WeWork - Coworking & Office Space,
173 Oxford Road,
Johannesburg, 2196
+27 73 036 2005
info@thinkforgrowth.online
www.thinkforgrowth.online

PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

PAIA and POPIA Manual

EasyComply (Pty) Ltd t/a ThinkForGrowth

Effective date: 2 November 2026

1. Introduction

This is the information manual of EasyComply (Pty) Ltd, trading as ThinkForGrowth, prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA).

PAIA gives everyone the right to request access to records held by a private body where the record is needed to exercise or protect a right. This manual explains:

- Who to contact to request a record
- What records EasyComply holds
- How to make a request, what it may cost, and why a request may be refused
- How EasyComply processes personal information under the Protection of Personal Information Act 4 of 2013 (POPIA)

This manual should be read with the EasyComply POPIA Compliance Manual and the Privacy Notice published at www.thinkforgrowth.online/Privacy.

2. Company and contact details

All requests under this manual go to the Information Officer, or the Deputy Information Officer if the Information Officer is unavailable.

Registered name	EasyComply (Pty) Ltd
Trading name	ThinkForGrowth
Registration number	2025/446772/07
Physical address	WeWork, 173 Oxford Road, Rosebank, Johannesburg, 2196
Postal address	WeWork, 173 Oxford Road, Rosebank, Johannesburg, 2196
Telephone	+27 73 036 2005
Email	info@thinkforgrowth.online
Website	www.thinkforgrowth.online
Head of the private body and Information Officer	Christopher Ndebele, Managing Director
Deputy Information Officer	Phomolo Faith Phiri-Ndebele

WeWork - Coworking & Office Space,
173 Oxford Road,
Johannesburg, 2196
+27 73 036 2005
info@thinkforgrowth.online
www.thinkforgrowth.online

3. The Information Regulator's guide to PAIA

The Information Regulator has published a guide, in each official language, on how to use PAIA and POPIA to request access to information. It explains the rights the Acts give you, how to make a request, and how to complain if a request is not handled properly.

The guide is available on the Information Regulator's website, www.inforegulator.org.za, or from the Regulator's offices.

You may also inspect or request a copy of the guide from EasyComply during normal office hours, using the contact details in section 2.

4. Records held by EasyComply

EasyComply holds the records below. Records marked freely available can be viewed without a formal request. All others require a request under section 6, and access is subject to the grounds for refusal in PAIA.

Category	Examples of records	Availability
Public information	Website content, Privacy Notice, Terms of Use, this manual	Freely available
Company and statutory	Memorandum of Incorporation, CIPC registration documents, securities register, beneficial ownership register, directors' resolutions	Request required
Financial	Accounting records, annual financial statements, tax returns and assessments, bank statements, invoices	Request required
Client records	Engagement letters, client files, working papers, financial statements, tax and statutory submissions made for clients, correspondence	Request required, and only the client or someone the client authorises
Employees and contractors	Employment contracts, payroll and tax records, leave records, contractor agreements	Request required
Suppliers and service providers	Contracts and operator agreements with software and service providers	Request required
Policies and compliance	POPIA Compliance Manual, internal policies and procedures, information security records	Request required

No notice has been published under section 52 of PAIA listing further categories of records that are automatically available.

5. Records kept under other legislation

EasyComply keeps records as required by the following laws, where they apply to its business:

- Basic Conditions of Employment Act 75 of 1997

WeWork - Coworking & Office Space,
173 Oxford Road,
Johannesburg, 2196
+27 73 036 2005
info@thinkforgrowth.online
www.thinkforgrowth.online

- 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
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

If a record is available to the public under one of these laws, it may be obtained in the way that law provides.

6. How to request access

1. Complete the prescribed request form (Form 2 of the PAIA Regulations), available on the Information Regulator's website.
2. Send it to the Information Officer by email or hand delivery, using the details in section 2.
3. Give enough detail to identify the record, the form of access you want, and the right you are exercising or protecting.
4. If you are requesting on behalf of someone else, include proof of your authority to do so.
5. Pay any request fee when asked. EasyComply will tell you in writing if a fee or deposit applies.

EasyComply will decide on a request within 30 days of receiving it. This period may be extended by up to a further 30 days in the circumstances PAIA allows, and you will be told in writing if this happens.

Fees. Fees are charged as prescribed in the PAIA Regulations, for the request and for searching, preparing and copying records. A requester asking for their own personal information does not pay the request fee.

Grounds for refusal. EasyComply may or must refuse access where PAIA requires it, including to protect:

- The privacy of a third party who is a natural person
- Commercial information of a third party or of EasyComply, such as trade secrets or financial information
- Confidential information owed to a third party, including client information held under professional confidentiality
- The safety of individuals or the protection of property
- Records privileged from production in legal proceedings

If you disagree with a decision. You may lodge a complaint with the Information Regulator or apply to court, within the time periods set out in PAIA.

WeWork - Coworking & Office Space,
173 Oxford Road,
Johannesburg, 2196
+27 73 036 2005
info@thinkforgrowth.online
www.thinkforgrowth.online

7. Processing of personal information (POPIA)

Purposes. EasyComply processes personal information to provide accounting, tax, payroll, company secretarial and business support services; to meet its legal obligations; to manage its client, employee and supplier relationships; to respond to enquiries; and to invoice for its services.

Data subjects and information held

Data subjects	Personal information
Clients and prospective clients (individuals)	Names, contact details, ID or passport numbers, tax reference numbers, income and financial records, bank details
Directors, shareholders and beneficial owners of client companies	Names, ID numbers, contact details, shareholding and beneficial ownership details
Employees of clients (for payroll)	Names, ID numbers, salaries, leave, tax and UIF details, bank details
EasyComply employees and contractors	Names, contact details, ID numbers, employment and payroll records, bank details
Suppliers and service providers	Names, contact details, contract and payment details
Website visitors and enquirers	Names, contact details and the content of their messages

Recipients. Personal information may be shared with SARS, CIPC, the Department of Employment and Labour, and other regulators where the law requires it or a client instructs it; with service providers that EasyComply uses to run its practice (cloud accounting, payroll, email and document storage, and website hosting); and with others a data subject authorises, such as their bank or auditor. EasyComply does not sell personal information.

Information sent outside South Africa. Some service providers store information on servers outside South Africa. EasyComply only uses providers subject to laws, binding rules or agreements that give a level of protection substantially similar to POPIA, as section 72 requires.

Security measures. EasyComply takes reasonable technical and organisational measures to protect personal information, including restricted access to client information, password-protected cloud systems from reputable providers, secure document sharing, and confidentiality obligations for everyone who works with it.

8. Availability and updates

This manual is available free of charge on request by email to info@thinkforgrowth.online, and for inspection at EasyComply's office during normal business hours. A copy will be provided to the Information Regulator on request.

EasyComply reviews this manual at least once a year, and whenever its records, processing or contact details change.

WeWork - Coworking & Office Space,
173 Oxford Road,
Johannesburg, 2196
+27 73 036 2005
info@thinkforgrowth.online
www.thinkforgrowth.online

Approval

Effective date	2 November 2026
Next review	2 November 2027
Approved by	Christopher Ndebele, Managing Director and Information Officer
Signature	
Date	2 November 2026