

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) for:

1. GoodX South Africa (Pty) Ltd
2. GoodX (Pty) Ltd
3. GoodX Enterprises (Pty) Ltd

Date of Compilation: 01/07/2021

Date of Revision: 02/07/2026

1. LIST OF ACRONYMS AND ABBREVIATIONS

1. "CEO": Chief Executive Officer
2. "DIO": Deputy Information Officer
3. "IO": Information Officer
4. "Minister": Minister of Justice and Correctional Services
5. "PAIA": Promotion of Access to Information Act No. 2 of 2000 (as amended)
6. "POPIA": Protection of Personal Information Act No. 4 of 2013
7. "Regulator": Information Regulator
8. "Republic": Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

1. Check the categories of records held by the body which are available without a formal PAIA request.
2. Understand how to make a request for access to a record of the body.
3. Know the description of records available in accordance with any other legislation.
4. Access all relevant contact details of the Information Officer.
5. Know if the body processes personal information, the purpose of processing, and the categories of data subjects concerned.
6. Know the recipients or categories of recipients to whom personal information may be supplied.
7. Identify planned transborder flows of personal information.
8. Confirm whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of personal information.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1. Information Officer

- **Name:** Kobus Wolvaardt
- **Tel:** 012 845 9888
- **Email:** legal@goodx.co.za
- **Fax:** N/A

3.2. Head Office / General Contacts

- **Physical Address:** 31 Snyman Road, Brummeria, Pretoria, Gauteng
- **Postal Address:** 31 Snyman Road, Brummeria, Pretoria, Gauteng
- **Website:** www.goodx.co.za

4. GUIDE ON HOW TO USE PAIA

The Regulator has updated and made available a revised Guide on how to use PAIA, available in all official languages and braille.

1. Members of the public can inspect or copy the Guide from the offices of public/private bodies or the Regulator during normal working hours.
2. The Guide can be accessed directly from the Information Regulator's website (<https://info regulator.org.za/>).

5. AUTOMATICALLY AVAILABLE RECORDS (WITHOUT FORMAL REQUEST)

The following categories of records are automatically available to the public without complying with a formal PAIA request process:

Category of Records	Types of the Record	Available on Website	Available upon Request
Marketing Material	Product brochures, newsletters, software feature listings	X	X
Public Corporate Profile	Company history, overview of software solutions	X	X



6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

The GoodX entities maintain records in terms of South African statutes, including but not limited to:

1. Companies Act 71 of 2008
2. Promotion of Access to Information Act 2 of 2000
3. Protection of Personal Information Act 4 of 2013
4. Electronic Communications and Transactions Act 25 of 2002
5. Basic Conditions of Employment Act 75 of 1997
6. Income Tax Act 58 of 1962
7. Value Added Tax Act 89 of 1991

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

The table below describes the subjects on which the GoodX entities hold records and the specific categories under each subject:

Subjects	Categories of Records
Strategic & Corporate	Memorandum of Incorporation, Shareholder agreements, board minutes.
Financial & Tax	Financial statements, VAT records, asset registers, auditor records.
Human Resources	Employment contracts, HR policies, payroll records, qualifications, employee special personal information.
Operations & Intellectual Property	Software source codes, proprietary platform architecture, product documentation.
Client Data	Software licensing agreements, service-level agreements (SLAs), client logs, and client personal and special personal information.



8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

GoodX processes personal and special personal information primarily to provide software development, licensing, support services, cloud-hosting infrastructure, internal operational management, and billing functions.

8.2 Categories of Data Subjects and Information Processed

1. **Clients:** Names, registration/ID numbers, system administrator credentials, billing addresses, bank details, patient special personal information.
2. **Service Providers:** Company registration details, VAT numbers, trade secrets, service agreements, bank details.
3. **Employees:** IDs, addresses, qualifications, gender, race, emergency contact details, health data.

8.3 Recipients to Whom Personal Information May Be Supplied

1. Healthcare Bodies: Business & Clinical information.
2. Financial Bodies: Debt collectors, credit bureaux and banks.
3. Compliance Bodies: Certification information.
4. Statutory Bodies: SARS (tax administration) and the Department of Employment and Labour.
5. Third-Party Infrastructure Partners: Secure cloud hosting infrastructure providers.

8.4 Planned Transborder Flows of Personal Information

Where GoodX utilises cloud hosting or backup architecture situated outside the Republic of South Africa, data is transferred securely. GoodX ensures that international service providers comply with strict data protection standards equivalent to POPIA via binding operator agreements.

8.5 Information Security Measures

To safeguard data confidentiality, integrity, and availability, GoodX implements robust measures, including:

- Advanced Data Encryption (at rest and in transit).
- Enterprise-grade Anti-virus, Anti-malware, and Firewalls.
- Role-based access controls and multi-factor authentication (MFA).
- ISO27001 and ISO9001 certification.

Confidentiality and Limitation of Liability:

1. While PAIA requires transparency about which records exist, all confidential information is preserved under standard commercial contract law.
2. For clarity within this regulatory framework, access to or release of any proprietary software records, trade secrets, or system architecture information remains strictly subject to the technical exemptions under Section 68 of PAIA, and any claims are governed by the limitation of liability provisions set out in the GoodX Software South Africa Standard Licence, Switch & Operator Agreement read together with the GoodX Software South Africa General Terms and Conditions, Policies and Standard Operating Procedures or other related agreements.

9. AVAILABILITY OF THE MANUAL

An electronic copy of this Manual is available:

1. On the official GoodX website: www.goodx.co.za
2. To any person upon request and upon payment of the reasonable prescribed fee.

10. UPDATING OF THE MANUAL

The head of the private body will regularly update this manual as legislative or internal operational requirements evolve.

Issued by: Kobus Wolvaardt - Chief Executive Officer