PAIA and POPIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 4 of 2013 (POPIA)

Onset Trading (Pty) Ltd · Version 1.0 · Date of compilation: 18 October 2026 · Next review: October 2027

1. Purpose of this manual

This manual explains how members of the public can request access to records held by Onset Trading (Pty) Ltd ("Onset Trading", "we"), what records we keep, how we process personal information, and how to object to or ask us to correct personal information. It is available on our website, at our shop, and on request.

2. About Onset Trading

Item	Details
Company name	Onset Trading (Pty) Ltd
Legal form	Private company registered in South Africa
Registration number	2016/440039/07
VAT number	4460295290
Second-hand goods dealer	Registered in terms of the Second-Hand Goods Act 6 of 2009, certificate no. A0500307
Business	Retail of new, refurbished and pre-owned computers, laptops, monitors, hardware, networking equipment and accessories; computer repairs and upgrades; software licences; laptop rental; internet café and printing; IT asset disposal (ITAD) and e-waste recycling.

3. Contact details of the Head of the body and Information Officer

In terms of PAIA and POPIA, the head of a private company is its Information Officer. Both officers are registered with the Information Regulator. Requests for records and all privacy matters must be addressed to:

Item	Details
Head and Information Officer	Bafana Cyprian Nkuna, Founder and Director
Deputy Information Officer	Resego Nkuna
Information Regulator registration	Information Officer registration no. 2026-069559, registered 18 October 2026 (appointments effective 1 October 2026)
Physical address	Shop CG18, Randview Shopping Centre, 509-511 Jan Smuts Avenue, Blairgowrie, Randburg, 2194
Postal address	As above

Item	Details
Telephone	011 285 0949
WhatsApp	061 302 9559
Email	sales@onsettrading.co.za (mark the subject "PAIA request" or "POPIA request")
Website	www.onsettrading.co.za

4. Guide on how to use PAIA

The Information Regulator has published a Guide on how to use PAIA and POPIA, in all official languages, to help people exercise their rights. You may get a copy from the Information Regulator, or inspect a copy at our shop during trading hours.

Information Regulator	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	Toll free 0800 017 160 · 010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

5. Records available without a formal request

The following information is freely available and does not require a PAIA request:

- Product listings, prices, policies (ordering, returns, photos, privacy) and contact details published on www.onsettrading.co.za
- Marketing material, price lists, flyers and posters displayed at or issued from our shop
- This manual

6. Records kept in terms of other legislation

We keep records as required by the following laws, where they apply to our business:

Legislation	Typical records
Companies Act 71 of 2008	Incorporation documents, register of directors, resolutions, annual returns
Income Tax Act 58 of 1962 Value-Added Tax Act 89 of 1991 Tax Administration Act 28 of 2011	Tax returns, invoices, credit notes, VAT records, supporting documents

Legislation	Typical records
Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Employment Equity Act 55 of 1998	Employment contracts, time and leave records, payslips, disciplinary records
Unemployment Insurance Act 63 of 2001 Compensation for Occupational Injuries and Diseases Act 130 of 1993 Skills Development Levies Act 9 of 1999	UIF, COIDA and levy registrations, declarations and payments
Consumer Protection Act 68 of 2008 Electronic Communications and Transactions Act 25 of 2002	Sales records, warranties, returns, customer complaints, online order records
Second-Hand Goods Act 6 of 2009	Register of second-hand goods bought and sold, seller identification records
Protection of Personal Information Act 4 of 2013	Privacy notices, consent records, information requests, security incident register

7. Subjects and categories of records held

Subject	Categories of records
Company and statutory	CIPC documents, director records, licences, registrations and certificates, lease agreement for the shop
Finance and tax	Accounting records, bank statements, invoices, quotations, receipts, management accounts, tax and VAT records
Employees	Employment contracts, CVs, ID copies, banking details for salaries, payroll, leave, training and disciplinary records
Customers	Names and contact details, quotations, orders, invoices, delivery and collection records, warranty and return records, repair job cards, WhatsApp and email correspondence
Suppliers and service providers	Supplier details, agreements, purchase orders, supplier invoices, payment records
Stock and second-hand goods	Stock lists, price guides, serial numbers, second-hand goods register, records of persons from whom goods were bought
ITAD and e-waste	Records of equipment received, data-wiping records, recycling and disposal records
Information technology	Website files, system and access records, backups

8. Processing of personal information (POPIA)

8.1 Purpose of processing

- To sell, rent, repair, upgrade, collect and deliver goods and services, and to issue quotations and invoices
- To honour warranties, returns, refunds and the cooling-off rights of customers
- To employ and pay staff, and to meet labour, tax and other legal obligations
- To keep the second-hand goods register and to prevent fraud and the trade in stolen goods
- To respond to enquiries and complaints, and, with consent, to send promotions

8.2 Categories of data subjects and information

Data subject	Personal information processed
Customers and prospective customers	Name, phone and WhatsApp number, email, company name, delivery address, order and payment details, device details and serial numbers
Persons selling goods to us	Name, ID number, contact details, address, details of goods sold, as required for the second-hand goods register
Employees and job applicants	Name, ID number, contact details, address, qualifications, employment history, banking details, tax and UIF details, emergency contacts
Suppliers and service providers	Contact persons, business details, banking details, agreements
Website visitors	The website does not store personal information on our server. A shopping cart is kept only in the visitor's own browser.

8.3 Recipients of personal information

We do not sell personal information. We share it only where needed to provide our services or where the law requires it, for example with:

- Couriers, for delivery of orders
- Our bank, accountants and auditors
- SARS, the Department of Employment and Labour, the South African Police Service and other authorities where required by law
- Service providers who host our website, email and backups

8.4 Transfer of information across borders

Some service providers we use, such as WhatsApp, email and cloud storage services, may store information on servers outside South Africa. We use reputable providers that protect information to a standard similar to POPIA, as required by section 72 of POPIA.

8.5 Security measures

- Password protection on computers, phones and accounts, with access limited to staff who need it
- Paper records containing personal information kept in a locked area
- Confidentiality obligations in employment contracts

- Secure wiping of storage on equipment received for repair, trade-in, resale or recycling
- Regular backups, and a documented plan for responding to security compromises

9. How to request access to a record

1. Complete the prescribed request form (Form 2 under the PAIA Regulations, available from the Information Regulator's website or from us).
2. Send it to the Information Officer by email, or deliver it to our shop. Include proof of identity and, if you act for someone else, proof of your authority.
3. Describe the record clearly, say in what form you want access (copy, inspection, electronic), and explain which right you want to exercise or protect.
4. Pay the request fee of R140.00. Where access is granted, an access fee may also apply for copying, search and preparation, as prescribed by the PAIA Regulations. We will tell you in advance if a deposit is required.
5. We will decide on your request within 30 days. We may extend this by up to 30 more days in the circumstances PAIA allows, and will tell you if we do.

We may refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, for example to protect the privacy of another person, commercially sensitive or confidential information, the safety of individuals or property, or records privileged from production in legal proceedings. If we refuse, we will give reasons.

If you are unhappy with our decision, you may lodge a complaint with the Information Regulator within 180 days, or apply to a court.

10. Your rights under POPIA

- Ask whether we hold personal information about you, and for a description of it
- Ask us to correct or delete personal information that is inaccurate, out of date, incomplete, misleading or unlawfully obtained (Form 2 under the POPIA Regulations)
- Object to the processing of your personal information on reasonable grounds, or to direct marketing (Form 1 under the POPIA Regulations)
- Withdraw consent you have given, at any time
- Lodge a complaint with the Information Regulator

Send requests to the Information Officer using the details in section 3. We will respond within 30 days.

11. Availability and updating of this manual

This manual is available on www.onsettrading.co.za, for inspection at our shop during trading hours, and by email on request. A reasonable fee may be charged for a printed copy. We will review and update this manual at least once a year and whenever our business or the law changes.

Approved by the Head of the body and Information Officer:

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Bafana C Nkuna · Founder, Director and Information Officer, Onset Trading (Pty) Ltd

Date: _____