



**CrossCheck**

Local- & Central Government Information Bureau

## PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS  
TO INFORMATION ACT, 2 OF 2000 [AS AMENDED]

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## 1 DOCUMENT VERSION CONTROL AND DOCUMENT OWNERS

### 1.1 DOCUMENT VERSION CONTROL

Number	Date Issued	Created/ Amended By	Comments
<b>V1.00</b>	1 April 2021	Stephen Lindsay	
<b>V2.00</b>	8 July 2024	Dirk Badenhorst Nicolene Maree	Grammatical & Cosmetic changes; Removed reference that the PAIA guide is available in all official languages and in braille; Removed mentioning of BBEE Affidavit, as we have a Certificate; Adjusted wording of 11.2 & 11.4 so that the content reads better.
<b>V2.01</b>	23 June 2025	Dirk Badenhorst	Alignment with the amendment to the POPIA Regulations dated 17 April 2025
<b>V2.02</b>	7 July 2025	Dirk Badenhorst	Annual review and updates to contact information (removal of deputy information officer details), updates to 11.4 and 11.5. Inclusion of Annexure D (Form 1) & Annexure E (Form 2) from Regulations

### 1.2 DOCUMENT OWNERS

Name	Positions
<b>Alain Craven</b>	Chief Information Officer

## 2 LIST OF ACRONYMS AND ABBREVIATIONS

	Acronym / Abbreviation:	Description:
2.1	<b>"CEO"</b>	Chief Executive Officer
2.2	<b>"IO"</b>	Information Officer
2.3	<b>"Minister"</b>	Minister of Justice and Correctional Services
2.4	<b>"NCA"</b>	National Credit Act, 34 of 2005
2.5	<b>"PAIA"</b>	Promotion of Access to Information Act, 2 of 2000 and regulations as amended
2.6	<b>"POPIA"</b>	Protection of Personal Information Act, 4 of 2013 and regulations as amended.
2.7	<b>"Regulator"</b>	Information Regulator
2.8	<b>"Republic"</b>	Republic of South Africa
2.9	<b>"CrossCheck"</b>	CrossCheck Information Bureau (Pty) Ltd

## 3 PURPOSE

This PAIA Manual is useful for the public to:

- 3.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

- 3.3. know the description of the records of the body which are available in accordance with any other legislation;
- 3.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is processed.

## 4 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION AT CROSSCHECK

### 4.1 Information Officer

<b>Name and Surname</b>	Gcobisa Sakwe
<b>Postal Address</b>	PO Box 491, Randburg, 2194
<b>Telephone number</b>	010 590 9505
<b>Email</b>	info.officerCC@crosscheckonline.co.za

#### 4.2 General contact details for Access to Information

<b>Email</b>	info.officerCC@crosscheckonline.co.za
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#### 4.3 Company details

<b>Organisation's name</b>	CrossCheck Information Bureau (Pty) Ltd
<b>Registration number</b>	1997/015143/07
<b>Postal Address</b>	PO Box 491, Randburg, 2194
<b>Physical Address</b>	Bureau Place, Turnberry Office Park, 48 Grosvenor Road, Bryanston, 2021
<b>Telephone number</b>	010 590 9505
<b>Email</b>	<a href="mailto:info@crosscheckonline.co.za">info@crosscheckonline.co.za</a>
<b>Website</b>	<a href="https://www.crosscheckonline.com">https://www.crosscheckonline.com</a>

## 5 KEY CONTACT DETAILS OF THE INFORMATION REGULATOR

### 5.1 Information Regulator

The Information Regulator has taken over the function to regulate PAIA from the South African Human Rights Commission from the 30<sup>th</sup> of June 2021. The Information Regulator also regulates POPIA.

Contact details of the Information Regulator:

<b>Postal Address</b>	PO Box 3153, Braamfontein, Johannesburg, 2017
<b>Physical Address</b>	JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001
<b>Telephone</b>	+27 (0) 10 023 5200
<b>Email</b>	<a href="mailto:enquiries@infoeregulator.org.za">enquiries@infoeregulator.org.za</a>
<b>Website</b>	<a href="https://www.infoeregulator.org.za">https://www.infoeregulator.org.za</a>

## 6 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

6.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

6.2. The aforesaid Guide contains the description of-

6.2.1. the objects of PAIA and POPIA;

6.2.2. access to the postal and street address, phone and fax number and, if available, electronic mail address of-

6.2.2.1. the Information Officer of every public body, and

- 6.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 6.2.3. the manner and form of a request for-
- 6.2.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
- 6.2.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 6.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 6.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 6.2.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*



- 6.2.6.1. an internal appeal;
- 6.2.6.2. a complaint to the Regulator; and
- 6.2.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 6.2.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.2.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.2.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 5 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

6.2.10. the regulations made in terms of section 92<sup>11</sup>.

6.3. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

6.4. The Guide can also be obtained–

6.4.1. upon request to the Information Officer;

6.5. from the website of the Regulator (<https://info regulator.org.za/>)

## 7 REASONS FOR ACCESS REFUSAL

A private body such as CrossCheck Information Bureau is entitled to refuse a request for information.

7.1 The main grounds for CrossCheck Information Bureau to refuse a request for information relates to the:

7.1.1 mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63 of PAIA) or a juristic person, as included in the POPIA which would involve the unreasonable disclosure of personal information of that natural or juristic person;

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<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

7.1.2 mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of the POPIA;

7.1.3 mandatory protection of the commercial information of a third party (section 64 of PAIA) if the record contains:

7.1.3.1 trade secrets of the third party;

7.1.3.2 financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;

7.1.3.3 information disclosed in confidence by a third party to CrossCheck Information Bureau if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

7.1.4 mandatory protection of confidential information of third parties (section 65 of PAIA) if it is protected in terms of any agreement;

7.1.5 mandatory protection of the safety of individuals and the protection of property (section 66 of PAIA); and/or

7.1.6 mandatory protection of records which would be regarded as privileged in legal proceedings (section 67 of PAIA).

7.2 The commercial activities (section 68 of PAIA) of a private body, such as CrossCheck Information Bureau, which may include:

7.2.1 trade secrets of CrossCheck Information Bureau;

7.2.2 financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of CrossCheck Information Bureau;

7.2.3 information which, if disclosed could put CrossCheck Information Bureau at a disadvantage in negotiations or commercial competition;

7.2.4 a computer program which is owned by CrossCheck Information Bureau and which is protected by copyright; and/or

7.2.5 the research information (section 69 of PAIA) of CrossCheck Information Bureau or a third party, if its disclosure would disclose the identity of CrossCheck Information Bureau, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

7.3 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

7.4 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give

access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

You will be notified in writing on Form 3 as required by PAIA as to whether your request for information has been approved or denied within 30 (Thirty) calendar days after receipt of a completed request refer Form 2 as per Annexure A.

## 8 CATEGORIES OF RECORDS OF CROSSCHECK INFORMATION BUREAU (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The categories of records held by CrossCheck Information Bureau which are available without a person having to request access by completing Form 2 as per the PAIA regulations (27 August 2021). These are records that are available on the website (as indicated) and a person may download or request telephonically or by sending an e-mail or a letter.

Refer to **Table 1** for documents which are available as described above.

Table 1			
Category of records	Types of the Record	Available on Website	Available upon request
Compliance	Terms of use for the website	X	
Compliance	Privacy policy for the website	X	

Compliance	PAIA Manual	X	
Compliance	BBBEE certificate	X	
Compliance	Company registration document (CIPC) This includes names of Directors		X
Compliance	SARS Tax Compliance Status (TCS)		X
Compliance	VAT registration		X
Commercial	Free Credit Report Note: One free annual credit report can be obtained by contacting myfreecreditreport@ CrossCheckonline.co.za		X
Marketing	Company Profile		X
Marketing	Public Product Information		X
Marketing	Newsletters		X

## 9 DESCRIPTION OF THE RECORDS OF CROSSCHECK INFORMATION BUREAU (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

These are the records which are created and available in accordance with any of the South African legislation. These are records that are available by request telephonically or by sending an e-mail or a letter.

Refer to **Table 2:**

Table 2	

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act number 71 of 2008
PAIA Manual	Promotion of Access to Information Act number 2 of 2000
PAIA Guides (Issued by Information Regulator and available on request)	Promotion of Access to Information Act number 2 of 2000

## 10 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CROSSCHECK INFORMATION BUREAU (PTY) LTD

The subjects in respect of which CrossCheck Information Bureau holds records and the categories of records held on each subject is depicted in **Table 3** below and a person can request access by completing Form 2 as per the PAIA regulations (27 August 2021) (Refer Annexure A for example of Form 2).

Table 3	
Subjects on which the body holds records	Categories of records
Compliance	<ul style="list-style-type: none"> <li>○ Policies and procedures</li> <li>○ Minutes of Board of Directors meetings</li> <li>○ Register of Board of Directors</li> <li>○ Form 44 (NCA) – Quarterly Synoptic Report</li> </ul>

**Table 3**

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>○ Form 43 (NCA) – Annual Compliance Review and Report</li> <li>○ Personal Information Impact Assessment</li> </ul>
Sales and Marketing	<ul style="list-style-type: none"> <li>○ Marketing Strategy</li> <li>○ List of clients and prospects</li> <li>○ CRM System with details of clients</li> <li>○ Client agreements</li> <li>○ Client files</li> <li>○ Client correspondence</li> <li>○ Sales Records</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>○ HR policies and procedures</li> <li>○ Advertised posts</li> <li>○ Employment contracts</li> <li>○ Employees records (including personal information)</li> <li>○ Employment equity plan</li> <li>○ Medical aid records</li> <li>○ Pension fund records</li> <li>○ Performance management records</li> <li>○ Employee benefit records</li> <li>○ Payroll records (including PAYE)</li> <li>○ Employee leave records</li> <li>○ SARS records (e.g. IRP5's)</li> <li>○ UIF records</li> </ul>



Table 3	
Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>○ Reporting (Employment Equity and Workplace skills plan)</li> <li>○ Training attendance register</li> <li>○ Disciplinary and grievance records</li> </ul>
Technology	<ul style="list-style-type: none"> <li>○ Information Security Policies</li> <li>○ Register of hardware</li> <li>○ Register of software</li> <li>○ Record of Access to systems</li> </ul>
Operations	<ul style="list-style-type: none"> <li>○ Rental agreements</li> <li>○ Non-disclosure agreements</li> <li>○ Supplier agreements</li> <li>○ Internal correspondence (emails/memos)</li> <li>○ Credit Bureau information (Natural as well as Juristic persons information)</li> <li>○ Dispute information</li> <li>○ Correspondence with consumers</li> </ul>

## 11 PROCESSING OF PERSONAL INFORMATION

### 11.1 Purpose of Processing Personal Information

There are various types of personal information that CrossCheck Information Bureau deal with. Refer to **Table 4** for the purpose per category of data subjects.

## 11.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

The categories of data subjects in respect of whom CrossCheck Information Bureau processes personal information and the nature or categories of the personal information being processed are depicted in **Table 4**.

Table 4		
Categories of Data Subjects	Personal Information that may be processed	Purpose
Clients and prospective clients	<u>Natural People</u> Names, ID numbers, date of birth, email address, physical address, postal address and contact numbers  <u>Juristic People</u> (such as companies) Name, company registration numbers Names, registration number, VAT numbers, physical address, e-mail address, postal address, contact numbers, company registration information and financial data.	To service our clients and to invoice them for the products sold or services rendered.

Table 4		
Categories of Data Subjects	Personal Information that may be processed	Purpose
Service Providers (including Suppliers/Vendors/Creditors)	Names, registration number, VAT numbers, physical address, e-mail address, postal address, contact numbers, company registration information, BEE status documents, SARS Tax Clearance, bank details, financial data.	To engage and pay service providers for products received or services that they have performed.
Consumers	<u>Natural People</u> Consumer Credit Information as per Section 70 (1) of the National Credit Act no 34 of 2005. <u>Juristic People (such as companies)</u> Consumer Credit Information as per Section 70 (1) of the National Credit Act no 34 of 2005.	To provide consumer reports that might also include consumer credit reports to our clients.
Employees and Contractors	Name and surname, ID numbers, passport, date of birth, marital status, next	To employ staff and contractors.

Table 4		
Categories of Data Subjects	Personal Information that may be processed	Purpose
	of kin and family details, email address, physical address, postal address, education and qualifications, gender and race, contact numbers, bank details, salary/remuneration amount, tax details and reference checks.	<p>To maintain employee records.</p> <p>To pay the employees and contractors.</p> <p>To comply with the necessary legislation and with company policies and procedures.</p>

### 11.3 The recipients or categories of recipients to whom the personal information may be supplied

The person or category of persons to whom CrossCheck Information Bureau may disseminate personal information is depicted in **Table 5**.

Table 5	
Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Names and Surname, Identity number for criminal checks	South African Police Services
Names and Surname, Identity number, qualifications for qualification verifications	South African Qualifications Authority

#### 11.4 Objection of processing of personal information

A data subject who wishes to object to the processing of personal information by CrossCheck Information Bureau must submit the objection to CrossCheck Information Bureau at any time during office hours. There will be no charge for sending or receiving the objection.

The data subject must object using the prescribed Form 1 (POPIA) as depicted in the POPIA Regulations dated 17 April 2025 (Refer to Annexure D) or a substantially similar document made available to the data subject. The objection to the processing of personal information can be submitted to CrossCheck Information Bureau via hand, fax, post, e-mail, SMS or WhatsApp or another method agreed with CrossCheck Information Bureau. Refer to the contact details of CrossCheck Information Bureau stipulated in paragraph 3.1.

We have also uploaded POPIA Form 1 to our website for ease of reference.

When collecting personal identifiable information directly from a data subject as depicted in Section 18, CrossCheck Information Bureau will inform the data subject in terms of Section 18(1)(h)(iv) of POPIA, of their right to object to the processing of their personal information, as referred to in Section 11(3) of POPIA.

If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by CrossCheck Information Bureau.

#### **11.5 Correction or deletion of personal Information**

CrossCheck Information Bureau acknowledge that the data subject has the right, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.

A data subject, who wishes to request the destruction or deletion of a record of his, her, or its personal information, in terms of section 24(1) (b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time. The request for destruction or deletion will be free of charge.

The data subject must request for a correction or deletion of personal information on Form 2 (POPIA) (Refer Annexure E) as depicted in the POPIA Regulations dated 17 April 2025. This will be free of charge. The correction or deletions of personal information can be submitted to CrossCheck Information Bureau via hand, fax, post, email, SMS, WhatsApp message or another method agreed with CrossCheck Information Bureau. Refer to the contact details of CrossCheck Information Bureau stipulated in paragraph 3.1.

A request for a correction or deletion of personal information by telephonic means shall be recorded by CrossCheck Information Bureau and such recording must, upon

request, will be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.

We have also uploaded POPIA Form 2 to our website for easy reference.

On receipt of this request, and after CrossCheck Information Bureau have verified the identity of the data subject, we will provide the data subject with a record of the data subjects personal information that CrossCheck Information Bureau have. After evaluation we will then do the following:

- correct the information;
- destroy or delete the information;
- provide the data subject, to his or her satisfaction, with credible evidence in support of the information; or
- where agreement cannot be reached between CrossCheck Information Bureau and the data subject, and if the data subject so requests, take such steps as are reasonable in the circumstances, to attach to the information in such a manner that it will always be read with the information, an indication that a correction of the information has been requested but has not been made.

If the case where the data subject still don't agree with CrossCheck Information Bureau, the data subject has a right to refer the matter to the Information Regulator, refer paragraph 4.1 for the details of the Information Regulator.

CrossCheck Information Bureau will within thirty (30) days of receipt of the outcome of the request, notify a data subject, in writing, of the action taken as a result of the request.

## **11.6 Planned transborder flows of personal information**

CrossCheck Information Bureau does not intend to transfer Personal Information outside of South Africa, but if it does, it will only do so to secure or back up such Personal Information or for technical reasons. If Personal Information is transferred outside of South Africa, CrossCheck Information Bureau will only transfer such Personal Information to other countries who have similar privacy and data protection laws as those in South Africa that provides an adequate level of protection, as required by section 72 of POPIA.

## **11.7 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

CrossCheck Information Bureau is committed to ensuring that personal and sensitive Information is secure. In order to prevent unauthorised access or disclosure to any Personal Information, CrossCheck Information Bureau has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information it collects.

CrossCheck Information Bureau makes use of secure data transmission and storage technologies to reasonably protect personal and sensitive Information from unauthorised disclosure and to maintain the integrity of personal and sensitive Information. CrossCheck Information Bureau organisation takes all reasonable technical and organisational measures to ensure the security of Personal and sensitive Information.



CrossCheck Information Bureau have comprehensive information security policies and procedures and have implemented security measures the cover the following areas:

- 11.7.1 **Physical** – Personal and sensitive information processed onsite and at reputable data centres in South Africa with the necessary physical measures in place;
- 11.7.2 **Logical** – Only people that must have access to information/data to perform their tasks have the required access. Strong passwords are used to protect information/data that is classified as restricted/confidential;
- 11.7.3 **Operational** – Anti-malware and anti-virus solutions are used; vulnerability tests are done and backups are made on a regular basis;
- 11.7.4 **Employees** – Prospective employees have been screened before appointment. This includes reference checks and criminal checks. Employees are also trained in relation to policies and procedures as and when required.

## 12 INFORMATION WE HOLD TO COMPLY WITH THE LAW

Where applicable to its operations, CrossCheck Information Bureau also retains records and documents in terms of the legislation described below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the specific Act; the below mentioned legislation and applicable internal policies and procedures, should such interested parties be

entitled to such information. A person can request access by completing Form 2 as per the PAIA regulations (27 August 2021) (Refer Annexure A for example of Form 2).

It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in paragraph 6 of this Manual.

CrossCheck Information Bureau hold information in accordance with the following legislation:

- Basic Conditions of Employment Act, 75 of 1997;
- Broad – Based Black Economic Empowerment Act, 53 of 2003;
- Companies Act, 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act, 130 of 1993;
- Competition Act, 89 of 1998;
- Constitution of the Republic of South Africa 1996;
- Consumer Protection Act, 68 of 2008;
- Copyright Act, 98 of 1978;
- Customs and Excise Act, 91 of 1964;
- Electronic Communications and Transactions Act, 25 of 2002;
- Employment Equity Act, 55 of 1998;
- Estate Agencies Affairs Act, 112 of 1976;
- Financial Intelligence Act, 38 of 2001;
- Income Tax Act, 58 of 1962
- Intellectual Property Laws Amendment Act, 38 of 1997 as amended;
- Labour Relations Act, 66 of 1995;
- Local Government: Municipal Systems Act 32 of 2000
- National Credit Act, 34 of 2005;
- Occupational Health and Safety Act, 85 of 1993;
- Pension Funds Act, 24 of 1956;

- Prescription Act, 68 of 1969;
- Promotions of Access to Information Act, 2 of 2000;
- Protection of Personal Information Act, 4 of 2013;
- Public Finance Management Act, 1 of 1999;
- Public Procurement Act, 28 of 2024;
- Short Term Insurance Act, 53 of 1998;
- Skills Development Act, 97 of 1998;
- Skills Development Levies Act, 9 of 1999;
- Unemployment Insurance Act, 63 of 2001;
- Unemployment Insurance Contributions Act, 4 of 2002;
- Value Added Tax Act, 89 of 1991.

## 13 BUREAU DATA SOURCES

To fulfil our duties as a credit bureau we are entitled, by law, to collect your personal information from the following data providers:

- 13.1 Credit providers and other registered data contributors, whose information we are obliged by the NCA to accept;
- 13.2 Government departments, courts and judicial offices;
- 13.3 Providers of long-term and short-term insurance;
- 13.4 Fraud investigators;
- 13.5 Educational institutions;
- 13.6 Debt Collectors;

13.7 Other registered credit bureaus.

## 14 HOW MUCH WILL IT COST YOU?

14.1. Section 52(3) of PAIA states that fees payable for access to records are to be prescribed.

14.2. Refer to Annexure B for Form 2 of PAIA (Outcome of request and of fees payable) and Annexure C for the detailed fees schedule in respect of private body's that was published in the PAIA regulation dated 27 August 2021.

## 15 AVAILABILITY OF THE MANUAL

15.1. A copy of the Manual is available-

15.1.1. on website of CrossCheck Information Bureau ([www.crosscheckonline.com](http://www.crosscheckonline.com));

15.1.2. head office of CrossCheck Information Bureau (Pty) Ltd for public inspection during normal business hours;

15.1.3. to any person upon request; and

15.1.4. to the Information Regulator upon request.

## 16 UPDATING OF THE MANUAL

The Information Officer in unification with the Legal & Compliance Team of CrossCheck Information Bureau (Pty) Ltd will on an annual basis update this manual.

## 17 NEXT REVISION DATE

The document will be reviewed on an annual basis.

## 18 ANNEXURES

See attached:

<b>A</b>	Form 2 of PAIA	Request for Access to Record	7 of PAIA
<b>B</b>	N/A	Fees Schedule	Annexure B of PAIA Regulations of 27 <sup>th</sup> of August 2021
<b>C</b>	Form 3 of PAIA	Outcome of Request and of Fees Payable	8 of PAIA
<b>D</b>	Form 1 of POPIA	Objection to the Processing of Personal Information	2 of POPIA
<b>E</b>	Form 2 of POPIA	Request for Correction of Deletion of Personal Information or Destroying or Deletion of Record	3 of POPIA

### **ANNEXURE A - FORM 2 - REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

#### **NOTE:**

- Proof of identity must be attached by the requester.*
- If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer


(Address)

E-mail address: 

--

Fax number: 

--

Mark with an "X"

☐ Request is made in my own name      ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made ( <i>when made on behalf of another person</i> )				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1" style="display: inline-table;"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request are made ( <i>if applicable</i> ):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b> (Mark the applicable box with an "X")</p>			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			

Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	



<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, videorecordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

## ANNEXURE B – FEES SCHEDULE

The fees schedule for private body's as per the PAIA regulation dated 27 August 2021 is depicted below.

<b>Nr</b>	<b>Item</b>	<b>Cost per A4 Size page or part thereof/item</b>	<b>Number of pages/items</b>	<b>Total</b>
1	The requester fee payable by every requestor	R 140.00		
2	Photocopy	R2.00 per page or part thereof	To be advised	To be advised
3	Printed copy	R2.00 per page or part thereof	To be advised	To be advised
4	For a copy in a computer-readable form on: (i) Flash drive To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R 40.00  R 40.00 R 60.00	To be advised	To be advised
5	For a transcription of visual images per A4 size-page	Service to be outsourced. Will depend on the quotation of the service provider	To be advised	To be advised
6	Copy of visual images		To be advised	To be advised
7	Transcription of an audio record, per A4-size	R24.00	To be advised	To be advised
8	Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00  R40.00 R60.00	To be advised	To be advised
9	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed the total cost of	R145.00  R435.00	To be advised	To be advised
10	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.	To be advised	To be advised
11	Postage, email or any other electronic transfer.	Actual costs	To be advised	To be advised

<b>TOTAL</b>	To be advised
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## ANNEXURE C – FORM 3 – OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

- If your request is granted the—
  - amount of the deposit, (if any), is payable before your request is processed; and
  - requested record/portion of the record will only be released once proof of full payment is received.
- Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

### 1. You requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
--	--

OR

### 2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

### 3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	

Preferred language:

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

☐ Yes

☐ No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
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The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch Code: \_\_\_\_\_

Reference Nr: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
*Information officer*

**ANNEXURE D - POPIA FORM 1 - OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021 [Regulation 2]**

*Note:*

- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form.*
- Complete as is applicable.*

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname/ registered name of data subject:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	

C	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a)</b> <i>(Please provide detailed reasons for the objection)</i>

Signed at ..... this ..... day of  
.....20.....

.....  
*Signature of data subject/designated person*



**ANNEXURE E - POPIA FORM 2 - REQUEST FOR CORRECTION OR DELETION OF  
PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD**

**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION  
OR DESTROYING OR DELETION OF RECORD OF PERSONAL  
INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF  
PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL  
INFORMATION, 2021**

[Regulation 3]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

**Request for:**

- a) Correction ☐ or deletion ☐ of personal information about the data subject which is in possession or under the control of the responsible party.

*Please select applicable reasons for the selected request:*

- (a) Inaccurate ☐
- (b) Irrelevant ☐
- (c) Excessive ☐
- (d) Out of Date ☐
- (e) Incomplete ☐
- (f) Misleading ☐
- (g) Obtained unlawfully ☐

- b) Destruction ☐ or deletion ☐ of a record of personal information about the data subject which is in the possession or under the control of the responsible party who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Postal or business address:	
	Code (      )
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Postal or business address:	
	Code (      )
Contact number(s):	
Fax number/ E-mail address:	
C	PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED
	<i>(Please specify the personal information required to be corrected / destroyed / deleted)</i>
D	EXPLANATION FOR THE SELECTED REASON FOR A REQUEST
	<i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party)</i>

Signed at ..... this ..... day of  
.....20.....

.....  
*Signature of data subject/ designated person*

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