



PAIA MANUAL

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

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2. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|-------------|---|
| 2.1 | “CEO” | Chief Executive Officer |
| 2.2 | “DIO” | Deputy Information Officer; |
| 2.3 | “IO” | Information Officer; |
| 2.4 | “Minister” | Minister of Justice and Correctional Services; |
| 2.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended; |
| 2.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 2.7 | “Regulator” | Information Regulator; and |
| 2.8 | “Republic” | Republic of South Africa |

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;

- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SWITCH ENERGY (PTY) LTD

3.1. Chief Information Officer

Name: Andrew Murray

Tel: 083 458 8085

Email: Andrew.murray@switch.org.za

3.2 Access to information general contact:

Email: info@switch.org.za

3.3 National or Head Office

Postal Address: 62 Main Road, Kalk Bay, Cape Town, 7990

Physical Address: 62 Main Road, Kalk Bay, Cape Town, 7990

Telephone: 021 879 1941

Email: info@switch.org.za

Website: switch.org.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The aforesaid Guide contains the description of-

- 4.2.1. the objects of PAIA and POPIA;
- 4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.2.2.1. the Information Officer of every public body, and
 - 4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.2.3. the manner and form of a request for-
 - 4.2.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.2.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.2.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 4.2.6.1. an internal appeal;
- 4.2.6.2. a complaint to the Regulator; and
- 4.2.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.2.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.2.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.2.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.2.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.3. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.4. The Guide can also be obtained-

4.4.1. upon request to the Information Officer;

4.4.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

6. CATEGORIES OF RECORDS OF SWITCH ENERGY (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
FULL PAIA MANUAL	PDF	X	X

7. DESCRIPTION OF THE RECORDS OF SWITCH ENERGY (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SWITCH ENERGY (PTY) LTD

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

Switch Energy (Pty) Ltd processes personal data under the lawful basis of contractual necessity, legal compliance, and, where applicable, data subject consent, in line with POPIA. Data subjects may exercise their rights to access, correct, or delete personal information by contacting the Information Officer

Switch Energy (Pty) Ltd processes personal information to efficiently deliver its smart metering, energy management, and billing solutions to clients. This includes collecting and processing customer, employee, and supplier data for purposes such as contract management, service provision, billing accuracy, compliance with legal and regulatory requirements, and customer support. Personal information may also be used to enhance service offerings, conduct data analytics for energy efficiency improvements, and ensure the security and integrity of our systems. We process personal data in accordance with the Protection of Personal Information Act (POPIA), ensuring that all information is collected lawfully, transparently, and only for legitimate business purposes. Switch Energy implements strict security measures to safeguard personal data and does not share or sell information to unauthorized third parties. Customers and stakeholders have the right to access, update, or request the deletion of their data in compliance with privacy regulations.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, and bank details
Service Providers	names, registration number, vat numbers, address, and payment details
Employees	ID numbers, qualifications, payroll details.

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

9.4 Planned transborder flows of personal information

Various hardware devices (managed on-premise by Switch's clients) and third-party integrations (managed by Switch) report into a data ingestion system at predefined intervals. After validation the data is loaded into a MongoDB cluster, at which point it is accessible to analytics queries and customer requests. Customers manage their data via the Switch administrative console and mobile app, which both communicate with the database via the API gateway system.

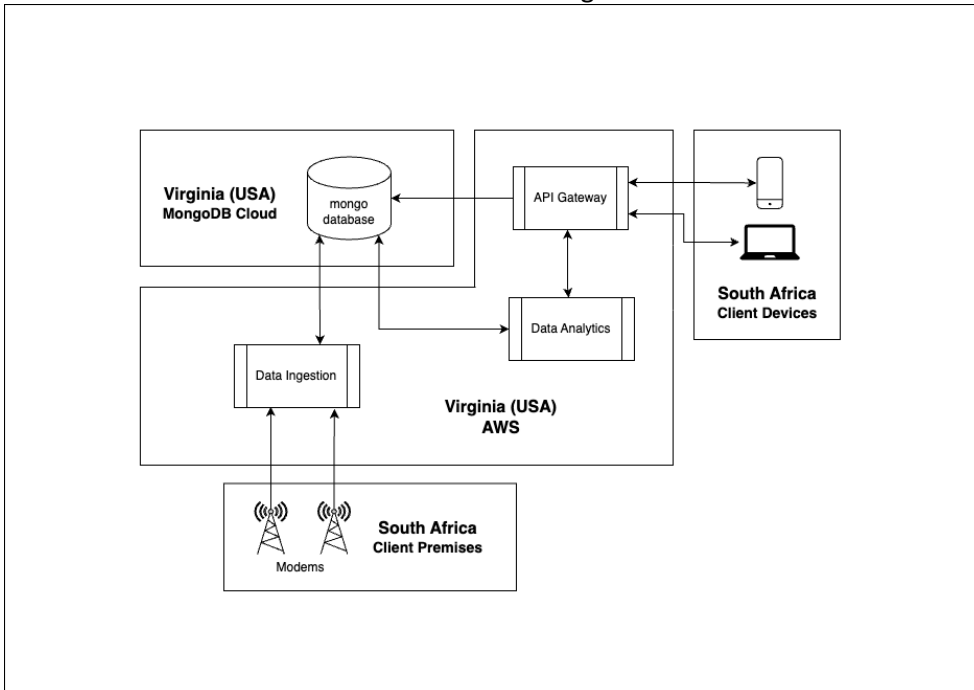
Internally, data may flow back-and-forth between the database and the data analytics system for various reasons, such as report generation and monthly billing run processing, but this all occurs within a single geographical zone.

As such, there are three sources of transborder data flows:

1. Integration with third-party systems that operate internationally.
2. Communication between hardware devices and data ingestion.
3. Communication between apps and the API gateway.

Switch Energy (Pty) Ltd may transfer personal information to data centers located in the United States of America for cloud storage and processing. These transfers comply with Section 72 of POPIA, ensuring that all third parties adhere to equivalent or higher data protection standards.

The switch Data flows are summarized in the diagram below:



9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Risk from Third-Party Providers

Data stored with third-party providers (such as MongoDB Inc. and AWS) may traverse multiple jurisdictions, potentially triggering obligations under various data protection laws. Even though both providers maintain robust security and privacy frameworks, there is still a risk that data could be exposed through misconfigurations, insider threats, or vulnerabilities in their systems. Additionally, if either provider experiences a major service disruption or targeted attack, Switch's clients might temporarily lose access to their data or face data integrity concerns. To mitigate these risks, Switch enforces strong encryption at rest and in transit (as detailed in Switch's Security Policy), ensuring data remains protected even in the event of a breach.

MongoDB Inc's privacy policy and data processing agreement::

1. <https://www.mongodb.com/legal/privacy/privacy-policy>
2. <https://www.mongodb.com/legal/data-processing-agreement>

Amazon Web Services' privacy policy and feature set::

1. <https://aws.amazon.com/compliance/privacy-features/>
2. <https://aws.amazon.com/privacy/>

Risk from Third-Party Integrations

Switch has integrations with various third-party metering providers, such as Livewire, PNP Scada and others. Whether data is flowing across borders or not depends on the particular integration, and in cases where it does Switch commits to informing the client of the integration details and any relevant

information about data privacy and flow.

When Switch integrates with external metering providers or other data sources (such as Livewire or PNP Scada), there is a possibility that sensitive information could be routed to systems with less stringent security measures or stored on servers in other jurisdictions. This raises both legal and operational risks, such as non-compliance with local data privacy regulations and increased vulnerability to unauthorized access. Additionally, improper configuration of these integrations could expose sensitive API keys, endpoints, or other credentials.

Switch commits to conducting a thorough review of each integration partner and notifying clients of any relevant information to data security and flow before such an integration is set up. Furthermore, all communication between Switch and integration partners is performed using end-to-end encryption protocols such as TLS.

Risk from Data Ingestion

During data ingestion, hardware devices and third-party integrations feed live data into Switch's systems, typically over public networks. This process is potentially vulnerable to interception, tampering, or spoofing if robust encryption and authentication measures aren't enforced. Inaccuracies or falsified data at this stage can propagate downstream, potentially affecting analytics, billing, and reporting. Physical hardware such as meters and modems sit at client premises, and as such it is the client's responsibility to ensure that they are not tampered with. Switch maintains responsibility for securing all communications between the physical hardware and the data ingestion servers, however. Risk is mitigated by validating and sanitizing all incoming data to ensure consistency, and by using strong authentication methods between devices and the ingestion layer to prevent spoofing attacks.

Risk from Console and Apps

Switch's web console and mobile apps allow users to access, manage, and query stored data. A compromise of these interfaces—through credential theft, cross-site scripting, or other application-layer exploits—could grant attackers unauthorized access to customer data. On mobile devices, risks include reverse engineering or malware that intercepts user credentials and session tokens. As Switch has no direct control over these devices, it is the client's responsibility to secure them against physical compromise. To protect against remote software-based attacks, Switch uses a robust OAuth2-based authorisation framework and ensures all communications occur over secure channels such as HTTPS.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 At <https://www.switch.org.za/privacy-policy>

10.1.2 head office of Switch Energy (Pty) Ltd for public inspection during normal business hours;

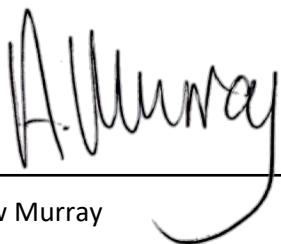
10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

11. UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to read "A. Murray", is written over a horizontal line. The signature is cursive and somewhat stylized.

Andrew Murray

Chief Executive Officer