EUROTECH APPLIANCE SERVICES (PTY) LTD

PAIA MANUAL

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

DATE OF COMPILATION: 26/10/2026
DATE OF REVISION: 26/10/2026

TABLE OF CONTENTS

1. List of acronyms and abbreviations

2. Purpose of PAIA Manual

3. Key contact details for access to information

4. Guide on how to use PAIA and how to obtain access to the Guide

5. Categories of records available without a formal PAIA request

6. Records available in accordance with other legislation

7. Subjects on which EuroTech holds records and categories of records

8. Processing of personal information

9. Availability of the Manual

10. Updating of the Manual

1. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
SARS	South African Revenue Service
UIF	Unemployment Insurance Fund
COIDA	Compensation for Occupational Injuries and Diseases Act
VAT	Value-Added Tax

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend 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 if the body 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;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body 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

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF EUROTECH APPLIANCE SERVICES (PTY) LTD

3.1. Chief Information Officer

Name:	Stefan Rüttinger
Tel:	+27 41 004 0647
Email:	service@eurotechappliance.co.za
Fax number:	Not applicable

3.2. Deputy Information Officer

(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.

Name:	Chantelle Joubert
Tel:	041 004 0647
Email:	service@eurotechappliance.co.za
Fax Number:	Not applicable

3.3 Access to information general contacts

Email:	service@eurotechappliance.co.za

3.4 National or Head Office

Postal Address:	Same as physical address – see below
Physical Address:	76A Pickering Street, Newton Park, Port Elizabeth, 6055, South Africa
Telephone:	+27 41 004 0647
Email:	service@eurotechappliance.co.za
Website:	www.eurotechappliance.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid 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, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a public body contemplated in section 11[3]; and

4.3.3.2. access to a record of a private body contemplated in section 50[4];

---

1 Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

2 Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

3 Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92[11].

4.4. Members of the public can inspect or make copies of the Guide from the offices of the 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. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

---

4 Section 50(1) of PAIA- A requester must be given access to any record of a private body if-
a) that record is required for the exercise or protection of any rights;
b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

5 Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

7 Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

8 Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

9 Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

10 Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11 Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding-
(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

5. CATEGORIES OF RECORDS OF EUROTECH APPLIANCE SERVICES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Company information	Contact details, service area, opening hours	X	X
Service information	Repair services, call-out and bench-fee information	X	X
Legal / compliance information	Privacy Policy,	X	X
Legal / compliance information	Terms & Conditions	X	X
Legal / compliance information	Cookie Policy	X	X
Legal / compliance information	PAIA/POPIA information, PAIA Manual	X	X

6. DESCRIPTION OF THE RECORDS OF EUROTECH APPLIANCE SERVICES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Personal information records	Protection of Personal Information Act 4 of 2013
Employment and payroll records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Income Tax Act 58 of 1962; Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Tax and accounting records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Occupational health and safety / compensation records	Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY EUROTECH APPLIANCE SERVICES (PTY) LTD

Subjects on which the body holds records	Categories of records
Corporate / Governance	Company registration documents; Memorandum of Incorporation; statutory and governance records; contracts and agreements
Finance and Tax	Invoices; quotations; payment records; bank and accounting records; VAT and tax records
Human Resources	Employment agreements; payroll records; employee records; leave, training and performance records
Customers and Service Operations	Customer contact details; service bookings; job cards; appliance details; diagnostic and repair records; quotations; invoices; warranty/service communications
Suppliers and Service Providers	Supplier contact details; quotations; orders; invoices; agreements; account information
Marketing and Website	Website content; enquiries; marketing records; consent / communication preferences where applicable

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

EuroTech Appliance Services (Pty) Ltd processes personal information for purposes including customer enquiries and bookings; provision of appliance repair and related services; customer communication; quotations, invoicing and payment administration; supplier and service-provider management; employee administration and payroll; legal and regulatory compliance; record keeping; fraud prevention and security; and, where lawfully permitted, marketing and customer relationship management.

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
Customers / Clients	Names; telephone numbers; email addresses; residential or business addresses; appliance and service details; communication history; quotations, invoices and payment-related information.
Service Providers / Suppliers	Names; business and contact details; registration and VAT information where applicable; banking/payment details; quotations, invoices and contractual information.
Employees / Job Applicants	Identification and contact details; address; employment and payroll information; tax and banking details; qualifications; training and performance information; legally required demographic information where applicable.
Business Partners / Professional Contacts	Names; roles; organisations; contact details; correspondence and contractual/business information.

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

Payment and transaction information
Banks, Yoco and other authorised payment or financial service providers, where required for payment processing, reconciliation, fraud prevention or related financial administration.

Customer contact and communications information
Authorised communications, email, hosting and technology service providers, including providers used for email, website hosting, customer communication and messaging services, where necessary for the provision and administration of EuroTech's services.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services or authorized screening providers, where lawfully required
Qualifications, for qualification verifications	South African Qualifications Authority or authorized verification providers, where applicable
Credit and payment history, for credit information	Credit Bureaus or payment / financial service providers, where lawfully applicable
Customer service and repair information	Employees and technicians who require the information to deliver the requested service; relevant suppliers or manufacturers where necessary for parts, warranty or technical support
Financial and statutory information	Accountants, auditors, banks/payment providers, SARS and other authorities where legally required

8.4 Planned transborder flows of personal information

EuroTech Appliance Services (Pty) Ltd uses cloud-based, website, communications, payment and information-management services in the course of its business operations.

These services include a customer and service management system and website infrastructure hosted using Google Firebase services, Google Analytics for website analytics, Yoco for payment processing, email and hosting services, and electronic communications platforms such as WhatsApp.

Personal information processed through these systems may include customer names and contact details, service addresses, appliance and repair information, invoices and payment-related information, service records, communications, website usage information, photographs and documents, and related administrative information.

EuroTech's Firebase environment includes the following confirmed data locations:

- the CRM database is hosted in the us-central1 region in Iowa, United States;
- the customer document and photo storage bucket is hosted in the US-EAST1 region in South Carolina, United States;
- application Cloud Functions are hosted in the us-central1 region in Iowa, United States; and
- Firebase Authentication processes data in the United States.

The public EuroTech website uses Firebase Hosting's global content delivery network and is therefore not limited to the location of the CRM database.

Accordingly, certain personal information is stored and/or processed outside the Republic of South Africa. Additional support, logging, infrastructure or service-provider processing may also occur outside the specific regions identified above in accordance with the applicable service-provider terms.

Where personal information is stored, accessed or processed outside the Republic of South Africa, EuroTech will manage such processing in accordance with the applicable requirements of POPIA, including section 72.

In addition, the Director of the company may from time to time perform company-related administrative and management functions while temporarily located outside South Africa, including in Germany. This may involve secure remote access to company information and, where operationally necessary, temporary or local storage of certain business records on devices under the Director's control.

Such information remains subject to EuroTech's confidentiality and information-security measures.

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

EuroTech Appliance Services (Pty) Ltd implements reasonable technical and organisational measures appropriate to the nature and scale of its operations to protect personal information against loss, unauthorised access, misuse, alteration or disclosure.

These measures include, where applicable:

- controlled access to business systems, records and customer information;
- password-protected user accounts and devices;
- access restrictions based on operational requirements and a need-to-know basis;
- appropriate anti-virus, anti-malware and software security measures;
- regular software and system updates;
- secure cloud-based systems and service providers;
- appropriate backup and data-recovery measures;
- physical protection of business records and devices; and
- confidentiality obligations applicable to employees and authorised persons who have access to personal information.

EuroTech reviews its information-security measures from time to time and updates them where reasonably necessary, taking into account the nature of the information processed, the systems used and the risks associated with such processing.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available -

9.1.1 on www.eurotechappliance.co.za;

9.1.2 head office of the EuroTech Appliance Services (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

At the date of revision of this Manual, the prescribed fee for a black-and-white photocopy or printed copy of an A4-size page for a private body is R2.00 per page or part thereof. Other fees applicable to formal PAIA requests, including request, search, preparation and reproduction fees, will be charged in accordance with Annexure B of the applicable PAIA Regulations, as amended from time to time.

10. UPDATING OF THE MANUAL

The head of EuroTech Appliance Services (Pty) Ltd will on a regular basis update this manual.

Issued by



Stefan Rüttinger
Director