications should include an appropriate opt-out mechanism. A person may also object by email.

9. How to request a record

1. Complete Form 2 of the PAIA Regulations, 2021 (Request for Access to Record). The form is available from the Information Regulator and from the Information Officer.
2. Send the form to privacy@noscotek.co.za, or deliver it to the street address in section 3, marked for the Information Officer. A request received through security@noscotek.co.za will be forwarded, but privacy@noscotek.co.za is the published PAIA request channel.
3. Include proof of identity. If the request is made for another person's record, include proof of authority to act for that person.
4. Describe the record sufficiently for it to be identified. State the right that is to be exercised or protected and explain why the requested record is required for that right.
5. State the preferred form of access, such as inspection, a copy or an electronic copy.
6. Records processed for a Nova customer. Where the requested record contains information that Noscotek processes as operator on behalf of a Nova customer, Noscotek will identify the relevant customer and, where appropriate, notify or consult that customer and assist the customer in dealing with the request. The requester may also be advised that the customer is the responsible party under POPIA and may be the more appropriate body from which to request the information.
7. A referral to or consultation with the customer does not, by itself, terminate a PAIA request made to Noscotek. Where the requested record is in Noscotek's possession or under its control and the request falls to be decided under PAIA, the Information Officer will deal with the request in accordance with PAIA, including any applicable third-party procedures and grounds for refusal.
8. Noscotek will decide a valid request as soon as reasonably possible and in any event within 30 days after receipt of the request or the required particulars, unless the period is lawfully extended under PAIA. The requester will be notified of an extension where one is made.
9. The outcome will be notified using PAIA Form 3 where applicable. If access is refused, the notice will give the reasons required by PAIA and explain the requester's remedies. If a fee is payable, access may be given after the prescribed fee has been paid, unless the requester is exempt.

A person who only wants a copy of this manual does not need to submit PAIA Form 2. The manual may be accessed through the website or requested from privacy@noscotek.co.za.

10. Fees

Fees are charged only as prescribed by PAIA and the PAIA Regulations. A personal requester does not pay the request fee. Copying, transcription, search and preparation, and delivery costs may still apply where prescribed.

If searching for and preparing the record is expected to exceed six hours, a deposit may be required in accordance with the prescribed fee schedule. The current prescribed amounts are set out in Annexure A.

11. Grounds on which access may be refused

Access may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including the following. This summary does not replace the Act. Where only part of a record is protected, the balance will be dealt with in accordance with PAIA where it can reasonably be severed.

- Privacy of a natural-person third party (section 63).
- Commercial information of a third party (section 64).
- Certain confidential information of a third party (section 65).
- Safety of individuals and protection of property (section 66).
- Legally privileged records (section 67).
- Commercial information of the private body (section 68).
- Research information of a third party or of the private body (section 69).

If a record cannot be found or does not exist, the requester will be notified as required by section 55.

Section 70 provides for disclosure in the public interest in the circumstances specified in that section, even where another refusal ground would otherwise apply.

12. Remedies

PAIA does not provide an internal appeal against a decision of a private body. A requester who is dissatisfied with a decision may lodge a complaint with the Information Regulator or apply to a court within the periods and on the grounds provided by PAIA.

A requester may also contact privacy@noscotek.co.za if the requester believes the request was misunderstood. That correspondence does not extend or replace any statutory remedy.

13. Availability of this manual

Once approved, this manual will be available:

- At <https://noscotek.co.za/paia-manual.pdf>, linked from <https://noscotek.co.za/paia.html> and from the footer of the company website.
- From a link on the public sign-in page at <https://nova.nostello.com/>. The link will point to the same PDF and will be available without signing in.
- For inspection, free of charge, at Noscotek's principal place of business during the business hours stated in section 3.
- By email, on request to privacy@noscotek.co.za.
- A copy will be provided to the Information Regulator upon request in accordance with section 51(3)(d) of PAIA.

This manual is published in English. A private-body PAIA manual is not required to be published in more than one official language.

14. Updating this manual

The Information Officer should review this manual at least annually and sooner if the company name, address, Information Officer, categories of records, processing activities or applicable legal requirements materially change. The published PDF should be replaced at the same web address so that existing links remain valid.

Date	Version	Change
28 September 2026	0.9	Initial draft for attorney review
29 September 2026	0.10	Attorney review notes incorporated; layout and publication wording revised
30 September 2026	1.10	First approved publication version

Annexure A - Prescribed PAIA fees

The amounts below reflect the fee schedule for private bodies in the PAIA Regulations, 2021 (GN R757, Government Gazette 45057 of 27 August 2021). Fees should be checked again if the Regulations are amended.

Description	Prescribed amount
Request fee payable by a requester other than a personal requester	R140.00
Photocopy / printed black-and-white copy of an A4-size page or part thereof	R2.00 per page or part thereof
Copy in computer-readable form on a flash drive supplied by the requester	R40.00
Copy in computer-readable form on a compact disc supplied by the requester	R40.00
Copy in computer-readable form on a compact disc supplied to the requester	R60.00
Transcription of visual images per A4-size page	Service to be outsourced; amount depends on the service-provider quotation
Copy of visual images	Service to be outsourced; amount depends on the service-provider quotation
Transcription of an audio record per A4-size page	R24.00
Copy of audio record on a flash drive supplied by the requester	R40.00
Copy of audio record on a compact disc supplied by the requester	R40.00
Copy of audio record on a compact disc supplied to the requester	R60.00
Search for and preparation of the record for disclosure, for each hour or part of an hour excluding the first hour	R145.00; not to exceed R435.00 in total
Deposit if the search exceeds six hours	One third of the amount per request calculated in accordance with the prescribed fee schedule
Postage, email or any other electronic transfer	Actual expense, if any

Important: The request fee does not apply to a personal requester. Any exemption or other fee rule in PAIA or the Regulations takes precedence over this summary.