

Manual in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") read with the Protection of Personal Information Act 4 of 2013 ("POPIA")

FOR: iFeedback (Pty) Ltd
(Registration Number: 2013/171267/07)

1. Introduction and Purpose of the Manual

This document serves as the official Information Manual for iFeedback (Pty) Ltd (hereinafter referred to as "iFeedback"), prepared in accordance with the requirements of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended. iFeedback is a "private body" as defined in PAIA and is therefore legally obligated to compile this manual.

The purpose of this manual is twofold, reflecting the convergence of South Africa's primary information laws. Firstly, it serves to give effect to the constitutional right of access to information, as enshrined in Section 32 of the Constitution of the Republic of South Africa, 1996. It provides a clear and structured framework outlining the procedures that must be followed by any person, referred to as a "requester," who wishes to request access to any of the records held by iFeedback.

Secondly, this manual integrates the transparency and accountability requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). In compliance with Section 17 of POPIA and the amended Section 51 of PAIA, this manual also serves as a public record of the personal information processing activities undertaken by iFeedback. It details the types of personal information processed, the purposes for which it is processed, and the security measures implemented to protect it.

iFeedback is a specialist research and consulting firm based in South Africa, providing end-to-end research solutions. Its core services encompass research design, multi-method data collection (including online surveys, panel access, and qualitative recruitment), advanced data analysis, and strategic consulting for a diverse clientele, including academic institutions and commercial enterprises.

It is important to note that as of 1 January 2022, the previous exemptions afforded to certain private bodies have fallen away. All private and public bodies in South Africa are now required to compile and make available a PAIA manual. This document represents iFeedback's commitment to operating in a transparent, lawful, and accountable manner in all its information processing activities.

2. Contact Details of iFeedback (Pty) Ltd (Section 51(1)(a))

This section provides the official statutory and contact details for iFeedback as required by PAIA.

Full Company Name:	iFeedback (Pty) Ltd
Registration Number:	2013/171267/07
Physical Address:	8 Glen Road, Glencairn, Cape Town, 7975
Postal Address:	8 Glen Road, Glencairn, Cape Town, 7975
Telephone Number:	0825208335
Website:	https://ifedback.co.za/
General Email Contact:	info@ifedback.co.za

3. Contact Details of the Information Officer

In terms of PAIA, the head of a private body is automatically designated as the Information Officer. The Information Officer is the individual legally accountable for ensuring iFeedback's compliance with both PAIA and POPIA. While certain duties may be delegated, the ultimate accountability remains with this individual.

The Information Officer's responsibilities include, but are not limited to, developing and maintaining this manual, establishing a compliance framework for both Acts, processing requests for access to information, and liaising with the Information Regulator on all related matters.

The contact details for the designated Information Officer for iFeedback are as follows:

Name of Information Officer:	Adriaan Buys
Position:	Managing Director
Email Address:	info@ifeedback.co.za
Telephone Number:	0825208335

4. The Information Regulator's Guide (Section 51(1)(b)(i))

In accordance with Section 10 of PAIA, the Information Regulator of South Africa has compiled a comprehensive guide. This guide is designed to assist any person who wishes to exercise their rights as contemplated in PAIA and POPIA. The guide is available in all official South African languages and provides detailed information on, among other things:

- The objectives of PAIA and POPIA.
- The contact details of the Information Officer of every public body and the Deputy Information Officers of all public and private bodies.
- The manner and form for submitting a request for access to a record.
- The assistance available from the Information Regulator.
- The legal remedies available in respect of any act or failure to act, including the procedures for lodging an internal appeal or a complaint with the Regulator.

The guide is available for public inspection and can be obtained directly from the Information Regulator. The contact details are as follows:

Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone Number:	010 023 5200

Email Address:	enquiries@info regulator.org.za
Website:	https://info regulator.org.za/

5. Records Available Without a Formal PAIA Request (Section 52)

In the interest of promoting transparency and accessibility, iFeedback makes certain categories of records automatically available to the public without the need for a formal request in terms of PAIA. These records can be accessed via the company website or may be requested directly from our offices.

The following records are automatically available:

- **Company Information:** Descriptions of iFeedback's services, core business approach, and areas of expertise.
- **Case Studies and Testimonials:** Examples of past projects and client feedback that are publicly shared.
- **Technology and Tools:** Information regarding the proprietary and third-party platforms used by iFeedback, such as the iFeedback.app survey platform.
- **Public Content:** Any articles, blog posts, or research summaries published by iFeedback for public consumption.
- **Marketing Materials:** Publicly available brochures, pamphlets, and other marketing content.
- **Company Contact Details:** Official contact information for the company.

6. Records Available in Accordance with Other Legislation (Section 51(1)(b)(iii))

iFeedback is required to retain certain records in terms of various South African statutes. The availability of these records is subject to the provisions, including any confidentiality clauses, contained within the respective legislation. The following table provides a non-exhaustive list of applicable legislation and the corresponding categories of records held by iFeedback.

Applicable Legislation	Categories of Records Held
Basic Conditions of Employment Act 75 of 1997	Employee particulars, employment contracts, remuneration records, leave records.
Companies Act 71 of 2008	Memorandum of Incorporation, securities register, minutes of meetings, records of directors, annual financial statements.
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Records of earnings, time worked, payment for piecework and overtime.
Consumer Protection Act 68 of 2008	Records relating to client transactions and agreements.
Electronic Communications and Transactions Act 25 of 2002	Records of electronic communications and transactions.
Employment Equity Act 55 of 1998	Employment equity plans and reports.
Income Tax Act 58 of 1962	Financial records, tax returns, employee tax information (IRP5s).
Labour Relations Act 66 of 1995	Records of disciplinary proceedings.
Protection of Personal Information Act 4 of 2013	Records of processing activities, data processing agreements with operators, consent records, information security incident reports.
Unemployment Insurance Act 63 of 2001	Records of employee contributions to the Unemployment Insurance Fund.

Value Added Tax Act 89 of 1991	VAT records, tax invoices, and returns.
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7. Description of Subjects and Categories of Records Held by iFeedback (Section 51(1)(b)(iv))

In compliance with PAIA, this section provides a comprehensive description of the subjects on which iFeedback holds records and the categories of records held on each subject. This information is intended to provide sufficient detail to facilitate a targeted request for access to a specific record.

Subject	Categories of Records
Corporate Governance	Memorandum of Incorporation; Minutes of Board and Management Meetings; Share Register; Company Policies and Procedures; PAIA Manual; Records relating to the appointment of the Information Officer.
Financial and Accounting	Annual Financial Statements; Tax Records; Banking Records; Asset Register; Invoices, Statements, and Payment Records (Clients and Suppliers); Management Accounts; Budgets and Financial Forecasts.
Human Resources	Employee Contracts; Personnel Files (including personal details, leave records, performance reviews); Payroll Records; Disciplinary Records; Employment Equity Plans; Staff Training Records; POPIA Consent and Confidentiality Agreements; Job Applications and CVs (for successful and unsuccessful candidates).

<p>Client and Project Management</p>	<p>Client Service Agreements and Mandates; Project Proposals and Scopes of Work; Correspondence with Clients; Ethical Clearance Documentation (from universities); Project Reports and Presentations (draft and final); Client Invoices and Billing Records.</p>
<p>Research Operations and Data</p>	<p>Research Methodologies and Designs; Survey Questionnaires and Interview Guides; Raw Quantitative Data Sets (potentially identifiable during collection, anonymised/de-identified for analysis); Transcripts and Recordings of Qualitative Interviews/Focus Groups; Respondent Lists and Contact Information (sourced and internal); Records of Consent from Research Participants (where applicable); Data Analysis Files and Code (e.g., R scripts); Data Visualisations (e.g., Tableau workbooks); System and Server Logs for survey platforms.</p>
<p>Supplier and Third-Party Management</p>	<p>Supplier and Consultant Agreements; Data Processing Agreements with Operators (e.g., database providers, hosting services); Non-Disclosure Agreements; Correspondence with Suppliers; Performance and Service Level Records.</p>
<p>Information Technology</p>	<p>IT Policies and Procedures (including Information Security Policy); System and Software License Agreements; Network and System Architecture Diagrams; Data Backup and Recovery Records; Incident Response Plans and Records.</p>

Marketing and Business Development	Marketing Strategies and Materials; Website Analytics and Performance Data; Client Testimonials and Case Studies.
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8. Processing of Personal Information in Accordance with POPIA (Section 51(1)(c))

This section provides a detailed account of iFeedback's personal information processing activities as mandated by both PAIA and POPIA. iFeedback is committed to upholding the eight conditions for the lawful processing of personal information as set out in POPIA.

8.1 Purpose of Processing Personal Information

iFeedback collects and processes personal information for specific, explicitly defined, and lawful purposes related to its business functions. These purposes include:

- **Research Execution:** To identify, contact, and engage with potential research participants for legitimate academic and commercial market research projects. This includes sending survey invitations, conducting interviews, and facilitating focus groups.
- **Data Analysis and Reporting:** To analyse collected data to generate aggregated and/or anonymised insights, reports, and strategic recommendations for clients.
- **Client Relationship Management:** To conclude and perform contracts with clients, manage projects, handle communications, and process billing and payments.
- **Human Resource Management:** To recruit, employ, and manage staff and consultants, including payroll administration, performance management, and compliance with labour laws.
- **Supplier and Operator Management:** To procure goods and services, manage contractual relationships with suppliers, and ensure that third-party operators who process personal information on iFeedback's behalf do so in a compliant manner.
- **Business Administration:** For general operational purposes, including financial accounting, tax compliance, and adherence to other statutory obligations.
- **Security and IT Management:** To ensure the security and integrity of iFeedback's IT infrastructure and the information it holds.

A critical distinction is made between communications for legitimate market research and those for direct marketing. iFeedback's use of sourced contact details is for the exclusive purpose of inviting individuals to participate in research studies. POPIA defines "direct marketing" as approaching a data subject to promote goods or services or to request a

donation. Genuine market research, which seeks to gather opinions and information rather than to sell a product or service, does not fall under this definition. iFeedback has implemented strict internal protocols to ensure that its initial outreach communications are purely for research invitation purposes and contain no promotional or marketing material, thereby avoiding the stringent opt-in consent requirements of Section 69 of POPIA.

8.2 Description of the Categories of Data Subjects and of the Information or Categories of Information Relating Thereto

iFeedback processes personal information relating to the following categories of data subjects:

- **Research Participants:** Individuals who are invited to or participate in research studies.
 - **Personal Information Processed:** Contact details (e.g., email address, telephone number), demographic information (e.g., age, gender, location), professional details (e.g., job title, industry), and personal opinions, views, and preferences as expressed in survey responses or interviews. In certain ethically approved academic or health studies, this may include "special personal information" (e.g., information on health or beliefs), which is always processed with the explicit, informed consent of the data subject.
- **Clients and Prospective Clients:** Individuals representing corporate or academic entities that procure or may procure iFeedback's services.
 - **Personal Information Processed:** Full name, job title, company name and details, work contact information (email, phone number), and correspondence records.
- **Client Employees:** In the context of specific projects, such as employee engagement surveys.
 - **Personal Information Processed:** Name, email address, employee number, department, job level, and responses to survey questions. This information is treated with the utmost confidentiality, and reports to the client are typically provided in an aggregated and anonymised format to protect individual privacy.
- **Employees, Consultants, and Job Applicants:** Individuals employed by, contracted to, or applying for a position at iFeedback.
 - **Personal Information Processed:** Full names, identity numbers, contact details, residential address, banking details, tax information, CVs and employment history, performance and disciplinary records.
- **Suppliers and Service Providers:** Individuals representing entities that provide goods or services to iFeedback.
 - **Personal Information Processed:** Contact person's name, business contact details, company information, and banking details.

8.3 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

iFeedback will only share personal information with third parties under specific and lawful circumstances:

- **Clients:** Research findings are primarily shared in an aggregated and/or anonymised format. In instances where non-anonymous data is shared, it is done only with the explicit consent of the research participants and is governed by strict confidentiality and data protection clauses in the client service agreement.
- **Third-Party Service Providers (Operators):** iFeedback engages operators to perform specific processing activities on its behalf. These include:
 - The database company from which business contact details are rented for respondent sourcing.
 - Cloud hosting providers (Scala Hosting) for survey platforms.
 - Cloud productivity and storage providers (Google Workspace).
 - Email delivery services (Amazon SES).All such engagements are governed by written data processing agreements that legally oblige the operator to maintain the confidentiality and security of the personal information and to process it only on iFeedback's instructions.
- **Statutory and Regulatory Bodies:** Information may be disclosed to bodies such as the South African Revenue Service (SARS) or the Information Regulator when required by law.

8.4 Planned Transborder Flows of Personal Information

In the course of its operations, iFeedback may transfer personal information to third parties located outside of the Republic of South Africa. This constitutes a "transborder information flow" under Chapter 9 of POPIA.

- **Destination and Purpose:** Personal information, particularly that of research participants and clients, may be processed and stored on servers located in the United States of America. This is necessary for the use of essential services, including survey hosting provided by Scala Hosting and business data storage via Google Workspace.
- **Legal Basis for Transfer:** iFeedback acknowledges that the data protection laws of the United States may not be deemed to provide an "adequate level of protection" substantially similar to that afforded by POPIA. Therefore, in compliance with Section 72 of POPIA, iFeedback ensures that such transfers are lawful by establishing a **binding agreement** with each foreign service provider. These agreements (such as Data Processing Addenda to the terms of service) contractually obligate the recipient to protect the personal information in a manner that effectively upholds the principles for reasonable processing as set out in POPIA.

8.5 General Description of Information Security Measures

iFeedback takes its responsibility to secure personal information seriously and has implemented appropriate, reasonable technical and organisational measures to protect it

against loss, damage, and unauthorised access, use, modification, or disclosure. These measures include:

- **Organisational Measures:**
 - **Policies and Procedures:** A suite of internal policies covering data protection, information security, and incident response.
 - **Access Control:** Access to personal information is restricted on a "need-to-know" basis, using the principle of least privilege.
 - **Confidentiality Agreements:** All employees and consultants are bound by confidentiality and data protection clauses in their contracts.
 - **Training and Awareness:** Regular training is provided to all staff on their responsibilities under POPIA and iFeedback's internal security protocols.³⁶
- **Technical Measures:**
 - **System Security:** All systems containing personal information are password-protected, and strong password policies are enforced.
 - **Encryption:** Data is encrypted both in transit (e.g., using SSL/TLS for web traffic) and at rest where appropriate.
 - **Network Security:** Firewalls and other network security measures are in place to prevent unauthorised access.
 - **Secure Data Handling:** Secure methods are used for the transfer and destruction of personal information.
 - **Vulnerability Management:** Regular monitoring and patching of systems to protect against known vulnerabilities.

9. Procedure for Requesting Access to Records

A requester must comply with all the procedural requirements of PAIA when making a request for access to a record held by iFeedback.

1. **Submission of Request:** The request must be made on the prescribed **Form 2**, a copy of which is attached as Annexure A to this manual.
2. **Recipient:** The completed form must be submitted to the Information Officer at the contact details provided in Section 3 of this manual.
3. **Sufficient Detail:** The requester must provide sufficient detail on the form to enable the Information Officer to identify the record(s) being requested and the identity of the requester. Proof of identity is required to be submitted with the request.
4. **Proof of Capacity:** If a request is made on behalf of another person, the requester must submit proof of the capacity in which they are making the request, to the reasonable satisfaction of the Information Officer.
5. **Justification for Request:** As iFeedback is a private body, a requester must identify the specific right that they are seeking to exercise or protect and provide a clear explanation

of why the requested record is necessary for the exercise or protection of that right.

6. **Processing of Request:** The Information Officer will process the request and provide a decision within 30 calendar days of receipt. This period may be extended once for a further 30 days if the request is complex or involves a large number of records.
7. **Notification of Decision:** The Information Officer will notify the requester of the decision in writing, using the prescribed Form 3. If the request is refused, adequate reasons for the refusal will be provided.

10. Prescribed Fees

The fees for requesting and accessing records from a private body are prescribed by the PAIA Regulations.

- **Request Fee:** A non-refundable request fee of **R140.00** is payable by the requester upon submission of the request form. This fee is for the request itself and does not guarantee that access will be granted.
- **Access Fees:** If the request for access is granted, the requester will be required to pay an access fee for the search, preparation, and reproduction of the requested records. The Information Officer will notify the requester of the amount of the access fee payable.
- **Deposit:** If the search and preparation of the records are expected to exceed six hours, the requester may be required to pay a deposit of one-third of the anticipated access fee before the work commences.
- **Fee Schedule:** A full schedule of the prescribed fees is attached as Annexure B to this manual.
- **Fee Exemption:** Requesters who are able to provide proof that they are indigent may be exempted from paying the request and access fees.

11. Availability of the Manual

This manual is made available in accordance with the provisions of PAIA and can be accessed through the following means:

- An electronic copy is available for public viewing and download on the iFeedback website at: <https://ifedback.co.za/documents/paia-manual.pdf>.
- A physical copy is available for inspection during normal business hours at the principal place of business of iFeedback, as detailed in Section 2, at no cost.
- A copy may be obtained from the Information Regulator upon request.

This manual will be updated on a regular basis, as required by Section 51(2) of PAIA.

12. Annexures

Annexure A: Form 2 - Request for Access to Record of Private Body (Regulation 7)

PAIA Form 2 can be downloaded from the Information Regulator here:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

Annexure B: Prescribed Fees for Private Bodies

For the Fee Schedule, please check the main PAIA portal, where you can find the official guides and regulations that contain the fee schedule:

<https://inforegulator.org.za/paia/>