

# PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

**Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and incorporating compliance with the Protection of Personal Information Act 4 of 2013 (POPIA).**

## **DATE OF COMPILATION**

29 June 2026

## **DATE OF REVISION**

29 June 2026

## 1. AN OVERVIEW OF RUBY DIGITAL

Ruby Search Solutions (Pty) Ltd T/A Ruby Digital Group is a premier digital marketing agency operating within South Africa. The company operates on a 100% virtual corporate framework, with all 39 workforce components, including executive leadership, operating remotely across national regions. The agency provides digital growth solutions, including Search Engine Optimisation (SEO), pay-per-click advertising management, web development, and content strategy.

## 2. COMPANY CONTACT DETAILS (Section 51(1)(a))

- **Full Registered Name:** Ruby Search Solutions (Pty) Ltd T/A Ruby Digital Group
- **Registration Number:** 2012/221435/07
- **Chief Executive Officer (Designated Information Officer):** Justin Mark Lester
- **Designated PAIA Contact Email:** tina@rubydigital.co.za
- **Contact Telephone Number:** (+27) 87 147 2442
- **Registered Physical Address (Domicilium):** 85 Alk van Zyl Avenue, Panorama, Cape Town, 7500

## 3. THE SOUTH AFRICAN INFORMATION REGULATOR'S GUIDE (Section 51(1)(b))

The Information Regulator has compiled a guide in terms of Section 10 of PAIA, containing information required by any person wishing to exercise any right contemplated in PAIA and POPIA. This guide is available in all official languages and can be accessed directly from the website of the Information Regulator: <https://inforegulator.org.za/>

## 4. LAWS APPLICABLE TO THE COMPANY (Section 51(1)(d))

Ruby Digital Group maintains operational data compliance frameworks aligned with, but not limited to, the following pieces of South African national legislation:

- Companies Act No. 71 of 2008
- Basic Conditions of Employment Act No. 75 of 1997
- Labour Relations Act No. 66 of 1995
- Employment Equity Act No. 55 of 1998
- Skills Development Levies Act No. 9 of 1999
- Unemployment Insurance Act No. 63 of 2001
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Protection of Personal Information Act No. 4 of 2013
- Electronic Communications and Transactions Act No. 25 of 2002

## 5. DESCRIPTION OF RECORDS HELD BY THE COMPANY (Section 51(1)(e))

The following schedules classify records generated, maintained, and securely archived within our unified cloud environment.

**Please Note:** Access to these records is not automatic and remains strictly subject to the grounds of refusal outlined in Section 7 of this manual.

### 5.1 Internal Operational & Financial Corporate Records

- Statutory registration logs, founding statements, and share register schedules.
- Audited dynamic financial accounting ledgers, management balances, and VAT profiles.
- Employee human capital records, formal remote employment pacts, internal code frameworks, and payroll ledgers.
- Intellectual property logs, including custom internal tech platforms and proprietary software code structures.

### 5.2 Marketing, Client, & Third-Party Commercial Data

- Mutual Service Level Agreements (SLAs), operational design prints, and contractual frameworks.
- Account transaction data mapped to cloud payment platforms (including Three Peaks billing profiles).
- Client-owned structural datasets used in marketing automation, including consumer email lists, target lead indices, names, and identifiers.
- Corporate profiles, administrative access profiles, and metadata within localized third-party ad managers and tracking suites.
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## 6. INTEGRATION WITH POPIA: PROTECTION OF PERSONAL INFORMATION (Section 51(1)(c))

### 6.1 Purpose of Processing Personal Data

Ruby Digital Group limits data processing exclusively to the following business justifications:

- Administering employee payroll, remote workspace frameworks, and mandatory statutory filings.

- Satisfying client-side campaign execution milestones, pixel tracking integrations, and account billing requirements.
- Facilitating client payment streams via accredited regional transactional clearing houses (Three Peaks).

## 6.2 Data Subjects and Information Categories Map

Data Subject Category	Categories of Personal Information Collected
<b>Internal Personnel &amp; Contractors</b>	Full identity details, physical addresses, banking details, tax allocations, performance tracking evaluations, and contract frameworks.
<b>Direct Clients / Corporate Entities</b>	Business registration records, VAT identifiers, administrative emails, phone contact paths, and platform integration credentials.
<b>Clients' Consumer Bases / Campaign Targets</b>	First and last names, communication emails, device identifiers, site usage metadata, and pixel behavioural parameters.

## 6.3 Cross-Border Outflows of Personal Information

To maintain campaign orchestration pipelines within a distributed infrastructure, personal or tracking data may be stored or processed across international borders. This occurs through cloud hosting ecosystems (such as Google Workspace) and cross-border programmatic ad management networks. Ruby Digital Group ensures these global service providers maintain security architecture that matches or exceeds South African POPIA baselines.

## 6.4 Information Security Defence Architecture

As a completely decentralised, 100% remote workspace operation, security parameters are applied at the machine and endpoint access layer:

- **Access Management:** Zero-trust cloud configurations limiting structural folder clearance to verified active workers.
- **Authentication Safeguards:** Enforced multi-factor authentication (MFA) parameters across internal communication nodes and ad tools.
- **Transmission Security:** Systemic use of secure file transfers and banking clearing channels to prevent data exposure or interception.

## 7. FORMAL STEP-BY-STEP PAIA REQUEST PROCESS

To invoke an official request under PAIA for access to records held by Ruby Digital Group, the requester must execute the following protocol precisely:

## 7.1 Submission Procedure

### 1. Complete Form 2: Mandatory Form.

The requester must download and complete the official **Form 2 (Request for Access to Record)** from the Information Regulator's portal. It must detail exactly what record is required and which right is being protected.

### 2. Pay Request Fee: R140.00 Private Body Fee.

An upfront, non-refundable Request Fee of **R140.00** must be paid into Ruby Digital Group's banking account. This fee applies to all standard requests from individuals or entities seeking business data, except those legally exempt.

### 3. Email to Designated Officer: Electronic Dispatch.

Send the completed Form 2 along with proof of payment directly to the designated compliance email at [tina@rubydigital.co.za](mailto:tina@rubydigital.co.za).

## 7.2 Decision Window & Legal Grounds for Refusal

Ruby Digital Group will evaluate the formal submission and issue an official response via **Form 3** within **30 days** of receipt.

In strict adherence to PAIA regulations, Ruby Digital Group is legally obligated to deny access to records if the disclosure would compromise:

- The personal privacy or individual details of an employee, contractor, or third party.
- Highly sensitive commercial trade secrets, proprietary software code architectures, or corporate financial models owned by the agency.
- Client-owned consumer lists, protected advertising methodologies, or proprietary partner data configurations.

## 8. MANUAL AVAILABILITY

This document is permanently hosted for public view on Ruby Digital Group's digital storefront website and remains instantly accessible upon request to the Information Officer.