



PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000
(PAIA)

1. COMPANY DETAILS

Enterprise Name: AXIOM GROUP AFRICA (PTY) LTD

Enterprise Number: 2026/112044/07

Registered Address: 12 Andries Bruyn Street, Horizon, Roodepoort, 1724, South Africa

General Email: info@axiomgroup.co.za

2. INFORMATION OFFICER

In terms of POPIA, the Chief Executive Officer of the Company is the duly registered Information Officer.

Full Name: Jonathan Michael Theron

Title: CEO

Contact Number: 079 769 8401

Email: jonathan@axiomgroup.co.za

3. DEPUTY INFORMATION OFFICER

Full Name: Luisfelipe Da Silva Carneira

Contact Number: 064 701 5454

Email: luisfelipe@axiomgroup.co.za

4. PROCESSING OF PERSONAL INFORMATION (POPIA COMPLIANCE)

AXIOM GROUP AFRICA (PTY) LTD processes personal information in accordance with the conditions for lawful processing as set out in POPIA.

4.1 Lawful Basis for Processing:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate business interest

4.2 Categories of Data Subjects:

- Clients and prospective clients
- Employees and contractors
- Suppliers and service providers
- Website users
- Emergency service subscribers

4.3 Categories of Personal Information:

- Identification information
- Contact information
- Financial and billing information
- Employment information
- Technical usage data
- Medical information (where applicable to emergency services)

4.4 Purpose Specification:

Personal information is collected for service delivery, account management, billing, regulatory compliance, HR administration, marketing (with consent), and emergency response facilitation.

4.5 Data Retention:

Records are retained only for as long as necessary in terms of applicable legislation and operational requirements.

4.6 Security Safeguards:

The Company implements appropriate technical and organisational measures including:

- Encrypted communications (SSL/TLS)
- Role-based access controls
- Secure hosting infrastructure
- Firewalls and intrusion monitoring
- Regular system audits
- Data minimisation practices

4.7 Cross-Border Transfers:

Where data is hosted internationally, transfers are subject to appropriate safeguards in compliance with Section 72 of POPIA.

4.8 Data Subject Rights:

Data subjects have the right to:

- Access their personal information
- Request correction or deletion
- Object to processing
- Withdraw consent
- Lodge a complaint with the Information Regulator

ANNEXURE A – FORM 2 (REQUEST FOR ACCESS TO RECORD)

FORM 2

REQUEST FOR ACCESS TO RECORD

(Section 53(1) of PAIA)

A. PARTICULARS OF PRIVATE BODY

Name: AXIOM GROUP AFRICA (PTY) LTD

Enterprise Number: 2026/112044/07

Address: 12 Andries Bruyn Street, Horizon, Roodepoort, 1724

B. PARTICULARS OF PERSON REQUESTING ACCESS

Full Names:

Identity Number:

Postal Address:

Telephone Number:

Email Address:

C. PARTICULARS OF RECORD REQUESTED

Provide full details of the record requested:

D. FORM OF ACCESS REQUIRED

Indicate whether copy, inspection, or electronic format is required.

E. REASON FOR REQUEST

(If requesting on behalf of another person)

Signature:

Date:

Date of Compilation: February 2026