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**DRIVE24 (PTY) LTD**  
**Registration: 2020/020545/07**

## PAIA MANUAL

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

DATE OF COMPILATION: 04/14/2026

DATE OF REVISION: 04/14/2026

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Directors: W Jooste | R J Janse van Vuren | T J van der Walt

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012 035 1680



info@drive.co.za



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## 1. INTRODUCTION

The Promotion of Access to Information Act gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.

Specifically, section 51(1) of the Act provides that within six months after the commencement of this section or within six months after coming into existence of the private body concerned, the head of a private body must compile a manual that must contain information regarding the subjects and categories of records held by such private bodies.

In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).

Drive24 (Pty) Ltd falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognizes that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance.

Accordingly, this manual provides a reference to the records held by Penta Motor Group and the process that needs to be adopted to access such records.

***All requests for access to information (other than information that is available to the public) must be addressed to the Head of the Business named in section 3 of this Manual.***

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## 2. LIST OF ACRONYMS AND ABBREVIATIONS

- a. **“CEO”** Chief Executive Officer
- b. **“DIO”** Deputy Information Officer;
- c. **“IO”** Information Officer;
- d. **“Minister”** Minister of Justice and Correctional Services;
- e. **“PAIA”** Promotion of Access to Information Act No. 2 of 2000  
(as Amended);
- f. **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- g. **“Regulator”** Information Regulator; and
- h. **“Republic”** Republic of South Africa

## 3. BUSINESS AND CONTACT DETAILS

**Name of Business:** Drive24 (Pty) Ltd  
**Information Officer:** Johan van Emmenis  
**Position:** Key Individual  
**Postal Address:** Same as physical address  
**Physical Address:** Guernsey Business Park, Warehouse A, 11 Saltus Street, Irene, 0157  
**Phone Number:** 0120351680  
**Number:** 0824457120  
**Email Address:** johan@drive.co.za  
**Website:** www.drive.co.za

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#### 4. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- a. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- b. have 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;
- c. know the description of the records of the body which are available in accordance with any other legislation;
- d. 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;
- e. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- f. 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;
- g. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- h. know the recipients or categories of recipients to whom the personal information may be supplied;

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- i. 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
- j. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DRIVE24 (PTY) LTD

### 5.1 Chief Information Officer

Name: Johannes Petrus Wilhelm van Emmenis  
Tel: 0824457120  
Email: [johan@drive.co.za](mailto:johan@drive.co.za)

### 5.2 Deputy Information Officer

Name: Roelof Janse van Vuuren  
Tel: 0120351680  
Email: [roelof@drive.co.za](mailto:roelof@drive.co.za)

### 5.3 Access to information general contacts

Email: [finance@drive.co.za](mailto:finance@drive.co.za)

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#### 5.4 National or Head Office

Postal Address:	Guernsey Business Park, Warehouse A, 11 Saltus Street, Irene, 0157
Physical Address:	Guernsey Business Park, Warehouse A, 11 Saltus Street, Irene, 0157
Telephone:	0120351680
Email:	finance@drive.co.za
Website:	<a href="http://www.drive.co.za">www.drive.co.za</a>

## 6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 6.1** 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.
- 6.2** The Guide is available in each of the official languages and in braille.
- 6.3** The aforesaid Guide contains the description of-
- 6.3.1** the objects of PAIA and POPIA;
- 6.3.2** the postal and street address, phone and fax number and, if available, electronic mail address of-
- 6.3.2.1** the Information Officer of every public body, and

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- 6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 6.3.3 the manner and form of a request for-
  - 6.3.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 6.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;
- 6.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 6.3.6 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-
  - 6.3.6.1 an internal appeal;
  - 6.3.6.2 a complaint to the Regulator; and
  - 6.3.6.3 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;
- 6.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

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- 6.3.10** the regulations made in terms of section 92<sup>11</sup>.
- 6.4** 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.
- 6.5** The Guide can also be obtained-
- 6.5.1** upon request to the Information Officer;
- 6.5.2** website

A copy of the Guide is also available in the English, for public inspection during normal office hours.

The Guide is also available at all offices and on the website of the South African Human Rights Commission, [www.sahrc.org.za](http://www.sahrc.org.za).

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**7. CATEGORIES OF RECORDS OF DRIVE24 (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

Category of Records	Type of Records	Available on Website	Available upon request
Company Information	Company profile	No	Yes
Company Information	Service offerings	Yes	Yes
Company Information	Contact details	Yes	Yes
Legal & Compliance	PAIA Manual	No	Yes
Legal & Compliance	POPIA Privacy Notice	No	Yes
Marketing & Sales	Brochures	Yes	Yes
Marketing & Sales	Pricing guides	Yes	Yes
Marketing & Sales	Product/service descriptions	Yes	Yes
Client Documentation	Standard Terms and Conditions	Yes	Yes
Client Documentation	Rental agreement templates	No	No
Employment Information	Vacancies	No	No
Employment Information	Recruitment policies	No	No
Policies	General company policies	No	Yes
Customer Support	Customer service procedures	No	Yes
Customer Support	Complaints and escalation processes	No	Yes

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**8. DESCRIPTION OF THE RECORDS OF DRIVE24 (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Company registration documents	Companies Act 71 of 2008
Financial statements	Income Tax Act 58 of 1962; VAT Act 89 of 1991; Companies Act 71 of 2008
VAT records	Income Tax Act 58 of 1962; VAT Act 89 of 1991; Companies Act 71 of 2008
PAYE and income tax records	Income Tax Act 58 of 1962; VAT Act 89 of 1991; Companies Act 71 of 2008
Employment contracts	Basic Conditions of Employment Act 75 of 1997; Unemployment Insurance Act 63 of 2001
Payroll records	Basic Conditions of Employment Act 75 of 1997; Unemployment Insurance Act 63 of 2001
UIF records	Basic Conditions of Employment Act 75 of 1997; Unemployment Insurance Act 63 of 2001
Workplace safety records	Occupational Health and Safety Act 85 of 1993
Incident reports	Occupational Health and Safety Act 85 of 1993
Credit agreements	National Credit Act 34 of 2005
Affordability assessments	National Credit Act 34 of 2005
Payment history records	National Credit Act 34 of 2005
PAIA Manual	Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013
POPIA compliance records	Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013
Vehicle registration documents	National Road Traffic Act 93 of 1996
Licensing records	National Road Traffic Act 93 of 1996
Insurance policies	Insurance Act 18 of 2017
Claims records	Insurance Act 18 of 2017

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**9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DRIVE24 (PTY) LTD**

Subjects on which the body holds records	Categories of records
Strategic & Management	Business plans
Strategic & Management	Strategic plans
Strategic & Management	Annual reports
Strategic & Management	Performance reports
Finance	Financial statements
Finance	Bank statements
Finance	Invoices and receipts
Finance	Budgets and forecasts
Finance	Audit reports
Human Resources	HR policies and procedures
Human Resources	Employee records
Human Resources	Employment contracts
Human Resources	Payroll and benefits records
Human Resources	Disciplinary records
Operations (Fleet Management)	Vehicle asset register
Operations (Fleet Management)	Vehicle allocation records
Operations (Fleet Management)	Maintenance and service records
Operations (Fleet Management)	Tracking and telematics data
Client Management	Client applications
Client Management	Rental agreements
Client Management	KYC documentation
Client Management	Credit assessments
Client Management	Communication records
Risk & Compliance	Risk assessments
Risk & Compliance	Fraud reports
Risk & Compliance	Compliance registers
Risk & Compliance	Audit findings
Sales & Marketing	Marketing strategies
Sales & Marketing	Campaign records
Sales & Marketing	Client databases (consented)
Sales & Marketing	Pricing models
Legal	Contracts and agreements

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Legal	Litigation records
Legal	Legal opinions
Supply Chain / Procurement	Supplier contracts
Supply Chain / Procurement	SLAs
Supply Chain / Procurement	Procurement records
Supply Chain / Procurement	Supplier invoices
IT & Systems	System access logs
IT & Systems	Data backups
IT & Systems	Cybersecurity reports
IT & Systems	System configurations
Debt Recovery & Collections	Arrears reports
Debt Recovery & Collections	Collection notes
Debt Recovery & Collections	Legal recovery documentation
Insurance	Insurance policies
Insurance	Claims records
Insurance	Incident reports

## 10. PROCESSING OF PERSONAL INFORMATION

### a. Purpose of Processing Personal Information

- Assess vehicle rental applications and onboard clients
- Perform credit checks, affordability assessments, and risk scoring
- Verify identity and prevent fraud
- Conclude and manage rental agreements
- Allocate and manage fleet vehicles
- Monitor vehicle usage, tracking, and compliance
- Process payments, debit orders, invoicing, and collections
- Manage arrears, repossessions, and debt recovery
- Communicate with clients regarding contracts, support, and updates
- Comply with legal and regulatory requirements (POPIA, NCA, etc.)
- Maintain internal records, reporting, and audit trails
- Improve service delivery, pricing models, and risk models

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b. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Customers / Clients	Full names and surname
Customers / Clients	Identity number / passport number
Customers / Clients	Contact details (cell phone, email)
Customers / Clients	Residential and employment address
Customers / Clients	Employment status and employer details
Customers / Clients	Income and affordability data
Customers / Clients	Bank statements and banking details
Customers / Clients	Credit history and credit score
Customers / Clients	Driver's license details
Customers / Clients	Vehicle allocation and usage data
Prospective Clients	Names and surname
Prospective Clients	Contact details
Prospective Clients	Initial enquiry information
Prospective Clients	Preliminary affordability or income information
Employees	Full names and ID numbers
Employees	Contact details and address
Employees	Employment contracts and job role
Employees	Qualifications and certifications
Employees	Payroll and banking details
Employees	Performance and disciplinary records
Employees	Race, gender, and demographic data (for compliance)
Service Providers / Suppliers	Company name and registration number
Service Providers / Suppliers	VAT number
Service Providers / Suppliers	Business address and contact details
Service Providers / Suppliers	Banking details
Service Providers / Suppliers	Contracts and SLAs
Service Providers / Suppliers	Trade information / service records
Guarantors / Sureties	Full names and ID numbers
Guarantors / Sureties	Contact details
Guarantors / Sureties	Financial and employment information
Guarantors / Sureties	Relationship to client
Third-Party Data Sources	Credit bureau data (scores, payment history)
Third-Party Data Sources	Fraud and identity verification data

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Third-Party Data Sources	Banking behaviour insights
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- c. 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 & Verification Information	South African Police Service
Identity & Verification Information	Identity verification service providers
Credit Information	TransUnion South Africa
Credit Information	Experian South Africa
Credit Information	Other registered credit bureaus
Banking & Payment Information	Banking institutions
Banking & Payment Information	Payment processors and debit order service providers
Employment & Income Verification	Employers
Employment & Income Verification	Payroll verification agencies
Qualification Verification	South African Qualifications Authority (SAQA)
Operational & Contractual Data	Legal advisors
Operational & Contractual Data	Auditors
Operational & Contractual Data	Fleet management partners
Operational & Contractual Data	Insurance providers
Debt Recovery Information	Debt collection agencies
Debt Recovery Information	Attorneys and legal service providers
IT Systems & Data Hosting	Cloud service providers
IT Systems & Data Hosting	IT support and system administrators

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d. Planned transborder flows of personal information

- Not applicable

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

#### Technical Measures

- Encryption (data at rest and in transit)
- Firewalls and intrusion detection systems
- Anti-virus and anti-malware software
- Secure cloud infrastructure
- Multi-factor authentication (MFA)

#### Access Control

- Role-based access control (RBAC)
- User authentication and password policies
- Access logging and monitoring

#### Operational Measures

- Secure document storage (physical and digital)
- Data minimization principles
- Data retention and destruction policies
- Regular backups and disaster recovery plans

#### Governance & Compliance

- POPIA compliance framework
- Employee training on data protection
- Confidentiality agreements
- Regular audits and risk assessments

#### Incident Management

- Data breach response plan
- Incident escalation procedures
- Regulatory notification processes

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## 11. AVAILABILITY OF THE MANUAL

- a. A copy of the Manual is available-
  - i. on [www.drive.co.za](http://www.drive.co.za), if any;
  - ii. head office of Drive24 (Pty) Ltd for public inspection during normal business hours;
  - iii. to any person upon request and upon the payment of a reasonable prescribed fee; and
  - iv. to the Information Regulator upon request.
- b. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 12. UPDATING OF THE MANUAL

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

***Issued by***

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***Johan van Emmenis***  
***Accountant***

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