

PAIA Manual - Private Body

Prepared for TECBINO (Pty) Ltd in terms of section 51 of PAIA

Entity	TECBINO (Pty) Ltd
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Status	Effective

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1. Acronyms and definitions

Term	Meaning
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
TECBINO	TECBINO (Pty) Ltd
Duewarden	The SaaS product operated by TECBINO

2. Purpose of this Manual

This Manual helps members of the public understand the categories of records held by TECBINO, which records may be available without a formal PAIA request, how to request access to another record, who to contact, and how TECBINO processes personal information for POPIA purposes. It is based on the Information Regulator's private-body PAIA manual structure.

3. Particulars and key contacts

Particular	Details
Legal name	TECBINO (Pty) Ltd

Particular	Details
Product / trading name	Duewarden
Registration number	2025/063187/07
Physical / service address	26 Leslie Avenue, Sandton, Gauteng, 2191, South Africa
Postal / correspondence address	26 Leslie Avenue, Sandton, Gauteng, 2191, South Africa
Website	https://www.duewarden.tecbino.co.za
General / support email	support_duewarden@tecbino.co.za
Telephone	+27 61 536 4024
Information Officer	Luigi Di Leo, Director
IO email	support_duewarden@tecbino.co.za
IO registration	Pending registration with the Information Regulator.
Deputy Information Officer	None designated at present

4. Information Regulator PAIA Guide and forms

The Information Regulator publishes the Guide on how to use PAIA, prescribed request / outcome / complaint forms and language versions. These are available from <https://inforegulator.org.za/paia/> and the Regulator eServices portal. The principal prescribed form for requesting access to a private-body record is Form 2 (Request for Access to Record), as updated by the Regulator from time to time.

A requester may contact the TECBINO Information Officer at support_duewarden@tecbino.co.za for reasonable assistance concerning a request. The Regulator's Guide is available in the official languages and in the forms made available by the Regulator.

5. Records available without a formal PAIA request

Category	Examples / access
Website and product information	Public Duewarden website pages, product descriptions and pricing.
Public legal documents	Terms of Service, Privacy Notice, Acceptable Use Policy, Cancellation & Refund Policy, this PAIA Manual and ECTA supplier disclosures.
Public corporate particulars	Information lawfully available through CIPC or published by TECBINO.

Category	Examples / access
Published technical / marketing material	Documents expressly designated by TECBINO for public distribution.

A record being described above does not make confidential, privileged, security-sensitive, third-party or otherwise protected information automatically available.

6. Records maintained under legislation

Depending on TECBINO's activities and status at the relevant time, records may be created or retained under legislation including:

- Companies Act 71 of 2008 and related regulations.
- Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011.
- Protection of Personal Information Act 4 of 2013.
- Promotion of Access to Information Act 2 of 2000.
- Electronic Communications and Transactions Act 25 of 2002.
- Consumer Protection Act 68 of 2008, where applicable.
- Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995, if and when applicable to personnel records.
- Copyright Act 98 of 1978, Cybercrimes Act 19 of 2020 and other applicable intellectual-property / security legislation.

TECBINO is not currently VAT registered. VAT-specific records become applicable if TECBINO registers as a vendor.

7. Subjects and categories of records held

Subject	Categories of records
Corporate	CIPC / registration records, constitutional documents, director / ownership records, resolutions and policies.
Finance and tax	Banking, invoices, receipts, subscriptions, transaction references, ledgers, tax and accounting records.
Customers and contracts	Terms, orders, quotations, enterprise agreements, subscriptions, correspondence and support records.
Product and technology	Software and architecture documentation, source code, configuration, change / release records, security documentation, logs and backups.
Privacy and compliance	Privacy notices, processing / retention records, operator agreements, international-transfer records, data-subject requests, incidents and regulatory correspondence.

Subject	Categories of records
Suppliers / operators	Contracts, DPAs, security reviews, service records, invoices and subprocessor information.
Personnel / contractors	Employment / contractor and access records, where applicable.
Intellectual property	Software, copyright works, trademarks, designs, licences, trade secrets and confidential know-how.

8. How to request access

1. Use the current prescribed PAIA Form 2 or another method accepted by current PAIA regulations.
2. Send the request to the Information Officer at support_duewarden@tecbino.co.za or to the physical address above.
3. Identify the record with enough detail for TECBINO to locate it, identify the requester, state the requested form of access and explain the right to be exercised or protected where PAIA requires this.
4. Provide reasonable proof of identity and, if acting for another person, authority to act.
5. Pay any lawfully prescribed request or access fee after receiving the required notice.
6. TECBINO will consider mandatory / discretionary refusal grounds, severability, third-party notice and public-interest requirements under PAIA.

9. Grounds on which access may be refused

Access may or must be refused where PAIA protects interests such as third-party privacy, confidential / commercial information, safety or security, legally privileged material, research information, or other protected records. Each request is assessed on its facts. Where reasonably possible, TECBINO will consider severing protected information and providing the remainder. Applicable public-interest overrides will be considered where required by PAIA.

10. POPIA - purpose of processing personal information

TECBINO processes personal information for account and user administration, providing and securing Duewarden, customer support, subscription billing, accounting / legal administration, security and fraud prevention, supplier management, service improvement, regulatory compliance and the exercise / defence of legal rights. Optional marketing may be added only under an appropriate POPIA / electronic-communications process.

11. POPIA - categories of data subjects and information

Data subject	Categories of personal information
Customer users / administrators	Name, work email, organisation, role, account identifier, authentication / technical data, correspondence.
Individuals referenced in Customer Data	Names, work contact details, service / calibration responsibilities, notes or other customer-entered information.
Billing / customer contacts	Name, email, organisation, plan, invoice / transaction reference and payment status.
Supplier contacts	Business contact, contract, invoice and due-diligence information.
Prospects / website visitors	Enquiry contact information and necessary technical data.
Personnel / contractors	Employment / contractor and access information, where applicable.

12. POPIA - recipients and operators

- Authorised TECBINO personnel and contractors with a legitimate need to know.
- Amazon Web Services (AWS) for Duewarden cloud hosting, application and authentication infrastructure.
- Paystack South Africa and payment / banking participants for subscription payment processing.
- Email infrastructure for service and support communications.
- Professional advisers, accountants, auditors or insurers where appropriate.
- Regulators, courts, law-enforcement or other bodies where authorised or required by law.
- Customer administrators and authorised users where Duewarden functionality requires sharing within the customer workspace.

13. POPIA - planned transborder flows

Duewarden application and authentication infrastructure is hosted by AWS in eu-central-1, Frankfurt, Germany. Account, workspace, authentication and technical data may therefore be processed in Germany. TECBINO maintains contractual / operator controls and a documented POPIA section 72 transfer basis.

Paystack South Africa may process payment and transaction information in South Africa and other countries. As at 27 September 2026, Paystack's South African privacy material identifies AWS servers in Ireland. TECBINO maintains Paystack contractual / DPA records and updates its transfer register when provider information changes.

14. POPIA - information security measures

TECBINO applies security measures appropriate to the risk, which may include role-based access, least privilege, authentication controls, encryption in transit, secure configuration, logging and monitoring, vulnerability / patch management, backups and recovery, change control, operator due diligence, confidentiality controls and an incident-response process. Detailed security information may be withheld from the public where disclosure would materially increase security risk.

15. Data-subject requests under POPIA

Data subjects may submit access, objection, correction or deletion / destruction requests using the current Information Regulator forms or another legally acceptable form. Requests should be sent to support_duewarden@tecbino.co.za. POPIA access requests are handled with regard to POPIA sections 23-25 and the applicable PAIA procedures.

16. Availability and updating of this Manual

This Manual will be published at <https://www.duewarden.tecbino.co.za> and made available for inspection at the TECBINO physical / service address listed in section 3 during normal business hours, subject to reasonable security and access arrangements. A copy will be provided to the Information Regulator or another requester where PAIA requires it. The Manual will be reviewed at least annually and when TECBINO's records, processing activities, Information Officer details or legal requirements materially change.

17. Issued by

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