

JUST PCs

CC T/A JUST PCS & JUST ECO

Promotion of Access to Information (PAIA) Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), read with the Protection of Personal Information Act 4 of 2013.

Private body	JUST PCs CC, trading as JUST PCs and JUST ECO
Registration number	2004/060554/23
VAT number	4600249660
Head of the private body / Information Officer	Justin Van Der Walt
Version	1.0
Effective date	June 2026
Next review	June 2027 (or earlier on material change)

This Manual is published on the company website at justpcs.co.za and is available for inspection at the company's head office. It is provided to the Information Regulator on request.

1. Introduction

The Promotion of Access to Information Act 2 of 2000, as amended ("PAIA"), gives effect to the constitutional right of access to information held by another person that is required for the exercise or protection of any right. The Protection of Personal Information Act 4 of 2013 ("POPIA") protects personal information processed by public and private bodies.

JUST PCs CC ("the company", "we", "us", "our") is a private body as defined in PAIA. This Manual is compiled in terms of Section 51 of PAIA, read with the relevant provisions of POPIA, to inform requesters how to access records held by the company and how the company processes personal information.

Since 1 January 2022 every private body in South Africa is required to have a PAIA Manual; no private body is exempt. This Manual applies to JUST PCs CC and to its trading divisions JUST PCs (refurbished ICT products and retail) and JUST ECO (IT asset disposal, data sanitisation and e-waste recycling).

2. About JUST PCs

Established in 2001 and based in Cape Town, JUST PCs supplies high-quality refurbished ICT products to businesses, schools and individuals. Its sister operation, JUST ECO, provides professional IT asset disposal (ITAD), data sanitisation and e-waste recycling to corporate, government and public clients.

Registered name	JUST PCs CC
Trading names	JUST PCs; JUST ECO
Registration number	2004/060554/23
VAT number	4600249660
Nature of business	Refurbished ICT sales and retail; IT asset disposal (ITAD), data sanitisation and e-waste recycling
Head office & physical address	Unit 5, 6 on Paris Road (entrance via London Circle), Brackengate Business Park, Brackenfell, Cape Town, 7560
Postal address	Unit 5, 6 on Paris Road, Brackengate Business Park, Brackenfell, Cape Town, 7560
Telephone	(021) 905 8874
Website	www.justpcs.co.za

3. Information Officer & Deputy

In terms of PAIA the Head of the Private Body is the Information Officer. Requests for access to records and requests relating to personal information must be directed to the Information Officer or, where designated, the Deputy Information Officer, at the details below.

Head of Private Body / Information Officer	Justin Van Der Walt
Deputy Information Officer	Tarien Kemp

Email (PAIA & POPIA matters)	admin@justpcs.co.za
Telephone	(021) 905 8874
Postal & physical address	Unit 5, 6 on Paris Road, Brackengate Business Park, Brackenfell, Cape Town, 7560

4. The Information Regulator

Complaints regarding a request for access to information, or the processing of personal information, may be lodged with the Information Regulator (South Africa):

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

5. Guide on how to use PAIA

The Information Regulator has, in terms of Section 10 of PAIA, published a Guide on how to use PAIA. The Guide explains how to exercise the rights contemplated in PAIA and POPIA and is available in the official languages from the Information Regulator, free of charge, on its website at <https://inforegulator.org.za> or by contacting the Regulator at the details in Section 4.

6. Records available without a PAIA request

Certain records are available without a formal PAIA request. These include:

- Information published on the company website (www.justpcs.co.za), including product information, terms and conditions, and this Manual;
- Records that the company is obliged to make available in terms of other legislation; and
- Records voluntarily made available, in the company's discretion, on request.

Access to any other record must be requested in accordance with Section 8 below.

7. Categories of records held

The company holds records relating to the following subjects. The listing of a category does not guarantee that a request for access will be granted; access is subject to the grounds for refusal in PAIA.

Subject / category	Records held
Corporate & statutory	Close Corporation founding statement and amendments, CIPC records, member details, resolutions, statutory registers, licences and permits, and governance/compliance documents.
Financial & tax	Accounting records, management accounts, invoices, quotations, statements, banking and payment records, VAT and income-tax records, and auditor/accountant correspondence.
Customer & sales	Customer contact and account details, orders, sales and delivery records, warranty, buy-back and returns records, and support/RMA correspondence.
Supplier & procurement	Supplier and service-provider details, purchase orders, supply agreements, and procurement correspondence.
Employee & human resources	Employment contracts and the independent-contractor agreement, payroll and benefit records, personnel files, leave records, performance and training records, and workplace policies.
JUST ECO — ITAD & data destruction	Asset intake and chain-of-custody records, device diagnostic results, data-sanitisation and erasure logs, NIST SP 800-88 data-destruction certificates, e-waste recycling and disposal records, and ITAD client agreements.
IT, website & marketing	Website and e-commerce records, customer database and CRM records, email and electronic communications, marketing and advertising records, and analytics data.
Insurance & risk	Insurance policies, claims, and related correspondence.

Records held in terms of other legislation

The company keeps records in accordance with, among others, the Close Corporations Act 69 of 1984 and the Companies Act 71 of 2008 (to the extent applicable); the Income Tax Act 58 of 1962 and the Value-Added Tax Act 89 of 1991; the Tax Administration Act 28 of 2011; the Basic Conditions of Employment Act 75 of 1997, the Labour Relations Act 66 of 1995, the Employment Equity Act 55 of 1998 and related labour legislation; the Consumer Protection Act 68 of 2008; the Electronic Communications and Transactions Act 25 of 2002; the National Environmental Management: Waste Act 59 of 2008 (e-waste); the Occupational Health and Safety Act 85 of 1993; PAIA; and POPIA.

8. How to request access to a record

Step 1 — Complete the request form

A request must be made on the prescribed Request for Access to Record (Form 2 / Form C for a private body), available from the Information Regulator's website at <https://inforegulator.org.za>. A copy may also be obtained from the Information Officer.

Step 2 — Submit the form

Submit the completed form to the Information Officer at the address or email in Section 3. The requester must provide sufficient particulars to identify the record and the requester,

identify the right that the requester is seeking to exercise or protect and explain why the requested record is required for that purpose, and indicate the preferred form of access and how to be notified of the decision.

Step 3 — Pay the prescribed fees

A requester (other than a personal requester) must pay the prescribed request fee before the request is processed. If granted, a prescribed access fee is payable for the search, reproduction and preparation of the record. Where the Information Officer estimates that preparation will exceed the prescribed hours, a deposit may be required. The fees are those prescribed in the Regulations to PAIA (Annexure B), as amended from time to time.

Step 4 — Decision

The Information Officer will decide on the request within 30 days of receipt. This period may be extended in the circumstances permitted by PAIA, in which case the requester will be notified. The requester will be informed of the decision and, where access is refused, of the reasons and the right to lodge a complaint.

Grounds for refusal

Access may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA — for example, to protect the privacy of a third party, commercial information, confidential information, legal privilege, or the safety of persons and property — subject to the public-interest override in Section 70.

Remedies

There is no internal appeal against a decision of a private body. A requester who is dissatisfied may, within 180 days, lodge a complaint with the Information Regulator (using the prescribed complaint form) or apply to court for appropriate relief.

9. Processing of personal information (POPIA)

Purpose of processing

The company processes personal information to sell and deliver refurbished ICT products and provide warranties and support; to provide ITAD, data-sanitisation and e-waste services and issue chain-of-custody and data-destruction certificates; to manage suppliers, employees and contractors; to operate its website and e-commerce; for marketing (subject to consent where required); and to comply with legal, tax and regulatory obligations.

Categories of data subjects and personal information

Data subjects include customers and prospective customers, ITAD clients and their representatives, suppliers and service providers, employees and contractors, and website users. Personal information may include names and contact details, identity and company-registration details, delivery and billing addresses, payment-related information, order and service history, employment and payroll information, device and asset identifiers linked to client data, and electronic-communication and website-usage data.

Recipients of personal information

Personal information may be shared with operators and service providers acting on the company's behalf (including IT, cloud, payment, logistics and marketing providers), with

professional advisers, and with regulators, courts or other parties where required or permitted by law.

Trans-border flows

The company uses cloud-based platforms and service providers whose servers may be located outside the Republic of South Africa — including its e-commerce and inventory platforms (for example Shopify and Zoho), its email and productivity services, and its digital-advertising and analytics providers (for example Google and Meta). Where personal information is transferred outside South Africa, the company does so in accordance with Section 72 of POPIA.

Security safeguards

The company takes reasonable technical and organisational measures to protect personal information against loss, damage and unauthorised access or processing. These include access controls and authentication, network and device security, secure data-sanitisation of decommissioned equipment in line with recognised standards (including NIST SP 800-88), backups, and confidentiality undertakings with staff and operators.

Rights of data subjects

A data subject may request confirmation of, and access to, their personal information; request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained; object to processing on reasonable grounds; and, where applicable, lodge a complaint with the Information Regulator. Requests are directed to the Information Officer in Section 3.

10. Availability and updating of this Manual

This Manual is available, free of charge, on the company website at www.justpcs.co.za and for inspection at the company's head office during business hours. A copy is provided to the Information Regulator on request. The Manual is reviewed and updated when the company's details, records or processing activities change materially, and at least annually.

Approved by the Head of the Private Body

Name: Justin Van Der Walt

Capacity: Member and Information Officer, JUST PCs CC

Signature: _____ Date: 2026-06-29