

# PAIA SECTION 51 MANUAL

## African K9 Solutions (Pty) Ltd

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### Document control

|                    |                                                                                                                       |
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| Issue date         | 25 September 2026                                                                                                     |
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| Review trigger     | Earlier review if legislation, regulator guidance, services, systems, operators, incidents or risk materially change. |
| Supersedes         | Version 1.0 documents dated 1 September 2026 dealing with the same subject matter.                                    |

### 1. Introduction and purpose

This Manual is prepared by African K9 Solutions (Pty) Ltd in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended. It identifies AK9, describes records held by AK9, explains how access requests are made, and records information required for the interaction between PAIA and the Protection of Personal Information Act 4 of 2013 (POPIA).

### 2. Key terms

|           |                                                  |
|-----------|--------------------------------------------------|
| AK9       | African K9 Solutions / AK9                       |
| DIO       | Deputy Information Officer                       |
| IO        | Information Officer                              |
| PAIA      | Promotion of Access to Information Act 2 of 2000 |
| POPIA     | Protection of Personal Information Act 4 of 2013 |
| Regulator | Information Regulator (South Africa)             |

### 3. Particulars of the private body

|                            |                                                                              |
|----------------------------|------------------------------------------------------------------------------|
| Legal name                 | African K9 Solutions (Pty) Ltd                                               |
| Trading name               | African K9 Solutions / AK9                                                   |
| CIPC registration number   | 2020/434827/07                                                               |
| VAT status                 | Not VAT registered                                                           |
| Head / Information Officer | Pieter Jacobus Andries Els                                                   |
| Deputy Information Officer | Thabiso Letshabo   tembisa@afरिकंक9solutions.co.za   082 925 6231            |
| Principal / postal address | 25 Lakeview Crescent, Aspen Hills, Johannesburg, Gauteng, 2091, South Africa |
| Telephone                  | 079 459 0852                                                                 |
| POPIA / PAIA email         | k9security@afरिकंक9solutions.co.za                                           |
| Website                    | www.afरिकंक9solutions.co.za                                                  |

## 4. PAIA Guide and assistance

The Information Regulator publishes the Guide on how to use PAIA, prescribed forms, fee information and complaint procedures. The Guide is available in all official languages from the Regulator. AK9 will make current English and Afrikaans copies of the Guide available for public inspection at its principal place of business during normal business hours, and will assist a requester to identify the correct procedure where reasonably possible.

[Information Regulator PAIA resources](#)

## 5. Records available without a formal PAIA request

| Category                                                                                                                                                                                                                                             | Examples                                                                                         | Access                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------|
| Company information                                                                                                                                                                                                                                  | Public business contact details and company/service information intentionally published by AK9.  | Website / public marketing material |
| Privacy and access information                                                                                                                                                                                                                       | This PAIA Manual and the AK9 Privacy Notice.                                                     | Website / request to IO             |
| Service information                                                                                                                                                                                                                                  | Published service descriptions, general public terms, brochures and published price information. | Website / public material           |
| Regulatory information                                                                                                                                                                                                                               | Publicly available registrations/accreditation information that AK9 elects to publish.           | Website / request where public      |
| <b>CONTROL NOTE</b>                                                                                                                                                                                                                                  |                                                                                                  |                                     |
| Automatic/public availability does not waive lawful grounds for refusing access to third-party personal information, confidential commercial information, security-sensitive records, legally privileged material or restricted vetting information. |                                                                                                  |                                     |

## 6. Records held by AK9

| Record category                        | Examples                                                                                                                                                                                                                                                   |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Corporate and governance</b>        | CIPC/company records, resolutions, policies, licences, registrations, accreditation records, contracts and compliance evidence.                                                                                                                            |
| <b>Financial</b>                       | Invoices, statements, payment records, banking/supplier/accounting/tax records. AK9 does not intentionally retain full payment-card data where a payment provider processes the transaction.                                                               |
| <b>Human resources</b>                 | Employee/contractor identity, employment, remuneration, leave, training, disciplinary, qualification, PSIRA, health-and-safety and related records.                                                                                                        |
| <b>Clients and suppliers</b>           | Contact details, quotations, contracts, correspondence, service records, site information and payment records.                                                                                                                                             |
| <b>Security, K9 and training</b>       | Security/K9 service records, learner/course/assessment/attendance/certification and operational records.                                                                                                                                                   |
| <b>Firearm administration/training</b> | Client identity/supporting records, competency/licence information, firearm details/serial numbers, storage/safe information, photographs, forms, motivations and training/application records supplied for the service.                                   |
| <b>Vetting / background screening</b>  | Candidate identity/contact data, authorities/mandates, criminal-screening transaction/result information, professional status, qualifications, employment/references, NRSO/NCPR process/result information and biometrics only where lawful and necessary. |
| <b>Tracking / telematics</b>           | Customer/vehicle/device identifiers, location, route, speed, event, recovery, dashcam or platform-related information used                                                                                                                                 |

|                                  |                                                                                                                                        |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
|                                  | in contracted services.                                                                                                                |
| <b>Website / communications</b>  | Website enquiries, forms, email/WhatsApp/SMS/telephone communications, technical logs and cookies/analytics data where enabled.        |
| <b>Incident / legal / rights</b> | Complaints, security incidents, data-subject requests, PAIA requests, breach records, disputes, legal correspondence and audit trails. |

## 7. Records available in terms of other legislation

- Companies Act 71 of 2008 and applicable company regulations.
- Tax Administration Act 28 of 2011 and applicable tax legislation.
- Basic Conditions of Employment Act 75 of 1997, Occupational Health and Safety Act 85 of 1993 and other employment laws.
- Private Security Industry Regulation Act 56 of 2001 and applicable regulations.
- Skills development legislation and QCTO/SASSETA/accreditation requirements where applicable.
- Firearms Control Act 60 of 2000 and applicable regulations where relevant to AK9 services.
- POPIA and PAIA.
- Criminal Law (Sexual Offences and Related Matters) legislation and the Children's Act 38 of 2005 where relevant to lawful vetting/facilitation processes.
- Any other law or regulator requirement applicable to a specific AK9 service.

## 8. How to request access

A request for access to an AK9 record must comply with PAIA. The requester should use the current prescribed PAIA Form 2 and submit it to [k9security@afrikan9solutions.co.za](mailto:k9security@afrikan9solutions.co.za) or to the principal address in section 3. A private-body requester must identify the record and the right to be exercised or protected, and explain why the record is required for that purpose.

- Proof of identity must be sufficient to protect the requested information from unauthorised disclosure.
- Prescribed fees apply where legally payable. AK9 uses the current Information Regulator fee structure in force at the date of the request.
- AK9 will deal with the request within the statutory period, subject to lawful extensions, third-party notices, fees and grounds for refusal.
- There is no internal appeal against the decision of the head of a private body. A requester may use the complaint/court remedies available under PAIA.

## 9. Processing of personal information

AK9 processes personal information to provide and administer its services; manage clients, staff, suppliers and learners; comply with legal/regulatory duties; protect people, property and systems; manage incidents and claims; carry out authorised verification/vetting; and communicate with data subjects.

| <b>Data subject category</b>              | <b>Information that may be processed</b>                                                                                                                                                                                                  |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Clients / customers</b>                | Identity/contact details, address, payment/transaction data, service history, correspondence and service-specific information such as vehicle/location or firearm administration records.                                                 |
| <b>Vetting candidates / client staff</b>  | Identity/contact information, employment/qualification/professional status, authority/consent, criminal behaviour/result information, NRSO/NCPR process/result information, biometrics where lawfully required and reference information. |
| <b>Employees / contractors / learners</b> | Identity/contact, employment/course/assessment/training data, remuneration/banking, attendance, PSIRA/training data, incident/disciplinary records and limited health/safety                                                              |

|                                                  |                                                                                                                                                                                                                 |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  | information where lawfully processed.                                                                                                                                                                           |
| <b>Suppliers / operators</b>                     | Business/contact, banking, tax, contract and security/processing information.                                                                                                                                   |
| <b>Website users / correspondents</b>            | Form/contact data, communications, technical, cookie and analytics information where enabled.                                                                                                                   |
| <b>Vehicle owners / drivers / tracking users</b> | Vehicle/device identifiers, contact details, location/route/speed/event data and media where contracted functions use them.                                                                                     |
| <b>Children</b>                                  | Not routinely targeted. Any child-focused or material child-information processing requires a lawful ground, appropriate competent-person involvement where applicable, additional safeguards and prior review. |

## 10. Recipients and planned cross-border flows

Depending on the service and lawful purpose, AK9 may exchange personal information with authorised clients/employers, regulators and public authorities, verification providers, accreditation/training bodies, banks/payment providers, accountants/payroll providers, cloud/email/hosting providers, tracking/telematics platforms, couriers, insurers and legal advisers. Disclosure is limited to what is necessary and lawful.

Cloud, hosting, email and technology infrastructure may involve processing outside South Africa. Before material cross-border processing, AK9 assesses the recipient/contract and ensures an applicable POPIA section 72 condition is met. Special personal information and children's information receive enhanced review, including prior-authorisation analysis where applicable.

## 11. Information security measures

- Role-based, least-privilege access, with restricted high-risk information limited to authorised personnel.
- Unique credentials, MFA where supported, device screen-lock and encryption where available.
- Controlled cloud storage/backups and restricted case folders for sensitive processing.
- Password-protected sensitive reports using random case passwords and separate-channel password delivery.
- Written operator/security terms where an operator processes personal information for AK9 or a client.
- Retention limits, secure destruction, incident response, access logging where available and periodic risk review.

## 12. Availability and review of this Manual

This Manual is available free of charge on [www.africank9solutions.co.za](http://www.africank9solutions.co.za), at the principal place of business during normal business hours for public inspection, to a requester in accordance with PAIA, and to the Information Regulator upon request. A printed hard copy may be subject to a reasonable copying charge where permitted. The Manual will be reviewed at least annually and earlier when material changes occur.

## Authoritative references

- Protection of Personal Information Act 4 of 2013 (POPIA).
- Promotion of Access to Information Act 2 of 2000 (PAIA), as amended.
- Regulations relating to the Promotion of Access to Information, 2021, and current prescribed PAIA forms/fees.
- Information Regulator: PAIA Manual Template for a Private Body; PAIA Guide; PAIA and POPIA forms and eServices.
- Regulations relating to the Processing of Data Subjects' Health Information by Certain Responsible Parties, 2026, where applicable to AK9 as employer or service provider.

- Applicable Companies Act, Tax Administration Act, Basic Conditions of Employment Act, Occupational Health and Safety Act, Private Security Industry Regulation Act, Firearms Control Act, skills-development/accreditation legislation and sector-specific requirements.

**Official portals verified for this issue:** [Information Regulator](#) | [eServices](#) | [PAIA resources](#) | [POPIA resources](#)