



L E G A L · P A I A M A N U A L

PAIA Manual

Access to information under PAIA and POPIA

Wingman (Pty) Ltd

Registration No. 2026/491842/07

222 Bowling Avenue, Woodmead, Johannesburg, Gauteng, 2191

PAIA Manual

PREPARED IN TERMS OF	Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA)
PRIVATE BODY	Wingman (Pty) Ltd (Registration No. 2026/491842/07)
INFORMATION OFFICER	Luke Tollman
VERSION / EFFECTIVE DATE	Version 1 / 1 July 2026
NEXT REVIEW	On material legal change

1 Introduction

- 1.1** This Manual is published by Wingman (Pty) Ltd (“Wingman” or “the Company”) in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA). 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.
- 1.2** The Manual explains the records the Company holds, how to request access to them, the fees that apply, and the remedies available if a request is refused. It also reflects the Company’s obligations under the Protection of Personal Information Act 4 of 2013 (POPIA), which amended PAIA and is administered by the same regulator.
- 1.3** Wingman is a recruitment and talent-services company. It operates a recruitment platform through which candidates may register their profiles and provides candidate-sourcing, screening, assessment and placement services to clients. In the course of its business, the Company holds records about its own affairs and personal information about employees, candidates, clients, suppliers and other persons.

2 Particulars of the private body and Information Officer

- 2.1** Requests for access to records, and any enquiry about this Manual, must be directed to the Information Officer:
 - **Information Officer:** Luke Tollman
 - **Postal and physical address:** 2 Sunbird Lane, Sandton Country Club Estate, Bowling Avenue, Woodmead, Johannesburg, Gauteng, 2191
 - **Registered address:** 222 Bowling Avenue, Woodmead, Johannesburg, Gauteng, 2191
 - **Email:** privacy@onwingman.com
- 2.2** The head of the Company is the Information Officer for the purposes of PAIA and POPIA. The Company has not designated a Deputy Information Officer; if it does, this Manual will be updated with that person’s particulars.

3 The Guide on how to use PAIA

- 3.1** The Information Regulator has published a Guide on how to use PAIA. The Guide explains how to exercise the rights in PAIA and POPIA in an easily understandable form, and is available in each of the official languages.

- 3.2** The Guide may be obtained from the Information Regulator, whose contact details appear in clause 8, including from the Regulator’s website at <https://inforegulator.org.za>.

4 Categories of records held by the Company

- 4.1** The Company holds records in the categories set out below. Listing a category does not mean that access to a particular record will be granted; access is decided in accordance with PAIA and is subject to the grounds for refusal in clause 7.

CATEGORY OF RECORD	EXAMPLES
Corporate and statutory	Certificate of incorporation, Memorandum of Incorporation, registers, minutes and resolutions
Financial and tax	Management accounts, annual financial statements, banking records, invoices, and SARS, PAYE and VAT records
Employee and human resources	Employment agreements, payroll and leave records, disciplinary and grievance records, and employee personal information
Candidate	Platform registrations, candidate profiles and CVs, candidate personal information, and placement records
Client and supplier	Contracts, correspondence, invoices and service records
Marketing	Prospect and lead lists, and campaign and communication records
Policies and compliance	Company policies, POPIA and PAIA records, and contracts and templates
IT and systems	System, access and security records

- 4.2 Records available without a request.** Some information is published or made available by the Company without the need for a PAIA request, including information on the Company’s website and marketing material.
- 4.3 Records available under other legislation.** Certain records may be accessible in terms of, and subject to, other legislation, including the Companies Act 71 of 2008, the Tax Administration Act 28 of 2011, the Basic Conditions of Employment Act 75 of 1997, the Labour Relations Act 66 of 1995, the Protection of Personal Information Act 4 of 2013 and the Value-Added Tax Act 89 of 1991.
- 4.4 Personal information under POPIA.** The Company processes personal information about employees, candidates, clients, suppliers and prospects, for purposes including recruitment, candidate registration, sourcing, screening, assessment, placement, client relationship management and business operations.
- 4.5** The categories of data subjects include employees, job applicants, candidates, clients, client contacts, service providers, contractors and other persons who interact with the Company.
- 4.6** The categories of personal information processed may include identity and contact details, CV and employment history, qualifications, assessment results, reference and verification information.

- 4.7** Personal information may be shared with clients, candidates, service providers, background-check providers, assessment providers, IT and cloud-hosting providers, payment and banking providers, professional advisers, regulators and other persons where required or permitted by law or necessary for the Company's business purposes.
- 4.8** The Company applies reasonable technical and organisational security measures to protect personal information, including access controls, confidentiality obligations, approved-system requirements, secure storage, data-protection policies, staff controls and incident-response processes. Further detail is set out in the Company's privacy notices and Data Protection & POPIA Policy.

5 How to request access to a record

- 5.1** To request access to a record under PAIA, complete the prescribed form (currently Form 2 – Request for Access to Record of Private Body, under Regulation 7 of the PAIA Regulations) and submit it to the Information Officer at the address or email in clause 2.
- 5.2** The request must:
- give enough detail to enable the Information Officer to identify the record and the requester;
 - identify the right that the requester is seeking to exercise or protect, and explain why the record is required to exercise or protect that right;
 - state the form of access required and how the requester wishes to be informed of the decision; and
 - be accompanied by proof of the requester's identity, and, where the request is made on behalf of another person, proof of the requester's authority to act.
- 5.3** The Information Officer will decide the request within 30 days, which period may be extended by a further 30 days in the circumstances allowed by PAIA. The requester will be notified of the decision and, where access is granted, of any access fee payable and the form in which access will be given.

6 Fees

- 6.1** Two types of fees may apply under PAIA: a request fee which is payable before the request is processed; and an access fee which is payable where access is granted, for reproducing the record and for any search and preparation time in excess of the hours prescribed by the Regulations.
- 6.2** The prescribed fees are set out in Annexure B to the PAIA Regulations (Government Notice R.757 of 27 August 2021), as amended from time to time. The current request fee for a private body is R140.00.

FEE	AMOUNT
Request fee (payable before the request is processed)	R140.00

Access fee (reproduction, and search and preparation in excess of the prescribed hours)	As prescribed in Annexure B to the PAIA Regulations (GN R.757 of 27 August 2021)
Deposit (where search and preparation are likely to exceed the prescribed hours)	Up to one-third of the access fee that would be payable

- 6.3** Where a deposit has been paid and the request is refused, the deposit is refunded. The Company may, as the Regulations allow, require the request fee or deposit to be paid before processing the request, and may withhold a record until the applicable fees are paid.

7 Grounds on which access may be refused

- 7.1** Access to a record may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA. These include the mandatory protection of:
- the privacy of a third party who is a natural person;
 - the commercial information of a third party, and the Company's own commercial information;
 - information held in confidence, and information that is legally privileged;
 - the safety of individuals, and the protection of property; and
 - research information of a third party or of the Company.
- 7.2** Access will be refused where a ground for refusal applies, unless PAIA requires disclosure (for example, where disclosure would reveal a substantial contravention of the law, or an imminent and serious risk to public safety or the environment, and the public interest in disclosure clearly outweighs the harm).

8 Remedies – complaint to the Information Regulator and the courts

- 8.1** PAIA does not provide for an internal appeal against a decision of a private body. If the Company refuses a request, fails to respond, or you are dissatisfied with a fee or other decision, you may lodge a complaint with the Information Regulator, or apply to a court for appropriate relief.
- 8.2** A complaint to the Information Regulator must be made on the prescribed form (Form 5) and ordinarily within 180 days of the decision or the failure to respond. The Regulator's contact details are:
- **Information Regulator (South Africa)**
 - **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - **Postal address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017
 - **Telephone:** 010 023 5200
 - **Email:** enquiries@infoeregulator.org.za
 - **Complaints (Form 5):** lodged through the Regulator's eServices Portal at <https://eservices.infoeregulator.org.za>
- 8.3** A requester may also apply to a court for relief within 180 days of being notified of a decision, in accordance with PAIA.

9 Availability of this Manual

- 9.1** This Manual is available, free of charge, for public inspection at the Company's principal place of business during normal business hours, on the Company's website, and on request to the Information Officer The Company will make the Manual available to the Information Regulator where required by PAIA or any applicable regulatory process.

10 Updating of this Manual

- 10.1** The Company updates this Manual on a regular basis and whenever there is a material change to its particulars, the records it holds, or the applicable law.