

PAIA Manual for Jubez Digital (Pty) Ltd

Effective Date: 16 October 2026

1. Introduction and Purpose of this Manual

This manual is published in terms of section 51 of the Promotion of Access to Information Act, 2000 (PAIA), by Jubez Digital (Pty) Ltd ("the Body"), a private body as defined in PAIA.

PAIA gives effect to the constitutional right of access to information held by public and private bodies, where that information is required for the exercise or protection of any right. This manual explains:

- The types of records held by the Body
- How to request access to those records
- The procedure, forms, and fees that apply to such requests
- How the Body processes personal information in terms of the Protection of Personal Information Act, 2013 (POPIA)

The Body operates the website <https://jubezdigital.com> ("Jubez Digital").

2. Contact Details

Head of the Body / Information Officer

- **Name:** Julie Rosenbaum
- **Email:** hey@jubezdigital.com
- **Phone:** +27 82 851 8704
- **Physical address:** 101C 9th Street, Linden, Randburg
- **Website:** <https://jubezdigital.com>

All requests for access to records, and all questions regarding this manual, should be directed to the Information Officer at the contact details above.

3. The Guide to PAIA (Section 10)

The Information Regulator has, in terms of section 10 of PAIA, published a Guide on how to use PAIA. The Guide explains, in an easily comprehensible form and manner, how to exercise the rights conferred by PAIA and POPIA, and is available in each official language.

The Guide is available free of charge from the Information Regulator:

- **Website:** <https://infoeregulator.org.za>
- **Email:** infoereg@infoeregulator.org.za
- **Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Copies of the Guide may also be requested from our Information Officer.

4. Records Available in Terms of Other Legislation

Where applicable to the Body, records are kept in accordance with legislation including, among others:

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962

- Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008
- Protection of Personal Information Act 4 of 2013

Records kept in terms of the above legislation may be requested in accordance with the procedure set out in this manual, where such legislation does not itself provide for access.

5. Categories of Records Held by the Body

The Body holds records in the following categories:

Statutory and company records

- Founding and incorporation documents, statutory registers, and company secretarial records

Financial records

- Accounting records, invoices and receipts, banking records, and tax records

Operational and website records

- Website content and configuration, published policies and legal notices, correspondence, and supplier agreements

Customer and user records

- Personal information collected through Jubez Digital, including: Full Name, Email Address, Phone Number, Cookies & Tracking Data
- Enquiries, support correspondence, and transaction records

Personnel records (where the Body employs staff)

- Employment contracts, remuneration records, and statutory employment records

Records automatically available

The following records are automatically available without a PAIA request: the content of <https://jubezdigital.com>, our published Privacy Policy and other website legal notices, and this manual. All other records must be requested in accordance with the procedure below.

6. How to Request Access to Records

The request procedure

- Complete the prescribed request form (Form 2 of Annexure A to the PAIA Regulations, 2021), available from the Information Regulator's website (<https://info regulator.org.za>) or from our Information Officer
- Address the request to the Information Officer at the contact details in this manual
- Identify the record(s) requested and the right you seek to exercise or protect, and explain why the record is required for the exercise or protection of that right
- Provide sufficient particulars to enable us to identify you (and, where applicable, proof of the capacity in which you make the request)

- Indicate the form of access required (inspection, copy, electronic copy)

Timeframe

We will decide on a request as soon as reasonably possible, and in any event within 30 days of receipt, as required by section 56 of PAIA. This period may be extended once, by up to 30 days, on the grounds permitted by PAIA, in which case you will be notified.

Grounds of refusal

Access may or must be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including the protection of the privacy of third parties, commercial information of third parties, and legally privileged records. Where a ground of refusal applies to only part of a record, the remainder will be disclosed if it can reasonably be severed.

Remedies

A requester aggrieved by a decision of the Body may lodge a complaint with the Information Regulator or apply to a court, as provided for in PAIA.

7. Prescribed Fees

Requests to a private body are subject to the fees prescribed in the PAIA Regulations, 2021, which include:

- **A request fee** (currently R140), payable when the request is submitted - unless you are exempt, such as when you request access to a record containing your own personal information
- **Access and reproduction fees**, calculated per the prescribed schedule (photocopies, printed copies, electronic copies, and postage)
- **A deposit** may be requested where the preparation of the record requires more than the prescribed hours of search and preparation

The prescribed fees are revised from time to time - the current schedule is available from the Information Regulator at <https://inforegulator.org.za>. No request fee is payable by a data subject requesting their own personal information.

8. Processing of Personal Information (POPIA)

In accordance with POPIA and the Information Regulator's guidance, the Body records the following about its processing of personal information:

Purpose of processing

Personal information is processed to provide and improve the products and services offered through Jubez Digital, to process transactions, to communicate with customers and users, to comply with legal obligations, and to prevent fraud.

Categories of data subjects and personal information

- Website visitors, customers, and users: Full Name, Email Address, Phone Number, Cookies & Tracking Data
- Employees and contractors (where applicable): recruitment, employment, and remuneration information

Recipients of personal information

Personal information may be shared with service providers that process information on the Body's behalf, in categories including: Analytics, Advertising.

Cross-border flows of personal information

Some service providers used by the Body are located outside South Africa. Personal information transferred to them is protected as required by section 72 of POPIA.

Security measures

The Body maintains appropriate, reasonable technical and organisational measures to secure personal information against loss, damage, unauthorised destruction, and unlawful access, as required by section 19 of POPIA, including access controls, encrypted transmission where appropriate, and confidentiality obligations on service providers.

Further detail on how personal information is processed is set out in the Privacy Policy published at <https://jubezdigital.com>.

9. Availability of this Manual

This manual is available:

- On the Body's website at <https://jubezdigital.com>
- From the Information Officer, on request, at hey@jubezdigital.com

This manual will be updated as and when required, including when the Body's contact details, record categories, or processing activities change.