

PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Including the business brands Afrivio and KTZ Media

Company detail	Information
Registered name	KTZ Holdings (Pty) Ltd
Registration number	2021/614249/07
Information Officer	Coralie Diaz
Information Officer email	info@afrivioapp.com
Registered address	35 Bristow Crescent Mayville Durban KwaZulu-Natal 4091
Date compiled / last revised	21 September 2026

This manual explains how to request access to records held by KTZ Holdings (Pty) Ltd and describes the main categories of records and personal information processed through its business activities and brands.

1 Introduction and purpose

This manual is issued by KTZ Holdings (Pty) Ltd in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), read with the Protection of Personal Information Act 4 of 2013 (POPIA). It applies to KTZ Holdings and its brands, including Afrivio and KTZ Media.

PAIA gives a requester a right of access to a record of a private body where the record is required for the exercise or protection of a right, subject to the procedural requirements and grounds of refusal contained in PAIA. This manual does not create an automatic right to all company records.

2 Company overview

KTZ Holdings (Pty) Ltd is a South African private company operating technology and digital-service brands. Afrivio is an AI-assisted workforce-matching and workforce-readiness platform. KTZ Media provides website development, mobile application development, digital marketing, branding and related technology services.

Brand	Main activities
Afrivio	Worker profiles, skills and availability information, employer project requirements, AI-generated pre-interview questions, recorded candidate video responses, workforce matching, readiness information, and employer access to candidate information subject to platform controls.
KTZ Media	Website and application development, hosting-related services, branding, digital marketing, client communications, project administration and related business services.

3 Company and Information Officer details

Item	Detail
Name of private body	KTZ Holdings (Pty) Ltd
Registration number	2021/614249/07
Head of private body / Information Officer	Coralie Diaz
Capacity	Director
Email address	info@afrivioapp.com
Telephone number	011 813 33320
Registered physical address	35 Bristow Crescent, Mayville, Durban, KwaZulu-Natal, 4091
Postal address	Same as registered address, unless otherwise notified
Afrivio website	https://afrivioapp.com
KTZ Media website	https://ktzmedia.co.za

Requests under PAIA should be directed to the Information Officer using the contact details above. A requester should confirm receipt if no acknowledgement is received within a reasonable period.

4 Information Regulator guide

The Information Regulator has published a guide explaining how to use PAIA and how to exercise rights under the Act. The guide and prescribed forms are available from the Information Regulator.

Information Regulator	Contact details
Website	https://infoeregulator.org.za
Email	enquiries@infoeregulator.org.za
PAIA complaints email	PAIAComplaints@infoeregulator.org.za
Telephone	010 023 5200
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

5 Records available without a formal PAIA request

Certain information may be available without a formal request, subject to access controls, confidentiality obligations, applicable law and the nature of the requester's relationship with the company. This may include:

- Public website content, service descriptions, published policies and contact information.
- A data subject's own account information and records that are available through an authenticated platform account.
- Invoices, quotations, contracts or correspondence already supplied to the relevant customer, supplier or contracting party.
- The company's published Privacy Notice, Terms and Conditions and this PAIA Manual.
- Information that the company is required by law to make publicly available.

Informal availability does not require the company to disclose another person's personal information, confidential business information, security information, privileged material or records protected by a ground of refusal under PAIA.

6 Records held by KTZ Holdings

The categories below describe records that may be held. Listing a category does not mean that every record exists or that access will be granted. Access remains subject to PAIA and other applicable law.

Category	Examples of records
Corporate and governance	CIPC records, constitutional documents, registers, resolutions, statutory filings, beneficial ownership records, licences, policies and internal governance records.
Finance and tax	Accounting records, bank and payment records, invoices, quotations, budgets, asset records, tax returns, SARS correspondence and audit information.
Employment and contractors	Employment and contractor agreements, payroll and attendance records, performance records, training records, disciplinary records, recruitment records and statutory employment documentation.
Customers and commercial	Customer details, proposals, agreements, subscription records, billing, support requests, project briefs, service records and business correspondence.
Suppliers and service providers	Supplier information, contracts, onboarding records, invoices, performance information, data-processing terms and due-diligence records.
Technology and security	System architecture, source code, access records, audit logs, security controls, incident records, backups, hosting information and technical documentation. Sensitive security records may be restricted.
Intellectual property	Trade marks, copyright material, designs, software, databases, domain information, brand assets, confidential methods and know-how.

Category	Examples of records
Legal and compliance	Policies, risk assessments, regulatory correspondence, complaints, legal advice, litigation records, POPIA records, PAIA requests and consent records.
Marketing and communications	Marketing materials, contact lists, campaign records, social-media content, media assets, enquiries and communication preferences.

7 Afrivio records

Record group	Examples
Worker and candidate profiles	Identity and contact details, location, skills, work history, qualifications, credentials, availability, preferred work area, profile content and account records.
AI-assisted pre-interviews	AI-generated occupation-related questions, candidate consent records, recorded video responses, metadata and related access records. Employers make their own recruitment and hiring decisions.
Employer and project records	Employer profiles, authorised users, projects, role requirements, headcounts, matching criteria, shortlists, teams, subscription and billing information.
Matching and readiness	Potential match results, availability indicators, document status, readiness information, training gaps and occupational fitness status where lawfully processed. Detailed medical diagnoses or results are not intended for employer disclosure.
Provider records	Training or occupational medical provider profiles, service information, accreditation or registration information supplied, requests, bookings and communications.
Platform administration	Authentication records, permissions, audit logs, support records, notifications, reports, security events and operational records.

8 KTZ Media records

Record group	Examples
Client projects	Project briefs, specifications, designs, content, credentials supplied for project use, approvals, change requests, deliverables and support records.
Web and app services	Domain and hosting details, email-service information, deployment records, source files, technical configurations, maintenance and security records.
Marketing and creative services	Brand information, media files, campaign information, audience and performance reports, social-media content and approved marketing materials.
Sales and administration	Leads, enquiries, proposals, quotations, agreements, invoices, payment records and client communications.

9 Records processed under applicable legislation

Where applicable to its operations, KTZ Holdings may hold records in accordance with legislation including:

Legislation	Examples of related records
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Legislation	Examples of related records
Companies Act 71 of 2008	Company, governance and statutory records.
Income Tax Act 58 of 1962	Tax and financial records.
Tax Administration Act 28 of 2011	Tax administration and correspondence.
Value-Added Tax Act 89 of 1991	VAT records, if applicable.
Basic Conditions of Employment Act 75 of 1997	Employment records, where applicable.
Labour Relations Act 66 of 1995	Employment-relations records, where applicable.
Employment Equity Act 55 of 1998	Employment equity records, where applicable.
Unemployment Insurance Act 63 of 2001	UIF records, where applicable.
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Workplace injury and registration records, where applicable.
Electronic Communications and Transactions Act 25 of 2002	Electronic transactions, communications and website information.
Consumer Protection Act 68 of 2008	Consumer-facing service and complaint records, where applicable.
Protection of Personal Information Act 4 of 2013	Privacy, security, data-subject and processing records.
Promotion of Access to Information Act 2 of 2000	Access requests and PAIA administration records.
Employment Services Act 4 of 2014	Employment-services related records, to the extent applicable to Afrivio's operating model.

This list is not exhaustive. Legislation applies only to the extent relevant to the company's activities and circumstances.

10 Processing of personal information under POPIA

10.1 Purposes of processing

- To create and administer user, customer, worker, employer and provider accounts.
- To provide workforce matching, AI-generated pre-interview questions, recorded interview access, project staffing and readiness functionality through Afrivio.
- To deliver websites, applications, hosting-related services, branding and digital services through KTZ Media.
- To communicate, provide support, process payments, keep records and manage contractual relationships.
- To secure systems, prevent fraud or misuse, investigate incidents and comply with legal obligations.
- To conduct marketing where permitted and manage communication preferences.

10.2 Categories of data subjects

- Workers, job seekers and candidates.
- Employer representatives and authorised platform users.
- Training providers, occupational medical providers and their representatives.
- Customers and prospective customers.
- Employees, contractors, applicants and former personnel.
- Suppliers, service providers, business partners and professional advisers.
- Website visitors and persons who communicate with the company.

10.3 Categories of personal information

- Identity, contact, demographic, location and account information.
- Education, qualifications, skills, employment history, availability and professional information.
- Photographs, voice and recorded video interview responses.
- Credentials, licences, certificates and document-status information.
- Occupational fitness status and limited health-related information where lawfully necessary; detailed medical results should remain subject to strict access controls.
- Commercial, transaction, subscription, billing and payment-related records.
- Technical identifiers, device, access, audit, security and usage information.
- Correspondence, enquiries, complaints, preferences and consent records.

10.4 Recipients or categories of recipients

- Authorised employers using Afrivio, subject to applicable access controls and the worker-facing notices and permissions.
- Authorised training and occupational medical providers where relevant to a requested service.
- Hosting, cloud, email, communications, analytics, AI, payment and other technology service providers acting under appropriate arrangements.
- Professional advisers, auditors, insurers, regulators, law-enforcement bodies or courts where lawfully required.
- Parties to a business transaction, subject to lawful safeguards and confidentiality requirements.

10.5 Cross-border transfers

Some service providers or systems may process or store personal information outside South Africa. KTZ Holdings must assess and implement an appropriate basis and safeguards for any cross-border transfer in accordance with POPIA. The actual hosting and processing locations should be kept in the company's internal data-processing register and privacy documentation.

10.6 Security measures

KTZ Holdings uses or requires reasonable technical and organisational safeguards appropriate to the information and risks involved. These may include role-based access controls, authentication, encryption where implemented, logging, secure hosting configurations, backups, incident response, confidentiality duties, provider controls and periodic review. Security information may be withheld where disclosure would create or increase a security risk.

10.7 Planned retention and deletion

Records are retained only for as long as required for the purpose for which they were collected, to meet contractual or legal obligations, to resolve disputes or to protect legitimate interests. Retention periods should be documented by record category. Records are securely deleted, anonymised or archived when retention is no longer justified, subject to legal preservation requirements.

11 How to request access to a record

A requester must use the prescribed PAIA request form applicable to private bodies and submit it to the Information Officer. Current forms should be obtained from the Information Regulator's website.

1. Identify the requester and provide sufficient contact details.
2. Describe the requested record clearly enough for the company to identify it.
3. State the right that the requester seeks to exercise or protect and explain why the record is required for that purpose.
4. Specify the preferred form of access and any relevant accessibility needs.
5. If acting for another person, provide proof of authority.
6. Submit the completed form to info@afrivioapp.com or to the registered address.
7. Pay any prescribed request or access fee when lawfully required and after receiving the applicable notice.

The Information Officer may request reasonable additional information to identify the record, verify identity, establish authority or process the request. A personal requester seeking access to their own personal information is treated in accordance with PAIA and POPIA and is not charged a request fee merely to initiate such a request.

12 Fees

Fees are governed by PAIA and the regulations in force at the time of the request. The company will not invent or substitute its own statutory fee schedule. Where a fee applies, the requester will receive written notice setting out the amount, basis and payment method before access is provided. Reproduction, search, preparation, delivery and deposit fees may apply where permitted by law.

13 Decision and grounds for refusal

The company will respond within the period prescribed by PAIA, subject to any lawful extension. Access may be granted in full, granted in part, or refused. Grounds of refusal may include:

- Protection of the privacy of another person.
- Protection of confidential commercial information of the company or a third party.
- Protection of confidential information supplied under a duty of confidence.
- Protection of the safety of individuals or security of property and systems.
- Protection of legally privileged records.
- Protection of research information or other interests recognised by PAIA.
- A mandatory or discretionary ground of refusal contained in PAIA.

Where reasonably possible, the company may provide access to a severable portion of a record after removing protected information. A refusal will include the reason and information about the available complaint or court process, as applicable.

14 Remedies

KTZ Holdings is a private body and does not have an internal PAIA appeal procedure. A requester who is dissatisfied with the outcome or handling of a request may lodge a complaint with the Information Regulator in the prescribed manner or approach a court with jurisdiction, subject to the requirements and time limits in PAIA.

15 Availability of this manual

This manual is available electronically from KTZ Holdings on request and should be published on the websites operated for Afrivio and KTZ Media where appropriate. A copy may also be inspected at the company's registered address by prior arrangement during reasonable business hours. The manual may be submitted to the Information Regulator if required by law or requested by the Regulator.

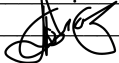
16 Review and approval

This manual should be reviewed when the company's contact details, brands, processing activities, legal obligations or PAIA procedures change, and otherwise at reasonable intervals.

Approved by: Coralie Diaz

Capacity: Director and Information Officer

Date: 21 September 2026

Signature: 

Completion items before publication

Complete the following two fields before publishing the manual:

- Insert the current business telephone number in section 3.

- Insert the current KTZ Media website URL in section 3, or remove that row if KTZ Media does not have a separate public website.

The company should also confirm the Information Regulator's current contact details, prescribed forms and fee schedule when implementing the manual. This document is a practical compliance draft and should be reviewed by a South African legal or privacy professional where legal assurance is required.