EJD Talent Solutions (PTY) LTD
Registration Number: 2025/587968/07
Registered Address: 1st Floor, Bel Air Shopping Centre, Bellairs Drive, North Riding, Johannesburg, 2169
Email: hello@ejdtalentsolutions.com
Phone: +27 (0)82 456 8555
Website: www.ejdtalentsolutions.com

PAIA / POPIA Manual

EJD Talent Solutions (Pty) Ltd | Version 1.1 | Effective 25 October 2026 | Supersedes Version 1.0 (effective 8 October 2026)

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by section 110 of the Protection of Personal Information Act 4 of 2013 ("POPIA"), which took effect on 30 June 2021. It explains what records EJD Talent Solutions (Pty) Ltd ("EJD", "we", "us", "our") holds, how personal information is processed, and how you can request access to information we hold.

This manual is separate from and does not replace our website Privacy Policy. The Privacy Policy explains how we handle your personal information day to day; this manual sets out your statutory right of access to records under PAIA.

1. List of Acronyms and Abbreviations

Acronym	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
SAHRC	South African Human Rights Commission

2. Purpose of This Manual

This manual is compiled for the information of the public. It enables the public to:

1. check the categories of records held by EJD which are available without a person having to submit a formal PAIA request;

2. gain a sufficient understanding of how to make a request for access to a record of EJD, by describing the subjects on which EJD holds records and the categories of records held on each subject;
3. know the description of the records of EJD which are available in accordance with any other legislation;
4. access the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
5. know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
6. know that EJD processes personal information, the purpose of that processing, and the description of the categories of data subjects and of the information relating to them;
7. know the description of the categories of data subjects and of the information or categories of information relating to them;
8. know the recipients or categories of recipients to whom the personal information may be supplied;
9. know whether EJD has planned to transfer or process personal information outside the Republic, and the recipients or categories of recipients to whom the personal information may be supplied; and
10. know whether EJD has appropriate security measures in place to ensure the confidentiality, integrity and availability of the personal information to be processed.

3. Key Contact Details for Access to Information

3.1 Information Officer

Name: Brandon Esterhuizen, Managing Director & Founder
Telephone: +27 (0)82 456 8555
Email: brandon@ejdtalentsolutions.com | Alternative email: legal@ejdtalentsolutions.com

3.2 Deputy Information Officer

No Deputy Information Officer is designated. Brandon Esterhuizen is the Information Officer, being the head of the private body for the purposes of POPIA section 55.

3.3 Access to information general contacts

Email: legal@ejdtalentsolutions.com

3.4 National or Head Office

Postal address: 1st Floor, Bel Air Shopping Centre, Bellairs Drive, North Riding, Johannesburg, 2169
Physical address: 1st Floor, Bel Air Shopping Centre, Bellairs Drive, North Riding, Johannesburg, 2169
Telephone: +27 (0)82 456 8555

Email: hello@ejdtalentsolutions.com
Website: www.ejdtalentsolutions.com

4. 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 ("the 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 Guide is available in each of the official languages and in braille.

4.3 The Guide contains a description of the objects of PAIA and POPIA; the postal and street address, phone and fax number and email address of the Information Officer of every public body and of every Deputy Information Officer designated in terms of section 17(1) of PAIA and section 56 of POPIA; the manner and form of a request for access to a record of a public body under section 11 and of a private body under section 50; the assistance available from the Information Officer of a public body and from the Regulator; 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 how to lodge an internal appeal, a complaint to the Regulator, or an application to court; the provisions of sections 14 and 51 requiring a public body and a private body to compile a manual, and how to obtain access to a manual; the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records; the notices issued under sections 22 and 54 regarding fees payable in relation to requests for access; and the regulations made under section 92.

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

4.5 The Guide can also be obtained on request from the Information Officer, or from the Regulator's website at **www.justice.gov.za/inforeg**.

4.6 A copy of the Guide is available for public inspection during normal office hours in English and, on request, in any other official language in which the Regulator makes it available.

5. Categories of Records Available Without a Formal Request

The following categories of records are available without a person having to submit a formal PAIA request:

Category of records	Types of record	How accessible
Company information	Nature of services, operational niches, general contact details	Website
Statutory documents	This PAIA / POPIA Manual	Website; on request to the Information Officer

Privacy documents	Privacy Policy, Cookie Policy	Website
Contractual terms	Website Terms of Use, Terms and Conditions of Service	Website
Regulatory guide	The Regulator's guide on how to use PAIA	Regulator's website; on request

6. Records Available in Accordance With Other Legislation

Category of records	Applicable legislation
Memorandum of Incorporation and company registration records	Companies Act 71 of 2008
This manual	Promotion of Access to Information Act 2 of 2000
Personal information records and processing records	Protection of Personal Information Act 4 of 2013
Employment and recruitment records	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997
Identity verification and screening records	Financial Intelligence Centre Act 38 of 2001
Financial, tax and VAT records	Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991
Candidate background and criminal record information	Criminal Procedure Act 51 of 1977; Protection of Personal Information Act 4 of 2013

7. Subjects on Which Records Are Held and Categories of Records Held on Each Subject

Subject	Categories of records
Recruitment and placement	Candidate CVs, application records, screening and shortlisting records, interview notes, reference notes, placement records
Candidate vetting	Identity and address verification, criminal record checks, qualification verification, reference checks, and where inherently required by a role, credit history checks
Client relationships	Client company details, contact person information, role briefs and job specifications, correspondence, service agreements and quotations
Finance and administration	Invoices, proof of payment, accounting records, tax and VAT records, banking records

Business development	Prospect and contact information used for outreach, campaign and correspondence records
Corporate and compliance	Statutory filings, CIPC records, regulatory and compliance records, this manual
Website and analytics	Website usage records, cookie and analytics data, enquiry form submissions

8. Processing of Personal Information (POPIA Disclosures)

8.1 Purpose of processing personal information

Personal information is collected and processed to source, screen and place candidates with client companies; to manage client relationships and service delivery; to conduct business development and marketing outreach; to maintain recruitment, financial and compliance records; and to meet legal, tax and regulatory obligations.

8.2 Categories of data subjects and the personal information processed

Category of data subjects	Personal information that may be processed
Job candidates	Name and contact details, identity number, CV content, qualifications, employment history, references, salary expectations, interview notes, vetting and verification results
Client company representatives	Name, business contact details, position and authority, correspondence
Prospective clients contacted through outreach	Name, business contact details, company information, correspondence
Website visitors	IP address, browser and device type, pages visited, date and time of access, referral URL, enquiry form contents
Service providers and their personnel	Name, business contact details, banking and payment details

Special personal information. EJD does not itself conduct criminal record, credit or similar background checks. Where a client requires such checks for a specific role, they are carried out by an accredited third-party vetting agency, at the client's request and only with the candidate's prior written consent. EJD does not intentionally collect other special personal information, except where a candidate voluntarily discloses it as relevant to a role.

Notification under POPIA section 18. Where personal information is collected, the data subject is informed of the information being collected, the purpose of collection, whether the supply of the information is voluntary or mandatory, the consequences of failing to provide it, the responsible party's details, the data subject's right to object, and the details of the Regulator. EJD's website Privacy Policy and Candidate Consent Form give effect to this.

8.3 Recipients or categories of recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients
Identity number, names and criminal record information, for criminal checks	Accredited vetting agencies, at client request and with candidate consent
Identity and address information, for FICA verification	Authorised third-party verification agencies
Qualifications, for qualification verification	South African Qualifications Authority and authorised verification agencies
Credit and payment history, where inherently required by a role	Registered credit bureaus
Candidate details, CVs and screening summaries	Client companies, for shortlisting and placement only
Correspondence and contact information	Google (Gmail), as email operator
Prospect and outreach contact information	Apollo.io, as outreach and prospect-management operator
Website and analytics information	Wix, as website hosting and analytics operator
Job advertisements and candidate applications	GiigHire, as job advertising and application operator
Business contact records	AI productivity tools (such as Anthropic Claude and Marblism), used for drafting communications and managing business contact records

EJD does not sell personal information. Information is supplied only as required for the purposes set out in this manual, or as required by law.

8.4 Planned transborder flows of personal information

EJD uses cloud-based operators that may process and store personal information on servers located outside the Republic. The operators and the countries in which they principally host data are:

Operator	Purpose	Country where data may be hosted
Google (Gmail)	Email correspondence and document storage	United States; European Union (Ireland)
Apollo.io	Outreach and prospect management	United States
Wix	Website hosting, forms and analytics	United States; European Union (Ireland); Israel

Third-party vetting agencies	Background and verification checks	South Africa, with sub-processing limited to the verification purpose
GiigHire	Job advertising and candidate applications	United States / as per provider terms
AI productivity tools (Anthropic Claude, Marblism)	Drafting communications and managing business contact records	United States / as per provider terms

These transfers are made on the grounds permitted by POPIA section 72(1): the data subject's consent and/or the necessity of the transfer to perform the contract between EJD and the data subject, or to take steps at the data subject's request, read with the written operator terms requiring a level of protection substantially similar to POPIA.

8.5 General description of information security measures

EJD applies reasonable technical and organisational measures to ensure the confidentiality, integrity and availability of the personal information in its care. These include role-based access controls and authentication on the systems that hold personal information; encryption in transit for cloud services; secure storage of candidate and client records; written operator terms with service providers; restriction of access to personal information to those who need it for the purpose of processing; secure deletion and de-identification of records once the retention period expires; and internal procedures for identifying, containing, assessing and reporting security compromises.

8.6 Security compromises (POPIA section 22)

Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, EJD will, as soon as reasonably possible after discovering the compromise, notify the Information Regulator and the affected data subjects in writing, setting out the details of the compromise and the recommended measures to be taken. Where the identity of the affected data subjects cannot be established, EJD will take reasonable steps to give public notice of the compromise in the manner prescribed by the Regulator.

8.7 Retention and destruction of records

Category of record	Retention period
Candidate records (CV, application, interview and placement records)	24 months from the last contact with the candidate, then securely deleted or de-identified
Unsolicited CVs	12 months, unless the candidate is placed or consent is renewed
Vetting results received from agencies	Duration of the recruitment process only, then securely destroyed
Client service agreements, quotations and placement records	5 years from the end of the engagement, for contractual and prescription purposes

Financial, accounting, tax and VAT records	5 years from the date of the relevant assessment or the end of the tax period, as required by the Tax Administration Act 28 of 2011
Marketing and outreach records	Until the data subject unsubscribes or objects, and thereafter securely deleted
Website and analytics data	As set out in the Cookie Policy
Corporate and compliance records	Indefinitely, where the Companies Act or another law requires it

8.8 Consent, justification and objection

EJD processes personal information only where a lawful basis under POPIA section 11 applies: the data subject's consent; necessity to perform a contract with the data subject; necessity to comply with a legal obligation; protection of a legitimate interest of the data subject; or a legitimate interest of EJD or a third party, unless the data subject's interests, rights and freedoms override those interests. A data subject may object at any time to processing based on a legitimate interest, and may withdraw consent at any time. Where consent is withdrawn or an objection is upheld, EJD will stop the processing unless another lawful basis applies.

8.9 Data subject rights

In terms of POPIA, a data subject has the right to be notified that personal information is being collected; to be notified of a security compromise; to request access to the personal information held; to request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained; to object to processing; to withdraw consent; not to be subject to a decision based solely on automated processing; and to lodge a complaint with the Regulator. Requests are made to the Information Officer using the contact details in section 3, and may be made using the form in Annexure A.

Where a data subject asks for access to their own personal information, no request fee or access fee is payable.

8.10 Marketing communications

EJD conducts business-to-business outreach about its own recruitment services. A recipient may opt out of marketing communications at any time using the opt-out link in the communication or by writing to the Information Officer, and the request will be actioned promptly.

8.11 Children's personal information

EJD does not knowingly process the personal information of children. Where a candidate is under 18, prior authorisation from the Information Regulator is required under POPIA section 57 before processing begins, and EJD will obtain the consent of a competent person. If EJD becomes aware that a child's personal information has been collected without the required authorisation, it will be deleted or the authorisation will be obtained before any further processing.

9. How to Request Access to a Record

1. Complete the prescribed request form. The form is reproduced in **Annexure A** to this manual and can also be obtained from the Information Regulator's website or on request from the Information Officer. The same form is used whether you are requesting access to your own personal information or to another record; where you are acting on behalf of another person, complete the relevant section and attach proof of your capacity and proof of identity.
2. Submit the completed and signed form to the Information Officer at hello@ejdtalentsolutions.com, providing sufficient detail to identify the record requested and, where applicable, the right you are seeking to exercise or protect.
3. Pay the prescribed request fee, where payable (see section 10). Processing of the request begins once the fee is received.
4. EJD will notify you of the decision within 30 days of receipt of a valid request (section 56 of PAIA). The period may be extended by up to a further 30 days in limited circumstances (section 57 of PAIA), such as where the request is complex or affects a third party's rights.

Grounds for refusal. A request may be refused on grounds permitted under PAIA, including where disclosure would unreasonably disclose a third party's personal information, would reveal commercially sensitive or confidential information, or where any other ground for refusal in PAIA applies. Where a request is refused, the requester will be given reasons and the remedies available.

Remedies. If a request is refused, or a decision is not given in time, the requester may lodge a complaint with the Information Regulator or apply to court for relief, in accordance with PAIA.

10. Fees

The following fees are the amounts prescribed for private bodies under the PAIA Regulations, 2021 (GNR 757), Annexure B. The Minister of Justice and Correctional Services may amend them; the current gazette will be checked whenever this manual is reviewed.

Item	Amount
Request fee (payable on submission, per request)	R140.00
Request by a personal requester (access to their own personal information)	No fee
Photocopies / printed copies	R2.00 per A4 page
Search and preparation of the record	R145.00 per hour (or part thereof), excluding the first hour, capped at R435.00 per request
Computer-readable copies (compact disc, DVD, flash drive)	R40.00 (R60.00 for audio copies)
Audio transcription of a record	R24.00 per page

Deposit (where search and preparation is expected to exceed 6 hours)	One-third of the estimated access fee, payable before processing continues
Postage, courier or electronic delivery	Actual cost where applicable

11. Availability of This Manual

1. This manual is available on EJD's website at www.ejdtalentsolutions.com.
2. It is available for inspection at EJD's head office, 1st Floor, Bel Air Shopping Centre, Bellairs Drive, North Riding, Johannesburg, 2169, during normal business hours (Monday to Friday, 08:00 to 17:00 SAST).
3. It is available to any person on request to the Information Officer, on payment of the prescribed fee per A4 photocopy made, as set out in Annexure B to the PAIA Regulations, 2021.
4. It is available to the Information Regulator on request.

12. Complaints and Contact

Questions, requests and complaints about access to information or the protection of personal information may be directed to the Information Officer, Brandon Esterhuizen:

Email: hello@ejdtalentsolutions.com | Alternative email: legal@ejdtalentsolutions.com
Telephone: +27 (0)82 456 8555

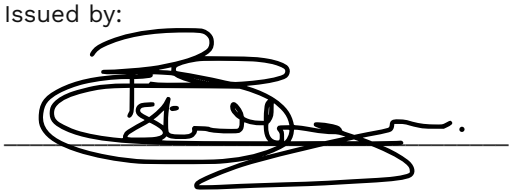
Complaints may also be lodged with the Information Regulator (South Africa):

Complaints: POPIAComplaints@inforegulator.org.za
General enquiries: enquiries@inforegulator.org.za
Website: www.inforegulator.org.za

13. Updating of This Manual

The Information Officer will update this manual on a regular basis, and at least annually, and whenever there is a material change in the records held, the processing of personal information, the operators used, or the applicable law. The current version and effective date are shown at the top of this manual.

Issued by:



Dated

25 October 2026

Brandon Esterhuizen
Managing Director & Founder, Information Officer

1st Floor, Bel Air Shopping Centre,
Bellairs Drive, North Riding,
Johannesburg, 2169

+27 (0)82 456 8555

hello@ejdtalentsolutions.com

EJD Talent Solutions (PTY) LTD
Registration Number: 2025/587968/07
Registered Address: 1st Floor, Bel Air Shopping Centre, Bellairs Drive, North Riding, Johannesburg, 2169
Email: hello@ejdtalentsolutions.com
Phone: +27 (0)82 456 8555
Website: www.ejdtalentsolutions.com

Annexure A: Request for Access to a Record

The pages that follow are the prescribed request form, **Form 2 (Regulation 7)**, published by the Information Regulator in terms of the Promotion of Access to Information Act 2 of 2000 and the PAIA Regulations, 2021 (GNR 757).

Complete every applicable section, attach proof of identity (and proof of your authority where the request is made on behalf of another person), sign the form, and submit it to the Information Officer at hello@ejdtalentsolutions.com. If the space provided is inadequate, continue on a separate page, sign every additional page, and attach it to the form.

Where you are requesting access to your own personal information, no request fee or access fee is payable. For all other requests, the request fee of R140.00 is payable before the request is considered, as set out in section 10 of this manual.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

_____
_____
_____
_____
(Address)

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (*If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD
*(Mark the applicable box with an "**X**")*

Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	**Facsimile**	**Electronic communication** ***(Please specify)***

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Requester / person on whose behalf request is made

---

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer