



**MOBIUS**  
GROUP

**MOBIUS HOLDINGS**

**PROMOTION OF ACCESS TO INFORMATION (PAIA) MANUAL**

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

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## 1. INTRODUCTION

“Mobius” or “We” refers to Mobius Holdings, a registered company in The Republic of South Africa and it’s subsidiaries.

### Subsidiaries and member companies

Member company	Address	Information Officer
Mobius Services (Pty) Ltd	Unit B107 Buchanan Square 160 Sir Lowry Road	Sandhya Mohan-Pillai, Managing Director
Phinity Risk Solutions (Pty) Ltd	Woodstock Cape Town 7925	Patrick Ryan, Director
Mobius Academy (Pty) Ltd		Lynn Martin, Director

We are committed to compliance with the directives of the South African Constitution and national legislation.

This manual was compiled in accordance with the Promotion of Access to Information Act (PAIA) No. 2 of 2000 and to address the requirements of the Protection of Personal Information Act (POPIA) No. 4 of 2013.

PAIA and POPIA give effect to section 32 of the South African Constitution, which focuses on the right to access information i.e. everyone has the right of access to information held by the state or a private body to enforce a culture of transparency and accountability.

Section 51 of POPIA requires that Mobius, as a private body, compile a manual giving information to the public regarding the records held and the procedures to be followed in requesting information.

## **2. PURPOSE OF THE PAIA MANUAL**

This manual is useful for the public to:

- check the categories of records held by Mobius which are available without a person having to submit a formal PAIA request,
- have a sufficient understanding of how to make a request for access to a record held by Mobius, by providing a description of the subjects on which Mobius holds records and the categories of records held on each subject,
- know the description of the records of Mobius which are available in accordance with any other legislation,
- access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access,
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it,
- know if Mobius will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto,
- know the description of the categories of data subjects and of the information or categories of information relating thereto,
- know the recipients or categories of recipients to whom the personal information may be supplied,
- know if Mobius has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied, and
- know whether Mobius has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



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### **3. CONTACT DETAILS**

Email Address: info@mobiusconsulting.co.za

Physical Address: B107 Buchanan Square

160 Sir Lowry Road

Woodstock

Cape Town

7925

Postal Address: PO Box 1171

Woodstock

7925

Telephone Number: 021 201 1120

Website: <https://mobiusconsulting.co.za>

#### **4. RECORDS AVAILABLE WITHOUT A REQUEST**

These records are mostly records that may be available on our website. A person may download or request these documents telephonically or by sending an email or a letter to the contact detail provided for above.

#### **5. RECORDS AVAILABLE IN TERMS OF LEGISLATION**

Mobius keeps information and records in accordance with the following legislation, which includes, but is not limited to the following legislation:

1. Basic Conditions of Employment Act 75 of 1997
2. Compensation for Occupational Injuries and Diseases Act 130 of 1993
3. Companies Act No. 71 of 2008
4. Income Tax Act 58 of 1962
5. Labour Relations Act 66 of 1995
6. Skills Development Levies Act 9 of 1999
7. Unemployment Insurance Act 63 of 2001
8. Value Added Tax Act 89 of 1991
9. Employment Equity Act 55 of 1998
10. Consumer Protection Act 2008

#### **6. CATEGORIES OF RECORDS HELD**

<b>Business Information</b>
<ol style="list-style-type: none"><li>1. Documents of Incorporation</li><li>2. Memorandum and Articles of Association</li><li>3. Minutes of Board of Directors meetings</li></ol>



4. Records relating to the appointment of directors/ auditor / secretary / public officer / and other officers
5. Share Register and other statutory registers

#### **Financial Records**

1. Annual Financial Statements
2. Tax Returns
3. Accounting records
4. Banking Records Bank Statements Paid Cheques Electronic banking records
5. Asset Register
6. Rental Agreements
7. Invoices
8. Contracts
9. General correspondence

#### **Income Tax Records**

1. PAYE Records
2. Documents issued to employees for income tax purposes
3. Records of payments made to SARS on behalf of employees
4. All other statutory compliances: -
  - VAT - Regional Services Levies - Skills Development Levies
  - UIF
  - Workmen's Compensation



### **Human Resources**

1. Employment contracts
2. Employment equity plan (If applicable)
3. Medical aid records
4. Pension fund records
5. Disciplinary records
6. Salary records
7. SETA records
8. Disciplinary code
9. Leave records
10. Training records
11. Training manuals

### **Client Service Records**

1. Client Correspondence
2. Client Audit Files
3. Client Contracts
4. Client Internal Control Reports
5. Client Business Information
6. Findings and Recommendation reports
7. Investigative Material
8. Legal Documentation
9. Proposal and Tender Documents
10. Project Plans
11. Risk Management Records
12. Solution Methodologies
13. Working Papers





## **7. PROCESSING OF PERSONAL INFORMATION**

Mobius processes personal information for the purposes of performing consulting and other service to our clients as well as in the day-to-day operations of running the business. The purposes are detailed in full in our Privacy Notice (<https://mobiusconsulting.co.za/wp-content/uploads/2023/05/202105-Mobius-Privacy-Notice-v3.0.pdf>).

### **7.1. CROSS BORDER TRANSFER**

Cross Border Transfer, we operate globally, and in certain instances, may process personal information in other countries to support ongoing business delivery. Some countries may not be subject to data protection laws or policies which are as stringent as the data protection laws applicable to the European Union and/or in South Africa. Where this is the case, we will ensure that the receiving party agrees in writing to implement adequate privacy principles before we share any personal information with such party.

### **7.2. INFORMATION SECURITY MEASURES**

We endeavour to protect the security, availability and confidentiality of personal information by implementing and maintaining reasonable technical and organisational controls. Our controls are aligned to leading practices and frameworks, including ISO27000 series and other generally accepted controls for information security.

## **8. REQUEST PROCESS**

A person who requests access to records must complete the necessary request form. The application form can be obtained from <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>. The completed form must be marked for the attention of the Information Officer and sent to:

- [info@mobiusconsulting.co.za](mailto:info@mobiusconsulting.co.za); or
- the postal address, P O Box 1171, Woodstock, 7915 provided in this manual.

The following should be detailed in the form:

- The requester must indicate which form of access is required;
- Identify the right that is sought to be exercised or protected;
- Provide an explanation of which the requested record is required for the exercise or protection of that right; and
- Provide proof of the capacity in which the requester is requesting the information- Proof of identification of the requestor (and related third parties acting on behalf of the requestor) must be provided on submitting the request form.

An initial response to a request may take up to 30 days from the date of receipt. The Information Officer may extend the period by an additional 30 days depending on the complexity of the request requirements. If access to a record/information is granted, the requestor will be notified and will include the following:

- An indication of the access fee that should be paid upon gaining access (if any).
- An indication of the form in which the access will be granted.

If access to a record/information is denied, the requestor will be notified and will include the following:

- Adequate reasons for the refusal.
- Advice on how to lodge an application against the refusal with a court, once the Requestor has exhausted all available remedies with Mobius.

### **8.1. REQUEST FEES**

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fees. Any other requester who is not a personal requester must pay the required fee before further processing of the request in terms of S54 of the Act. Refer to Appendix B for the detailed prescribed fees.



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## **9. AVAILABILITY OF THE MANUAL**

The latest copy of this manual is available on the Mobius website, <https://mobiusconsulting.co.za/> and is located at the Head Office for public inspection during normal business hours. The manual is also available to any person upon request upon the payment of a reasonable prescribed fee; and to the Information Regulator upon request.

## **10. UPDATING OF THE MANUAL**

This manual will be updated as required or when the relevant legislation changes.



## **APPENDIX B: PRESCRIBED FEES**

These prescribed fees below was published by the Minister of Justice and Constitutional Development in the Government Gazette No. 23119, General Notice No. 187 of 15 February 2002, and are set out as follows:

<b>Access Fees For Reproduction</b>	
Each photocopy of A4 sized part or a part thereof	R1.10
Each photocopy of A4 sized page or part thereof held on a computer or in electronic or machine readable form	R0.75
Copy of a computer readable memory stick	R7.50
Copy of a computer readable compact disc	R70.00
Transcript copy of visual images of an A4 sized page or part thereof	R40.00
Copy of visual images	R60.00
Transcription of an audio record on an A4 sized page or part thereof	R20.00
Copy of the audio record	R30.00
Times reasonably spent to locate a record and preparation for the disclosure or part thereof	R30.00 per hour
<b>Request Fees</b>	
Access to a record containing personal information of the requestor	Free
Any other access to a record as a public body made by a requestor and another person other than the requestor	R50.00
<b>Postal Fees</b>	
Postage of a record to the Requestor	R9.75



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Courier of a record to the Requestor	R99.00
<b>Appeal Fees</b>	
Lodging an appeal to Mobius upon refusal for the request	R50.00

All payments shall be made in the form of an Electronic Funds Transfer (EFT) to the Mobius bank account. The banking details for Mobius as follows:

Bank: FNB

Account Number: 62345981197

Account Name: Mobius Services (Pty) Ltd

Branch Code: 201 809

Reference: PAIA Name Surname