



Promotion of Access to Information Act (PAIA) Manual

(V2.1)

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Version	Date	Description / Changes	Approved / Adopted By	Reference
1.0	December 2024	Initial PAIA Manual	Board of Directors	Minutes of Meeting
2.0	21 October 2025	Update to include revised PAIA and POPIA provisions, updated Deputy Information Officer, and organisational changes	Board of Audit Committee	Noted in Minutes of Meeting – 21 October 2025
2.1	19 May 2026	Enhancement of PAIA Manual to address Information Regulator requirements and strengthen alignment with PAIA and POPIA	Executive Compliance Committee	Exco Compliance Committee

1. Definitions / Glossary of Terms

Postbank/ the Bank	The South African Postbank SOC Limited Postbank a state-owned entity providing banking services and operating under the relevant legislation and regulatory framework, including PAIA and PoPIA.
Act	Refers to the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended, and includes any regulations published in terms of the Act.
Access Fee	The fee charged to a requester for accessing records in terms of PAIA.
Business Day	Any day other than a Saturday, Sunday, or public holiday in South Africa.
Confidential Information	Information deemed sensitive, whether under law or contract, that may not be disclosed as it could harm the interests of Postbank or a third party.
Consent	The voluntary, informed, and specific agreement by a data subject to the processing of their personal information, as required by PoPIA.
Data Breach	A security incident in which personal information is accessed, disclosed, or destroyed in a manner that compromises its confidentiality, integrity, or availability, as defined under PoPIA.
Data Subject	Any natural or juristic person to whom personal information relates, as defined in PoPIA. For example, Postbank customers or employees whose personal information is processed.
Deputy Information Officer	One or more Deputy Information Officers are appointed in terms of section 17 of PAIA to support the Information Officer in carrying out their duties. Deputy Information Officers are responsible for receiving and facilitating requests, assisting in complaint handling, and

	ensuring compliance with Postbank's PAIA and PoPIA obligations.
Exemptions	Categories of information that may be exempt from disclosure under PAIA, such as confidential business information or personal information protected under PoPIA.
Information Officer	The individual appointed by Postbank in terms of PAIA and PoPIA, responsible for ensuring compliance with both acts, including handling requests for access to information and overseeing the protection of personal information.
Manual	This document, which serves as Postbank's PAIA Manual, outlining processes and procedures for requesting access to information held by Postbank.
PAIA	The Promotion of Access to Information Act, 2000, which aims to give effect to the constitutional right of access to information held by the state or another person that is required for the exercise or protection of any rights.
Personal Information	Any information relating to an identifiable, living natural person or an existing juristic person as defined in PoPIA. This includes names, identity numbers, contact details, biometric data, and financial information.
Private Body	Any juristic entity, including a company, trust, or partnership, carrying on business in South Africa, excluding public bodies.
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction, as per PoPIA.
PoPIA	The Protection of Personal Information Act, 2013 (Act No. 4 of 2013), which regulates the processing of personal information to ensure that information is collected, used, and shared responsibly and transparently.

Public Body	Any department of state or administration in the national, provincial, or local sphere of government, or any other institution performing a public function in terms of legislation.
Public Finance Management Act (PFMA)	The Public Finance Management Act No. 1 of 1999 is legislation in South Africa that regulates the management of public funds by government entities. It aims to ensure transparency, accountability, and effective financial management within the public sector. The PFMA establishes the framework for the budgeting, reporting, and auditing of government finances, ensuring that funds are used efficiently and for their intended purposes.
Third Record	Any recorded information, in any form or medium, regardless of when it was created, that is under the control of Postbank and subject to PAIA.
Requester	Any person (natural or juristic) who submits a request for access to a record of Postbank under PAIA
Third Party	Any person, other than the requester or Postbank, who may be affected by the release of information requested under PAIA.

2. Introduction

The Promotion of Access to Information Act No. 2 of 2000 (PAIA), as amended, gives effect to Section 32(1)(a) and (b) of the Constitution of the Republic of South Africa, 1996. This section guarantees the right of access to information held by public and private bodies when such information is required for the exercise or protection of any rights.

The Protection of Personal Information Act No. 4 of 2013 (PoPIA) gives effect to Section 14 of the Constitution, which provides for the right to privacy, ensuring that personal information is safeguarded from misuse.

As a state-owned entity and public body, Postbank SOC Limited (Postbank/the Bank) is subject to the requirements of PAIA, PoPIA, and other applicable legislation, regulations, and supervisory body directives. In fulfilling its mandate, Postbank is committed to promoting transparency and accountability while ensuring the protection of personal information.

3. Purpose

The purpose of this Postbank PAIA Manual is to inform requesters of the procedural and other requirements that a request for information must meet, as prescribed by PAIA.

Section 9 of PAIA recognizes that the right to access information is not absolute and is subject to justifiable limitations, including but not limited to:

- Commercial confidentiality;
- The promotion of effective, efficient, and good governance;
- Reasonable protection of privacy.

These limitations ensure that the right to access information is balanced with other rights, such as those enshrined in the Constitution, as well as Postbank's obligations under applicable legislation, regulations, and supervisory requirements.

4. Access to Records Held by Postbank

4.1. General Access Requirements- Records held by Postbank may be accessed by request only after the necessary procedural requirements have been met, in accordance with PAIA and PoPIA.

4.2. Types of Requesters-

- **Personal Requester:** A requester who seeks access to records containing personal information about themselves. Postbank will voluntarily provide a personal requester with access to such records, subject to verification of identity and without requiring compliance with the procedural requirements applicable to other requesters.

- **Other Requester:** Any requester who is not a personal requester. These requesters must follow the procedural steps outlined by PAIA and may be subject to limitations or refusal based on the nature of the requested records.

4.3. Proactive Disclosure of Information

In line with section 15 of PAIA, Postbank may voluntarily and proactively make certain categories of information available to the public, without requiring a formal PAIA request. This includes, but is not limited to:

- Annual reports and audited financial statements.
- Strategic plans and performance reports.
- Public procurement information and tenders.
- Regulatory submissions and compliance disclosures where legally permissible. Such information will be published on Postbank's official website or through other appropriate channels.

5. **Types of Records Held by Postbank**

Postbank maintains records in accordance with its legislative mandate, operational activities, and regulatory obligations. Records are categorised as set out below:

5.1 Availability of Records

The records listed below are held by Postbank in the ordinary course of its operations as a state-owned company and a participant in the South African banking sector.

Access to these records is not automatic and will only be granted upon submission of a valid request in terms of the Promotion of Access to Information Act, 2000 (PAIA), and subject to the applicable grounds for refusal provided for in the Act.

In assessing requests, Postbank applies:

- its obligations as a public entity under PAIA; and
- its responsibilities as a financial institution operating within the South African banking sector, including adherence to applicable industry standards and practices.

Postbank aligns its information-handling practices with recognised banking sector standards, including principles reflected in the Banking Association South Africa (BASA) Code of Conduct for the Processing of Personal Information by the Banking Industry, particularly in relation to the protection of customer confidentiality, financial information, and the security of banking systems.

Accordingly, access to records may be refused where disclosure would:

- compromise the privacy of customers or third parties;
- reveal confidential, proprietary, or commercially sensitive banking information;
- prejudice the security, integrity, or operational functioning of Postbank's systems or infrastructure; or
- contravene applicable legislation, regulatory requirements, or contractual obligations.

The inclusion of a record category in this Manual does not imply that access will be granted, and all requests will be assessed strictly in accordance with PAIA.

5.2 Statutory and Regulatory Records

- Compliance registers and reports
- Regulatory submissions
- Policies and governance documents

5.3 Customer and Account Records

- Customer identification and onboarding records (KYC)
- Account records and transaction histories
- Card, ATM and digital banking records
- Social grant beneficiary records

5.4 Financial and Accounting Records

- Financial statements
- Payment and transaction records
- Audit reports

5.5 Risk, Compliance and Governance Records

- Risk registers and mitigation plans
- Internal audit reports
- Compliance monitoring reports
- Board and committee documentation

5.6 Human Resources Records

- Employee records
- Payroll records
- Recruitment and vetting records
- Training records

5.7 Information Technology and Security Records

- System logs and access records
- Cybersecurity monitoring records
- Incident reports

5.8 Third-Party and Vendor Records

- Contracts and service level agreements (SLAs)
- Due diligence records
- Vendor onboarding records

5.9 Operational and Administrative Records

- Internal correspondence

- Operational reports
- Policies and procedures

6. Processing of Personal Information in terms of POPIA

Postbank processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").

Postbank is committed to ensuring that personal information is processed in a lawful and reasonable manner that does not infringe the privacy of data subjects.

Postbank adheres to the conditions for lawful processing of personal information, which include:

- accountability;
- processing limitation;
- purpose specification;
- further processing limitation;
- information quality;
- openness;
- security safeguards; and
- data subject participation.

Postbank processes personal information for purposes including, but not limited to:

- customer onboarding and account management;
- administration of social grant payments;
- compliance with legal and regulatory obligations;
- fraud prevention and risk management;
- employee and operational processing activities.

Data subjects have the right to:

- request access to their personal information;
- request correction or deletion of their personal information;
- object to the processing of their personal information;
- lodge a complaint with the Information Regulator.

Requests relating to personal information must be submitted using the prescribed POPIA forms and directed to the Information Officer or Deputy Information Officer.

Postbank's detailed approach to the processing of personal information is set out in the Customer Privacy Policy, available on the Postbank website.

7. Request Procedure

- 7.1. The requester must comply with the procedural requirements as outlined in PAIA when requesting access to a record/s.
- 7.2. The requester must complete **Annexure A – Form 02: Request for Access to Record** (available under the PAIA section on the Postbank SOC Limited website)

and submit it together with the required request fee and, where applicable, a deposit, to the Information Officer of Postbank SOC Limited.

Submission can be made via any of the following channels:

Telephone- Customer Care	0800 53 54 55
Email	compliance@postbank.co.za
Physical Address:	National Postal Centre (NPC) Corner 497 Sophie de Bruyn & Jeff Masemola Streets Pretoria 0002
Postal Address;	P.O Box 10 000 Pretoria 0001
Website:	www.postbank.co.za
Information Officer	Ms Nikki Mbengashe

7.3. The prescribed form must contain sufficient information to enable the Postbank Information Officer to:

- Identify the record/s requested.
- Identify the requester.
- Specify the form of access required if the request is granted.
- Provide the postal address or email address of the requester.

7.4. The requester must:

- State that the information is required to exercise or protect a right.
- Clearly specify the nature of the right to be exercised or protected.
- Explain why the requested records are necessary to exercise or protect such a right.

7.5. Postbank will process the request within thirty (30) business days. Where an extension is necessary (e.g., if the request is for a large volume of information or requires consultation with third parties), Postbank may extend the period for a further thirty (30) business days, as permitted under PAIA. The requester will be notified in writing of the extension and reasons.

7.6. The requester will be informed in writing whether access has been granted or refused. If the requester requires reasons for the decision, they must specify the preferred manner in which such reasons should be communicated.

7.7. If the request is made on behalf of another person, proof of the requester's capacity to act on behalf of that person must be submitted to the reasonable satisfaction of the Postbank Information Officer.

- 7.8. The requester must pay the prescribed access fee before further processing can take place.
- 7.9. If a requester is unable to complete the prescribed form due to a disability or illiteracy, the requester is to liaise with the Postbank Information Officer.
- 7.10. Requests may be submitted to the Information Officer or a designated Deputy Information Officer. All Deputy Information Officers act with delegated authority and must maintain an internal log of requests received and processed.

8. Grounds for Refusal of Access to Records

Postbank may refuse access to certain records based on the following justifiable grounds, as provided for in PAIA:

- 8.1. Protection of the Privacy of Third Parties- Access may be denied if disclosure would result in an unreasonable invasion of personal privacy.
- 8.2. Protection of Commercial Information- Access to financial, technical, or other commercial information may be refused if disclosure could cause harm to the interests of Postbank or third parties.
- 8.3. Confidentiality of Third-Party Information- Access may be refused if the information is subject to confidentiality agreements or legally protected.
- 8.4. Legal Privilege- Records that are protected by legal professional privilege will not be disclosed.
- 8.5. Safety and Security Considerations- Access may be denied if disclosure could endanger the safety of individuals or compromise the security of property.
- 8.6. Protection of Personal Information- In accordance with PoPIA, access to records containing personal information is restricted. Such information may only be accessed by the data subject, their authorised representative, or other parties with a legal right to such access.

9. Third-Party Information Requests and Risk Management

9.1. Third-Party Risk Assessment Procedure

Postbank is committed to safeguarding personal and sensitive information when dealing with third parties. To this end, the following steps will be implemented:

- 9.1.1 Risk Assessment for Information Sharing-
 - a) Initial Evaluation: Prior to sharing information, conduct a thorough risk assessment of the third party, including their business purpose and necessity for the data.
 - b) Approval Process: Secure approval from the Information Officer or a designated committee before sharing any personal or sensitive information.

9.1.2. Due Diligence Questionnaire

- a) Objective: Evaluate the third party's data privacy and security measures.
- b) Key Questionnaire Areas: Policies and procedures on data protection and regulatory compliance (e.g., PoPIA).
- c) Security infrastructure, including encryption and access controls.
- d) Incident management and reporting protocols.
- e) Past data breaches or violations, if any.

9.1.3. Assessment Outcomes: Based on responses, classify the third party as high, medium, or low risk, and apply corresponding safeguards.

9.2. Handling Third-Party Information Requests

9.2.1. Request Verification: Authenticate the legitimacy of the request by verifying the identity and authority of the requesting party.

9.2.2. Consent Requirements: Ensure appropriate consent has been obtained from the data subject before disclosing information.

9.2.3. Minimum Disclosure Principle: Share only the information strictly necessary to fulfill the request's purpose.

9.3. Incident Management Requirements

Third parties granted access to personal information must adhere to Postbank's incident management standards.

9.4. Reporting Protocols

9.4.1. Mandatory Reporting: Third parties must notify Postbank of any data breaches, suspected breaches, or incidents that may impact shared information within 24 hours of detection.

9.4.2. Information Required in Reports: Nature and scope of the incident, types of personal information affected, and immediate measures taken to contain the breach.

9.4.3. Post-Incident Review- Postbank will conduct a joint investigation with the third party to identify root causes and implement corrective actions.

9.5. Monitoring

- Maintain a log of all third-party information requests, including the purpose, data shared, and associated approvals.
- Periodically review and audit third-party data handling practices to ensure continued compliance.
- Postbank will maintain an audit trail of all third-party information disclosures. Logs will include requester identity, purpose of disclosure, information shared, legal basis, and approval records. Quarterly reviews of these disclosures will be performed by the Compliance Function to ensure alignment with PAIA, PoPIA, and applicable contractual obligations.

10. Remedies Available When Postbank Refuses a Request for Information

10.1. Internal Remedies

Postbank does not have an internal appeal procedure. The decision of the Information Officer is final.

10.2. External Remedies

If access to a record is denied, the requester has the following external remedies:

- *Lodging a Complaint with the Information Regulator-* The requester may submit a complaint to the Information Regulator within one hundred and eighty (180) business days of receiving Postbank's decision. The Regulator has the authority to investigate and make a ruling on whether access should be granted or denied. The table below provides the contact information of the Regulator.
- *Application to Court-* The requester may also apply to a court for relief. The appropriate court is usually the Magistrates' Court, High Court, or Constitutional Court. This step can be taken if the requester believes that the refusal of access is unjustified under PAIA or infringes on constitutional rights.
- If the requester is dissatisfied with the Information Regulator's outcome, they may seek judicial review or apply to the High Court, Magistrates' Court, or Constitutional Court for appropriate relief. Postbank will cooperate fully with any lawful investigation or order issued by the Regulator or the Courts.

Telephone- Enquiries	Toll Free: +27 80 001 7160
Email	PAIAComplaints@inforegulator.org.za
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, 2191.
Postal Address;	P.O Box 31533, Braamfontein, Johannesburg, 2017
Website:	www.inforegulator.org.za

11. Transparency and Governance Statement

Postbank is committed to upholding the constitutional right of access to information in a manner that promotes transparency, accountability, and ethical governance. In doing so, Postbank aligns its PAIA implementation with its broader corporate

governance framework, including King IV principles, PFMA requirements, and supervisory expectations from regulatory bodies.

12. Conclusion

Postbank SOC Limited remains committed to upholding the principles of transparency, accountability, and the protection of personal information in line with the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (PoPIA). This manual provides the necessary guidance for requesters seeking access to records in accordance with the provisions of PAIA.

Should you have any further questions or require additional assistance, you are encouraged to contact the Information Officer or visit our website for more information on how to exercise your right to access information.



Annexure A – Access Request and Internal Appeal Forms

The following prescribed forms are available on the Postbank SOC Limited website under the *PAIA* section:

- a) Form 02 – Request for Access to Record- This form must be completed in full by any person requesting access to a record of Postbank SOC Limited. Form 02 is the official document published by the Information Regulator (South Africa) in terms of Regulation 7 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as prescribed by the PAIA Regulations.
- b) Form 03 – Internal Appeal Form- This form must be completed in full by any person lodging an internal appeal against a decision of the Information Officer or Deputy Information Officer of Postbank SOC Limited. Form 03 is the official document published by the Information Regulator (South Africa) in terms of Regulation 8 of the PAIA Regulations.
- c) Completed forms, together with any required supporting documents, must be submitted to the Information Officer via email at compliance@postbank.co.za
- d) Both forms are also available for download from the Information Regulator's website at www.inforegulator.org.za.

Annexure B: Reproduction and Access Fees

This Annexure explains the fees charged by Postbank for granting access to information under the Promotion of Access to Information Act (PAIA), 2000. The fees are set in line with Part III of Annexure A of the PAIA Regulations and are outlined below:

1. Reproduction Fees

These fees apply to obtaining copies or transcriptions of records that are either automatically available or provided in response to a request for access:

- Photocopy of an A4 size page or part thereof: R1.10
- Printed copy of an A4 size page or part thereof held in electronic format: R0.75
- Copy in a computer-readable format on:
 - USB: R40.00
 - Compact Disc (CD): R70.00
- Transcription of visual images (A4 size page or part thereof): R40.00
- Copy of visual images: R60.00
- Transcription of an audio record (A4 size page or part thereof): R20.00
- Copy of an audio record: R30.00

2. Access Fees

Access fees are payable when requesting records under PAIA and may include costs for searching, preparing, and reproducing records as follows:

- Photocopy of an A4 size page or part thereof: R1.10
- Printed copy of an A4 size page or part thereof held in electronic format: R0.75
- Copy in a computer-readable format on:
 - USB: R40.00
 - Compact Disc (CD): R70.00
- Transcription of visual images (A4 size page or part thereof): R40.00
- Copy of visual images: R60.00
- Transcription of an audio record (A4 size page or part thereof): R20.00
- Copy of an audio record: R30.00
- Search and preparation of records (per hour or part thereof): R30.00

Note: If the time spent searching and preparing the record exceeds six (6) hours, a deposit may be requested.

3. Request Fee

A request fee applies to any requester, excluding personal requesters (those seeking records about themselves):

- Request Fee: R50.00

4. Other Fees

- Search Fee: R30.00 per hour or part thereof for searching and preparing the record for disclosure (after six hours).
- Deposit: One-third (1/3) of the estimated access fee may be required if the search and preparation time exceeds six (6) hours.
- Postage Fees: Actual postage costs are payable if records are mailed to the requester.

5. Deposits

Where the request requires considerable time or resources to process (more than six hours), Postbank may request a deposit. The deposit will be one-third (1/3) of the estimated access fee. If the request is refused, this deposit will be refunded.

6. Postage

The actual postage costs for mailing records will be charged to the requester if non-electronic copies are requested.

Annexure C: Information Available in Terms of Other Legislation

In terms of the Promotion of Access to Information Act (PAIA), the following legislation describes the types of records available for a state-owned bank in accordance with respective legal requirements:

- Banks Act No 94 of 1990
- Basic Conditions of Employment Act No 75 of 1997
- Companies Act No 71 of 2008
- Compensation for Occupational Injuries and Diseases Act No 130 of 1993
- Competition Act No 89 of 1998
- Consumer Protection Act No 68 of 2008
- Cybercrimes Act No 19 of 2020
- Electronic Communications and Transactions Act No 25 of 2002
- Employment Equity Act No 55 of 1998
- Financial Intelligence Centre Act No 38 of 2001
- Financial Advisory and Intermediary Services Act No 37 of 2002
- Income Tax Act No 58 of 1962
- Labour Relations Act No 66 of 1995
- Long-term Insurance Act No 52 of 1998
- National Credit Act No 34 of 2005
- National Payment System Act No 78 of 1998
- Occupational Health and Safety Act No 85 of 1993
- Prescription Act No 68 of 1969
- Prevention of Organised Crime Act No 121 of 1998
- Private Security Industry Regulation Act No 56 of 2001
- Protection of Personal Information Act No 4 of 2013 (POPIA)
- Public Finance Management Act No 1 of 1999 (PFMA)
- Short-term Insurance Act No 53 of 1998
- Unemployment Insurance Act No 63 of 2001
- Value-added Tax Act No 89 of 1991

