

PAIA Manual

ITC Business Administrators Proprietary Limited

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 as amended

Version 0.1 | Compilation date 9 October 2026 | Approval date 12 October 2026.

1 Purpose and scope

This manual explains how to request records held by ITC Business Administrators (the Company), a business within Alefbet Collections and Recoveries. It describes record categories, personal information processing, request procedures, fees and remedies. The Company provides debt collection and business administration, including healthcare, educational and personal lending account collections where mandated.

PAIA access is assessed under section 50 and the applicable refusal provisions; listing a record does not make it automatically public.

2 Company and officer contact details

Field	Details
Exact registered legal name	ITC Business Administrators Proprietary Limited
Company registration number	2005/023751/07
Head of the private body	Ian Patrick Wood – Chief Executive Officer
Information Officer	Shadreck Dandara -Head of Client Services
Information Officer contacts	Telephone 083 993 1991 Email shadreckd@alefbet.co.za Office Nr 011 019 0000
Deputy Information Officer	Yolande Oliver – Project Manager Tel: 082 522 9159 Office Nr 011 019 0000
Street and postal addresses	257 Beyers Naude Drive, Blackheath, Randburg, 2196
General and PAIA contacts	Telephone 011 019 0000 General email info@itcba.co.za PAIA email paia@alefbet.co.za
Company website	www.itcba.co.za
Inspection hours	8 am to 5 pm weekdays 8 am to 1 pm on Saturdays

3 The PAIA Guide and publicly available records

The Information Regulator's section 10 Guide explains how PAIA works, how to request information, available assistance, fees and remedies.

Guide copies are available at the Company registered address for inspection in English, as pre-arranged with the information officer.

3.1 Records available without a formal PAIA request

The approved PAIA manual and the official PAIA Guide are available through the access arrangements in section 10. Other information already published on the Company's website can be accessed directly. Additional approved categories, such as company profiles, public brochures, published privacy notices or other categories, and the specific access channels may be requested.

4 Records maintained under other legislation

The following is a proposed entity-specific schedule for confirmation. Statutory retention does not grant unrestricted public access; the relevant legislation and PAIA govern disclosure.

Legislation	Relevant record categories
Companies Act 71 of 2008	Incorporation documents, statutory registers, resolutions and accounting records, where applicable.
PAIA 2 of 2000 and POPIA 4 of 2013	Manual, access requests, decisions, processing documentation and privacy records.
Debt Collectors Act 114 of 1998	Registration, collection and related accounting records required for the entity's activities.
National Credit Act 34 of 2005	Credit-related collection and consumer records where the mandate falls within its scope.
Labour and employment legislation	Employment, payroll and benefit records under the BCEA 75 of 1997, LRA 66 of 1995, EEA 55 of 1998 and Skills Development Act 97 of 1998, where applicable.
Tax and workplace legislation	Tax records under Income Tax Act 58 of 1962, VAT Act 89 of 1991 and Tax Administration Act 28 of 2011; applicable UIF, occupational health and compensation records.

Subjects and categories of records

The schedule below describes records that may be held in electronic, paper, audio or other form. It must be confirmed against the Company's record inventory. A request may cover only records actually in the Company's possession or under its control.

Subject	Record categories
Corporate governance	Company registers, board and management resolutions, policies and delegated authorities.
Client mandates	Service agreements, collection instructions, client correspondence, mandate changes and performance reports.
Collection accounts	Account placements, balances supplied by creditors, contact verification, tracing results, payment promises, arrangements, payment history and reconciliations.
Healthcare collection mandates	Patient billing and account information supplied for authorised collection; medical aid and related correspondence where necessary. Clinical information is not assumed to be held.
Customer communications	Call recordings and transcripts, emails, SMS, approved messaging exchanges, queries and complaint resolutions.
Payments and finance	Receipt and allocation records, bank and reconciliation records, invoices, fee calculations, payovers and trust-related records where held.
Human resources	Recruitment, employment contracts, remuneration, training, performance, leave and disciplinary records.
Suppliers and operators	Procurement records, supplier contracts, due diligence, processing agreements and service assessments.
Compliance and risk	Registrations, complaints, audit and quality records, privacy assessments, incident logs and regulatory correspondence.
Information technology	System access and activity logs, backup and recovery records, approved tools register and security assessments.
Digital and automated services	Approved campaign records, chatbot interactions, AI processing assessments and human review records where used. Detailed system safeguards remain subject to lawful disclosure assessment.

Client ownership or contractual confidentiality does not automatically defeat a PAIA request. The Information Officer must consider legal custody or control, applicable refusal grounds and whether protected parts can be separated from disclosable parts.

6 Processing of personal information

6.1 Purposes and processing roles

Personal information is processed to administer client mandates; verify identity and contact details; communicate about accounts; manage repayment arrangements, payments and reconciliations; resolve disputes and complaints; report performance; conduct quality assurance; manage employment and suppliers; secure systems; and fulfil applicable legal duties. Each purpose requires an appropriate lawful basis; consent is not the only possible basis.

For creditor mandates, the Company may act as an operator on the client's instructions. It acts as a responsible party where it determines the purpose and means of processing, including its own employment and supplier administration. The role depends on the actual activity and contract; the Company does not claim one role for every record.

6.2 Data subjects and information categories

Category of data subject	Personal information that may be processed
Debtors and account holders	Names, identity and contact details; creditor account references, balances, payment and contact history; verification and trace data relevant to the mandate.
Patients and medical aid contacts	Patient billing, scheme membership and claim information needed for authorised collections; health information only where held and lawfully necessary.
Client representatives	Names, business contact details, roles, instructions, correspondence and contractual information.
Employees and applicants	Identity and contact details, qualifications, employment and remuneration information, benefits and legally required employment data.
Suppliers and contractors	Identity or registration details, contacts, contractual and payment information and necessary due diligence.
Representatives and complainants	Identity, authority to act, contact details, case correspondence and relevant supporting information.
Visitors and system users	Access or security records and technical logs where actually collected.

6.3 Special information and children

Health, biometric, criminal-history and other special personal information, and children's information, are processed only where a specific lawful authorisation applies under POPIA. They are not assumed to be processed merely because a client mandate exists.

6.4 Automated processing

Approved digital tools may support communications and quality assurance. Solely automated decisions with legal or substantial effects must meet POPIA section 71. Where applicable safeguards are required, data subjects must be able to make representations and obtain sufficient information about the underlying logic.

7.1 Categories of recipients

Disclosure is limited to the information needed for a lawful purpose. The following proposed recipient categories must be validated against actual mandates and operator arrangements; no category creates a blanket right to receive data.

Recipient category	Information and purpose
Mandating clients or creditors	Account progress, payments, queries and reconciliations under the authorised mandate.
Approved operators	Necessary data for hosting, CRM, telephony, messaging, tracing, payments or AI services, subject to written processing and security terms.
Group shared service teams	Necessary HR, finance, IT or compliance information where authorised and protected; group membership alone is insufficient.
Banks and payment providers	Payment and reconciliation data required for authorised transactions.
Professional advisers and authorities	Relevant records for legal advice, audits or lawful regulatory, court or law-enforcement requirements.
Credit bureaus and tracing providers	Identity, contact and credit-related data only where the mandate and applicable law permit the activity.

7.2 Planned transfers outside South Africa

ITC BA does not have any planned foreign hosting, backup, vendor support, remote access or other cross-border processing.

7.3 Security measures

The proposed security framework includes role-based access and confidentiality controls; multi-factor authentication; encryption in storage and transfer; approved endpoint protection and firewalls; secure paper storage and disposal; controlled vendors and AI tools; staff training; backups and recovery testing; and incident response. These measures support confidentiality, integrity and availability.

7.4 Retention and disposal

Records are retained for the period justified by their purpose, applicable law, contractual obligations and lawful holds, then securely destroyed or de-identified. A category-specific retention schedule governs these periods. Records relevant to an outstanding access request must be preserved for the required statutory period of 5 years, unless otherwise agreed upon in writing with a client where retention is limited to legal, financial, audit, regulatory, dispute-resolution and recordkeeping obligations.

8 How to request access

8.1 Submit the prescribed request

Use PAIA Form 2 available at <https://info regulator.org.za/paia-forms/> and send it to this Company's Information Officer at the email, postal or street address in section 2. A requester who needs help may contact the officer or the Regulator. Provide only the identity evidence reasonably needed to verify identity and authority.

Required particulars	What to provide
Requester and representative	Full names and contact details; proof of authority if acting for another person.
Records sought	A clear record description, account reference where relevant and the period covered.
Right to be exercised or protected	Identify the right and explain why the records are needed for that right under section 50.
Preferred access and response	State inspection, copies or other preferred form and how to communicate the decision.
Accessibility needs	Identify disability or other assistance requirements for the form of access.

8.2 Decision periods

Subject to the statutory third-party procedures, the Company must decide and notify the requester as soon as reasonably possible and within 30 calendar days after receiving the request or the required section 53 particulars. Under section 57, it may extend once by no more than 30 days on a permitted ground, such as extensive records, remote searches, necessary consultation or the requester's written consent. The extension notice must give its period, reasons and remedy information within the original statutory period. No decision within the applicable period is a deemed refusal under section 58.

8.3 Disclosure and lawful refusal

A decision will explain the form of access, applicable fees or adequate refusal reasons and the complaint route. PAIA grounds include protected third-party privacy, specified confidential or commercial information, legal privilege, safety or property security and protected research. These are assessed case by case under sections 63 to 69. The section 70 public-interest override must be considered where its conditions apply. Disclosable portions must be released where they can reasonably be separated from protected material.

Where third-party information requires notification, the Company follows sections 71 to 73 before disclosure. If a record cannot be found or does not exist after reasonable searches, the Company provides the affidavit or affirmation required by section 55. PAIA does not require creation of a record that does not exist.

8.4 Requests about your own personal information

Under POPIA section 23, after adequate identity verification, confirmation of whether the Company holds your personal information is free. Access to that information is addressed within a reasonable time, subject to applicable fees and lawful refusal rules. Correction or deletion requests under section 24 are addressed as soon as reasonably practicable; statutory retention may limit deletion. Use the current POPIA correction or objection forms at <https://info regulator.org.za/popia-forms/>. These are different from PAIA forms with the same numbers. Contact the Information Officer for the appropriate route.

9 Fees and remedies

9.1 Prescribed private body fees

The fees below reflect the Regulator's private body schedule checked on 9 October 2026. The applicable regulations prevail if the schedule changes. The officer will issue the fee or outcome notice, using PAIA Form 3 where applicable, before collecting payment. POPIA confirmation under section 23 remains free.

Fee item	Published amount or basis
PAIA request fee	R140.00, where payable.
A4 photocopy or printed page	R2.00 per page or part of a page.
Computer readable copy	R40.00 on requester-supplied flash drive or CD; R60.00 on a Company-supplied CD.
Audio transcription	R24.00 per A4 page or part of a page.
Audio copy	R40.00 on requester-supplied flash drive or CD; R60.00 on a Company-supplied CD.
Visual images	Outsourced service quotation for transcription or copy.
Search and preparation	R145.00 per hour or part, excluding the first hour; maximum R435.00.
Deposit if search exceeds six hours	One-third of the applicable amount per request, calculated under items 2 to 8 of the published schedule.
Delivery	Applicable delivery cost must be specified in the fee notice; confirm the prescribed basis before charging.

A deposit is refunded if access is refused. Access may be withheld until applicable fees are paid. Fee, deposit and access-form decisions may be challenged through the statutory remedies. Public-body income exemptions must not be assumed to apply to this private body.

9.2 Complaint to the Information Regulator

The PAIA internal appeal procedure for certain public bodies does not apply to this Company. A requester dissatisfied with refusal, a deemed refusal, fees, an extension or the form of access may lodge a complaint using PAIA Form 5. Normally lodge it within 180 days of the decision or applicable deemed refusal. The Regulator may require condonation for a late complaint. Supply the original request, proof of submission, the decision or evidence of no response and relevant correspondence.

PAIA complaints: PAIAComplaints@infoeregulator.org.za. General enquiries: enquiries@infoeregulator.org.za or 010 023 5200. Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191. Current channels: <https://infoeregulator.org.za/contact-us/>.

Court relief is available under sections 78 to 82, subject to section 78 requirements, including exhaustion of the applicable complaints procedure and the applicable 180-day application period. An informal Company reconsideration does not replace or suspend statutory remedies. Privacy complaints use the distinct POPIA complaint route and form.

10 Availability review and approval

Once approved, this manual must be available on the Company website if it has one, at its principal place of business for inspection during normal business hours, to a person upon request and payment of a reasonable permitted copy amount, and to the Information Regulator on request. Inspection is free. Website and office arrangements are those completed in section 2.

The head of the Company is responsible for keeping the manual current. The Information Officer will coordinate review at least annually as an internal review standard and when contacts, record categories, processing activities, recipients, transfers or applicable law materially change.

Issued by Ian Patrick Wood, authorised head or Information Officer for and on behalf of ITC Business Administrators (Pty) Ltd.

Approval date 12 October 2026.

Next scheduled review 01 October 2027.

Publication date and website location 13 October 2026.

11 Official forms and source references

PAIA Form 2 is the access request; Form 3 is the outcome and fees notice; Form 5 is the PAIA complaint. Obtain current official forms through the links below. The Company will assist with copies; the explanatory text in this manual is not a replacement form.

PAIA Act 2 of 2000 as amended

<https://www.justice.gov.za/legislation/acts/2000-002.pdf>

POPIA Act 4 of 2013

<https://www.justice.gov.za/legislation/acts/2013-004.pdf>

Information Regulator private body manual template

<https://infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Manual-Template-Private-Body.pdf>

PAIA Guide and guidance

<https://infoeregulator.org.za/paia/>

PAIA forms

<https://infoeregulator.org.za/paia-forms/>

Private body fee schedule

<https://infoeregulator.org.za/paia-fees-structure-2/>

Regulator contact details

<https://infoeregulator.org.za/contact-us/>

POPIA forms

<https://infoeregulator.org.za/popia-forms/>

Legal references: PAIA sections 50 to 73, 77A and 78 to 82; POPIA sections 11, 14, 19 to 25, 26 to 35, 55 to 56 and 71 to 72. Sources checked 9 October 2026. Internal security disclosures require entity confirmation before issue.