Doc ID: HASHTAG-IO-02 · FINAL v1.0 · Effective 27 October 2026 · CSD supplier no. MAAA1773919

PAIA Manual — HAHSTAG INTERNATIONAL (PTY) LTD (t/a Hashtag International)

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), read with the Protection of Personal Information Act 4 of 2013 ("POPIA")

Version	1.0
Date of compilation	27 October 2026
Last reviewed	27 October 2026
Available at	https://hashtagintl.com/paia (and at our principal place of business)

> Since the exemption for small private bodies lapsed on 31 December 2021, every private body, regardless of size or turnover, must compile a PAIA manual, make it available on its website (if it has one) and at its principal place of business, and provide copies on request. This manual is published to meet that obligation.

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1. Introduction and purpose

HAHSTAG INTERNATIONAL (PTY) LTD (t/a Hashtag International) ("**Hashtag**", "**we**", "**us**") is a South African business process outsourcing (BPO) company. We provide trained contact-centre staff, infrastructure and management to clients in the United Kingdom, Ireland and the United States of America for outbound telesales, appointment setting and customer service, billed per agent hour.

PAIA gives effect to the constitutional right of access to information held by another person where that information is required for the exercise or protection of any right. This manual explains:

- what categories of records we hold;
- which records are automatically available without a formal request;
- how to request access to records that are not automatically available, and what it costs;
- how we process personal information under POPIA.

This manual does not create any right of access beyond what PAIA provides. Access may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA.

2. Company details

Registered name	HAHSTAG INTERNATIONAL (PTY) LTD (t/a Hashtag International)
Registration number (CIPC)	2026/794619/07 (registered name HAHSTAG INTERNATIONAL (PTY) LTD; name-correction to HASHTAG pending)
Income tax reference	9311207279
VAT number (if registered)	To be advised (VAT registration in progress with SARS)
Directors	Christopher Naidoo (sole director)
Registered address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal
Physical / operating address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal
Postal address	35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal
Telephone	+27 61 808 9331
Email	chris@hashtagintl.com
Website	https://hashtagintl.com

3. Information Officer and Deputy Information Officer(s)

Under PAIA and POPIA, the head of a private body is its Information Officer unless that duty is authorised to another person. Information Officers must be registered with the Information Regulator.

Role	Name	Contact
Information Officer	Christopher Naidoo (Director) — registered with the Information Regulator from 6 Oct 2026	chris@hashtagintl.com
Deputy Information Officer	None appointed	—

Address for all PAIA requests: 35 Dentvale Close, Rydalvale, Phoenix, Durban, KwaZulu-Natal, or by email to the Information Officer above (subject line: "PAIA Request").

4. Guide on how to use PAIA and POPIA

The Information Regulator has published a Guide (under section 10 of PAIA) on how to use PAIA and POPIA. It is available in all official languages from the Regulator:

Information Regulator (South Africa) - Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 - Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017 - Telephone: 010 023 5200 · Toll-free: 0800 017 160 - General enquiries: enquiries@inforegulator.org.za - PAIA complaints: PAIAComplaints@inforegulator.org.za - POPIA complaints: POPIAComplaints@inforegulator.org.za - Website: https://inforegulator.org.za

A copy of the Guide may also be inspected at our offices during normal business hours or requested from our Information Officer.

(Contact details checked against the Regulator's website on 27 October 2026; please re-check before each review.)

5. Records automatically available (section 52)

The following are available without a formal PAIA request (subject to reasonable reproduction cost):

- This PAIA manual.
- Information published on https://hashtagintl.com, including our Privacy Policy.
- Marketing and service brochures (when issued).

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

6. Records available in terms of other legislation

We keep records as required by, among others, the following laws (the list is not exhaustive):

- 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
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 (RICA)
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991
- Currency and Exchanges Act 9 of 1933 and the Exchange Control Regulations

Where a law grants a right of access to a record, access must be sought under that law.

7. Subjects and categories of records held

Subject	Categories of records
Company secretarial	Memorandum of Incorporation; CIPC registration documents; share register; beneficial ownership records; directors' resolutions and minutes; annual returns
Finance and tax	Annual financial statements; management accounts; general ledger; invoices and statements; bank records; tax returns and SARS correspondence (income tax, PAYE, VAT, UIF, SDL); exchange-control / balance-of-payments documentation; audit or review reports

Subject	Categories of records
Human resources	Employment contracts; job applications and CVs; ID and right-to-work documents; payroll and leave records; performance, training and disciplinary records; attendance and shift records; medical certificates; night-work health assessments; employment equity records; COIDA records
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)	Lead/contact data, call recordings, CRM and dialler records belonging to clients, processed on clients' instructions. Requests for these records should usually be directed to the relevant client as responsible party.
Suppliers	Supplier agreements; purchase orders; invoices; supplier due-diligence records
IT and security	IT policies; access logs; asset registers; security incident records; backup records
Operations	Policies and procedures; scripts and training material; workforce-management schedules; health and safety records
Legal	Contracts; litigation and dispute records; insurance policies; licences and permits
Marketing	Website content; enquiry and lead records from our own marketing; consent and opt-out records

The fact that a category is listed does not mean access will be granted; each request is assessed against the grounds of refusal in PAIA.

8. Processing of personal information (POPIA)

8.1 Purposes of processing

- Providing contracted outsourced contact-centre services to clients (as an **operator** on the client's behalf).
- Recruiting, employing, training, paying and managing staff.
- Managing client and supplier relationships, billing and collections.
- Complying with legal, tax, labour and regulatory obligations.
- Securing our premises, systems and information.
- Marketing our own services to businesses, with an opportunity to opt out.

8.2 Categories of data subjects and personal information

Data subjects	Personal information
Employees, contractors and applicants	Name, ID/passport number, contact details, address, banking details, tax number, qualifications, employment history, remuneration, performance, disciplinary records, call recordings and quality scores, attendance, CCTV images (if any), and special personal information where legally required (e.g. health information for sick leave or night-work assessments; race for employment equity reporting)

Data subjects	Personal information
Client representatives	Names, job titles, business contact details, correspondence
Clients' customers and prospects (processed as operator)	Names, telephone numbers, email and postal addresses, account or order information, call recordings, call notes and outcomes, consent/opt-out status — as supplied by or collected for the client
Suppliers and their representatives	Names, contact details, banking and tax details, contract information
Website visitors and enquirers	Name, contact details, message content, IP address, cookie and analytics data

8.3 Recipients or categories of recipients

- Clients (for whom we process as operator) and their authorised systems (diallers, CRMs, VoIP).
- Our service providers: IT and cloud hosting, payroll, accounting and audit, banking, insurance, legal advisers, recruitment and background-screening providers (with consent where required).
- Government and regulatory bodies where required by law (e.g. SARS, Department of Employment and Labour, UIF, Compensation Fund, Information Regulator, SARB via our bank).

8.4 Planned trans-border flows

Our services are delivered to clients in the United Kingdom, Ireland and the United States. Personal information about clients' customers and prospects is typically held in clients' own systems in those or other countries and accessed by our staff from South Africa. Some of our own service providers (e.g. email and cloud software) may store data outside South Africa. Transfers are made only in line with section 72 of POPIA, for example under binding agreements that provide an adequate level of protection, or where necessary to perform a contract. For UK and EU-origin data, we support the transfer mechanisms our clients are required to use (see our Data Processing Agreement).

8.5 Security measures

We take appropriate, reasonable technical and organisational measures, including: role-based access control and unique user log-ins; multi-factor authentication where supported; device and endpoint protection; restrictions on personal phones, recording and removable media on the production floor; clean-desk practice; confidentiality undertakings and POPIA training for staff; least-privilege access to client systems; logging and monitoring; secure disposal; supplier due diligence; and an incident-response procedure including notification of security compromises under section 22 of POPIA.

8.6 Objection and correction

Data subjects may object to processing (POPIA section 11(3)) using Form 1, and request correction or deletion (section 24) using Form 2, under the POPIA Regulations. Forms are available from the Information Regulator's website or our Information Officer.

9. How to request access

1. **Form**: Use **Form 2** (Request for Access to Record) prescribed under the PAIA Regulations, 2021. Forms are available from https://inforegulator.org.za or our

Information Officer.
2. **Submit** the form to the Information Officer by email, post or hand delivery (details in section 3).
3. **Detail**: Provide enough detail to identify the record(s) and the requester, state the form of access required, and state the right you seek to exercise or protect and why the record is required for that purpose (section 53).
4. **Acting for someone else**: If you request on behalf of another person, provide proof of the capacity in which you act.
5. **Assistance**: If you cannot read or write or have a disability, you may make the request orally; the Information Officer will help complete the form.

9.1 Timelines

- We will decide on a request within **30 days** of receiving it (with the request fee, if applicable).
- We may extend this period once by up to **30 days** in the circumstances set out in section 57 of PAIA, with written notice and reasons.
- If we do not respond in time, the request is regarded as refused (section 58).

9.2 Third-party notification

Where a request concerns a third party's records or information, we must take reasonable steps to notify that third party, who may make representations (sections 71–73).

10. Fees

Fees are prescribed by the PAIA Regulations, 2021 (Annexure B). As published by the Information Regulator at the date of this manual:

Item	Amount
Request fee (payable by every requester other than a personal requester seeking their own personal information)	R140.00
Photocopy / printed copy of A4 page (per page or part)	R2.00
Copy on flash drive (provided by requester)	R40.00
Copy on compact disc (provided by requester / by us)	R40.00 / R60.00
Transcription of an audio record (per A4 page)	R24.00
Transcription or copy of visual images	Outsourced; at quoted cost
Search and preparation time (per hour or part, excluding the first hour)	R145.00, up to a maximum of R435.00
Deposit (if search and preparation exceeds six hours)	One-third of the access fee
Postage, email or other electronic transfer	Actual expense, if any

The Information Officer will notify you (using **Form 3**) of fees payable. Records will be released only once fees are paid. If a request is refused, any deposit will be refunded. *(Fees may change; the Regulator's current schedule applies.)*

11. Grounds for refusal

We may or must refuse access on the grounds in Chapter 4 of Part 3 of PAIA, including to protect:

- the privacy of third parties who are natural persons (section 63);
- third parties' commercial information (section 64);
- confidential information of third parties (section 65);
- the safety of individuals and property (section 66);
- records privileged from production in legal proceedings (section 67);
- our own commercial information, including trade secrets and pricing (section 68);
- research information (section 69).

Records requested for criminal or civil proceedings after proceedings have commenced are excluded from PAIA where their production is provided for by other law (section 7). A request may also be refused if it is manifestly frivolous or vexatious, or would substantially and unreasonably divert our resources.

12. Remedies

Hashtag does not have an internal appeal procedure. If you are dissatisfied with our decision (including fees, extension or form of access), you may within **180 days** of being notified:

- lodge a complaint with the **Information Regulator** (Form 5, to PAIAComplaints@inforegulator.org.za); or
- apply to a competent court for relief (sections 78–82).

13. Availability and updating

This manual is available on https://hashtagintl.com, at our principal place of business, and on request from the Information Officer (a reasonable copying fee may apply). We will review it at least annually and when our business changes materially.

Signed: _____ Christopher Naidoo, Director and Information Officer HAHSTAG INTERNATIONAL (PTY) LTD (t/a Hashtag International) Date: 27 October 2026