

# SWYFTCO (PTY) LTD

trading as Legally Armed Western Seaboard

## PAIA MANUAL AND POPIA COMPLIANCE FRAMEWORK

**Consolidated Version 1.3 Final Draft**

Prepared in terms of section 51 of PAIA and aligned with POPIA

| Document detail        | Information                                                |
|------------------------|------------------------------------------------------------|
| Legal entity           | SWYFTCO (PTY) LTD                                          |
| Registration number    | 2023/812056/07                                             |
| Tax / VAT numbers      | 9168400274 / 4920322551                                    |
| Information Officer    | Hough Arie van Wyk                                         |
| IO registration number | 2026-066107                                                |
| Contact                | hough.vanwyk@swyftco.com   083 999 5411                    |
| Address                | 191 Athens Road, Flamingo Vlei, Tableview, Cape Town, 7441 |
| Version                | 1.3 Final Draft                                            |
| Issue date             | 9 September 2026                                           |
| Status                 | For client review and approval                             |

## DOCUMENT APPROVAL AND REVIEW SCHEDULE

| Control                       | Required entry / approved position      |
|-------------------------------|-----------------------------------------|
| Document owner                | Information Officer: Hough Arie van Wyk |
| Prepared with assistance from | Tax A Sured (Pty) Ltd                   |
| Approved by                   | <u>Hough van Wyk</u>                    |
| Capacity                      | Director / Information Officer          |
| Approval date                 | <u>10 September 2026</u>                |
| Effective date                | <u>10 September 2026</u>                |

|                                 |                                                                        |
|---------------------------------|------------------------------------------------------------------------|
| Next scheduled review           | 12 months after the effective date, or earlier after a material change |
| Review frequency                | At least annually and after a material change                          |
| Master controlled copy location | Swyftco Google Drive                                                   |
| Public copy location            | Available On request from from Information Officer                     |
| Superseded copy archive         | Swyftco Google Drive                                                   |
| Current version                 | 1.3 once approved                                                      |

### Document status

This is a final draft until the approval and effective-date fields above are completed. Once signed, Version 1.3 becomes the controlled master. Printed or emailed copies are uncontrolled unless specifically marked and recorded as controlled copies.

## CHANGE CONTROL REGISTER

| Version | Date             | Change summary                                                                                                                         | Prepared / reviewed by           | Approval status          |
|---------|------------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------------|
| 1.0     | 8 September 2026 | Initial SWYFTCO consolidated manual                                                                                                    | Tax A Sured / SWYFTCO            | Superseded               |
| 1.2     | 9 September 2026 | Expanded operators, cloud processing and Donor A Sured controls                                                                        | Tax A Sured / SWYFTCO            | Superseded               |
| 1.3     | 9 September 2026 | Consolidated client feedback; broadened AWS wording; aligned 17.2 and 17.3; added employee pack, cloud register and lifecycle controls | Tax A Sured / Hough Arie van Wyk | Final draft for approval |
| Next    | _____            | _____                                                                                                                                  | _____                            | _____                    |

## MANUAL LIFECYCLE AND REGULATORY POSITION

- LC1** The PAIA manual is maintained by SWYFTCO as the private body. It is not presented in this framework as a document requiring advance approval by the Information Regulator. It must be available as required and capable of being produced during a compliance assessment, complaint or investigation.
- LC2** The signed master, approval record, prior versions and change register must be retained. The public copy must match the approved current version, excluding confidential annexures and registers.
- LC3** A scheduled review must occur at least annually. An earlier review is triggered by a material change in legal entity details, Information Officer details, business activities, categories of data subjects or information, processing purposes, operators, cloud regions, security framework, retention, incidents, legislation or publication details.
- LC4** Minor operational changes that remain within the approved framework may be recorded in the relevant annexure or register without automatically reissuing the manual. Examples include adding an authorised user, renewing an operator agreement or adding a system within an already approved cloud environment, provided the change does not materially alter the public disclosures or risk profile.

- LC5** A material change requires an impact review by the Information Officer. The affected manual clauses, notices, contracts, registers and training material must be updated before or promptly when the change is implemented, depending on the nature of the change and any legal notification duty.
- LC6** Every revision must receive a unique version number, date, change summary, reviewer and approver. Superseded versions must be marked “Superseded”, removed from active circulation and retained in the restricted archive for audit purposes.
- LC7** Compliance depends on implementation, not the manual alone. The annexures, signed operator agreements, employee acknowledgements, access records, request records, incident records, training evidence and review minutes demonstrate that the framework is operating in practice.

## VERSION 1.3 SUMMARY

- Confirmed SWYFTCO as responsible party and clarified the Legally Armed trading and franchisor relationships.
- Expanded operator and recipient schedule to include Legally Armed Volksrust, Josi Loss Adjusters t/a Legally Armed, Google Workspace, AWS, Tax A Sured, Xero, Courier Guy, PostNet and SAPS.
- Broadened AWS wording so it applies to Donor A Sured, Legally Armed information and future SWYFTCO systems.
- Recorded AWS owner as SWYFTCO, with primary and backup region af-south-1, Cape Town.
- Aligned sections 17.2 and 17.3 and added the material-change test in section 17.4.
- Recorded live-data alpha testing, exclusion of bank and card details, donation values, restricted access and no external developer access.
- Added employee privacy, confidentiality, acceptable-use and incident-reporting documents.
- Added Technology and Cloud Services, Authorised User Access, System Change and Testing, Processing, Request and Incident registers.
- Added this approval, lifecycle and change-control schedule.

## DOCUMENT AND ANNEXURE INDEX

| Ref | Annexure                                                | Class           | Lifecycle action                             |
|-----|---------------------------------------------------------|-----------------|----------------------------------------------|
| A   | Current prescribed PAIA Form 2                          | Public          | Attach current official form                 |
| B   | Current prescribed fees and outcome material            | Public          | Attach current official material             |
| C   | SWYFTCO Client Privacy Notice and Consent               | Client-facing   | Prepare, approve and issue                   |
| D   | Employee Privacy Notice and POPIA Acknowledgement       | Employee        | Prepare, issue and retain acknowledgement    |
| E   | Employee Confidentiality Undertaking                    | Employee        | Prepare, sign and retain                     |
| F   | Acceptable Use and Information Security Acknowledgement | Employee / user | Prepare, sign and retain                     |
| G   | Data Breach and Incident Reporting Acknowledgement      | Employee / user | Prepare, sign and retain                     |
| H   | Operator Register and Operator Agreements               | Confidential    | Complete and retain signed agreements        |
| I   | Data Retention and Destruction Schedule                 | Internal        | Approve, review and retain disposal evidence |
| J   | Security and Incident Response Procedure                | Internal        | Approve, communicate and test                |

|   |                                                      |                   |                                                                |
|---|------------------------------------------------------|-------------------|----------------------------------------------------------------|
| K | Personal Information Processing Register             | Confidential      | Complete and maintain                                          |
| L | Data Subject and PAIA Request Register               | Confidential      | Maintain for all requests                                      |
| M | Security Incident Register                           | Confidential      | Maintain for all suspected and confirmed incidents             |
| N | Legacy Document Conversion Register                  | Internal          | Track withdrawal and replacement of Legally Armed forms        |
| O | Technology and Cloud Services Register               | Confidential      | Maintain systems, regions, access and contracts                |
| P | Authorised User Access Register                      | Confidential      | Maintain grants, reviews and removals                          |
| Q | System Change and Testing Register                   | Confidential      | Maintain changes, testing and live-data controls               |
| R | Information Officer Registration Certificate         | Evidence          | Retain current certificate                                     |
| S | PAIA Annual Reporting Confirmations                  | Evidence          | Retain confirmations                                           |
| T | Document Approval, Review and Change-Control Records | Internal evidence | Maintain this schedule, review minutes and superseded versions |

## PART A: PUBLIC PAIA MANUAL

### 1. Purpose and status

- 1.1 This manual is prepared for SWYFTCO (PTY) LTD as a private body under section 51 of PAIA.
- 1.2 It identifies records, access procedures, Information Officer details and relevant personal-information disclosures.
- 1.3 Access is not automatic and may be granted, partly granted or refused under PAIA.
- 1.4 Confidential operational annexures are excluded from the public copy.

### 2. Identity and activities

- 2.1 SWYFTCO (PTY) LTD, registration number 2023/812056/07, trades as Legally Armed Western Seaboard.
- 2.2 The business provides technical and firearm licensing support services, including competency, licence, renewal, motivation, appeal and review support within client mandates.

### 3. Information Officer

- 3.1 Information Officer: Hough Arie van Wyk. Email: hough.vanwyk@swyftco.com. Telephone: 083 999 5411.
- 3.2 All PAIA and POPIA requests, complaints and security concerns must be directed to the Information Officer and entered in the applicable register.
- 3.3 [CLIENT TO CONFIRM: Deputy Information Officer appointment, if any.]

## 4. PAIA guide and forms

- 4.1** The Information Regulator guide and current prescribed forms may be obtained from the Regulator or requested from the Information Officer.

## 5. Voluntarily available records

- 5.1** Website information, brochures, public registers and price lists may be available without a formal request, subject to lawful restrictions.
- 5.2** [CLIENT TO CONFIRM: website and social-media addresses and control of the Legally Armed website.]

## 6. PAIA request procedure

- 6.1** Submit the current prescribed Form 2 with sufficient record, identity, authority, right and contact details.
- 6.2** Pay any prescribed fee where applicable.
- 6.3** SWYFTCO will communicate the decision and remedies. Refusal may apply where PAIA protects privacy, confidentiality, privilege, safety, commercial information or another protected interest.

## 7. Availability

- 7.1** The approved manual will be available from the Information Officer and any approved SWYFTCO publication channel.
- 7.2** The public copy must be reviewed and replaced when a material revision is approved.

## 8. Categories of records

| Subject                 | Examples                                                                                                   |
|-------------------------|------------------------------------------------------------------------------------------------------------|
| Corporate               | CIPC, governance, ownership, policies and licences                                                         |
| Finance and tax         | Invoices, Xero, VAT, tax, banking and payment records                                                      |
| Firearm-service clients | Identity, address, competency, licences, SAPS forms, motivations, safe photographs and supporting evidence |
| Employees               | Identity, contact, contracts, payroll, tax and access                                                      |
| Suppliers and operators | Contracts, invoices, due diligence and service records                                                     |
| Technology and cloud    | AWS, Google Workspace, Xero, access, backups, logs, testing and incidents                                  |
| PAIA and POPIA          | Manuals, notices, consents, requests, incidents, training and reviews                                      |
| Legal and risk          | Contracts, disputes, advice, claims and insurance                                                          |

## PART B: POPIA COMPLIANCE FRAMEWORK

## 9. Governance and lawful processing

- SWYFTCO is the responsible party where it determines the purpose and means of processing.

- The Information Officer oversees governance, requests, incidents, operators, training and reviews.
- Processing must meet the eight conditions in POPIA, including accountability, limitation, purpose, quality, openness, security and data-subject participation.
- Special personal information, children's information and firearm-security information require heightened necessity, authorisation and access controls.

## 10. Operators and recipients

| Party                                 | Purpose / status                                                                              |
|---------------------------------------|-----------------------------------------------------------------------------------------------|
| Legally Armed Volksrust               | Operator role and written agreement to confirm                                                |
| Josi Loss Adjusters t/a Legally Armed | Ongoing role and information flow to confirm                                                  |
| Google Workspace                      | Email, productivity and storage; contract and transfer position to record                     |
| AWS                                   | Hosting, storage, backup, development and testing; SWYFTCO-owned account in af-south-1        |
| Tax A Sured                           | Accounting, payroll, tax and authorised testing support; operator terms to confirm or prepare |
| Xero                                  | Accounting platform; access and data-location details to record                               |
| Courier Guy / PostNet                 | Delivery information limited to purpose                                                       |
| SAPS                                  | Application recipient under mandate and law                                                   |

## 11. Retention and security

- Section 13 files: up to five years, subject to approved purpose and lawful basis.
- Section 15/16 files: up to ten years, subject to approved purpose and lawful basis.
- Unconverted enquiries: twelve months.
- Use individual accounts, multi-factor authentication, least privilege, encryption, updated security software and controlled sharing.
- Review access on role change or exit and document destruction or deletion.
- Apply the incident procedure and section 22 assessment to testing and production incidents.

## 12. Employees and authorised users

- Issue the Employee Privacy Notice and POPIA Acknowledgement.
- Obtain the Employee Confidentiality Undertaking.
- Obtain the Acceptable Use and Information Security Acknowledgement.
- Obtain the Data Breach and Incident Reporting Acknowledgement.
- Record induction, refresher training, access grants and removals.

## PART C: CLOUD, HOSTING, DEVELOPMENT AND TESTING

### 13. Future-proof cloud scope

- 13.1** This Part applies to AWS, Google Workspace and other approved cloud, hosting, storage, application, integration, development, testing, staging, production, backup and recovery environments.
- 13.2** Additional systems within an approved environment do not, by themselves, require a manual revision if processing remains within this framework and is assessed and recorded in Annexures K and O.
- 13.3** A manual revision is required where a change materially alters the public disclosures, data subjects, data categories, purposes, recipients, cross-border position, safeguards, risk profile or legal obligations.

### 14. AWS and Donor A Sured

| Control                                         | Confirmed position                                                                                                                       |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| AWS account owner                               | SWYFTCO (PTY) LTD                                                                                                                        |
| Primary and backup region                       | af-south-1, Cape Town                                                                                                                    |
| Current live-data users                         | Hough Arie van Wyk and Tracey Jones                                                                                                      |
| External developers or support with live access | None currently                                                                                                                           |
| Donor A Sured testing                           | Live data used during alpha testing; no bank account or credit-card details; donation values and relevant IT3(s) fields may be processed |
| Wider AWS use                                   | May include Legally Armed data and future SWYFTCO systems, subject to governance controls                                                |

### 15. Live-data testing controls

- Document the necessity and obtain Information Officer approval.
- Use the minimum data required and apply masking or pseudonymisation where feasible.
- Separate testing and production credentials and restrict access to named users.
- Record imports, exports, changes, users, results and deletion in Annexure Q.
- Delete temporary test copies when the purpose ends, subject to lawful retention.
- Treat testing incidents under the same escalation and notification framework as production incidents.

### 16. APPROVAL

#### Approval statement

I approve this Version 1.3 manual and compliance framework for SWYFTCO (PTY) LTD, subject to completion of marked confirmations and controlled annexures. I confirm that the framework must be implemented in practice and reviewed after material changes and at least annually.

| Name               | Capacity                       | Signature                                                                            | Date              |
|--------------------|--------------------------------|--------------------------------------------------------------------------------------|-------------------|
| Hough Arie van Wyk | Director / Information Officer |  | 10 September 2026 |

**Final review note**

Before approval, SWYFTCO must complete marked items, approve the controlled annexures, ensure legacy documents are withdrawn and verify that the manual reflects actual operational practices. Specialist legal or technical review should be obtained where appropriate, particularly for special personal information, children, live-data testing, operator roles and cloud transfers.