



PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000
(as amended)

read with section 51(1)(c) as inserted by the Protection of Personal Information Act 4 of 2013

HAHSTAG INTERNATIONAL (PTY) LTD

trading as Hashtag International

CIPC registration number 2026/794619/07

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1. List of acronyms and abbreviations

Term	Meaning
"Company", "Hashtag", "we", "us"	HAHSTAG INTERNATIONAL (PTY) LTD trading as Hashtag International, registration number 2026/794619/07
"Head"	The head of a private body as defined in section 1 of PAIA. For Hashtag, a company, this is its chief executive officer or equivalent officer, or a person duly authorised by that officer. Christopher Naidoo, the sole director, is the head of Hashtag.
"DIO"	Deputy Information Officer
"IO"	Information Officer
"Minister"	Minister of Justice and Constitutional Development
"PAIA"	Promotion of Access to Information Act 2 of 2000, as amended
"PAIA Regulations"	Regulations relating to the Promotion of Access to Information, 2021 (GN R.757 in Government Gazette 45057 of 27 August 2021)
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator (South Africa)
"Republic"	Republic of South Africa
"Guide"	The Guide on how to use PAIA, updated by the Regulator under section 10 of PAIA
"Operator" / "Responsible party"	As defined in section 1 of POPIA

2. Purpose of this PAIA manual

This PAIA manual is useful for the public to:

- 2.1 check the categories of records held by Hashtag that are available without a person having to submit a formal PAIA request;
- 2.2 understand how to make a request for access to a record of Hashtag, from the description of the subjects on which Hashtag holds records and the categories of records held on each subject;
- 2.3 know the description of the records of Hashtag that are available under any other legislation;
- 2.4 access the contact details of the Information Officer, who will assist the public with the records they want to access;
- 2.5 know the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 2.6 know whether Hashtag processes personal information and the purpose of that processing;
- 2.7 know the categories of data subjects and of the information or categories of information relating to them;
- 2.8 know the recipients or categories of recipients to whom personal information may be supplied;
- 2.9 know whether Hashtag plans to transfer or process personal information outside the Republic, and the recipients or categories of recipients to whom it may be supplied; and
- 2.10 know whether Hashtag has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information it processes.

This manual does not give any right of access beyond what PAIA provides. A requester must be given access to a record of a private body only if (a) the record is required for the exercise or protection of any rights, (b) the requester complies with PAIA's procedural requirements, and (c) access is not refused on a ground in Part 3, Chapter 4 of PAIA (PAIA s50(1)).

2A. About Hashtag International

HAHSTAG INTERNATIONAL (PTY) LTD trading as Hashtag International is a private company incorporated in South Africa on 6 October 2026 and based in Phoenix, Durban. It has two business lines:

- **Contact-centre / business process outsourcing (BPO) services:** inbound customer support, outbound calling and appointment setting for business clients in the United Kingdom, Ireland, the United States of America, Canada, Australia and New Zealand. For this work we usually act as an **operator** (POPIA s1, ss20–21) that processes our clients' customer and prospect information on their instructions.
- **Customs clearing and cross-border logistics support:** preparing customs documentation and supporting the movement of goods across South Africa's borders, including to and from other Southern African Customs Union (SACU) countries. **Our SARS clearing agent licence application is pending.** Until a licence is granted, we do not lodge customs declarations as a licensed clearing agent.

3. Key contact details for access to information of Hashtag International

3.1 Information Officer

Name	Christopher Naidoo
Designation	Sole Director (head of the private body) and Information Officer
Registration with the Regulator	Registration no. 2026-069056, registered 13 October 2026 (appointment date shown on the certificate: 6 October 2026)
Tel	061 808 9331 (international: +27 61 808 9331)
Email	chris@hashtagintl.com
Fax number	None

3.2 Deputy Information Officer

No Deputy Information Officer has been designated (PAIA s17 read with s56 of POPIA). All requests go to the Information Officer. This section will be updated if a Deputy Information Officer is designated.

3.3 Access to information general contacts

Email	chris@hashtagintl.com (use the subject line "PAIA Request" or "POPIA Request")
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3.4 National or head office

Registered name	HAHSTAG INTERNATIONAL (PTY) LTD
Trading name	Hashtag International
Registration number	2026/794619/07
Postal address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, 4068 (same as the physical address)
Physical address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, 4068
Telephone	061 808 9331
Email	chris@hashtagintl.com
Website	https://hashtagintl.com
Receiving requests	Requests may be sent by email at any time. An emailed request is received when it enters our mailbox and can be retrieved (Electronic Communications and Transactions Act 25 of 2002, s23). Our team works international shifts aligned to client time zones. Requests are handled on South African business days (Monday to Friday, excluding South African public holidays). PAIA time periods are calendar days, not business days: the day of receipt is excluded, and if the last day falls on a Sunday or public holiday, the next day is the last day. The manual and the Guide

	can be inspected at our office during normal business hours on South African business days, by appointment.
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4. Guide on how to use PAIA and how to obtain access to the Guide

- 4.1 The Regulator has, under section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily understood form and manner, as may reasonably be required by a person who wishes to exercise any right in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The Guide contains the description of:
 - 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax number and, if available, email address of (a) the Information Officer of every public body, and (b) every Deputy Information Officer of every public and private body designated under section 17(1) of PAIA and section 56 of POPIA;
 - 4.3.3 the manner and form of a request for (a) access to a record of a public body (section 11), and (b) access to a record of a private body (section 50);
 - 4.3.4 the help available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5 the help available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6 all remedies in law for an act or failure to act in respect of a right or duty in PAIA and POPIA, including how to lodge (a) an internal appeal, (b) a complaint to the Regulator, and (c) an application to a court against a decision of the information officer of a public body, a decision on internal appeal, a decision of the Regulator or a decision of the head of a private body;
 - 4.3.7 the provisions of sections 14 and 51 that require a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.8 the provisions of sections 15 and 52 on voluntary disclosure of categories of records by a public body and a private body, respectively;
 - 4.3.9 the notices issued under sections 22 and 54 on fees to be paid for requests for access; and
 - 4.3.10 the regulations made under section 92.
- 4.4 Members of the public can inspect or make copies of the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5 The Guide can also be obtained:
 - 4.5.1 on request to the Information Officer (section 3.1 above); or
 - 4.5.2 from the website of the Regulator: <https://info regulator.org.za/paia-guidelines/> (current English version: "PAIA-Guide-English_20210905", October 2021).
- 4.6 A copy of the Guide is also available in the following two official languages for public inspection at our office during normal business hours: **English** and **isiZulu**.

Contact details of the Information Regulator (taken from <https://info regulator.org.za/contact-us/> on 13 October 2026):

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 • Toll-free: 0800 017 160
General enquiries	enquiries@info regulator.org.za
PAIA complaints (Form 5)	PAIAComplaints@info regulator.org.za
POPIA complaints (Form 5)	POPIAComplaints@info regulator.org.za
Website / eServices	https://info regulator.org.za • https://eservices.info regulator.org.za

5. Categories of records of Hashtag that are available without a person having to request access

The following records are available without a formal PAIA request (PAIA s52). Only a reproduction fee may be charged for a copy (s52(2)).

Category of records	Types of the record	Available on website	Available on request
Public company information	Registered name, trading name, registration number, contact details	X	X
PAIA and POPIA documents	This PAIA manual; Privacy Policy	X	X
Marketing information	Description of services, brochures and website content	X	X
PAIA Guide	Regulator's Guide on how to use PAIA (English and isiZulu)		X (inspection at office)

No notice under section 52(2) of PAIA has been submitted to the Minister.

6. Description of the records of Hashtag that are available in accordance with any other legislation

Hashtag keeps records as required by the laws below. Where another law gives a right of access to a record, access may be sought under that law. This list is not exhaustive.

Category of records	Applicable legislation
Memorandum of Incorporation; CIPC registration documents; securities register; records of directors; minutes and resolutions; beneficial ownership records	Companies Act 71 of 2008
PAIA manual	Promotion of Access to Information Act 2 of 2000
Records of processing of personal information; consent and objection records; security compromise records	Protection of Personal Information Act 4 of 2013
Employment contracts, time and remuneration records	Basic Conditions of Employment Act 75 of 1997
Employment equity records (if and when designated or voluntary)	Employment Equity Act 55 of 1998
Disciplinary, grievance and dispute records	Labour Relations Act 66 of 1995
Occupational injury and disease records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
UIF registration and contribution records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Skills development levy and training records	Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999
Tax returns, PAYE records, supporting documents	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
VAT records (if and when registered)	Value-Added Tax Act 89 of 1991
Customs declarations, clearing documents, books and accounts of a licensed clearing agent (once licensed)	Customs and Excise Act 91 of 1964 and its rules
Cross-border payments and balance-of-payments documentation	Currency and Exchanges Act 9 of 1933 and the Exchange Control Regulations
Electronic transactions and communications records	Electronic Communications and Transactions Act 25 of 2002

Call-recording and interception records	Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002
Consumer and direct-marketing records (South African consumers)	Consumer Protection Act 68 of 2008
B-BBEE records (if applicable)	Broad-Based Black Economic Empowerment Act 53 of 2003

7. Description of the subjects on which Hashtag holds records and categories of records held on each subject

Subjects on which Hashtag holds records	Categories of records
Company secretarial and governance	Memorandum of Incorporation; CIPC certificates and filings; securities register; director records; resolutions and minutes; beneficial ownership register; Information Regulator registration certificate
Finance and tax	Financial statements and management accounts; general ledger; invoices and statements; bank records; SARS registrations, returns and correspondence (income tax, PAYE, UIF, SDL, VAT if registered); exchange-control documents; tax clearance / compliance status
Human resources	Recruitment records (adverts, CVs, interview and assessment records); employment contracts; ID and right-to-work documents; payroll, leave and attendance records; training records; performance and disciplinary records; confidentiality undertakings; medical certificates; health and safety records
BPO / contact-centre clients	Master services agreements, statements of work and data processing agreements; client correspondence; billing and time records; campaign reports; quality-assurance records
Client-owned data held as operator	Clients' customer and prospect lists, call recordings, call notes and outcomes, CRM/dialler/ticketing records and suppression lists, processed only on clients' instructions, usually inside the client's own systems. Requests for these records should normally go to the client (the responsible party). We will pass on any request we receive.
Customs clearing and logistics	Clearing services agreements; powers of attorney and letters of authority; commercial invoices, packing lists, bills of lading, air waybills and road manifests; customs declarations and supporting documents; SARS and other customs administration correspondence; transporter and driver details; shipment tracking records; records of duties and VAT paid or deferred; SARS licence application and licence records
Suppliers and service providers	Supplier agreements; quotations, orders and invoices; supplier due-diligence and security assessments
Information technology and security	IT and information-security policies; user access records and logs; asset registers; backup records; security incident and breach register
Data protection and access to information	Data Protection and Information Security Policy; privacy notices; records of processing; impact assessments; consent, objection and opt-out records; PAIA and POPIA request register
Legal	Contracts; licences, permits and registrations; insurance policies; litigation and dispute records; legal opinions (which may be privileged)
Marketing and website	Website content; enquiry and lead records from our own marketing; consent and opt-out records; website analytics data

Listing a category does not mean access will be granted. Each request is assessed against PAIA, including the grounds for refusal in Part 3, Chapter 4.

8. Processing of personal information

8.1 Purpose of processing personal information

Hashtag processes personal information only for specific, lawful purposes related to its business (POPIA ss9–13). These are:

- **BPO / contact-centre services (as operator):** providing inbound customer support, outbound calling and appointment-setting services for business clients, on their documented instructions, including call recording, quality assurance and managing opt-outs and suppression lists.
- **Customs clearing and cross-border logistics support:** preparing and, once licensed, lodging customs documents and declarations; communicating with customs administrations, transporters, shipping lines, freight forwarders and port or border authorities; tracking shipments; and billing for these services.
- **Recruitment and employment:** recruiting, vetting (with notice and consent where required), employing, training, paying and managing staff and contractors.
- **Client and supplier management:** concluding and performing contracts, invoicing, collecting payment and paying suppliers.
- **Legal and regulatory compliance:** meeting tax, labour, company, customs, exchange-control, POPIA and PAIA obligations, and responding to lawful requests from authorities.
- **Security:** protecting our premises, systems and information, and detecting and responding to security compromises.
- **Own marketing:** marketing our services to businesses, in line with POPIA s69 and the foreign rules that apply, with an opt-out offered.
- **Website operation:** responding to enquiries received through <https://hashtagintl.com> and keeping the website working and secure.
- **Access and data-subject requests:** dealing with PAIA requests, POPIA requests, objections and complaints.

8.2 Description of the categories of data subjects and of the information or categories of information relating thereto

Categories of data subjects	Personal information that may be processed
Employees, contractors and job applicants	Name, ID or passport number, date of birth, gender, nationality and right-to-work status, contact details and address, banking details, income tax number, qualifications, employment history, references, remuneration and benefits, leave and attendance, performance and disciplinary records, training records, call recordings and quality scores for their own calls, user IDs and system access logs. Special personal information only where the law requires or allows it, for example health information (sick leave, occupational health) and race (employment equity reporting), and criminal-record information only with consent for relevant roles.
Director and shareholder	Name, ID number, contact details, address, signature, tax details
Representatives of BPO and customs clearing clients	Name, job title, business contact details, signature, correspondence, billing contact information
Clients' customers and prospects (processed as operator)	Name, telephone number, email and postal address, account or order details, call recordings, call notes and outcomes, appointment details, consent and opt-out status, and any other fields specified by the client's instructions
Customs clients who are natural persons or sole proprietors (importers and exporters), consignors and consignees	Name, ID or passport number, address and contact details, SARS customs client number and tax number, details of goods and transactions (invoices, values, tariff classification, origin), banking and payment details
Transporters, drivers and logistics contacts	Name, ID or passport number, contact details, vehicle registration, driver's licence and cross-border permit details, trip and border-crossing information
Suppliers and service providers (and their representatives)	Name, registration number, VAT number, address, contact details, banking details, contract information
Website visitors and enquirers	Name, company, contact details, message content, IP address, device and browser

	data, cookie identifiers
PAIA and POPIA requesters and complainants	Name, ID number, contact details, request details, proof of authority, correspondence

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

Category of personal information	Recipients or categories of recipients
Clients' customer and prospect data, call recordings and outcomes	The relevant BPO client (the responsible party) and the client's own systems and providers (dialler, CRM, telephony, ticketing)
Customs, shipment and transaction information	SARS (Customs), other SACU customs administrations (for example Revenue Services Lesotho), the Border Management Authority and port or border authorities where required, transporters, shipping lines and airlines, freight forwarders and partner clearing agents, customs EDI software and network providers, cargo insurers
Employee tax, payroll and statutory information	SARS, Department of Employment and Labour, UIF, Compensation Fund, payroll and accounting service providers, bank
Employee names and work details	BPO clients for whom the employee works (for example agent names and user IDs for client systems)
Identity and qualification information, for background checks	Background-screening providers, the South African Police Service and the South African Qualifications Authority, with the data subject's consent where required
Financial and banking information	Our bank, auditors or accountants, and, for cross-border payments, the South African Reserve Bank through our authorised dealer bank
Email, documents and business records	IT, email and cloud service providers (for example Zoho Mail), IT support providers
Information relevant to legal claims or advice	Legal advisers, insurers, courts and tribunals
Any category, when required by law	The Information Regulator, law-enforcement agencies and other public bodies with a lawful request or legal power

We do not sell personal information. Service providers that process personal information for us are bound by written agreements requiring confidentiality and security measures (POPIA ss20–21).

8.4 Planned transborder flows of personal information

Hashtag plans to transfer personal information outside the Republic in the following cases:

Flow	Countries	Categories of personal information	Recipients
BPO services: access to and return of client data	United Kingdom, Ireland, United States, Canada, Australia, New Zealand (and wherever the client hosts its systems)	Clients' customer and prospect data, call recordings and notes; agent names and user IDs	BPO clients and their system providers
Customs clearing and cross-border logistics	Lesotho, Botswana, Namibia, Eswatini (SACU) and the countries of origin or destination of shipments	Importer, exporter, consignee, transporter and driver details; transaction and shipment data	Foreign customs administrations, partner clearing agents, transporters, forwarders and shipping lines
Cloud and software services	The countries where our email and cloud providers (for example Zoho Mail) host data	Business email, documents and contact details of all categories of data subjects	Email, cloud-storage and software providers

Each transfer is made only on a ground permitted by POPIA s72(1). Examples: the recipient is bound by a law, binding corporate rules or a binding agreement giving an adequate level of protection; the data subject

consents; or the transfer is needed to perform a contract with, or in the interest of, the data subject. For personal information we receive from clients in the United Kingdom and Ireland, we also follow the transfer terms in the client's data processing agreement (for example the UK International Data Transfer Agreement or Addendum, or the EU Standard Contractual Clauses). Before transferring special personal information or children's personal information to a country without adequate protection, we will check whether the Regulator's prior authorisation is needed (POPIA s57(1)(d)).

8.5 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Hashtag has adopted a Data Protection and Information Security Policy (version 1.0, 13 October 2026) that sets out the measures below (POPIA ss19–22):

- **Governance:** a registered Information Officer; written policies; a personal information impact assessment; records of processing; annual policy review.
- **People:** confidentiality and data-protection undertakings signed before access is granted; induction and annual refresher training; proportionate pre-employment checks; disciplinary consequences for breaches.
- **Access control:** unique user accounts; least-privilege access by client and campaign; multi-factor authentication wherever supported; prompt removal of leavers' access; separate administrator accounts; periodic access reviews.
- **Passwords:** a minimum length passphrase policy; no sharing or reuse; an approved password manager; account lock-out after repeated failed log-ins.
- **Devices and networks:** company-managed or approved devices only; supported operating systems with automatic updates; anti-malware; screen locks; full-disk encryption on laptops; USB storage blocked unless approved; encrypted Wi-Fi with a separate guest network.
- **Call floor:** no personal phones or recording devices on the call floor; clean-desk rule; no screenshots or photographs; visitor sign-in and escort; same-day shredding of paper containing personal information.
- **Client data:** client data kept in clients' systems wherever possible; processing only on documented instructions; written data processing agreements; call recordings paused for payment-card details; return or deletion at the end of an engagement.
- **Suppliers:** security and privacy due diligence; written contracts requiring security measures; a record of where each provider stores data.
- **Retention and disposal:** retention schedules; secure deletion; wiping or destruction of storage media; cross-cut shredding.
- **Security compromises:** a breach response plan. Clients are notified immediately (target 24 hours). Where Hashtag is the responsible party, the Regulator (through the eServices portal) and affected data subjects are notified as soon as reasonably possible (POPIA s22).

9. How to request access to a record

- 9.1 **Form.** A request for access to a record of Hashtag must be made on **Form 2 (Request for access to record, Regulation 7 of the PAIA Regulations)**. A copy is in Annexure A, and the official form can be downloaded from <https://info regulator.org.za/paia-forms/>.
- 9.2 **Submission.** Send the completed form to the Information Officer by email (chris@hashtagintl.com, subject "PAIA Request") or deliver it by hand or post to 35 Dentvale Close, Rydalvale, Phoenix, Durban, 4068.
- 9.3 **Proof of identity and authority.** Attach proof of identity. If you request on behalf of another person, attach proof of your authority (Form 2, notes 1 and 2).
- 9.4 **Particulars.** Give enough detail for the Information Officer to identify the record and the requester; state the form and manner of access you want; give your contact details; and identify the right you seek to exercise or protect and explain why the record is needed for it (PAIA s53(2)).

- 9.5 **Help.** If you cannot read or write, or have a disability, you may make the request orally. The Information Officer will help you complete the form at no charge.
- 9.6 **Request fee.** You will be notified to pay the request fee (section 10) before the request is processed further (PAIA s54(1)), unless the voluntary waiver in section 10.2 applies.
- 9.7 **Your own personal information (POPIA s23).** A data subject may ask Hashtag, free of charge, to confirm whether it holds personal information about them. They may also request the record or a description of it, including the identity of third parties who have had access to it, using the PAIA procedure in this section (POPIA ss23 and 25). Requests to correct or delete personal information are made on Form 2 of the POPIA Regulations, 2018, and objections to processing on Form 1 of those Regulations. Where we hold the information only as an operator for a client, we will refer the request to that client promptly and help the client respond.

10. Fees

- 10.1 The fees that private bodies may charge are prescribed in Annexure B of the PAIA Regulations. They are reproduced in Annexure B of this manual, as published by the Regulator at <https://inforegulator.org.za/paia-fees/> (accessed 13 October 2026).
- 10.2 **Request fee:** R140.00, payable before the request is processed further (item 1). **Voluntary waiver:** Hashtag waives the request fee for a data subject, or a person authorised by the data subject, who requests access to the data subject's own personal information. The waiver covers only the request fee. Access fees (section 10.3) may still apply.
- 10.3 **Access fee:** payable if access is granted. It covers reproduction (for example R2.00 per A4 page), search and preparation at R145.00 for each hour or part of an hour excluding the first hour, up to a maximum of R435.00, and actual postage or electronic transfer costs (PAIA s54(6)–(7)).
- 10.4 **Deposit:** if the search and preparation is likely to take more than six hours, the requester will be asked to pay a deposit of one third of the access fee (PAIA s54(2); Annexure B item 10). A deposit is repaid if access is refused (s54(4)).
- 10.5 Hashtag may withhold a record until the fees have been paid (s54(5)). The outcome and fees are communicated on Form 3 of the PAIA Regulations.
- 10.6 The Regulator's fee leaflet states that the income-based exemption from access fees (GN R.991 of 14 October 2005) applies only to public bodies.
- 10.7 A requester may lodge a complaint with the Regulator, or apply to court, against the tender or payment of the request fee or deposit (PAIA s54(3)(b)).

Payment of fees. Pay by EFT into the account below, using the reference given on the Form 3 notice. Send proof of payment to chris@hashtagintl.com.

Account name	HAHSTAG INTERNATIONAL (PTY) LTD
Bank	FNB (First National Bank)
Account type	Gold Business Account
Account number	63230893471
Branch code	250655 (universal)
Reference	PAIA reference number on the Form 3 notice

11. Decisions, grounds for refusal and remedies

- 11.1 **Time limit.** The Information Officer will decide as soon as reasonably possible, and in any event within 30 calendar days of receiving a complete request, and will notify the requester (PAIA s56). The period may be extended once, by up to 30 days, in the circumstances in s57 (for example, a large number of

records or necessary consultation), with notice and reasons. A failure to decide within the period is a deemed refusal (s58).

- 11.2 **Third parties.** If a request concerns a record containing a third party's personal, commercial or confidential information, the third party will be informed within 21 days of receiving the request and may make representations (ss71–73). This can affect the time taken to decide.
- 11.3 **Grounds for refusal.** Access may or must be refused on the grounds in PAIA ss62–69. These include: protection of the privacy of a third party who is a natural person (s63); commercial information of a third party (s64); certain confidential information of a third party (s65); safety of individuals and protection of property (s66); records privileged from production in legal proceedings (s67); commercial information of Hashtag, such as trade secrets, financial or commercial information whose disclosure would likely cause harm, and information supplied in confidence (s68); and research information (s69). Records that cannot be found or do not exist are dealt with by affidavit under s55. Where only part of a record is protected, the rest will be released (s59).
- 11.4 **Public interest override.** Despite these grounds, access must be granted if disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (s70).
- 11.5 **Remedies.** Hashtag is a private body, so there is **no internal appeal**. A requester or third party who is dissatisfied with a decision (including a refusal, deemed refusal, fees or an extension) may, within **180 days** of the decision: (a) lodge a complaint with the Information Regulator on **Form 5** (PAIAComplaints@inforegulator.org.za) (PAIA ss77A–77B); or (b) apply to a court with jurisdiction for appropriate relief (ss78–82).

12. Availability of the manual

- 12.1 A copy of this manual is available:
 - 12.1.1 on our website at <https://hashtagintl.com/paia>;
 - 12.1.2 at the head office of Hashtag (35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, 4068) for public inspection during normal business hours;
 - 12.1.3 to any person on request and on payment of a reasonable amount; and
 - 12.1.4 to the Information Regulator on request.
- 12.2 A fee for a copy of the manual, as set out in Annexure B of the PAIA Regulations (R2.00 per A4-size page or part thereof), is payable for each A4-size photocopy made.

13. Updating of the manual

The head of Hashtag will update this manual regularly (PAIA s51(2)), and at least once a year. It will also be updated when the business changes materially, for example when the SARS clearing agent licence is granted, when a Deputy Information Officer is designated, or when new countries, systems or service providers are added. Next scheduled review: **13 October 2027**.

Issued by

Issued for and on behalf of HAHSTAG INTERNATIONAL (PTY) LTD trading as Hashtag International by its head and Information Officer.



Christopher Naidoo

Director and Information Officer

Information Regulator registration no. 2026-069056

Date: 13 October 2026

Key contacts at a glance

	Hashtag International	Information Regulator
Contact person	Christopher Naidoo, Information Officer	PAIA / POPIA complaints
Address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, 4068	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	061 808 9331	010 023 5200 • 0800 017 160
Email	chris@hashtagintl.com	enquiries@inforegulator.org.za PAIAComplaints@inforegulator.org.za POPIAComplaints@inforegulator.org.za
Website	https://hashtagintl.com	https://inforegulator.org.za
Forms	Form 2 (Annexure A) to request access	Form 5 to lodge a complaint

Annexure A – Form 2: Request for access to record [Regulation 7]

Reproduced from the form published by the Information Regulator

(<https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>). The addressee details have been filled in. Requesters may also use the official PDF.

NOTE: 1. Proof of identity must be attached by the requester. 2. If the request is made on behalf of another person, proof of that authorisation must be attached to this form.

TO: The Information Officer	Christopher Naidoo, HAHSTAG INTERNATIONAL (PTY) LTD (trading as Hashtag International) 35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, 4068
Email address	chris@hashtagintl.com
Fax number	N/A

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 (when made on behalf of another person)	
Postal address	
Street address	
Email address	
Contact numbers: Tel. (B) / Cellular / Facsimile	
Full names of person on whose behalf request is made (if applicable)	
Identity number	
Postal address	
Street address	
Email address	
Contact numbers: Tel. (B) / Cellular / Facsimile	

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if known, to enable the record to be located. (If the space is inadequate, continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (mark the applicable box with an "X")

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	☐
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FORM OF ACCESS (mark the applicable box with an "X")

Printed copy of record (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 record on flash drive (including virtual images and soundtracks)	☐
Copy of record on compact disc drive (including virtual images and soundtracks)	☐
Copy of record saved on cloud storage server	☐

MANNER OF ACCESS (mark the applicable box with an "X")

Personal inspection of record 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)	☐
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 (if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the space is inadequate, continue on a separate page and attach it to this form. The requester must sign all the additional pages.

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	

FEES

a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d) If you qualify for exemption from the payment of any fee, please state the reason for exemption.

Reason	
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You will be notified in writing whether your request has been approved or denied and, if approved, the costs relating to your request, if any. Please indicate your preferred manner of correspondence: ☐ Postal address ☐ Facsimile ☐ Electronic communication (please specify): _____

Signed at _____ this _____ day of _____ 20____

Signature of requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number	
Request received by (state rank, name and surname of Information Officer)	
Date received	
Access fees	
Deposit (if any)	
Signature of Information Officer	

Annexure B – Fees in respect of private bodies

Source: Annexure B of the PAIA Regulations, 2021 (GN R.757, GG 45057, 27 August 2021), as published by the Information Regulator at <https://infoeregulator.org.za/paia-fees/> and in its "PAIA Fee Structure and Exemptions" leaflet (March 2026), both accessed 13 October 2026. The amounts match the private-body schedule in the Regulator's own PAIA manual (May 2025).

Item	Description	Amount
1	The request fee payable by every requester	R140.00
2	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3	Printed copy of A4-size page	R2.00 per page or part thereof
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 (ii) compact disc – if provided to the requestor	R40.00 R40.00 R60.00
5	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation from the service provider.
6	Copy of visual images	Service to be outsourced. Will depend on the quotation from the service provider.
7	Transcription of an audio record, per A4-size page	R24.00
8	Copy of an audio record on: (i) flash drive (to be provided by requestor) (ii) compact disc – if provided by requestor (ii) compact disc – if provided to the requestor	R40.00 R40.00 R60.00
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 a total cost of	R145.00 R435.00
10	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11	Postage, e-mail or any other electronic transfer	Actual expense, if any

Note to item 1: Hashtag voluntarily waives the request fee for a data subject, or a person authorised by the data subject, who requests access to the data subject's own personal information (section 10.2). Access fees may still apply.