

INVICTUS OUTSOURCING SOLUTIONS

PAIA MANUAL

Promotion of Access to Information Act 2 of 2000

Prepared in terms of section 51, as amended, and incorporating applicable POPIA requirements

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Approval

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1. Introduction and purpose

The Promotion of Access to Information Act 2 of 2000, as amended (PAIA), gives effect to the constitutional right of access to information held by the State and to information held by another person / other entities where that information is required for the exercise or protection of a right. This Manual has been compiled by Invictus Outsourcing Solutions (Invictus) as a private body in terms of section 51 of PAIA.

The Manual also describes the processing of personal information by Invictus as required by section 51(1)(c) of PAIA, read with the Protection of Personal Information Act 4 of 2013 (POPIA). It is intended to help members of the public understand what records Invictus holds, how to request access and how Invictus processes and protects personal information.

The Manual enables a requester to:

- identify records that are available without a formal PAIA request;
- understand the subjects on which Invictus holds records and the categories of records held;
- submit a properly completed request for access to a record;
- identify the Information Officer responsible for dealing with requests;
- understand the applicable fees, time periods, grounds for refusal and remedies; and
- understand the categories, purposes, recipients, transborder flows and safeguards relating to personal information processed by Invictus.

Important: This Manual does not create a right of access beyond the rights provided by PAIA, POPIA and other applicable law. Each request will be considered on its own facts.

2. Scope and status of this Manual

This Manual applies to records in the possession or under the control of Invictus, irrespective of whether the records were created by Invictus. It covers records relating to Invictus's own operations and records processed while providing outsourced human resources, industrial relations, payroll, employment equity, skills development, occupational health and safety, B-BBEE, recruitment, training and related business services.

In relation to personal information, Invictus may act as a responsible party for its own business activities or as an operator processing personal information for a client under contract. The applicable role depends on who determines the purpose and means of the processing. A request concerning a client-controlled record may require consultation with that client or another affected third party.

This Manual should be read with Invictus's privacy notices, contractual confidentiality obligations, records-retention rules and information-security policies. If there is any inconsistency, applicable legislation prevails.

3. Definitions

Term	Meaning
Access fee	A prescribed fee payable for reproducing, searching for and preparing a record for disclosure, where applicable.
Client	A natural or juristic person that receives or has received services from Invictus.
Data subject	The person to whom personal information relates.
Deputy Information Officer or DIO	A person, if any, formally designated and registered to assist the Information Officer with PAIA and POPIA duties.
Guide	The guide on how to use PAIA prepared and updated by the Information Regulator under section 10 of PAIA.
Head of the Private Body	The person regarded as the head of a private body under PAIA. For this Manual, this function is performed by the Information Officer identified below.
Information Officer or IO	The person responsible for encouraging and ensuring compliance with PAIA and POPIA and registered with the Information Regulator as required.
Invictus	Invictus Outsourcing Solutions.
Operator	A person who processes personal information for a responsible party under a mandate or contract, without being under the direct authority of that responsible party.
PAIA	The Promotion of Access to Information Act 2 of 2000, as amended, and its regulations.
Personal information	Information relating to an identifiable living natural person and, where applicable, an identifiable existing juristic person, as contemplated in POPIA.
Personal requester	A requester seeking access to a record containing personal information about that requester.
Personnel	Employees, directors, temporary staff, contractors, consultants and other persons who perform work for or on behalf of Invictus.
POPIA	The Protection of Personal Information Act 4 of 2013 and its regulations.
Processing	Any operation or activity concerning personal information, including collection, receipt, recording, storage, use, disclosure, alteration, restriction, erasure or destruction.
Record	Recorded information in any form or medium that is in the possession or under the control of Invictus, whether or not Invictus created it.
Regulator	The Information Regulator established under POPIA.
Requester	A person making a request for access to a record under PAIA, including a person acting on behalf of another person.
Responsible party	A person who, alone or together with others, determines the purpose of and means for processing personal information.
Special personal information	Personal information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric information or alleged or proven criminal behaviour.
Third party	A person other than the requester and Invictus to whom a requested record relates.

4. Company and Information Officer details

Item	Details
Private body	Invictus Outsourcing Solutions
Information Officer	Peter McDermott
Capacity	CEO / Information Officer / Head of the Private Body
Telephone	086 173 7263
Email	peter@invictusgroup.co.za
General PAIA email	admin@invictusgroup.co.za
Postal address	P.O. Box 1127, Cresta, 2118
Physical address	Ground Floor, Wrigley Building, The Campus, 57 Sloane Street, Bryanston, 2021
Website	www.invictusgroup.co.za
Office hours	Normal business hours (8am to 5pm), excluding weekends and public holidays

Requests: All PAIA requests should be submitted to the Information Officer or the general PAIA email address. A person should not send a PAIA request to an individual consultant who is not authorised to process it.

The Information Officer has been appointed in accordance with POPIA and registered with the Information Regulator.

A Deputy Information Officer, if formally designated and registered, may assist the Information Officer. Unless otherwise communicated, requesters should use the contact details above. At date of publication, no Deputy Information Officer has been appointed.

5. PAIA Guide and the Information Regulator

The Information Regulator has prepared and made available a Guide explaining how to exercise rights under PAIA and POPIA. The Guide describes the objects of the legislation, the prescribed forms, fees, assistance available, complaints and court remedies. It is available in official languages and in accessible formats published by the Regulator.

A copy of the Guide may be obtained:

- from the Information Officer using the contact details in section 4;
- for public inspection at Invictus's head office during normal business hours, in English and Afrikaans; or
- from the Information Regulator's website.

Contact	Details
Name	Information Regulator (South Africa)
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

Contact	Details
Telephone	010 023 5200
Toll-free	0800 017 160
General email	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

Official PAIA information and forms: [Information Regulator PAIA portal](#)

6. Records available without a formal PAIA request

Invictus has not published a separate notice under section 52(2) of PAIA. The following public-facing records may nevertheless be accessed without completing a formal PAIA request, subject to availability, copyright and reasonable reproduction charges.

Category	Records	Access
PAIA and privacy information	Current PAIA Manual; public privacy notices; public website terms	Website and on request
Company information	Company profile; public contact information; general description of services	Website and on request
Published material	Newsletters; articles; media releases; public updates	Website and on request
Marketing material	Public brochures; service descriptions; event or training information	Website and on request
Recruitment information	Publicly advertised vacancies and application instructions	Website or relevant recruitment channel
Supplier and compliance information	Current public B-BBEE certificate or affidavit and public supplier information, where applicable	On request
Information Officer details	Name, role and published contact details	This Manual and on request

Confidential records: Personnel files, disciplinary records, payroll information, client records and third-party personal information are not automatically available. Access requires a formal request and remains subject to PAIA, POPIA and confidentiality obligations.

7. Records available in terms of other legislation

Invictus creates, receives and retains records under legislation applicable to its business and the services it provides. The list below is indicative and must be read subject to amendments and the applicability of each law to a particular record or service.

Legislation	Indicative records
Companies Act 71 of 2008	Incorporation and governance records; Memorandum of Incorporation; registers; resolutions; annual returns; financial records

Legislation	Indicative records
Basic Conditions of Employment Act 75 of 1997	Contracts; working-time, remuneration, leave and termination records; payroll records
Labour Relations Act 66 of 1995	Collective agreements; disciplinary and grievance records; union matters; dispute and CCMA records
Employment Equity Act 55 of 1998	Employment equity plans and reports; workforce profiles; consultation and committee records
Skills Development Act 97 of 1998	Training, learnership, skills planning, assessment and SETA records
Skills Development Levies Act 9 of 1999	Skills levy, Workplace Skills Plan and Annual Training Report records
Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002	UIF declarations, contributions, employee and benefit-claim records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Registration, return of earnings, injury-on-duty, claim and compensation records
Occupational Health and Safety Act 85 of 1993	Risk assessments; appointments; audits; inspections; incidents; training and committee records
National Minimum Wage Act 9 of 2018	Working-time and remuneration records relevant to minimum-wage compliance
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax returns; IRP5 certificates; PAYE records; supporting documents; SARS correspondence
Value-Added Tax Act 89 of 1991	VAT returns; tax invoices; input and output tax records; SARS correspondence
Broad-Based Black Economic Empowerment Act 53 of 2003	Ownership, management-control, skills, supplier and socio-economic-development records
Protection of Personal Information Act 4 of 2013	Privacy notices; processing records; consent and objection records; operator agreements; security-incident records
Promotion of Access to Information Act 2 of 2000	PAIA Manual; requests; decisions; fee, complaint and compliance records
Consumer Protection Act 68 of 2008	Client contracts; terms; complaints; service and marketing records, where applicable
Electronic Communications and Transactions Act 25 of 2002	Electronic communications; website terms; electronic transaction and signature records
Cybercrimes Act 19 of 2020	Cybersecurity incident, investigation and reporting records, where applicable
Copyright Act 98 of 1978	Training materials; manuals; reports; templates and other intellectual property
Employment Services Act 4 of 2014 and Immigration Act 13 of 2002	Recruitment and placement records; eligibility and right-to-work records, where applicable

Access: The existence of a statutory record does not make it automatically accessible. Every request remains subject to the requirements and grounds for refusal in PAIA and other applicable laws.

8. Subjects and categories of records held by Invictus

Subject	Categories of records
Corporate governance	Incorporation records; governance structures; policies; resolutions; registers; insurance; business continuity

Subject	Categories of records
Finance and tax	Accounting records; budgets; management accounts; annual financial statements; banking details; invoices; debtors; creditors; tax and audit records
Internal human resources	Personnel files; contracts; policies; remuneration; payroll; benefits; leave; attendance; performance; discipline; grievances; termination and post-employment records
Client administration	Proposals; quotations; engagement letters; service agreements; instructions; correspondence; service-delivery and relationship-management records
Industrial relations and employment law support	Investigations; disciplinary and incapacity processes; grievances; retrenchments; collective matters; settlement agreements; CCMA, bargaining council and court-related records
Payroll services	Employee master data; timesheets; remuneration; deductions; banking details; payslips; tax numbers and notices; UIF; leave and statutory submissions
Recruitment	Vacancies; applications; CVs; screening; interview notes; assessments; references; placement and candidate-consent records
Employment equity and skills development	Plans; reports; workforce profiles; committee minutes; training records; learnerships; WSP and ATR records
Occupational health and safety and COIDA	Risk assessments; policies; legal appointments; training; audits; incident reports; injury-on-duty claims; return-of-earnings and compliance records
B-BBEE	Ownership; management-control; skills; enterprise and supplier development; socio-economic-development and verification records
Training and intellectual property	Course material; facilitator and learner records; attendance; assessments; certificates; manuals; templates; copyright and licence records
Sales and marketing	Prospect and lead records; campaigns; newsletters; website enquiries; events; consent; opt-out and client-feedback records
Suppliers and contractors	Due diligence; contracts; purchase orders; invoices; banking; performance; confidentiality and operator agreements
Information technology and security	User accounts; permissions; device and software records; logs; backups; licences; service tickets; incidents; access-control and vendor records
PAIA, POPIA and compliance	Manuals; privacy notices; requests; decisions; complaints; processing inventories; risk assessments; operator records; breaches; training and regulator correspondence
Facilities and physical security	Visitor records; access-control logs; CCTV footage; incident reports; lease and premises records

9. How to request access to a record

A requester seeking access to a record that is not automatically available must complete the prescribed PAIA Form 2 and submit it to the Information Officer. The form may be delivered by email, post or hand using the details in section 4.

- Use PAIA Form 2: Request for Access to Record under regulation 7.
- Provide sufficient identification and, where acting for another person, proof of authority.
- Describe the requested record with enough detail to enable Invictus to identify and locate it.
- State the form of access required, such as inspection, an electronic copy or a printed copy.

- Identify the right to be exercised or protected and explain why the requested record is required for that purpose.
- Provide the address or email to which the decision and further communications must be sent.
- Pay the prescribed request fee or deposit where PAIA permits Invictus to require payment.

A requester who cannot complete the prescribed form because of illiteracy or a disability may make an oral request. The Information Officer will provide reasonable assistance, reduce the request to writing and provide a copy to the requester.

Private-body threshold: For access to a private-body record, the requester must show that the record is required for the exercise or protection of an identified right. A general interest in the information is not sufficient.

10. Decision, time periods and third-party consultation

10.1 Decision and time periods

Invictus will ordinarily notify the requester of its decision as soon as reasonably possible and within 30 days after receiving a properly completed request, subject to PAIA. The period may be extended once by no more than 30 additional days in circumstances permitted by PAIA, including where the request concerns a large quantity of records, requires a search at another location or requires consultation that cannot reasonably be completed within the original period. The requester will be notified of an extension and the reasons for it.

The outcome and any fees payable will be communicated substantially in the prescribed PAIA Form 3. If access is granted, Invictus will provide access in the requested form where reasonably possible and lawful. If access is refused, the notice will state adequate reasons and identify the applicable remedy.

10.2 Records not found or not in existence

If a record cannot be found or does not exist after reasonable steps have been taken, the Information Officer may give notice by affidavit or affirmation in accordance with section 55 of PAIA. If the record is later found, the requester will be notified and the request reconsidered, subject to any lawful ground for refusal.

10.3 Third-party consultation

Where a requested record relates to a third party and PAIA requires consultation, Invictus will take reasonable steps to notify that third party. The third party may make representations as to why access should be refused or consent to disclosure. Invictus will decide the request in accordance with PAIA and notify the requester and affected third party of the outcome.

10.4 Severability

Where only part of a record is protected from disclosure, Invictus will consider whether the protected portion can reasonably be severed and access granted to the remainder.

11. Fees

The fees below reflect the prescribed private-body fee structure published by the Information Regulator as at the issue date. Fees are subject to amendment by law. A personal requester is not liable for the request fee contemplated in section 54(1) of PAIA, but access and reproduction fees may still apply.

Description	Amount
Request fee	R140.00, where applicable
Photocopy or printed black-and-white A4 copy	R2.00 per page or part thereof
Printed copy of an A4-size page	R2.00 per page or part thereof
Copy on requester-provided flash drive	R40.00
Copy on requester-provided compact disc	R40.00
Copy on compact disc supplied by Invictus	R60.00
Transcription of visual images	Service-provider quotation
Copy of visual images	Service-provider quotation
Transcription of an audio record	R24.00 per A4 page
Audio copy on requester-provided flash drive	R40.00
Audio copy on requester-provided compact disc	R40.00
Audio copy on compact disc supplied by Invictus	R60.00
Search and preparation	R145.00 per hour or part thereof, excluding the first hour; prescribed maximum R435.00
Deposit where search exceeds six hours	One-third of the amount calculated in terms of the applicable access items
Postage, email or other electronic transfer	Actual expense, if any

Payment: Invictus may defer further processing or access until a lawfully required fee or deposit has been paid. If a request is refused after a deposit has been paid, the amount due to the requester will be refunded in accordance with PAIA.

12. Grounds on which access may or must be refused

Access is not automatic. Invictus may or must refuse access where a ground in Chapter 4 of Part 3 of PAIA applies, subject to the public-interest override and other exceptions in PAIA. Grounds include:

Ground	Summary
Third-party privacy	Unreasonable disclosure of personal information about a natural person, including certain information about a deceased person.
Third-party commercial information	Trade secrets; financial, commercial, scientific or technical information likely to cause harm; or information supplied in confidence that could prejudice negotiations or competition.

Ground	Summary
Confidential information	Information whose disclosure would constitute an action for breach of a duty of confidence owed to a third party under an agreement.
Safety and property	Information whose disclosure could endanger an individual's life or physical safety, or prejudice the security of a building, system, means of transport or other property.
Legal privilege	Records privileged from production in legal proceedings, unless the person entitled to the privilege waives it.
Invictus commercial information	Invictus trade secrets; commercially sensitive financial, technical or contractual information; information likely to prejudice negotiations or competition; and protected computer programs.
Research information	Research information whose disclosure would expose the subject matter, a researcher or a third party and place the research or researcher at a serious disadvantage.

12.1 Public-interest override

Despite a ground for refusal, access must be granted where section 70 of PAIA applies - namely, where disclosure would reveal evidence of a substantial contravention of or failure to comply with the law, or an imminent and serious public-safety or environmental risk, and the public interest in disclosure clearly outweighs the harm contemplated by the relevant ground for refusal.

13. Remedies and complaints

Invictus is a private body and does not have an internal PAIA appeal procedure. A requester or third party dissatisfied with a decision, fee, extension, form of access or failure to decide may use the external remedies provided by PAIA.

- First give Invictus a reasonable opportunity to respond to the request or concern using the Information Officer details in section 4.
- Submit a complaint to the Information Regulator using PAIA Form 5. For a private-body matter, the complaint must ordinarily be lodged within 180 days after the decision complained of, or after the applicable decision period expired.
- Approach a court with competent jurisdiction for appropriate relief in accordance with PAIA, including any applicable requirement to exhaust the relevant complaint procedure.

Complaint contact: PAIA complaints may be sent to PAIAComplaints@inforegulator.org.za. The current Form 5 and complaint guidance are available on the Information Regulator's website.

14. Processing of personal information

Invictus processes personal information only where there is a lawful justification and for purposes connected with its business, contractual duties, legal obligations or legitimate operations. Processing purposes may include:

- providing outsourced HR, industrial relations, payroll, employment equity, skills development, occupational health and safety, COIDA, B-BBEE, recruitment, training and related advisory services;

- onboarding, identifying and communicating with clients, personnel, candidates, learners, service providers and other stakeholders;
- performing contracts, administering service delivery, maintaining records, invoicing, collecting debts and making payments;
- recruiting, employing, remunerating, developing, managing and terminating personnel;
- administering payroll, tax, UIF, benefits, leave, workplace injury and statutory submissions;
- conducting workplace investigations, disciplinary and incapacity processes, grievances, retrenchments, disputes and litigation support;
- undertaking due diligence, background, qualification, reference, credit or criminal checks where lawful and appropriate;
- complying with legal, regulatory, professional, contractual, audit and reporting obligations;
- protecting people, premises, systems, confidential information, intellectual property and business operations;
- managing risk, fraud prevention, security incidents, business continuity, quality assurance and internal audits;
- marketing services, maintaining business relationships and managing consent and opt-out preferences in accordance with POPIA; and
- responding to enquiries, complaints, data-subject requests and PAIA requests.

Invictus may receive personal information directly from a data subject, from a client, from an employer, candidate, supplier, regulator, public source, verification provider or other authorised third party. Invictus will seek to process information that is adequate, relevant and not excessive for the identified purpose.

Invictus processes personal information only on one or more lawful grounds recognised in POPIA, including consent where applicable, contractual necessity, compliance with legal obligations, legitimate interests, and where necessary, for pursuing the legitimate interests of the responsible party, or a third party.

15. Categories of data subjects and personal information

Data-subject category	Personal information that may be processed
Clients and client representatives	Names; identity or registration details; roles; contact details; contracts; instructions; correspondence; billing, banking, tax and service records
Client employees and workers	Identification; contact; demographic; right-to-work; employment; attendance; leave; payroll; banking; tax; performance; disciplinary; grievance; health, disability, injury, union and dispute information
Employees, former employees and contractors	Identification; contact; qualifications; employment history; screening; contracts; remuneration; benefits; payroll; tax; banking; leave; performance; discipline; health; disability; access and termination records
Applicants and candidates	CVs; qualifications; employment history; contact and identification details; interview and assessment records; references; screening; remuneration expectations and placement records
Learners and training delegates	Identification; employer; contact details; attendance; assessment; competence; certification; feedback and payment information

Data-subject category	Personal information that may be processed
Suppliers, operators and service providers	Representative and company details; registration; contact; tax; B-BBEE; banking; contracts; invoices; due diligence; security and performance records
Directors, shareholders and beneficial owners	Identification; contact; ownership; governance; financial; tax; declarations; conflicts and statutory records
Website users, prospects and marketing contacts	Contact details; enquiries; preferences; consent; opt-outs; event participation; technical, device, cookie and usage information
Visitors and physical-access users	Name; contact; host; access times; vehicle details; CCTV images and incident information
Complainants, PAIA requesters and data subjects	Identification; contact; request or complaint details; evidence; correspondence; decisions and remedy records
Dependants, beneficiaries and emergency contacts	Names; relationship; contact; identification and benefit information where necessary for employment or statutory purposes

Special information: Where necessary and lawful, Invictus may process special personal information or information about children, including race for employment-equity purposes, health and disability information for employment or safety purposes, union information for labour-relations purposes, and dependant information for benefits. Additional safeguards and statutory authorisations apply.

16. Recipients of personal information

Recipient or category	Purpose
Clients and authorised client representatives	Delivery of contracted HR, IR, payroll, compliance, recruitment, training and related services
SARS, UIF, Compensation Fund and Department of Employment and Labour	Statutory registration, declarations, reporting, claims, inspections and compliance
CCMA, bargaining councils, courts, tribunals and regulators	Dispute resolution, proceedings, investigations, complaints and legal compliance
SETAs, training providers and professional or qualification bodies	Skills reporting, learnerships, training, assessment and verification
B-BBEE verification agencies, auditors and consultants	Verification, assurance, audit and compliance
Banks, payment processors and payroll providers	Payments, payroll administration, account verification and financial controls
Medical schemes, insurers, benefit administrators and occupational-health providers	Benefits, insurance, workplace health, incapacity and claims administration
Attorneys, advocates, auditors, debt collectors and other professional advisers	Legal advice, proceedings, audits, debt recovery, risk and governance
Background, qualification, reference and credit-verification providers	Lawful screening and verification
Cloud, software, hosting, communications, cybersecurity and IT-support providers	System operation, storage, support, security, backup and business continuity
Law-enforcement and public authorities	Compliance with lawful requests, investigations and prevention of crime or fraud
Group companies, successors or transaction parties	Internal administration, restructuring, due diligence or transfer of a business, subject to confidentiality and law

Personal information will be disclosed only where authorised by law, necessary for the identified purpose, required under contract, based on valid consent where consent is the appropriate basis, or otherwise permitted by POPIA. Operators are required to process information under appropriate contractual and security obligations.

17. Transborder flows of personal information

Invictus uses cloud-based, hosted and remotely supported business systems. Depending on the provider, system configuration, data-centre location and support arrangements, personal information may be stored in or accessed from jurisdictions outside South Africa. The information may include client, employee, payroll, recruitment, training, supplier, communications and system-support data.

Cross-border recipients may include contracted cloud-hosting, software, communications, cybersecurity, backup and professional-service providers. Transfers are permitted only where the requirements of section 72 of POPIA are met, including where the recipient 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 a contract; or another lawful ground applies.

Invictus's cross-border safeguards include, as appropriate:

- vendor due diligence and periodic review;
- operator, confidentiality and data-protection terms;
- access controls, encryption and secure transmission;
- data minimisation and retention controls; and
- incident-notification and cooperation obligations.

Provider locations: The exact jurisdiction may change when a provider changes its infrastructure or support model. Further non-confidential information may be requested from the Information Officer.

18. Information security safeguards

Invictus implements, and requires relevant operators to implement, reasonable and appropriate technical and organisational measures designed to preserve the confidentiality, integrity and availability of personal information. Invictus retains records only for as long as necessary to fulfil the purpose for which they were collected or as required by law, contractual obligation, or legitimate business interest. Records are securely destroyed or anonymised when retention is no longer required. Where required by POPIA, Invictus will notify the Information Regulator and affected data subjects of a security compromise as soon as reasonably possible. Safety measures are selected according to risk and may include:

Safeguard area	General measures
Governance	Information-security and privacy policies; assigned accountability; risk assessment; processing and asset records; periodic review
Identity and access management	Role-based access; least privilege; password controls; multi-factor authentication where supported; timely user provisioning and removal

Safeguard area	General measures
Technical protection	Encryption in transit and, where supported, at rest; endpoint protection; anti-malware; firewalls; patching; secure configuration and monitoring
Resilience	Backups; recovery procedures; business-continuity arrangements; availability monitoring and testing appropriate to the system
Physical protection	Controlled office and records access; visitor management; secure storage; CCTV or alarm controls where used
Personnel controls	Confidentiality undertakings; screening where appropriate; privacy and security awareness; disciplinary consequences for unauthorised access
Operator management	Due diligence; written operator agreements; confidentiality; security, incident-notification, return and deletion obligations
Records management	Retention schedules; secure disposal; access restrictions; legal holds and minimisation
Incident response	Internal escalation; containment; investigation; evidence preservation; notification to the Regulator and affected data subjects where required

Security-sensitive detail: To avoid weakening security, Invictus may refuse to disclose detailed system configurations, credentials, vulnerability information or other security-sensitive records, subject to PAIA.

19. POPIA rights and requests

Subject to POPIA and other applicable law, a data subject may request confirmation of whether Invictus holds personal information about them, request access to that information, object to certain processing, request correction or deletion, withdraw consent where processing depends on consent, and lodge a complaint with the Information Regulator.

Right	How to exercise it
Access to personal information	Use the PAIA access process and Form 2. Access may be subject to identity verification, fees and lawful grounds for refusal.
Objection to processing	Use POPIA Form 1 where section 11(3) applies. An objection is free of charge and must provide sufficient reasons where required on the form.
Correction or deletion	Use POPIA Form 2 to request correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained information, or destruction of a record Invictus is no longer authorised to retain.
Direct marketing	A data subject may withdraw consent or opt out of unsolicited electronic direct marketing using the mechanism provided in the communication or by contacting Invictus.
Complaint	Use POPIA Form 5 to complain to the Information Regulator about alleged interference with the protection of personal information.

Invictus may require reasonable proof of identity and authority before releasing or changing personal information. A correction or deletion request cannot override a lawful retention obligation, litigation hold, evidentiary need or other lawful basis for retaining the information.

20. Availability, approval and updating of the Manual

20.1 Availability

A copy of this Manual is available:

- on the Invictus website at www.invictusgroup.co.za;
- for public inspection at Invictus's head office during normal business hours, by prior arrangement;
- from the Information Officer on request, subject to any lawful reproduction fee; and
- to the Information Regulator on request.

20.2 Updating

The Information Officer will review this Manual at least annually and whenever a material change occurs, including a change to Invictus's contact details, services, records, processing activities, systems, security measures, applicable legislation or prescribed forms and fees. The latest electronic version supersedes earlier versions.

20.3 Approval

Item	Details
Prepared for	Invictus Outsourcing Solutions
Approval authority	Peter McDermott - Information Officer / CEO
Signature	
Date	1 September 2026

Appendix A. Prescribed forms and official resources

Use the latest version of each prescribed form published by the Information Regulator. The forms are not reproduced in this Manual because they may be amended independently of the Manual.

Resource	Purpose	Official source
PAIA Form 1	Request for a copy of the Guide from an Information Officer	Open PAIA forms
PAIA Form 2	Request for Access to Record	Open PAIA forms
PAIA Form 3	Outcome of Request and Fees Payable	Open PAIA forms
PAIA Form 5	Complaint Form	Open PAIA forms
POPIA Form 1	Objection to Processing of Personal Information	Open POPIA forms
POPIA Form 2	Request for Correction or Deletion	Open POPIA forms
POPIA Form 5	Complaint Regarding Interference with Personal Information	Open POPIA forms
PAIA Guide	Guide on how to use PAIA	Open official PAIA page
Fee schedule	Current PAIA fee structure and exemptions	Open official PAIA page

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