

domino4

Access to information.

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, including the disclosures required under the Protection of Personal Information Act 4 of 2013.

Meta Economic Development Organisation NPC

Private-body manual | English | Version 1.0
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Issued by Judith Norah Sandrock

This manual explains how to request existing records and exercise information rights.

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1. About the body and contacts

This manual applies to the private body identified below and to records under its possession or control in carrying out its activities. The website presents STEM programmes, educational technology, teacher development and member services. A brand name does not by itself identify a separate responsible party.

Particular	Details
Legal entity	Meta Economic Development Organisation NPC
Registration / status	CIPC 2016/023262/08 Non-profit company (NPC)
Trading / programme names	domino4, Springbot and Springbot Academy; MaxIQ Space programmes operated by the body
Information Officer	Judith Norah Sandrock Managing Director Information Officer
Officer contact	legal@domino4.com 082 317 7606
Deputy Information Officer(s)	Bjarke de Jager Gotfredsen Director Deputy Information Officer
Principal physical address	Suite 1204, 12th Floor, Illovo Point, 68 Melville Road, Illovo, Sandton, Gauteng, 2196
Postal address	Suite 1204, 12th Floor, Illovo Point, 68 Melville Road, Illovo, Sandton, Gauteng, 2196
Inspection hours	Monday to Friday, 09:00 to 16:00 (South African time)
Website / general enquiries	domino4.com hello@domino4.com

PAIA Guide

The Information Regulator publishes a section 10 Guide explaining PAIA and POPIA, access procedures, fees, assistance and remedies. It is available through [the Regulator's PAIA resources](#). Regulation 3 requires the body to make the Guide available for inspection at its head office in at least two official languages. Copies can be requested from the Information Officer for inspection during the hours above. The official Guide is available electronically in English and Afrikaans.

Abbreviations: PAIA - Promotion of Access to Information Act; POPIA - Protection of Personal Information Act; IO - Information Officer; DIO - Deputy Information Officer.

2. Public and statutory records

2.1 Records available without a formal PAIA request

The following published material is freely available from the website. Public availability does not extend to private accounts, unpublished teaching submissions, personal information or confidential business records.

Category	How to access
About the organisation	About domino4 and Contact
Programme and product descriptions	Springbot , Springbot Academy and MaxIQ Space
Published teaching resources and news	Resources and News
Public policies and this manual	Policies and terms ; this manual is downloadable in English and Afrikaans without login.

2.2 Records kept or accessible under other legislation

Where the body and its activities fall within the legislation below, relevant records may be held. A duty to keep a record does not make it open to everyone. Access follows that legislation and, where appropriate, PAIA.

Legislation	Relevant records, where applicable
PAIA 2 of 2000; POPIA 4 of 2013	This manual, access requests, decisions and processing/consent records.
Companies Act 71 of 2008	Formation documents, statutory registers, governance and financial records, if a company.
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; VAT Act 89 of 1991	Tax, accounting and VAT records where applicable.
Consumer Protection Act 68 of 2008; ECTA 25 of 2002	Consumer transactions, electronic agreements, invoices, cancellations and complaints.
Employment and workplace laws, where applicable	Employment, payroll, leave and safety records under the BCEA 75 of 1997, LRA 66 of 1995, EEA 55 of 1998, UIF Acts 63 of 2001 and 4 of 2002, OHS Act 85 of 1993 and COIDA 130 of 1993.

3. Subjects and categories of records

The categories below cover the body's operations where records are held. A category describes a type of record; it does not confirm that a particular record exists or confer automatic access. Requests are assessed individually under PAIA.

Subject	Categories of records
Corporate and governance	Formation and registration records; mandates; management decisions; policies; licences; legal correspondence and agreements, where held.
Finance and transactions	Quotations; purchase orders; invoices; receipts; payment references; accounting records; tax returns; cancellation and refund correspondence, where held.
Customers and partner organisations	Enquiries and correspondence; contact details; school/institution and distributor relationships; agreements; support requests.
Member services and school access	Account profile and contact details; institution and user type; authentication and account-management records; school membership and access permissions; school-issued learner accounts.
Springbot Academy and programmes	Published curricula and module descriptions; enrolment and scheduling records; attendance, assessment, portfolios, certificates and participant feedback where collected.
Learning resources and projects	Published resources; technical documentation; designs and learner/teacher submissions where saved or supplied to the body.
Suppliers and contractors	Supplier contacts; quotations; contracts; invoices; service and data-processing arrangements, where held.
Personnel, where applicable	Recruitment and employment records; payroll; leave; training; contracts; workplace safety and disciplinary records.
Privacy and communications	PAIA/POPIA requests and outcomes; notices; permission and consent records where collected; marketing preferences; image publication permissions and complaints.
Information technology and security	System configuration and access records; security event records; incident correspondence; software licences and operational documentation where retained.

The body is a STEM technology and training provider. This manual does not present it as a registered school or claim that it keeps school examination, medical or disciplinary files. A request may identify an additional record not expressly listed here.

4. Requests and applicable fees

4.1 Submit a request

Use the current prescribed **PAIA Form 2**, linked on page 10. Send it to the Information Officer by email, post or delivery using the contacts on page 2. Identify the record, yourself, your preferred access/response format, the right you seek to exercise or protect, and why the record is needed for that right. If acting for someone else, attach evidence of authority. Supply the identity evidence required by the form; contact the officer if you need a secure delivery method.

PAIA concerns existing recorded information, including electronic records. It does not generally require the body to answer a questionnaire or create a new report. General enquiries may be sent to hello@domino4.com without submitting Form 2. Contact the officer if disability or another barrier prevents completion of the form, so appropriate assistance can be arranged.

4.2 Fees

The officer will notify you of applicable fees, any deposit and how to pay before payment is required. Prescribed exemptions apply. Confirming under POPIA section 23 whether the body holds your personal information is free; copies may attract a prescribed fee. The table summarises the private-body tariff in Annexure B of the 2021 PAIA Regulations. The legally applicable tariff prevails if amended.

Item	Private-body tariff
Request fee	R140, subject to applicable exemptions.
A4 printed / photocopied page	R2 per page or part of a page.
Computer-readable copy	R40 on a requester-provided flash drive; R40 on a requester-provided CD; R60 where the CD is supplied.
Visual image copy / transcription	An outsourced service quotation.
Audio transcription	R24 per A4 page.
Audio copy	R40 on a requester-provided flash drive or CD; R60 where the CD is supplied.
Search and preparation	R145 per hour or part of an hour after the first hour; capped at R435.
Deposit where search exceeds six hours	One-third of the amount per request calculated under tariff items 2 to 8, as prescribed.
Postage or electronic transfer	Actual expense, if any.

If access is refused, a deposit must be repaid. A record may be withheld pending payment of applicable access fees. Fee/deposit decisions can be challenged through the remedies on page 6. Downloading this manual and viewing the listed public website records is free.

5. Decisions and remedies

5.1 Response and timing

Subject to PAIA's third-party procedures, the officer will decide and notify you as soon as reasonably possible and within 30 calendar days after receipt of the request or the required particulars under section 53(2). Section 57 permits one extension of no more than 30 days on specified grounds, or with written consent. An extension notice must state the period, reasons and challenge procedure. Failure to decide within the applicable period is a deemed refusal.

If a record cannot be found or does not exist, the officer will provide the affidavit or affirmation required by section 55 describing the steps taken. Where required, third parties will be notified and given an opportunity to make representations. Their objections do not replace the statutory assessment.

5.2 Access, partial disclosure and refusal

Access to a private-body record depends on section 50: the record must be needed to exercise or protect a right, the procedural requirements must be met, and no applicable refusal ground may justify withholding it. The officer considers third-party privacy, commercial/confidential information, safety and property, legal privilege, commercial information of the body and research information under sections 63 to 69.

Accessible portions must be separated from protected material where reasonably possible. The mandatory public-interest override in section 70 must be considered where its tests are satisfied. A refusal notice gives adequate reasons, the statutory provisions relied on and the available remedies, without revealing protected contents. A grant notice explains the access format and fees.

5.3 Complaints and court remedies

There is **no statutory internal appeal** for this private body. You may ask the officer to clarify a decision, but that does not suspend statutory time limits. An aggrieved requester or third party may lodge a written complaint with the Information Regulator under section 77A, generally within **180 days** of the relevant decision, including a deemed refusal. Use PAIA Form 5 and attach the request and correspondence.

Complaints: PAIAComplaints@inforegulator.org.za or [the Regulator's eServices portal](#). Court relief is available under sections 78 to 82, subject to section 78(1), including exhaustion of the applicable complaints procedure, and the relevant 180-day period. Seek advice promptly on the appropriate remedy and deadline.

The Regulator: 010 023 5200; enquiries@inforegulator.org.za. Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191. Verify current contact channels at inforegulator.org.za/contact-us.

6. Personal information and purposes

6.1 Purposes of processing

The body processes information to respond to enquiries, establish and administer accounts and school access, provide STEM products/resources and teacher-development programmes, manage support and contractual relationships, assess and certify participation where offered, and meet applicable legal obligations. Employment, supplier and transaction administration apply where those activities occur.

Security and access information supports authentication, permission management and protection of the service. Promotional communications and public use of identifiable images require an appropriate lawful basis and, where required, specific permission. A course enquiry or account registration does not itself authorise unrelated marketing.

6.2 Data subjects and information categories

Data subjects	Information categories, where collected
Visitors and enquirers	Contact details, organisation, correspondence and enquiry/support details; technical connection/security information where recorded.
Teachers and programme participants	Name, contact and school/institution details; user type; enrolment, attendance, work/assessment evidence, feedback and certificate records where collected.
Learners and school administrators	Name or school-issued username; institution and user type; school membership and permissions; authentication/account records; saved or submitted project information where held.
Parents / guardians / representatives	Contact details, relationship or authority and permission/request correspondence where required.
Customers, schools and partners	Business/contact particulars, agreements, order and service records, invoice/payment references where held.
Suppliers and contractors	Business and contact particulars, registration/tax and payment information necessary for procurement and contracting where applicable.
Employees and applicants, where applicable	Contact and identity particulars, qualifications, employment, payroll, tax, leave and performance records needed for employment and legal duties.

Children's information is subject to POPIA sections 34 and 35. Processing requires an applicable statutory exception, commonly prior consent from a competent person. This manual does not grant permission to collect a child's information or replace any required school/guardian arrangements. Special personal information is subject to its additional statutory conditions.

7. Recipients and international processing

7.1 Recipients or categories of recipients

Personal information may be supplied only as necessary for an authorised purpose and on a lawful basis. Access by staff or school users must be limited to their responsibilities. The following categories apply where the associated service or relationship is used.

Recipient category	Information / reason for disclosure
Authorised staff, facilitators and support personnel	Contact, account, programme and support records needed to carry out assigned duties.
Schools / institutions and authorised administrators	School-associated accounts and programme participation records needed for approved school access or delivery. This does not authorise access to unrelated schools or personal accounts.
Hosting, authentication, email and IT providers	Account, communication, service and security information needed to operate the systems. AWS supports the website/member infrastructure.
Form, shop, payment and delivery providers, where used	Enquiry, order, invoice, payment-reference and delivery information necessary for the relevant activity. Linked external services may have their own notices and contracting parties.
Professional advisers and lawful authorities	Records necessary for advice, accounting, legal compliance, a lawful request or the establishment, exercise or defence of rights.
Programme partners / certification bodies, where applicable	Only relevant participation or evidence records where required for the agreed programme and lawful disclosure. No endorsement or submission is implied by this category.

7.2 Planned transborder flows

The website/member infrastructure uses AWS services configured in the Cape Town region. Public website delivery uses a global content-delivery network; this is not a statement that all personal-information processing occurs only in South Africa. The website also links to Google Forms and external Shopify/MaxIQ shops.

AWS is the processing supplier identified by the body. Account and member services are configured in AWS Cape Town, South Africa. CloudFront uses a global edge network: connection and request information, such as IP addresses, may be processed at international edge locations outside South Africa. No additional planned international recipient has been identified by the body for this manual. External links to third-party form or shop destinations do not by themselves authorise MEDO to transfer personal information to those destinations.

Before personal information is transferred to a recipient outside South Africa, an applicable basis under POPIA section 72 must be established. This may include adequate protection through law, binding rules or an agreement, valid consent, or another applicable contractual/statutory basis. Additional prior-authorisation requirements may apply to certain transfers of children's or special personal information. The applicable notice must describe the actual transfer.

8. Safeguards, rights and availability

8.1 General security measures

The website configuration provides HTTPS-only access to member APIs, redirection from HTTP, a TLS 1.2 minimum and HSTS. Member services use secure session cookies, input validation, origin checking, permission checks and request-rate controls. Account authentication and school-role controls restrict access to member functions.

Measures to be implemented and maintained across the body include proportionate staff access, secure storage of paper/electronic records, confidentiality obligations and operator contracts, retention and secure disposal, backup/recovery arrangements, staff awareness, regular safeguard reviews and incident response. These descriptions are not a guarantee of absolute security or a claim that all operational measures have already been verified.

Where the POPIA section 22 threshold is met, the responsible party must notify the Regulator and affected data subjects as soon as reasonably possible, subject to the Act. Operators must immediately inform the responsible party of a qualifying compromise.

8.2 Personal-information rights

After appropriate identity verification, you may ask whether the body holds your personal information, request access, or seek correction/deletion or destruction where statutory grounds apply. You may object to processing on applicable grounds and withdraw consent where processing depends on consent. Withdrawal does not retrospectively invalidate lawful processing; deletion may be limited by lawful retention requirements.

Send requests to the officer on page 2. POPIA Forms 1 and 2 and complaint channels are available from the Regulator. This manual describes records and access procedures; the website privacy notice must provide the notices applicable to specific collection activities.

8.3 Availability and updating

This manual is available free in English and Afrikaans on domino4.com through Policies and terms, without a member login. It is also available for public inspection at the principal place of business during the hours on page 2, to any person upon request for a reasonable reproduction amount where applicable, and to the Information Regulator upon request.

The head of the body is responsible for regular updates, particularly when contact details, record categories, processing or legislation changes. The compilation/revision dates and version on the cover identify the current document.

Issued by: Judith Norah Sandrock | Managing Director | Information Officer
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9. Official forms and references

Use the current official forms. The links below are clickable in the electronic manual. Request forms are submitted to the body; complaint forms are submitted to the Information Regulator.

Resource	Official source
PAIA access request: Form 2	Download the prescribed access-request form
PAIA complaint: Form 5	Download the prescribed complaint form Use current Regulator contact details on page 6; the downloaded form may show an earlier office address.
PAIA Guide and language versions	Regulator PAIA resources
POPIA requests and complaint forms	Regulator POPIA forms
Current Regulator contact channels	Regulator contact page eServices portal
PAIA Act 2 of 2000, as amended	Department of Justice legislation
POPIA Act 4 of 2013	Department of Justice legislation
PAIA Regulations and private-body fees	Gazette 45057, Notice R757, 27 August 2021
Private-body manual template	Information Regulator section 51 template

PAIA and POPIA prevail if this manual is inconsistent with them. Publication is an access-to-information measure and does not certify compliance with all legislation.