

SEVEN TWENTY DEGREES (Pty) Ltd

CIPC Registration No: 2023/212025/07

Information Regulator Registration No: 2026-000351

Trading as 7Maintain™

PAIA MANUAL

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

Date of compilation: 18 May 2026

Date of revision: 18 May 2026

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Version 1.1

1. List of acronyms and abbreviations

CEO	Chief Executive Officer
CIPC	Companies and Intellectual Property Commission
CMMS	Computerised Maintenance Management System
HPB	Head of a Private Body (as contemplated in PAIA section 1)
IO	Information Officer
IR	Information Regulator (established under POPIA section 39)
PAIA	Promotion of Access to Information Act, 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act, 4 of 2013
PII	Personal Identifiable Information
SAR	Subject Access Request (POPIA section 23)
the Company	SEVEN TWENTY DEGREES (Pty) Ltd
the Regulator	the Information Regulator of South Africa
Republic	Republic of South Africa

2. Purpose of this PAIA Manual

This PAIA Manual is published by SEVEN TWENTY DEGREES (Pty) Ltd (“the Company”) in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) (“PAIA”). It is intended to enable any member of the public to:

- understand the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- understand how to submit a request for access to a record held by the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- identify records of the Company which are made available in accordance with any other legislation;
- contact the Information Officer who will assist the public with the records they intend to access;
- locate the Regulator’s Guide on how to use PAIA (the “PAIA Guide”);
- understand the Company’s processing of personal information, including the purposes of processing, the categories of data subjects, the categories of personal information processed, the recipients to whom personal information may be

supplied, any planned transborder flows, and the security measures applied to that personal information.

3. Key contact details for access to information

3.1 Head of the Private Body and Information Officer

Capacity	Head of the Private Body and Information Officer (designated in terms of section 17(1) of PAIA and section 55(1) of POPIA, as the head of a private body).
Full names	Terence Jack Grenfell
Designation	Chief Executive Officer and Sole Director, SEVEN TWENTY DEGREES (Pty) Ltd
ID number	8101145025084
IO appointment date	1 September 2024 — registered with the Information Regulator on 13 January 2026 under Registration No. 2026-000351 (certificate issued by Mr M Mosala, CEO: Information Regulator)
Telephone	+27 79 532 1767
Email	paia@7maintain.com
Postal address	52 Wilkes Road, Pietermaritzburg, 3201, KwaZulu-Natal, South Africa
Physical address	52 Wilkes Road, Pietermaritzburg, 3201, KwaZulu-Natal, South Africa

3.2 Deputy Information Officer

As at the date of compilation, the Company has not designated a Deputy Information Officer. The Company is a single-director private company. In terms of section 17(1) of PAIA and section 56(a) of POPIA, the designation of a Deputy Information Officer is discretionary for a private body of this size. All PAIA requests should accordingly be directed to the Information Officer at the contact details set out in clause 3.1 above. The Company will designate Deputy Information Officers as the team grows and will update this manual accordingly.

3.3 General access-to-information contact

Email for PAIA requests	paia@7maintain.com
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Postal address for requests	The Information Officer, SEVEN TWENTY DEGREES (Pty) Ltd, 52 Wilkes Road, Pietermaritzburg, 3201
Telephone	+27 79 532 1767

3.4 Registered office of the Company

Registered name	SEVEN TWENTY DEGREES (Pty) Ltd
CIPC registration number	2023/212025/07
Information Regulator registration number	2026-000351 (registered 13 January 2026)
Trading name	7Maintain
Registered office	52 Wilkes Road, Pietermaritzburg, 3201, KwaZulu-Natal, South Africa
Websites	https://7maintain.com and https://7maintain.co.za (both domains share the same backend)
General email	paia@7maintain.com

4. The PAIA Guide and how to obtain access to it

In terms of section 10(1) of PAIA, the Information Regulator has compiled, updated and published an easily understandable Guide on how to use PAIA (the “Guide”). The Guide explains the rights conferred by PAIA and the Protection of Personal Information Act 4 of 2013 (“POPIA”), the procedures for requesting access to a record of a public or private body, the assistance available from information officers and from the Regulator, the remedies available to a requester, and the fees applicable to a request.

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

4.1 How to obtain the Guide

- From the Information Regulator’s website at <https://inforegulator.org.za/paia/>, where it is published in all eleven official languages.
- By written or emailed request addressed to the Information Officer of SEVEN TWENTY DEGREES (Pty) Ltd at the contact details set out in clause 3 above.
- By inspecting a copy at the Company’s registered office during normal business hours.

4.2 Languages in which the Guide will be held for inspection at the Company

The Company will keep copies of the PAIA Guide available for public inspection during normal office hours in the following two official languages: **English** and **isiZulu**.

5. Categories of records of the Company that are automatically available

The Company has voluntarily decided to make certain records publicly available, in accordance with section 52(1) of PAIA, without a person needing to submit a formal PAIA request. These records may be downloaded from the Company's website (where indicated) or obtained by sending a written request to the Information Officer.

Category of records	Types of records	On website	On request
Corporate identity records	Company name, registration number, trading name (7Maintain), registered office address	Yes	Yes
Product information	Public 7Maintain marketing materials, product fact sheets, sales brochures	Yes	Yes
Privacy posture	Privacy notice, POPIA statement, summary of data processing practices	Yes	Yes
PAIA Manual	This Manual (signed and dated)	Yes	Yes
Standard terms	Quote PDF, standard terms of service, Vendor Information page (which includes the Company's published POPIA compliance commitment, 48-hour acknowledgement and 30-day formal response on Subject Access Requests)	Yes (with each quote)	Yes
Trade mark notices	7Maintain trade mark notice and copyright notice	Yes	Yes

6. Records held in terms of other legislation

The Company holds certain records which are created and kept in compliance with statutory and regulatory obligations other than PAIA. The principal categories are:

Category of records	Applicable legislation
Memorandum of Incorporation, share register, register of directors, annual returns	Companies Act 71 of 2008

Statutory financial records, fixed-asset register, supporting documents and tax records	Companies Act 71 of 2008; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
VAT records (once VAT-registered)	Value-Added Tax Act 89 of 1991
Payroll, UIF and SDL records (when employees are appointed)	Basic Conditions of Employment Act 75 of 1997; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Levies Act 9 of 1999; Tax Administration Act 28 of 2011
Records of processing of personal information of customers, prospects, contractors and visitors	Protection of Personal Information Act 4 of 2013 (POPIA)
Trade mark and copyright records relating to 7Maintain and SEVEN TWENTY DEGREES brand assets	Trade Marks Act 194 of 1993; Copyright Act 98 of 1978
Electronic transaction and consumer records arising from online sales of 7Maintain subscriptions	Electronic Communications and Transactions Act 25 of 2002; Consumer Protection Act 68 of 2008
Payment processing records held by the Company in relation to Paystack-processed transactions	Financial Intelligence Centre Act 38 of 2001 (where applicable); POPIA
This PAIA Manual and records of PAIA requests received and processed	Promotion of Access to Information Act 2 of 2000

7. Subjects on which the Company holds records, and categories of records held on each subject

As at the date of compilation, the Company holds the following categories of records. Access to these records is governed by PAIA, POPIA, and any other legislation applicable to a particular category. Disclosure may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA (sections 62 to 69), including but not limited to the mandatory protection of the privacy of third parties, commercial information of third parties, confidential information, the safety of individuals and property, and records protected by legal privilege.

Subject	Categories of records held
Corporate and statutory	Memorandum of Incorporation; CIPC filings, certificate of incorporation, share register, register of directors, resolutions of directors and shareholders; statutory registers.

Finance and tax	Bank statements, invoices, quotes, receipts, expense records, general ledger, management accounts, annual financial statements, income tax returns and supporting documents, VAT records (once registered).
Customer records (7Maintain SaaS)	Customer master data (organisation name, contact people, billing details), customer contracts and quotes (including the Vendor Information page committing to POPIA compliance), Subject Access Request logs (POPIA section 23), audit logs of all customer-data state mutations within 7Maintain, customer-organisation equipment data, location data of technicians captured during maintenance work, photographs of work performed, customer support tickets and correspondence.
Pilot customer records	Onboarding records and operational data for SteelWorks Vereeniging (pilot customer), processed strictly in line with the customer's instructions as the responsible party.
Personal information of customer users and end-users (POPIA)	Names, work emails, telephone numbers, employment role/work history information of customer technicians, photographs of work performed (which may incidentally include images of persons), location data of technicians during the performance of maintenance work, equipment data tagged to specific customer organisations.
Sales, marketing and prospects	CRM records of prospective customers, marketing campaign records, opt-in/opt-out logs for direct marketing in terms of POPIA section 69.
Supplier and contractor records	Supplier master data (name, registration number, VAT number, address, banking details where supplied for payment), contracts and SLAs, supplier onboarding records (envisaged for the post-v4 marketplace).
Intellectual property	Trade mark applications and registrations relating to 7Maintain and SEVEN TWENTY DEGREES brand assets; copyright records relating to source code, designs and product documentation; trade-secret records.
Payments	Paystack transaction records, reconciliations, refunds.
Information security and compliance	Audit logs of state mutations within the 7Maintain product; security incident records; backup and disaster-recovery records; access-control records; privacy-impact and risk assessments.
Employees	None at the date of compilation. Once employees are appointed: employment contracts, ID copies, qualification records, payroll records, tax records, performance records, disciplinary records.
PAIA and POPIA compliance	This PAIA Manual; records of PAIA requests received and processed (including Form 02 submissions, responses, fee notices and appeals); records of POPIA Subject Access Requests; this Manual's review and revision history.

8. Processing of personal information

8.1 Purpose of processing personal information

The Company processes personal information for the following purposes:

- to provide the 7Maintain industrial Computerised Maintenance Management System (CMMS) SaaS product to customer organisations and their authorised users;
- to authenticate users, manage access control, and audit-log all state mutations within the product;
- to deliver location-based maintenance workflows (which require the location of technicians at the moment a maintenance task is performed);
- to record evidence of maintenance work performed (which may include photographs of equipment, and incidentally of personnel);
- to manage commercial relationships with customers, prospective customers, suppliers and contractors, including the issue of quotes, contracts, invoices and receipts;
- to process payments via Paystack and to maintain records of those payments;
- to respond to PAIA requests, POPIA Subject Access Requests, and other lawful requests;
- to comply with the Company's statutory and regulatory obligations, including under the Companies Act, the Income Tax Act, the Tax Administration Act, POPIA and PAIA;
- to protect, exercise or defend the Company's legal rights.

The Company has designed 7Maintain to minimise the processing of personal information, to audit-log state mutations, to capture customer consent in the workflows where consent is the lawful basis, and to operationalise a 30-day formal response to Subject Access Requests in line with POPIA section 23.

8.2 Categories of data subjects and personal information processed

Category of data subject	Categories of personal information processed
Authorised users of customer organisations (technicians, supervisors, managers)	Full names, work email addresses, telephone numbers, employment role and work history within the customer organisation, login credentials (hashed), audit-log entries reflecting actions taken, photographs of work performed (which may include the user), location data of technicians during maintenance work.
End-users and contact persons at customer organisations	Full names, work email addresses, telephone numbers, role/designation.
Prospective customers and marketing contacts	Full names, work email addresses, telephone numbers, organisation name and role, marketing opt-in/opt-out status.

Suppliers and contractors	Names of contact persons, designations, work email addresses, telephone numbers, banking details where supplied for payment, ID/registration numbers where required for compliance checks.
Directors and officers of the Company	Full names, ID numbers, contact details, residential and postal addresses, tax numbers.
Website visitors and account holders	Names, email addresses, telephone numbers, IP addresses, cookies and analytics identifiers.
Employees (none at the date of compilation; future)	Full names, ID numbers, contact details, banking details, tax numbers, qualifications, employment records, payroll records, performance and disciplinary records.

8.3 Recipients of personal information

Category of personal information	Recipients or categories of recipients
Customer-user account, audit-log and maintenance records	Authorised personnel of the relevant customer organisation; the Company acting as operator for the customer.
Payment data	Paystack (Pty) Ltd, as the payment-processing operator.
Hosting and infrastructure data	Cloud-infrastructure providers contracted to the Company under written operator agreements (POPIA section 21).
Tax and statutory records	South African Revenue Service; CIPC; auditors and tax practitioners contracted to the Company; the Company's bankers, where required.
Marketing data	Communications and analytics service providers contracted to the Company under written operator agreements.
Personal information disclosed in response to a lawful request	The Information Regulator; competent courts; law-enforcement agencies; the requester in a PAIA request, where access is granted.
Credit and verification checks (where applicable, e.g. supplier onboarding)	Credit bureaus, the South African Qualifications Authority and similar verification bodies, with the data subject's consent.

8.4 Planned transborder flows of personal information

The Company processes and stores personal information using cloud-infrastructure providers. Where those providers store data outside the Republic of South Africa, the Company relies on the bases set out in section 72 of POPIA, in particular: (i) the data subject's consent; (ii) the processing being necessary for the performance of a contract with

the data subject; and (iii) the recipient being subject to a law, binding corporate rules or binding agreement that provides an adequate level of protection.

Where personal information is transferred outside the Republic, the Company contracts with each operator in writing and requires that operator to comply with security safeguards equivalent to those required by POPIA section 19. The specific countries and providers in use at any time are recorded in the Company's processing register and are made available on request.

8.5 Information security safeguards

In compliance with section 19 of POPIA, the Company has implemented reasonable, technical and organisational security measures to maintain the confidentiality, integrity and availability of personal information under its control. These measures include:

- encryption of personal information in transit (TLS) and at rest;
- role-based access control, with least-privilege access and individual user accounts;
- multi-factor authentication for administrative accounts;
- comprehensive audit logging of state-mutating operations within the 7Maintain product;
- regular backups, with restore testing;
- vulnerability and patch management for application and infrastructure components;
- written operator agreements (POPIA section 21) with each operator processing personal information on behalf of the Company;
- an internal Subject Access Request workflow that operationalises the 30-day response window contemplated in POPIA section 23, with an initial acknowledgement target of 48 hours as published in the Company's Vendor Information page;
- a security-incident response procedure, including the obligation to notify the Information Regulator and affected data subjects in terms of POPIA section 22 where a security compromise has occurred.

9. Procedure for requesting access to records

A requester who wishes to obtain access to a record of the Company must comply with PAIA and with this manual.

9.1 Form of request

- A request must be made on **Form 02 (Request for Access to Record of Private Body)**, prescribed under Regulation 7 of the PAIA Regulations. Form 02 is available

at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>.

- The completed Form 02 must be delivered to the Information Officer at **paia@7maintain.com** or by post to The Information Officer, SEVEN TWENTY DEGREES (Pty) Ltd, 52 Wilkes Road, Pietermaritzburg, 3201, or by hand at the registered office.
- The form must provide sufficient particulars to enable the Information Officer to identify the record requested and the requester, the form of access required, and the postal address or fax number of the requester in the Republic.
- In terms of section 53(2)(d) of PAIA, the requester must identify the right that the requester seeks to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- If the requester wishes to be informed of the decision in any manner other than in writing, the requester must indicate that manner and the necessary particulars.
- If the request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.

9.2 Fees

The fees for access to records of a private body are prescribed in terms of section 54 of PAIA and Regulation 11 of the PAIA Regulations and are set as published by the Information Regulator. The current schedule of private-body fees, as at the date of compilation, is:

Item	Description	Amount (ZAR)
1	Request fee (payable by every requester on submission of a request)	R140.00
2	Photocopy or printed black-and-white copy, per A4 page or part of a page	R2.00
3	Printed copy of an A4-size page	R2.00
4a	Copy in a computer-readable form on a flash drive provided by the requester	R40.00
4b	Copy in a computer-readable form on a CD provided by the requester	R40.00
4c	Copy in a computer-readable form on a CD supplied by the Company	R60.00
5	Transcription of visual images, per A4 page or part of a page	Quotation (outsourced)
6	Copy of visual images	Quotation (outsourced)

7	Transcription of an audio record, per A4 page	R24.00
8a	Copy of an audio record on a flash drive provided by the requester	R40.00
8b	Copy of an audio record on a CD provided by the requester	R40.00
8c	Copy of an audio record on a CD supplied by the Company	R60.00
9	Search and preparation, per hour or part thereof (excluding the first hour); capped at R435.00	R145.00 / R435.00 cap
10	Deposit (where search exceeds six hours)	One-third of the total fees calculated in items 2–8
11	Postage, email or other electronic transfer	Actual expense, if any

Fees may be revised from time to time by the Information Regulator. The fee schedule applied to any given request is the schedule in force at the date the request is submitted.

9.3 Timelines

- In terms of section 56 of PAIA, the Information Officer must decide a request as soon as reasonably possible and in any event within **thirty (30) days** after the request has been received.
- The 30-day period may be extended once, by a further period of not more than thirty (30) days, in the circumstances contemplated in section 57 of PAIA.
- If the requester does not pay any fees required, the request is suspended until payment is received.

9.4 Refusal of a request

Access to a record will be refused only on the grounds set out in Chapter 4 of Part 3 of PAIA, including but not limited to: the mandatory protection of the privacy of third parties who are natural persons (section 63); the mandatory protection of commercial information of third parties (section 64); the mandatory protection of certain confidential information of third parties (section 65); the mandatory protection of the safety of individuals and the protection of property (section 66); records protected by legal privilege (section 67); and the protection of commercial information of the private body (section 68). Where access is refused, the Information Officer will give written reasons that disclose, with reference to the relevant provision of PAIA, the grounds for refusal.

9.5 Remedies

- PAIA does not provide for an internal appeal against a refusal by a private body. A requester aggrieved by a decision of the Information Officer may either lodge a complaint with the Information Regulator (Form 05), within 180 days, or apply to a competent court for appropriate relief.
- The Information Regulator’s contact details are: **enquiries@info regulator.org.za**; **+27 10 023 5200**; Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191.

10. Availability of this Manual

In compliance with section 51(3) of PAIA, this Manual is available:

- on the Company’s websites, at **<https://7maintain.com/legal/paia-manual.pdf>** and at **<https://7maintain.co.za/legal/paia-manual.pdf>** (both domains serve the same back-end and the Manual is published at each address so that any requester, on either domain, can locate it directly);
- at the registered office of the Company (52 Wilkes Road, Pietermaritzburg, 3201) for public inspection during normal business hours;
- to any person upon written request to **paia@7maintain.com**, against payment of a reasonable prescribed fee (R2.00 per A4 page) for a printed copy; and
- to the Information Regulator on request, free of charge.

11. Updating of this Manual

The Head of the Private Body, in the capacity of Information Officer, will review this Manual at least annually and on any material change to the Company’s records, processing activities, contact details or information-officer designation. The latest version replaces all previous versions and is dated as set out in the cover page and in the signature block below.

12. Issue and signature

Issued in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) at Pietermaritzburg on this 18th day of May 2026.



Terence Jack Grenfell

Head of the Private Body and Information Officer
Information Regulator Registration No: 2026-000351 (registered 13 January 2026)
IO appointment date: 1 September 2024
Chief Executive Officer and Sole Director

for and on behalf of SEVEN TWENTY DEGREES (Pty) Ltd
CIPC Registration No: 2023/212025/07

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