Succession Group.

Promotion of Access to Information Act 2 of 2000, section 51

PAIA manual.

How to request access to records held by Succession Group under the Promotion of Access to Information Act.

Version 1.0, 20 October 2026 | successiongroup.co.za/paia-manual

Contents

1. Introduction and purpose
2. Abbreviations
3. Key contact details for access to information
4. The Information Regulator's Guide on how to use PAIA
5. Records available without a request
6. Records kept in terms of other legislation
7. Subjects and categories of records held
8. How to request access
9. Processing of personal information
10. Availability and updating of this manual

1. Introduction and purpose

Succession Group operates successiongroup.co.za, an online marketplace where owners of South African small and medium businesses, and brokers acting for them, can list a business for sale and prospective buyers can browse listings and contact sellers. It also offers online business valuation tools.

PAIA gives effect to the constitutional right of access to information held by another person where that information is required to exercise or protect a right. This manual:

- lists the categories of records Succession Group holds and those available without a formal request;
- explains how to make a request, the fees that may apply and the grounds on which a request may be refused;
- describes how Succession Group processes personal information, as required by the Protection of Personal Information Act 4 of 2013 (POPIA); and
- gives the contact details of the person who handles requests.

2. Abbreviations

Abbreviation	Meaning
CPA	Consumer Protection Act 68 of 2008
ECTA	Electronic Communications and Transactions Act 25 of 2002
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Succession Group	Succession Group, the business that operates successiongroup.co.za

3. Key contact details for access to information

All requests for access to records go to Succession Group's Information Officer. Under PAIA the head of a private body is its Information Officer.

Detail	Information
Information Officer	Iris de Villiers
Email	info@successiongroup.co.za
Telephone	082 627 2810
Physical address	Willowdale, 420 Jan Smuts Avenue, Oerder Park, Randburg, 2194
Postal address	Same as physical address
Website	successiongroup.co.za

The Information Officer is registered with the Information Regulator.

4. The Information Regulator's Guide on how to use PAIA

The Information Regulator publishes a Guide that explains how to use PAIA and POPIA, in every official South African language and in braille. It covers the objects of both Acts, the help available from Information Officers and the Regulator, and the remedies open to requesters.

You can:

- download the Guide from the Information Regulator's website (inforegulator.org.za/paia-guidelines);
- ask Succession Group's Information Officer for a copy, using Form 01 (Request for a copy of the Guide), available on the Regulator's PAIA forms page (inforegulator.org.za/paia-forms); or
- inspect a copy at Succession Group's principal place of business during office hours.

Information Regulator: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191. Email enquiries@inforegulator.org.za, telephone 010 023 5200.

5. Records available without a request

The following records are freely available on successiongroup.co.za and do not require a formal PAIA request:

Record	Where to find it
Terms of Service	successiongroup.co.za/terms-of-service
Privacy Policy, including the Confidentiality Undertaking	successiongroup.co.za/privacy-policy
Seller packages and prices	successiongroup.co.za/sell
Published business listings	successiongroup.co.za/buy
Information about the valuation tools	successiongroup.co.za/valuation
This PAIA manual	successiongroup.co.za/paia-manual

Sellers and account holders can also view their own listings, saved valuations and package details in their seller dashboard at any time.

6. Records kept in terms of other legislation

Succession Group keeps records as required by the laws below, to the extent they apply to it. Access to these records is subject to PAIA and to the law concerned. Laws marked "where applicable" apply only to the extent they are relevant to Succession Group.

Legislation	Typical records
Companies Act 71 of 2008	Memorandum of incorporation, registers, minutes, annual financial statements
Income Tax Act 58 of 1962	Tax returns, assessments and supporting records
Tax Administration Act 28 of 2011	Records supporting tax returns, kept for at least 5 years
Value-Added Tax Act 89 of 1991	VAT invoices and returns (where applicable)
Consumer Protection Act 68 of 2008	Customer agreements, cancellations and refunds
Electronic Communications and Transactions Act 25 of 2002	Records of electronic transactions and online agreements
Protection of Personal Information Act 4 of 2013	Records of processing, consents and data subject requests
Promotion of Access to Information Act 2 of 2000	This manual and records of access requests
Basic Conditions of Employment Act 75 of 1997	Employee records, working time and remuneration (where applicable)
Labour Relations Act 66 of 1995	Disciplinary and employment records (where applicable)
Unemployment Insurance Act 63 of 2001	UIF records (where applicable)
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury and compensation records (where applicable)
Skills Development Levies Act 9 of 1999	Skills levy records (where applicable)

7. Subjects and categories of records held

Succession Group holds records on the subjects below. Listing a category does not mean access will be granted; each request is assessed against the grounds for refusal in section 8.

Subject	Categories of records
Company and governance	Incorporation documents, registers, resolutions, minutes, statutory returns
Finance and tax	Accounting records, bank records, invoices, tax and VAT records, annual financial statements
Seller accounts and packages	Account details, package orders and payments, package activation and expiry, cancellations and refunds
Business listings	Listing details and photos, owner or broker details, listing questionnaire answers, Succession Scores, review notes and decisions, listing history
Seller financial documents	Financial statements, management accounts and other documents uploaded by sellers (held under the Confidentiality Undertaking)
Valuations	Valuation inputs and results saved by signed-in users
Enquiries and correspondence	Buyer enquiries passed to sellers, contact form messages, email correspondence
Website and security	Server logs, security records, website content and configuration
Suppliers and service providers	Agreements, invoices and correspondence with hosting, email, payment and other providers
Legal and compliance	Policies, POPIA and PAIA records, legal correspondence
Personnel (where applicable)	Employment contracts, payroll, leave and disciplinary records

8. How to request access

Send a completed Form 02 (Request for access to a record) to the Information Officer at the email or address in section 3. The form is on the Regulator's PAIA forms page (inforegulator.org.za/paia-forms); always use the latest version.

The request must:

- identify the record or records requested;
- identify you, and if you act for someone else, show your authority to do so;
- state the form of access you want (for example a copy by email);
- give an email or postal address in South Africa for our reply; and
- state which right you want to exercise or protect, and why the record is needed for it.

Timeframes

We will decide on a request within 30 days of receiving it. We may extend this once, by up to 30 more days, in the circumstances PAIA allows, and will tell you why. If we do not respond in time, the request is regarded as refused. Where a record contains information about a third party, we will notify that party and consider their representations before deciding.

Fees

Private bodies may charge the fees prescribed under PAIA. The current amounts, as published by the Information Regulator (inforegulator.org.za/paia-fees-structure-2), are:

Item	Fee
Request fee	R140.00
Printed or photocopied A4 page	R2.00 per page
Copy on flash drive or CD you supply	R40.00
Copy on CD we supply	R60.00
Transcription of an audio record	R24.00 per A4 page
Search and preparation, after the first hour	R145.00 per hour, up to R435.00

If the search will take more than 6 hours, we may ask for a deposit of one-third of the expected access fee. You will be told the fees payable on Form 03 before access is given. No fee applies to a request for your own personal information under POPIA, other than the prescribed fee for copies.

Grounds for refusal

We may refuse access only on the grounds in Chapter 4 of Part 3 of PAIA, including to protect:

- the privacy of another natural person;
- commercial information of a third party, such as a seller's financial statements and business records;
- information provided in confidence by a third party;
- the safety of individuals and the protection of property;
- records privileged from production in legal proceedings; and
- Succession Group's own commercial information, such as trade secrets and information whose disclosure would harm its competitive position.

If part of a record must be refused, we will give access to the rest where possible, and explain our reasons for any refusal.

Remedies

Succession Group has no internal appeal procedure. If you are not satisfied with a decision, you may, within 180 days:

- lodge a complaint with the Information Regulator, at PAIAComplaints@inforegulator.org.za or through its complaints page (inforegulator.org.za/complaints); or
- apply to a court with jurisdiction for appropriate relief.

9. Processing of personal information

This section is required by section 51(1)(c) of PAIA. It summarises how Succession Group processes personal information; the full detail is in the Privacy Policy.

Purposes of processing

Succession Group processes personal information to:

- create and manage user accounts and verify email addresses;
- process package purchases, cancellations and refunds, and keep financial records;
- review, verify, publish and manage business listings;
- calculate valuations and Succession Scores;
- pass buyer enquiries to the relevant seller;

- send service emails and respond to messages;
- protect the website against fraud, misuse and security incidents; and
- comply with legal and regulatory obligations.

Data subjects and categories of personal information

Data subjects	Personal information processed
Sellers (business owners and brokers)	Name, email, phone, billing address, account details, order and payment records, owner or broker status, brokerage name
Businesses listed for sale (juristic persons)	Business name, industry, location, trading history, staff numbers, financial figures, assets, financial statements and management accounts, questionnaire answers, photos
Buyers and enquirers	Name, email, optional phone number, enquiry message
Valuation tool users	Business figures and answers; saved to the account only if signed in
Website visitors	IP address, browser type, pages visited, essential cookies
People who contact us	Name, email, message
Service providers	Contact person details, banking and contract details
Employees and contractors (where applicable)	Identity, contact, banking, tax and employment details

Recipients of personal information

- Sellers, who receive the details of buyers who enquire about their listings.
- The public, who can see the details a seller chooses to publish in a listing.
- Service providers who host the website, deliver email and process payments, bound by confidentiality.
- Professional advisers such as attorneys, auditors and accountants.
- Regulators, courts and law enforcement, where the law requires it.

Information sellers submit privately about their business is not disclosed to buyers or other third parties without the seller's authorisation, under the Confidentiality Undertaking in the Privacy Policy.

Planned transborder flows

Some service providers, including providers of website fonts, email and payment services, may store or process personal information outside South Africa. Succession Group transfers personal information across borders only as section 72 of POPIA allows, for example where the recipient is bound by laws or an agreement giving substantially similar protection, or where the transfer is needed to perform an agreement with the data subject. A list of these providers is available from the Information Officer on request.

Security measures

Succession Group takes appropriate, reasonable technical and organisational measures to protect personal information, including:

- encrypted connections (HTTPS) for the whole website;
- passwords stored in hashed form;
- seller financial documents stored in a protected location, opened only through permission-checked links;
- access limited to staff, advisers and providers who need it, under confidentiality obligations; and
- notifying affected people and the Information Regulator of any security compromise, as section 22 of POPIA requires.

10. Availability and updating of this manual

This manual is available:

- on successiongroup.co.za/paia-manual, where it can be downloaded as a PDF;
- at Succession Group's principal place of business, for inspection during office hours; and
- to the Information Regulator, on request.

A printed copy may be requested from the Information Officer; the prescribed fee for copies may apply.

Succession Group will review this manual at least once a year and update it whenever its services, records or processing of personal information change.

Version	Date	Approved by
1.0	20 October 2026	Iris de Villiers, Information Officer