PAIA Manual

Promotion of Access to Information Act
Section 51 Manual — Private Body

TRUST FRAMEWORK PUBLICATION TC-LEG-003

Last updated: August 2026

Entity	Terracloud Technologies T/A Terracloud Technology
Registration No.	2011/083806/23
Information Officer	Craig Cloete (CEO)
IO Email	craig@terracloud.technology
General Enquiries	info@terracloud.technology
Version	1.0
Effective Date	August 2026
Next Review Date	May 2027
Jurisdictions	South Africa (primary) | Germany | United Kingdom

This manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and is aligned with the Protection of Personal Information Act 4 of 2013 (POPIA). It must be made available to any person on request and submitted to the Information Regulator.

1. DOCUMENT CONTROL

Document Title	PAIA Manual
Document Number	TC-LEG-003
Document Owner	Craig Cloete, Information Officer
Responsible Entities	Terracloud Technologies CC (South Africa) Terracloud Technology GmbH (Germany) Terracloud Technology Ltd (United Kingdom)
Document Classification	Public
Version	1.0
Effective Date	August 2026
Next Review Date	August 2027
Approved By	Craig Cloete, Information Officer

2. REVISION HISTORY

Version	Date	Summary of Changes	Author
1.0	Aug 2026	First issue as TC-LEG-003 within the Terracloud Trust Framework. Original document; no prior version exists.	Craig Cloete

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1. Introduction

The Promotion of Access to Information Act 2 of 2000 (PAIA) gives effect to the constitutional right of access to information held by the State and by private bodies, where that information is required for the exercise or protection of any right.

Section 51 of PAIA requires every private body to compile a manual that describes the records it holds and the procedure for requesting access to those records. This manual serves that purpose for Terracloud Technologies T/A Terracloud Technology (referred to in this manual as 'Terracloud' or 'the Company').

Terracloud is a compliance-driven cybersecurity and IT services provider operating across South Africa, Germany, and the United Kingdom. Our services include IT support, cybersecurity, disaster recovery, cloud backup, and POPI IT-Enablement for small to medium enterprises.

2. Company Details and Information Officer

2.1 Company Information

Registered Name	Terracloud Technologies cc
Trading Name	Terracloud Technology
Registration No.	2011/083806/23
Business Address	659 8th Avenue, Mayville, Pretoria, 0084
Postal Address	659 8th Avenue, Mayville, Pretoria, 0084
Telephone	+27 12 0040540
Email	privacy@terracloud.technology
Website	www.terracloud.technology

2.2 Organisational Structure

Terracloud Technology operates as a single legal entity (Terracloud Technologies CC) trading under the name Terracloud Technology. The Company provides services across the following functional areas:

- IT Support and Asset Management
- Cybersecurity Planning and Implementation
- Managed Local and Cloud Backup
- Disaster Recovery Planning and Implementation
- Network Audits
- Email Hosting and Archiving
- POPI IT-Enablement
- Security Monitoring and Endpoint Detection (EDR)

The Company operates from its primary base in South Africa and extends its services to clients in Germany and the United Kingdom. International operations are supported through Terracloud Technology GmbH (Germany) and Terracloud Technology Ltd (United Kingdom).

2.3 Information Officer

The following person has been designated as the Information Officer of Terracloud Technology in accordance with POPIA Section 55 and is responsible for compliance with PAIA and POPIA:

Information Officer	Craig Cloete
Title	CEO
Email	craig@terracloud.technology
Postal Address	659 8th Avenue, Mayville, Pretoria, 0084
Physical Address	659 8th Avenue, Mayville, Pretoria, 0084
Telephone	+27 12 0040540

The Information Officer is registered with the Information Regulator of South Africa in accordance with POPIA Section 55. All PAIA requests and POPIA data subject requests should be directed to the Information Officer at the contact details above.

2.4 Deputy Information Officer

The following person has been designated as Deputy Information Officer of Terracloud Technology in accordance with POPIA Section 56 and PAIA Section 17. The Deputy Information Officer assists the Information Officer with PAIA and POPIA compliance obligations and may be contacted in the first instance for access to information requests:

Deputy Information Officer	Jean Burger
Title	Operations Manager
Email	jean@terracloud.technology

3. Information Regulator

The Information Regulator is the independent statutory body established under POPIA to oversee compliance with PAIA and POPIA. Data subjects and requesters may contact the Information Regulator to lodge complaints or obtain guidance.

Name	Information Regulator of South Africa
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, 2017
General Enquiries	enquiries@inforegulator.org.za
PAIA Complaints	PAIAComplaints@inforegulator.org.za

POPIA Complaints	POPIAComplaints@inforegulator.org.za
Telephone	+27 10 023 5200
Website	www.inforeg.org.za

4. Categories of Records Held

The following categories of records are held by Terracloud Technology. All records are subject to the grounds for refusal set out in Section 7 of this manual.

4.1 Governance and Corporate Records

- Company registration documents and certificates
- Memorandum of Incorporation (MOI)
- Board resolutions and minutes
- Shareholder records
- Risk and compliance reports
- Insurance policies

4.2 Operational Records

- Client contracts and Service Level Agreements (SLAs)
- Client onboarding records
- Support ticket records and resolution logs
- Supplier and vendor contracts
- Project records and deliverable documentation

4.3 IT Systems and Infrastructure Records

- Microsoft 365 records (Exchange, OneDrive, SharePoint)
- Cloud backup system records and logs
- Security monitoring logs and EDR records
- Network audit records
- System configuration and change management records
- Incident and data breach records

4.4 Compliance and Regulatory Records

- POPIA processing records and data subject consent records
- Joint Standard and FSCA compliance documentation (where applicable)
- Audit evidence and compliance assessments
- PAIA manual and POPIA policies
- Information Officer registration records

4.5 Financial Records

- Invoices issued and received
- Bank statements and financial statements
- Tax records and SARS submissions
- Payroll records
- Asset registers

4.6 Human Resources Records

- Employee contracts and offer letters
- Leave records
- Performance records
- Training and certification records
- Disciplinary records (where applicable)
- Health and safety records

4.7 Marketing and Communications Records

- Marketing materials and website content
- Email correspondence with clients and prospects
- Social media records

5. Automatically Available Records

The following records are made available by Terracloud Technology without the need for a formal PAIA request:

- This PAIA Section 51 Manual (available on the Terracloud Technology website and on request)
- Privacy Policy (available on the Terracloud Technology website)
- Cookie Policy (available on the Terracloud Technology website)
- Terms of Use (available on the Terracloud Technology website)
- General service descriptions and pricing information (as published on the website)

All other records held by Terracloud Technology are subject to the formal request procedure set out in Section 6 of this manual.

6. Procedure for Requesting Access to Records

6.1 Who May Request

Any person may submit a request for access to a record held by Terracloud Technology in terms of PAIA. A requester may be:

- A person who is the subject of the record (a data subject under POPIA)
- A person seeking access to a record required to exercise or protect any right

6.2 How to Submit a Request

Requests must be submitted in writing to the Information Officer using the Request Form attached as Annexure A to this manual, or an equivalent written request containing the same information. Requesters may alternatively use the prescribed PAIA Form 2 published under the PAIA Regulations, which is available from the Information Regulator's website at www.inforeg.org.za.

Requests may be submitted by:

- Email to craig@terracloud.technology
- Post to the postal address of the Information Officer listed in Section 2.3
- Hand delivery to the physical address of the Information Officer listed in Section 2.3

6.3 Information Required in a Request

A valid request must include:

- The full name, identity number, and contact details of the requester
- If the requester is acting on behalf of another person, proof of authorisation
- A description of the record requested with sufficient detail to enable identification
- The form in which access is required (printed copy, electronic copy, inspection, etc.)
- A statement of the right being exercised or protected, and why the record is required to exercise that right
- Payment of the prescribed request fee (see Section 9)

6.4 Processing and Response Timeframes

Terracloud Technology will process requests as follows:

Acknowledgement	Within 5 business days of receipt of a valid request
Decision	Within 30 days of receipt of a valid, complete request (including payment of the request fee)
Extension	The 30-day period may be extended by a further 30 days where the request requires a search through a large number of records, or where fulfilling the request would unreasonably interfere with the activities of the Company. The requester will be notified of any extension.
Third-party records	Where a record relates to a third party, Terracloud Technology must notify the third party and allow them the opportunity to make representations before a decision is made. In such cases, an additional 30 days applies.

6.5 Decision and Notification

The Information Officer will notify the requester in writing of the decision. If access is granted, the notification will confirm the form in which access will be given and any applicable access fees. If access is refused (in whole or in part), the notification will state the grounds for refusal and the requester's right to appeal or seek further recourse (see Section 8).

7. Grounds for Refusal

Access to a record may be refused on the following grounds in terms of PAIA:

Protection of personal information	Where the record contains personal information of a third party, and that third party has not consented to disclosure and there are no grounds to override this protection
Commercial and confidential information	Where disclosure would harm the commercial or financial interests of the Company or a third party, including trade secrets, financial information supplied in confidence, or research information
Legal privilege	Where the record is subject to legal professional privilege (e.g. legal advice received)
Safety and security	Where disclosure could endanger the life or physical safety of any individual, or compromise the security of a property or system
Research information	Where disclosure could expose prematurely disclosed research information
Third-party interests	Where a third party has made representations objecting to disclosure and there are grounds to uphold their objection
Operational interests	Where disclosure could prejudice the effective administration of the Company's operations

Partial access: Where a record contains information that may be refused alongside information that may be disclosed, Terracloud Technology will endeavour to grant access to the portions that may be disclosed (with the refused portions redacted), where it is reasonably practicable to do so.

8. Remedies Available to Requesters

If a requester is aggrieved by a decision of the Information Officer — whether by refusal of access, the form of access granted, the fees charged, or failure to respond within the prescribed timeframe — the following remedies are available:

8.1 Internal Appeal

A requester may lodge an internal appeal with the head of Terracloud Technology within 30 days of receipt of the decision (or the expiry of the 30-day response period where no decision was made).

Appeal to	CEO, Terracloud Technology
Email	privacy@terracloud.technology
Postal Address	659 8th Avenue, Mayville, Pretoria, 0084
Timeframe	Within 30 days of the decision or lapse of response period
Decision period	The head of the Company must decide the appeal within 30 days of receipt

The appeal must be in writing and must specify the grounds of appeal. If the internal appeal is unsuccessful or no decision is made within 30 days, the requester may proceed to the remedies below.

8.2 Complaint to the Information Regulator

A requester may lodge a complaint with the Information Regulator after exhausting the internal appeal process. The Information Regulator may investigate and make a finding. Contact details for the Information Regulator are provided in Section 3.

8.3 Application to Court

A requester may approach a court of law (the High Court or a Magistrate's Court with jurisdiction) to compel access to a record. An application to court may be made:

- After the internal appeal process has been exhausted, or
- Where the head of the Company has failed to decide the internal appeal within 30 days

Requesters are encouraged to contact the Information Officer in the first instance to resolve any concerns informally before resorting to formal appeal or court processes.

9. Fees

Fees for PAIA requests are prescribed by the Minister of Justice and Constitutional Development under the PAIA Regulations. The following fees apply:

Item	Fee	Notes
Request fee (where the requester is not the data subject)	R140.00	Payable per request
Search fee (per hour or part thereof after first hour)	R30.00	If search exceeds 6 hours, a deposit may be required
Reproduction — printed copy (per A4 page)	R1.10	
Reproduction — electronic copy (per megabyte)	R70.00	
Reproduction — transcription of visual or audio material (per A4 page)	R40.00	
Reproduction — copy of a computer-printed copy (per A4 page)	R0.75	
Deposit (where search exceeds 6 hours)	One third of the anticipated fees	Payable in advance
Indigent exemption	No fee	Requester must prove inability to pay

All fees must be paid prior to access being granted. Where the requester is the data subject and the record relates to their own personal information, no request fee is payable — only reproduction fees apply.

Where a requester demonstrates that they cannot afford the prescribed fees, they may apply in writing to the Information Officer for a waiver. The Information Officer will consider such applications on a case-by-case basis.

Fees are subject to change by Ministerial notice. For the current prescribed fee schedule, refer to the PAIA Regulations published in the Government Gazette or contact the Information Regulator.

10. POPIA Alignment

This manual is read together with Terracloud Technology's Privacy Policy, which sets out in detail how personal information is collected, processed, stored, and protected in accordance with POPIA.

Terracloud Technology processes personal information in accordance with the eight conditions for lawful processing under POPIA:

- Accountability — Terracloud takes responsibility for ensuring that personal information is processed in compliance with POPIA
- Processing limitation — personal information is processed lawfully, minimally, and only for the purpose for which it was collected
- Purpose specification — personal information is collected for a specific, explicitly defined purpose
- Further processing limitation — personal information is not processed for purposes incompatible with the original purpose of collection
- Information quality — reasonable steps are taken to ensure personal information is accurate, complete, and up to date
- Openness — data subjects are informed of the collection and purpose of their personal information
- Security safeguards — appropriate technical and organisational measures are implemented to protect personal information
- Data subject participation — data subjects may request access to, correction of, or deletion of their personal information

10.1 Cross-Border Data Transfers

Terracloud Technology operates across South Africa, Germany, and the United Kingdom. Where personal information is transferred between these jurisdictions, appropriate safeguards are in place in accordance with POPIA Section 72 and applicable EU/UK data protection requirements. These include Standard Contractual Clauses (SCCs) for transfers to the EU and the UK International Data Transfer Agreement (IDTA) for transfers to the UK.

10.2 Data Breach Notification

In the event of a data breach that compromises personal information, Terracloud Technology will notify:

- The Information Regulator as soon as reasonably possible
- Affected data subjects where it is likely that the breach will result in a risk to their rights

11. Availability of This Manual

This manual is available:

- On the Terracloud Technology website at www.terracloud.technology
- On request from the Information Officer at craig@terracloud.technology
- At the physical offices of Terracloud Technology during business hours

A copy of this manual has been submitted to the Information Regulator in accordance with PAIA requirements.

Version	1.0
Effective Date	August 2026
Next Review Date	August 2027
Approved by	Craig Cloete, Information Officer

Annexure A — PAIA Request Form

Requesters may use this form or submit an equivalent written request containing all the information below. This form may be submitted by email, post, or hand delivery to the Information Officer (see Section 2.3).

SECTION A: REQUESTER DETAILS	
Full Name	
Identity Number / Passport Number	
Postal Address	
Telephone Number	
Email Address	
Preferred method of response (email / post / collection)	

SECTION B: REPRESENTATIVE (if acting on behalf of another person)	
Full Name of Representative	
Capacity (e.g. attorney, agent, guardian)	
Contact Details of Representative	
Authority for representation (attach proof)	
SECTION C: RECORD REQUESTED	
Description of the record requested	
Reference number (if known)	
Date of record (if known)	
Subject matter of the record	
Form of access required (printed copy / electronic copy / inspection / other)	
SECTION D: GROUNDS FOR REQUEST	
Right being exercised or protected	
How the record is required to exercise or protect that right	
If the record relates to your own personal information, confirm: Yes / No	
SECTION E: FEES	
Confirmation that request fee of R140 has been paid (attach proof of payment)	
Application for fee waiver? Yes / No	
If yes, grounds for waiver application	

Signature of Requester: _____

Date: _____

Annexure B — Outcome Notification Form

This form is completed by the Information Officer and returned to the requester to communicate the outcome of a PAIA request.

SECTION A: REQUESTER DETAILS	
Full Name of Requester	
Reference Number	
Date of Request	
Date of This Notification	
SECTION B: DECISION	
Decision (tick one): ☐ Access Granted in Full ☐ Access Granted in Part ☐ Access Refused	
Record(s) to which access is granted (if applicable)	
Record(s) to which access is refused (if applicable)	
Grounds for refusal (cite relevant PAIA section)	
Form of access to be provided	
SECTION C: FEES	
Access fee payable (if any): R	
Deposit required (if any): R	
Payment due date	
Payment method	
SECTION D: REQUESTER'S RIGHTS	
Right to internal appeal within 30 days: Yes	
Internal appeal to be addressed to: Craig Cloete, CEO	
Right to approach Information Regulator: Yes (see Section 3 of this manual)	
Right to apply to court: Yes (after internal appeal is exhausted)	

Signature of Information Officer: _____

Date: _____

Terracloud Technologies T/A Terracloud Technology | Registration No. 2011/083806/23

PAIA Section 51 Manual | V1.0 | Effective: August 2026 | Review: June 2027

Related Documents

This manual forms part of the Terracloud Trust Framework and should be read together with the following controlled publications:

- TC-LEG-001 — Privacy Policy
- TC-LEG-002 — Terms of Use
- TC-LEG-004 — Cookie Policy
- TC-LEG-005 — Applicant Privacy Notice
- TC-LEG-006 — Data Subject Request Form
- TC-SEC-001 — Responsible Disclosure Policy
- TC-SEC-002 — Compliance & Security Statement