pleks

PAIA · S51 · PRIVATE BODY · V1.0

PAIA Manual

Pleks (Pty) Ltd — Promotion of Access to Information Act 2 of 2000

COMPILED BY	LAST REVIEWED	IN FORCE FROM	ACT
Pleks (Pty) Ltd	**2026 · 05**	**2025 · 06 · 01**	**PAIA · s51**

CONTENTS

01 Introduction

02 Contact details

03 SAHRC guide

04 Freely available records

05 Records held by Pleks

06 Grounds for refusal

07 How to request access

08 Sub-processors and third-party operators

09 Security and protection of records

10 Amendments to this manual

11 Certification

01 · INTRODUCTION

Introduction

Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) requires every private body to compile a manual containing the information prescribed in that section. This manual has been compiled in accordance with those requirements.

Pleks (Pty) Ltd is a private body as defined in PAIA. This manual describes the categories of records held by Pleks, explains the procedure for requesting access to those records, and provides the contact details of our Information Officer.

This manual is available free of charge on our website at pleks.co.za/paia-manual.

02 · CONTACT DETAILS

Contact details

Information Officer: Stéan Bouwer

Email: legal@pleks.co.za

Company: Pleks (Pty) Ltd, Republic of South Africa

All PAIA requests, queries, and complaints regarding access to information must be directed to the Information Officer at the contact details above. We respond within 30 days of receiving a complete request.

03 · SAHRC GUIDE

SAHRC guide

The South African Human Rights Commission (SAHRC) has compiled a guide on how to use PAIA. This guide is available on the SAHRC website at sahrc.org.za, and from the SAHRC directly. The guide describes in plain language the subjects and categories of records held by public and private bodies, and how to request access.

Contact the SAHRC at info@sahrc.org.za or on 011 877 3600.

04 · AVAILABLE RECORDS

Freely available records

The following records are available on our website without a formal PAIA request:

4.1 Legal documents

- Privacy Policy (pleks.co.za/privacy)
- Terms of Service (pleks.co.za/terms)
- Cookie Policy (pleks.co.za/cookie-policy)
- Credit Check Policy (pleks.co.za/credit-check-policy)
- POPIA Processing Register (pleks.co.za/popia-register)
- This PAIA Manual (pleks.co.za/paia-manual)

4.2 General product information

- Product feature descriptions and pricing (pleks.co.za/#pricing)
- Sub-processor list (within the Privacy Policy and section 08 of this manual)

No request or fee is required to access any of the documents listed above.

05 · RECORDS HELD

Records held by Pleks

The following categories of records are held by Pleks in the course of operating its property management platform. These records are held in electronic form and stored on servers operated by Supabase (United States) under Standard Contractual Clauses.

CATEGORY · SUBJECTS	EXAMPLES	RETENTION
Agency accounts agencies, admins	Company name, registration number, address, VAT number, banking details, subscription records	Duration of account + 7 years (TAA s29)
User accounts individual users	Name, email, hashed password, role, login history, MFA enrolment	Duration of employment + 3 years
Rental applications applicants	ID number, contact details, employment info, bank statements, pay slips	Declined: 12 months · Successful: lease term + 5 years (RHA s5(7))
Credit check results applicants	FitScore, bureau report, consent record, NCA check log	3 years (NCA intermediary obligation)
Lease records tenants, landlords	Signed lease, rent amount, deposit, special conditions, addenda	End of term + 5 years (RHA s5(7))

Inspection records tenants, properties	Ingoing/outgoing inspection report, photos, condition notes, signatures	End of lease + 5 years
Financial records tenants, landlords, agencies	Rent payments, trust account transactions, owner statements, arrears history	7 years (Tax Administration Act s29)
Maintenance records tenants, contractors	Job description, contractor assigned, completion status, photos, cost	End of lease + 3 years
Communication log tenants, landlords	System-generated emails, SMS notices, WhatsApp messages via platform	3 years
Consent records applicants, tenants	POPIA and NCA consent timestamps, IP address, consent text version	Duration of record + 3 years
Audit log all users	Login events, data access events, admin actions — no PII values stored	10 years (POPIA s19)
Billing records agencies	Subscription plan, PayFast transaction IDs, invoice history	7 years (TAA s29)

06 · GROUNDS FOR REFUSAL

Grounds for refusal

Pleks may refuse a request for access to a record on the following grounds permitted by PAIA:

- **Protection of personal information (PAIA s63):** Where disclosure would unreasonably disclose personal information about a third party who has not consented to disclosure, and that party's right to privacy outweighs the requester's right of access.
- **Commercial information (PAIA s64):** Where a record contains trade secrets, financial, commercial, scientific or technical information the disclosure of which would likely cause harm to the competitive position of Pleks or a third party.
- **Confidential information of third parties (PAIA s65):** Where a record contains information supplied in confidence by a third party, the disclosure of which could reasonably be expected to prejudice the future supply of similar information.
- **Legal privilege (PAIA s67):** Where a record contains information protected by legal professional privilege.
- **Research information (PAIA s69):** Where disclosure of a record would reveal the identity of a person who provided information in confidence, and disclosure would be likely to prejudice future research of the same nature.

Where access is refused, the Information Officer will provide written reasons for the refusal on Form 3. The requester may apply for internal appeal or approach the Information Regulator.

07 · HOW TO REQUEST ACCESS

How to request access

7.1 Who may request

Any person — including a juristic person — may submit a request for access to a record held by Pleks. You need not provide reasons for your request; however, providing context may help us locate the correct record and assess whether any grounds for refusal apply.

7.2 How to submit (PAIA Form 2)

Requests must be submitted using PAIA Form 2, which is available from the Information Regulator at inforeg.org.za or on request from our Information Officer. Send the completed form to legal@pleks.co.za. We will acknowledge receipt within 3 business days.

7.3 Request fee

A request fee of R140 (as prescribed by the PAIA Regulations) is payable before we process your request. This fee covers the cost of searching for and preparing the record. The fee is waived for personal information requests by the data subject.

7.4 Response time

We will respond to your request within 30 days of receiving it. We may extend this period by a further 30 days where the request is for a large number of records, or where meeting the 30-day deadline would unreasonably interfere with our operations.

7.5 Form 3 — outcome

Whether access is granted or refused, we will notify you using PAIA Form 3. If access is granted, the record will be provided in the format you requested, subject to availability.

7.6 Internal appeal and complaints

If access is refused, or you are dissatisfied with the response, you may approach the Information Regulator at inforeg.org.za or 010 023 5200. The Information Regulator may investigate and order compliance.

CONTACT	DETAILS
Information Officer	Stéan Bouwer · legal@pleks.co.za
Information Regulator	inforeg.org.za · 010 023 5200

08 · SUB-PROCESSORS

Sub-processors and third-party operators

Pleks uses the following third-party service providers (sub-processors) in the operation of the platform. Each sub-processor processes personal information only on Pleks's documented instructions and is bound by a data processing agreement.

PROVIDER	PURPOSE	REGION
Supabase database & storage	Encrypted database storage, file storage, authentication infrastructure	USA · SCC · POPIA s72
Vercel application hosting	Serving the Pleks application and edge processing of requests	USA · SCC · POPIA s72
Resend transactional email	Sending system emails — lease notifications, arrears alerts, verification codes	USA · SCC · POPIA s72
Africa's Talking SMS gateway	Sending SMS notifications to tenants and landlords	Kenya · SCC · POPIA s72
Anthropic AI processing	AI-assisted income extraction from bank statements — output only, no raw data retained	USA · SCC · POPIA s72
Searchworx credit bureau	Credit and background checks on rental applicants under the NCA	South Africa
DocuSeal e-signatures	Generating, sending and storing signed lease and consent documents	USA · SCC · POPIA s72
Better Stack monitoring	Uptime monitoring and incident alerting — no personal data transmitted	EU · SCC
PayFast payments	Subscription billing and rent collection on the trust account	South Africa

For sub-processors operating outside South Africa, data processing agreements incorporating Standard Contractual Clauses (SCCs) under POPIA s72 are in place. Copies are held on file and available to the Information Regulator on request.

09 · SECURITY & PROTECTION

Security and protection of records

- All data is encrypted in transit using TLS 1.3 and at rest using AES-256 disk encryption via Supabase.
- Sensitive fields (ID numbers, banking details, credit reports) are additionally encrypted at the application level before being written to the database (encrypt-before-INSERT, decrypt-after-SELECT).

- Access is controlled by role-based permissions scoped to each organisation. No user can access another organisation's data.
- An immutable audit log records all access to personal information, reviewed quarterly.
- Where Pleks has reasonable grounds to believe that personal information it processes for an agency has been accessed or acquired by an unauthorised person, Pleks will notify that agency (as Responsible Party) immediately, as POPIA s21(2) requires. Notifying the Information Regulator and affected data subjects of that data is the agency's duty under POPIA s22.

9.2 Retention and destruction

RECORD TYPE	LEGAL BASIS	RETENTION PERIOD
Declined rental applications	POPIA principle 8	12 months from decision
Successful application records	RHA s5(7)	Lease term + 5 years
Lease and tenancy records	RHA s5(7)	End of term + 5 years
Financial and trust account records	Tax Administration Act s29	7 years
Credit check records (NCA intermediary)	NCA obligations	3 years
Audit log (access and consent events)	Internal · POPIA s19	10 years
User accounts (after deletion)	POPIA principle 8	90 days then purged

10 · AMENDMENTS

Amendments to this manual

Pleks will review this manual at least once every two years, or whenever there is a material change in our records, processing activities, or the applicable law. The current version of this manual is always available at pleks.co.za/paia-manual.

The version number and effective date on the cover of this document indicate when it was last updated. Requesters are encouraged to check the website for the most current version before submitting a request.

Where a material change is made to the categories of records held, the purposes for which they are processed, or the grounds on which access may be refused, we will update this manual and publish the updated version on our website within 30 days of the change taking effect.

11 · CERTIFICATION

Certification

I, the undersigned, being the Information Officer of Pleks (Pty) Ltd, certify that this manual has been compiled in accordance with the requirements of section 51 of the Promotion of Access to Information Act 2 of 2000, and that the information contained herein is, to the best of my knowledge, accurate and complete as at the date of compilation.

Name	Stéan Bouwer
Title	Information Officer — Pleks (Pty) Ltd
Date compiled	1 June 2025
Last reviewed	5 May 2026
Version	v1.0