

PAIA MANUAL

Promotion of Access to Information Act 2 of 2000
(as amended)

UNTAMED TECHNOLOGIES (PTY) LTD

Trading as Untamed Tech • Smart Homes

Registration number	2020/655773/07
VAT number	4800304224
Prepared in terms of	Section 51 of the Promotion of Access to Information Act 2 of 2000, as amended by the Protection of Personal Information Act 4 of 2013
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Issued by	Wynand Ackerman, Director and Information Officer

This manual is published so that members of the public can understand what records Untamed Technologies holds, how to request access, and how personal information is processed.

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1. LIST OF ACRONYMS AND ABBREVIATIONS

CEO / Director	Chief Executive / Managing Director of the Company
Company	Untamed Technologies (Pty) Ltd, registration 2020/655773/07
CPA	Consumer Protection Act 68 of 2008
DIO	Deputy Information Officer
ECTA	Electronic Communications and Transactions Act 25 of 2002
IO	Information Officer
Minister	Minister of Justice and Correctional Services
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
Republic	Republic of South Africa

2. PURPOSE OF THIS PAIA MANUAL

This Manual is useful for the public to—

- check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- know the description of the records of the Company which are available in accordance with any other legislation;

- access the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- know the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- know whether the Company processes personal information, the purpose of that processing, and the categories of data subjects and information relating thereto;
- know the recipients or categories of recipients to whom personal information may be supplied;
- know whether the Company transfers or processes personal information outside the Republic, and to whom; and
- know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of personal information which is processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Untamed Technologies (Pty) Ltd is a private body. The head of the body is the Information Officer for purposes of PAIA and POPIA.

3.1 Information Officer

Name	Wynand Ackerman
Title	Director
Telephone	010 157 3329
Mobile / WhatsApp	060 011 4089
Email	info@untamedtech.co.za
Fax number	Not applicable

3.2 Deputy Information Officer

No Deputy Information Officer has been designated as at the date of this Manual. All PAIA and POPIA requests must be sent to the Information Officer at the details above. This section will be updated if a Deputy Information Officer is designated in terms of section 56 of POPIA.

3.3 Access to information general contact

Email for PAIA / POPIA requests	info@untamedtech.co.za
Mark the subject line	PAIA Request or POPIA Request

3.4 Head office

Postal address	Cresta Corner, 1 Arbor Road, Cresta, Randburg, Johannesburg, 2194
Physical address	Cresta Corner, 1 Arbor Road, Cresta, Randburg, Johannesburg, 2194
Telephone	010 157 3329
Email	info@untamedtech.co.za
Website	https://untamedtech.co.za
Office hours	Monday–Friday 08:00–17:00; Saturday 09:00–14:00; closed on public holidays

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

The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA (“the 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.

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

The Guide contains a description of—

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);
- the assistance available from an Information Officer of a public body, and from the Regulator, in terms of PAIA and POPIA;
- 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 an internal appeal (public bodies), a complaint to the Regulator, and an application to court;
- the provisions of sections 14 and 51 requiring a public body and a private body respectively to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

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

The Guide can also be obtained—

- upon request to the Information Officer of Untamed Technologies; and
- from the website of the Regulator at <https://infoeregulator.org.za/>.

4.1 Information Regulator contact details

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 Toll-free 0800 017 160
General email	enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
Website	https://infoeregulator.org.za

A copy of the Guide is available in the following two official languages at the Company’s head office for public inspection during normal office hours:

English and Afrikaans.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

The following records are available without completing Form 2. They may be downloaded from the website or requested by email or telephone.

Category of records	Types of record	Website	On request
Public company information	Trading name, registration number, VAT number, physical address, contact numbers, office hours	Yes	Yes
About the business	Company profile, services offered (smart home automation, IoT, energy/solar integration, security, gates, Home Assistant), owner profile	Yes	Yes
Products	Product listings, descriptions, published prices, specifications and compatibility notes as displayed in the online store	Yes	Yes
Policies published online	Refunds, returns, warranties and related shop terms	Yes	Yes
This Manual	PAIA Manual (this document)	Yes	Yes
Marketing content	Public social-media posts, product demonstration videos and published promotional material	Yes	Yes

Records that contain another person's personal information, client installation details, technical credentials, unpublished pricing, or commercially confidential information are not automatically available and must be requested under section 50 of PAIA.

6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

The Company creates and retains records as required by South African law. Access to these records is subject to the provisions of the relevant Act and to the grounds of refusal in PAIA. The list is not exhaustive.

Category of records	Applicable legislation
Memorandum of Incorporation, CIPC returns, director and share records	Companies Act 71 of 2008
This PAIA Manual and PAIA request files	Promotion of Access to Information Act 2 of 2000
Personal information processing records, operator agreements, security incident records	Protection of Personal Information Act 4 of 2013
Income tax returns, supporting schedules, employee tax certificates	Income Tax Act 58 of 1962
VAT invoices, VAT returns and supporting records	Value-Added Tax Act 89 of 1991
PAYE, UIF and SDL submissions; IRP5 / IT3(a)	Fourth Schedule to the Income Tax Act; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Levies Act 9 of 1999
Employment contracts, attendance, leave and disciplinary records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employment equity and related records (where applicable)	Employment Equity Act 55 of 1998
Workplace injury and assessment records (where applicable)	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Occupational health and safety records	Occupational Health and Safety Act 85 of 1993

Category of records	Applicable legislation
Consumer contracts, warranties, returns and complaints	Consumer Protection Act 68 of 2008
Electronic communications, website terms and e-commerce records	Electronic Communications and Transactions Act 25 of 2002
Import, customs and landed-cost records	Customs and Excise Act 91 of 1964
Banking and payment records	Financial Intelligence Centre Act 38 of 2001 (to the extent applicable); National Payment System rules

7. SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

The Company holds records on the subjects below. Listing a category does not mean that a record in that category will be disclosed. Each request is assessed against Chapter 4 of Part 3 of PAIA.

Subject	Categories of records
Company secretarial / statutory	MOI, CIPC documents, director resolutions, share register, this Manual, registered address records
Strategic and operational	Business plans, showroom and premises records, supplier and brand-partner arrangements, operational procedures, health-and-safety notes
Finance and tax	Annual financial records, management accounts, budgets, bank statements, Speedpoint/card-machine settlements, PayFast and other payment-gateway reports, invoices, credit notes, supplier invoices, VAT packs, tax submissions, asset register
Sales and customers	Quotes, sales orders, WooCommerce orders, delivery notes, proof of delivery, warranties, returns, complaints, client correspondence (email and WhatsApp), installation job cards
Technical / project files	Site surveys, installation addresses, device lists and serial numbers, network and integration notes, Home Assistant configuration notes, remote-access records, after-sales support logs, manufacturer warranty claims
Products and inventory	Product catalogues, stock records, landed-cost workings, serial-number tracking, supplier price lists, import documents
Human resources	Employment contracts, identity documents (where held), banking details for payroll, leave records, performance and disciplinary records, UIF / PAYE files
Suppliers and service providers	Supplier details, contracts or terms, tax invoices, delivery records, product certifications supplied by vendors
Information technology	Website and shop administration records, backups, device and account inventories, password-manager holdings, CCTV recordings at the premises (if and when recorded)
Marketing	Website analytics, mailing or enquiry lists, social-media content and advertising records, promotional artwork
Legal and insurance	Contracts, insurance policies and claims, correspondence with attorneys or the Regulator (if any), PAIA/POPIA request files

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing personal information

The Company processes personal information only for lawful, defined purposes connected with its business as a smart-home, IoT, energy and security specialist. Those purposes include—

- identifying customers and responding to enquiries, quotes and showroom visits;
- concluding and performing sale, supply, installation and support contracts;
- delivering products, scheduling technicians and providing after-sales support and warranties;
- invoicing, collecting payment, processing refunds and keeping tax records;
- administering the online store, payment gateways and delivery;
- managing suppliers, contractors and employees;
- securing premises, systems and client installations;
- complying with legal obligations (tax, companies, consumer, labour and information-law);
- improving products and services; and
- sending marketing communications only where permitted (consent or an existing customer relationship, with an opt-out).

8.2 Categories of data subjects and information relating thereto

Categories of data subjects	Personal information that may be processed
Customers / clients (retail and installation)	Name, identity or registration number, contact numbers, email, physical / installation / delivery address, order and payment history, bank or card references as processed by the payment provider, correspondence, site photographs, device and configuration notes reasonably required to install or support a system
Website and online-store users	Name, email, phone, delivery address, order contents, IP address and device/browser data collected by the site or analytics tools, cookie identifiers
Enquirers (WhatsApp, email, social media, walk-in)	Name, contact details, and the content of the enquiry
Employees and contractors	Identity number, contact details, address, qualifications, banking details, tax numbers, emergency contacts, employment history, leave and payroll information, and (where relevant) race and gender for statutory reporting
Suppliers and service providers	Names of contacts, registration and VAT numbers, addresses, bank details, contractual terms
Directors	Identity particulars, contact details and statutory director records

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

Personal information is disclosed only when it is necessary for the purposes in 8.1, required by law, or done with the data subject's instruction or consent. Recipients include—

Category of personal information	Recipients or categories of recipients
Identity number and names, where a criminal check is lawfully required	South African Police Service
Qualifications, where verification is required	South African Qualifications Authority or an appointed verification service
Credit and payment history, where a credit assessment is lawfully required	Registered credit bureaux

Category of personal information	Recipients or categories of recipients
Tax, payroll and statutory submissions	SARS, the Unemployment Insurance Fund, the Compensation Fund, CIPC
Payment instructions and card transactions	First National Bank, Speedpoint / card acquirer, PayFast and any other payment gateway used by the Company
Delivery name, phone and address	Couriers and logistics providers
Accounting records	The Company's external accountant / bookkeeper and auditors (if appointed)
Cloud-hosted business data	Operators who host email, accounting, e-commerce, backups or collaboration tools under contract
Device-cloud identifiers required for a product to function	The relevant product manufacturer or cloud platform (for example eWeLink / Sonoff, Shelly, or Home Assistant Cloud) where the customer has chosen that product
Information required by law or a court	A regulator, court, or other competent authority

The Company does not sell personal information.

8.4 Planned transborder flows of personal information

The Company is based in South Africa. Some operators used to run the business store or process information on servers outside the Republic. Depending on the tool in use at the time, this may include—

- accounting and invoicing software (for example QuickBooks);
- the website and WooCommerce online store and their hosting provider;
- payment gateways;
- email, file storage and productivity suites (for example Google or Microsoft);
- messaging and advertising platforms (WhatsApp, Meta, TikTok);
- product-manufacturer clouds that a customer elects to use so that a device can be controlled remotely (commonly hosted in the European Union, the United States or Asia).

Where personal information is transferred outside the Republic, the Company relies on one or more of the conditions in section 72 of POPIA: the operator is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection; the data subject consents; the transfer is necessary for the performance of a contract with the data subject or for the conclusion or performance of a contract in the data subject's interest; or another ground in section 72 applies.

Clients who do not want a particular device cloud to process their information should raise this before installation so that a local or offline option can be considered where the product allows it.

8.5 Information security measures

The Company implements technical and organisational measures appropriate to its size and the nature of the information it holds. These include, as applicable at the date of this Manual—

- access to business systems limited to staff who need that access to do their work;
- unique user accounts and strong passwords, with multi-factor authentication on email, banking, shop administration and other critical systems where the platform supports it;
- use of a password manager for shared and client credentials, rather than storing passwords in open documents;
- anti-malware / endpoint protection on company devices;
- regular backups of critical business data;
- physical security of the showroom and office (controlled access, and alarm / CCTV where installed);
- staff instruction that client network details, remote-access credentials and installation notes are confidential;

- operator contracts or terms with key processors that require the operator to protect the information; and
- review of access when a staff member leaves.

No security measure is perfect. The Company will notify the Regulator and affected data subjects of a security compromise as required by section 22 of POPIA.

9. HOW TO REQUEST ACCESS TO A RECORD

A requester must be given access to a record of the Company if that record is required for the exercise or protection of any rights, the requester complies with the procedural requirements in PAIA, and access is not refused on a ground in Chapter 4 of Part 3 of PAIA.

9.1 Form of request

Requests must be made on Form 2 (Request for Access to Record) prescribed by the PAIA Regulations, 2021. Form 2 replaced the older “Form C”. The form is available from—

the Information Regulator: <https://inforegulator.org.za/paia-forms/>; or

the Information Officer on request.

The completed form must be sent to info@untamedtech.co.za or delivered to the head office address in section 3. The request must—

- provide sufficient particulars to enable the Information Officer to identify the requester and the record;
- indicate the form of access required (inspection, copy, electronic copy);
- state the right the requester is seeking to exercise or protect, and why the record is required for that purpose; and
- if the request is made on behalf of another person, include proof of the capacity in which the requester is acting.

9.2 Fees

Fees are prescribed in Annexure B of the Regulations Relating to the Promotion of Access to Information, 2021, as amended. The Company charges only the prescribed tariffs. As at the date of this Manual the private-body fees include—

Item	Amount
Request fee (payable by every requester, except a requester seeking their own personal information)	R140.00
Photocopy or printed black-and-white copy of an A4 page	R2.00 per page
Copy on a flash drive supplied by the requester	R40.00
Copy on a CD supplied by the requester	R40.00
Copy on a CD supplied by the Company	R60.00
Transcription of an audio record, per A4 page	R24.00
Search and preparation, per hour or part hour after the first hour	R145.00 (capped at R435.00)
Deposit if search is likely to exceed 6 hours	One third of the estimated access fee
Postage or electronic transfer	Actual expense, if any

VAT may be added where the Company is required to levy VAT. The Information Officer will give notice of any fee or deposit before the request is processed further. A requester seeking their own personal information is not charged the request fee.

9.3 Decision and time periods

The Information Officer must decide whether to grant or refuse the request and notify the requester within 30 days of receipt of a complete request. The period may be extended once by a further 30 days if the request is for a large number of records, requires a search of records not kept at the head office, or consultation is necessary. The requester will be told of any extension.

If access is granted, the notice will state the access fee (if any) and the form in which access will be given. If access is refused, the notice will state the ground of refusal, the requester's right to lodge a complaint with the Regulator or to apply to court, and the period within which to do so.

9.4 Remedies

A private body has no internal PAIA appeal. A requester or third party who is dissatisfied with a decision of the Information Officer may—

- lodge a complaint with the Information Regulator using the prescribed complaint form, at PAIAComplaints@inforegulator.org.za; or
- apply to a court with jurisdiction for appropriate relief, within the period allowed by PAIA.

10. GROUNDS FOR REFUSAL

The Information Officer must or may refuse a request on the grounds in Chapter 4 of Part 3 of PAIA. These include, among others—

- mandatory protection of the privacy of a third party who is a natural person;
- mandatory protection of commercial information of a third party (trade secrets, financial, commercial, scientific or technical information the disclosure of which is likely to cause commercial harm, and information supplied in confidence);
- mandatory protection of certain confidential information of a third party;
- mandatory protection of the safety of individuals and property;
- mandatory protection of records privileged from production in legal proceedings;
- commercial information of the Company itself (trade secrets, financial or technical information the disclosure of which is likely to cause harm, and information about negotiations);
- research information of the Company or a third party; and
- requests that are manifestly frivolous or vexatious, or that would unreasonably divert resources.

Where a record contains both disclosable and protected information, the protected portions will be severed where reasonably possible and the remainder disclosed.

11. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available—

1. on the Company website at <https://untamedtech.co.za>;
2. at the head office of Untamed Technologies, Cresta Corner, 1 Arbor Road, Cresta, Randburg, Johannesburg, 2194, for public inspection during normal business hours;
3. to any person upon request and upon payment of the reasonable prescribed fee; and
4. to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, is payable per A4-size photocopy made.

12. UPDATING OF THIS MANUAL

The head of Untamed Technologies (Pty) Ltd will update this Manual on a regular basis, and whenever there is a material change to the Company's structure, contact details, record categories or personal-information practices.

Issued by

Wynand Ackerman

Director and Information Officer

Untamed Technologies (Pty) Ltd

16 September 2026

This Manual is prepared to meet the Company's duties under section 51 of PAIA. It is not legal advice. The Information Officer should be registered with the Information Regulator, and this Manual should be published on the website and kept at the head office.