



PAIA MANUAL

Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)

To address the requirements of the
Protection of Personal Information Act,
4 of 2013

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1. Purpose, Scope and Legislative Context

This Manual is prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"), as amended, and to address the relevant requirements of the Protection of Personal Information Act, 2013 ("POPIA").

This Manual explains what information Velocity holds, how a requester may access records in terms of PAIA, how Personal Information is processed in accordance with POPIA, and who to contact for assistance.

It applies to **Global Trolley (Pty) Ltd** (Registration Number 2012/018126/07) **t/a Velocity** and governs access to records held by Velocity in connection with its business operations, service providers, employees, officers, agents, and any persons acting on its behalf. This Manual also applies to the websites and city portals operated by Velocity, including velocity.digital, Joburg.co.za and Pretoria.co.za, and any further city sites operated by Velocity from time to time.

The purpose of this Manual is to:

- Enable requesters to understand the categories of records held by Velocity and how to request access to them in terms of PAIA;
- Explain how Velocity processes Personal Information in accordance with POPIA; and
- Outline the rights of requesters and Data Subjects, together with the procedures, forms, timeframes, and other requirements applicable to access requests and privacy-related enquiries.

This Manual must be read together with PAIA, POPIA, and any regulations or guidelines issued by the Information Regulator.

As required by Section 51(3) of PAIA, this Manual may be updated periodically to reflect operational or legislative changes and will be made available on Velocity's website and on request from the Information Officer.

PAIA gives effect to the constitutional right of access to information held by public and private bodies, where such access is required to exercise or protect rights. POPIA regulates the processing of Personal Information and complements PAIA by governing how Velocity collects, uses and protects such information.

2. Acronyms, Abbreviations, and Definitions

Unless otherwise specified, terms in this Manual have the meanings assigned to them in PAIA and POPIA, and references to legislation include amendments and related regulations.

Term	Simple Meaning
Consent	When you freely agree to share your personal information or receive marketing.
Data Breach / Security Compromise	When personal information is accessed, lost, or shared without permission.
Data Subject	A person whose personal information is being collected or processed.
Direct Marketing	Messages sent to promote goods or services through email, SMS, WhatsApp, or phone calls.
Form 2	The official form used to request access to records under PAIA.
Information Officer	The person responsible for handling information requests and privacy compliance at Velocity Media.
Information Regulator	The authority that oversees compliance with PAIA and POPIA in South Africa.
PAIA	The law that gives people the right to request access to information held by organisations.
Personal Information	Information that identifies you (e.g., name, ID number, contact details, account info).
POPIA	The law that protects personal information and explains how organisations must collect and use it.
Processing	Anything done with personal information, like collecting, storing, using, sharing, or deleting it.
Record	Any information the Company holds, whether electronic, written, audio, or stored in another format.

Term	Simple Meaning
Requester	Anyone who requests access to information under PAIA.
Third Party	Someone other than you and Velocity Media who may be affected by an information request.
Velocity Media / Velocity / the Company	Global Trolley (Pty) Ltd t/a Velocity Media.

3. Key Contact Details for Access to Information of Global Trolley (Pty) Ltd T/A Velocity Media

These contact details show who to reach if you want to request access to records or have questions about your personal information.

Role	Name	Contact Details
Information Officer (Designated in terms of PAIA & POPIA)	Ryan Bradley Sessel	Tel: +27 73 392 7594 Email: ryan@velocitymedia.co.za
Deputy Information Officer	Barbara Pallavicini Sessel	Tel: +27 78 905 7996 Email: barbara@velocitymedia.co.za
PAIA & POPIA access requests, queries and complaints		Email: accounts@velocitymedia.co.za
Registered Office (Physical and Postal Address)	Website	Contact Details
377 Rivonia Boulevard Edenburg Rivonia Gauteng 2128	https://velocity.digital/	Tel: +27 73 392 7594

The Information Officer and Deputy Information Officer have been registered with the Information Regulator in accordance with section 56 of POPIA.

Complaints and Escalation

If a Data Subject believes that Velocity has interfered with the protection of their Personal Information or has contravened POPIA, they may submit a complaint to the Information Regulator using the contact details below.

Information Regulator (South Africa)

Website: <https://inforegulator.org.za>

Tel: +27 (0)10 023 5200

PAIA Complaints: PAIAComplaints@inforegulator.org.za

POPIA Complaints: POPIAComplaints@inforegulator.org.za

4. Guide on How to Use PAIA

The Information Regulator publishes a Guide to assist individuals in understanding their rights under PAIA and POPIA and how to request access to information.

The Guide is available in official languages on the Regulator's website and may be requested directly from its offices:

Information Regulator (South Africa)

Website: <https://inforegulator.org.za>

Tel: +27 (0)10 023 5200

Email: enquiries@inforegulator.org.za

A copy of the Guide may also be requested from the Information Officer of Velocity Media.

5. Records Automatically Available Without a PAIA Request

Velocity has not published a notice in terms of section 52(2) of PAIA indicating categories of records that are automatically available without a request. Certain information is already publicly accessible on Velocity's

website and does not require a PAIA request, including general company information, terms of use, privacy notices and service descriptions.

The Privacy Policy on our website provides additional information on the processing of Personal Information and should be read together with this Manual.

6. Records Available in Terms of Other Legislation

Velocity holds records in accordance with various legislative requirements applicable to its business operations. Where legislation permits access to records without requiring a PAIA request, such access will be granted in terms of that legislation. In all other cases, access requests must be made in accordance with PAIA.

Key applicable legislation includes:

- Companies Act 71 of 2008
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Skills Development Levies Act 9 of 1999
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Electronic Communications and Transactions Act 25 of 2002
- Cybercrimes Act 19 of 2020
- Protection of Personal Information Act 4 of 2013
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978

This list is not exhaustive and may be updated as new legislation is enacted or as additional access rights arise in law.

7. Categories of Records Held by Velocity

Velocity maintains records across the high-level categories set out below. Access to these records is subject to PAIA, POPIA, confidentiality, and legal privilege where applicable.

Corporate and Governance Records	Company registration documents, resolutions, shareholder and director records, governance frameworks.
Financial and Accounting Records	Financial statements, accounting records, billing records, tax records, payment records, asset registers.
Human Resources Records	Employee records, recruitment information, training records, policies and employment documentation.
Supplier and Contracting Records	Contracts, procurement documents, quotations, service level agreements, onboarding documentation.
Customer and CRM Records	Customer and client contact details, CRM records, communication and engagement history, account and transaction records, and marketing and subscription preferences.
Marketing, Content and Platform Records	Published website content, campaigns, analytics, media, brand assets, public communications.
IT, Security and System Administration Records	System configuration records, access logs, backups, security controls,

	software licensing, asset management.
Legal, Compliance and Policy Records	Policies, privacy notices, PAIA Manual, contracts, compliance reports, internal controls documentation.
User-Generated and Member Content Records	Member and vendor articles, listings, images, and mall specials and events; member and vendor account records; content reports, takedown notices and moderation decisions; and editorial review records.
Competition and Promotion Records	Competition entries, entrant details, winner records, draw records, and related correspondence, retained for three years in terms of the Consumer Protection Act.

8. Processing Of Personal Information

Velocity processes Personal Information in accordance with POPIA for purposes relating to its business operations, including providing digital media services, managing customer and vendor relationships, operating its websites and city portals, hosting member-published content (which may be publicly visible), running competitions and promotions, engaging employees and contractors, and fulfilling legal and contractual obligations.

Velocity processes Personal Information of the following broad categories of Data Subjects:

Category	Examples of Personal Information
Customers, website users, marketing subscribers	Contact details, communication preferences, engagement history, account and transaction details
Vendors, suppliers, and service providers	Business contact details, contractual information, billing details
Employees, contractors and applicants	Contact and identification information, employment records, remuneration data, compliance documentation
Platform, campaign and CRM users	Interaction logs, analytics data, usage data, consent records
Members and content contributors (vendors and explorers)	Account and profile details, published articles, listings and images, business contact details, and consent and moderation records. Published member content may be publicly visible.
Competition and promotion participants	Name, contact details, entry details, prize eligibility, and consent records

Personal Information may be shared with service providers, operators, regulatory authorities, financial institutions, and partners where necessary to perform services, comply with law, or fulfil contractual obligations. All operators are required to implement appropriate security measures and process Personal Information only on instruction from Velocity.

Personal Information may be stored or processed outside South Africa where adequate protection measures exist or where protected through contractual mechanisms, in accordance with section 72 of POPIA.

Velocity implements technical and organisational security safeguards including access controls, encryption, monitoring, backups, and operator agreements to protect the confidentiality, integrity and availability of Personal Information.

Data Subjects have rights under POPIA, including access, correction, objection, deletion, restriction, withdrawal of consent, and lodging complaints with the Information Regulator.

9. How Requests are Processed

If a requested record cannot be located or does not exist despite reasonable steps to source it, Velocity will notify the requester in writing in accordance with PAIA, including, where appropriate, an affidavit confirming that the record cannot be found.

10. Availability and Updates of this Manual

This Manual is available to the public in electronic format on Velocity Media's official website and associated platforms operated by Velocity Media. A copy may also be inspected at the registered head office during normal business hours, or requested from the Information Officer. Electronic copies are provided free of charge; however, a reasonable fee may apply for printed copies in accordance with PAIA regulations.

This Manual may be updated from time to time to reflect changes in legislation, business operations, systems, or processing practices. The latest approved version will be published on the Velocity Media website and associated platforms.