PAIA Manual – NEWDUSK (Pty) Ltd (RenewTrack)

NEWDUSK (PTY) LTD

Operator of RenewTrack (https://renewtrack.co.za)

PAIA MANUAL

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

Company registration number	2012/052245/07
Information Regulator registration number	2026-072325
Date of compilation	16/11/2026
Date of revision	17/11/2026

1. List of acronyms and abbreviations

1.1 "CEO" – Chief Executive Officer

1.2 "Company" – NEWDUSK (Pty) Ltd, registration number 2012/052245/07, operator of RenewTrack

1.3 "DIO" – Deputy Information Officer

1.4 "IO" – Information Officer

1.5 "Minister" – Minister of Justice and Constitutional Development

1.6 "PAIA" – Promotion of Access to Information Act 2 of 2000 (as amended)

1.7 "POPIA" – Protection of Personal Information Act 4 of 2013

1.8 "Regulator" – Information Regulator (South Africa)

1.9 "Republic" – Republic of South Africa

1.10 "RenewTrack" – the licence tracking and renewal reminder service operated by the Company at https://renewtrack.co.za

2. Purpose of this PAIA Manual

This PAIA Manual helps members of the public to:

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

2.2 understand how to request access to a record of the Company, through a description of the subjects on which the Company holds records and the categories of records held on each subject;

2.3 know the description of the records of the Company which are available in accordance with any other legislation;

2.4 access the contact details of the Information Officer, who will assist the public with the records they intend to access;

2.5 know the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;

2.6 know whether the Company processes personal information, the purpose of processing it, and the categories of data subjects and of the information relating to them;

2.7 know the description of the categories of data subjects and of the information or categories of information relating to them;

2.8 know the recipients or categories of recipients to whom personal information may be supplied;

2.9 know whether the Company transfers or processes personal information outside the Republic, and the recipients to whom it may be supplied; and

2.10 know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information it processes.

3. Key contact details for access to information of NEWDUSK (Pty) Ltd

3.1 Information Officer

Name	Sharon Naude
Designation	Information Officer, appointed 16/11/2026 (Information Regulator registration 2026-072325)
Tel	+27 66 020 0777
Email	privacy@renewtrack.co.za

3.2 Deputy Information Officer

No Deputy Information Officer has been designated at the date of this manual. If one is designated in terms of section 17(1) of PAIA, their details will be added here and registered with the Regulator.

3.3 Access to information general contacts

Email	privacy@renewtrack.co.za

3.4 Head office

Postal address	117 Louis Street, Waterkloof Ridge, Pretoria, 0181
Physical address	117 Louis Street, Waterkloof Ridge, Pretoria, 0181
Telephone	+27 66 020 0777
Email	privacy@renewtrack.co.za
Website	https://renewtrack.co.za

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 ("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 the description of:

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

4.3.3 the manner and form of a request for access to a record of a public body contemplated in section 11, and access to a record of a private body contemplated in section 50;

4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6 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 an internal appeal, a complaint to the Regulator, and an application with a court against a decision by the information officer of a public body, a decision on internal appeal, a decision by the Regulator or a decision of the head of a private body;

4.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from 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:

4.5.1 upon request to the Information Officer of the Company; and

4.5.2 from the website of the Regulator (https://inforegulator.org.za).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours: English and Afrikaans.

5. Categories of records of NEWDUSK (Pty) Ltd which are available without a person having to request access

Category of records	Types of the record	Available on website	Available upon request
Public information	PAIA Manual	Yes	Yes
Public information	Privacy Policy	Yes	Yes
Public information	Terms of Use	Yes	Yes
Product information	Description of the RenewTrack service,	Yes	Yes

Category of records	Types of the record	Available on website	Available upon request
	features and FAQs		
Company information	Company name, registration number and contact details	Yes	Yes

6. Description of the records of NEWDUSK (Pty) Ltd which are available in accordance with any other legislation

Category of records	Applicable legislation
Memorandum of Incorporation, company registration documents and share register	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Records of personal information processed, Information Officer registration	Protection of Personal Information Act 4 of 2013
Tax records, including income tax records	Tax Administration Act 28 of 2011; Income Tax Act 58 of 1962
Electronic transaction and website records	Electronic Communications and Transactions Act 25 of 2002
Consumer agreements and subscription terms	Consumer Protection Act 68 of 2008
Employee records (if the Company has employees)	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001

7. Subjects on which the Company holds records and categories of records held on each subject

Subjects on which the Company holds records	Categories of records
Company secretarial	Memorandum of Incorporation, CIPC registration documents, director and shareholder records, Information Officer registration
Finance and tax	Financial statements, accounting records, invoices, receipts, bank statements, tax records
Customers (RenewTrack users)	Account and profile records, uploaded licence and certificate documents, extracted licence details and expiry dates, reminder settings, subscription and payment records, consent records, support correspondence
Business customers	Company account records, authorised user lists, licence records of staff, vehicles and equipment, compliance reports and exports
Service providers and suppliers	Agreements, contact details, invoices and payment records
Information technology and security	System and access logs, backup records, security incident records
Marketing	Website and social media content, marketing consent records
Human resources (if applicable)	Employment contracts, employee personal records, payroll records, policies and procedures

8. Processing of personal information

8.1 Purpose of processing personal information

The Company processes personal information to:

- create and manage RenewTrack user and company accounts;

- store licences, permits and certificates uploaded by users, and read the details and expiry dates from them;
- send licence expiry reminders by email and WhatsApp, as chosen and consented to by the user;
- process subscription payments and issue invoices and receipts;
- provide customer support and respond to queries;
- prepare compliance reports and exports for business customers;
- keep the service secure, prevent fraud and misuse, and maintain backups;
- send service updates and, with consent, marketing communications; and
- comply with legal, tax and regulatory obligations.

8.2 Categories of data subjects and the personal information processed

Categories of data subjects	Personal information that may be processed
Individual users	Name, surname, email address, telephone and WhatsApp number, login details, licence and certificate documents (which may include ID numbers, dates of birth, photographs, addresses, vehicle registration details and licence numbers), expiry dates, reminder preferences, consent records, subscription and payment records
Business customers and their authorised users	Company name, registration and VAT numbers, contact persons, user names, email addresses and telephone numbers, billing details
Persons whose licences are loaded by a business customer (e.g. employees, drivers)	Name, licence and certificate details, licence documents, expiry dates
Service providers and suppliers	Names, registration and VAT numbers, contact details, bank details
Website visitors	Device and usage information, cookies, enquiry details
Employees (if applicable)	Name, ID number, contact details, qualifications, bank details, payroll and tax information

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

Category of personal information	Recipients or categories of recipients
Account data, uploaded documents and licence records	Cloud hosting and database provider (Lovable Cloud)
Payment and subscription details	Payment provider (PayFast)
WhatsApp number, name and reminder content	WhatsApp Business messaging provider and Meta Platforms (WhatsApp)
Email address, name and reminder content	Email delivery service provider (Resend)
Uploaded licence documents, for reading details and expiry dates	Lovable AI Gateway, currently using Google Gemini 3 Flash Preview (google/gemini-3-flash-preview)
Financial and tax records	South African Revenue Service, the Company's accountants and auditors
Any personal information, where required by law	Law enforcement, courts and regulators, including the Information Regulator

Emails sent to the Company, including requests under this manual, are stored with the Company's email hosting provider, xneelo, in South Africa. The Company does not sell personal information to third parties.

8.4 Planned transborder flows of personal information

Some personal information is stored or processed outside the Republic:

Category of personal information	Country or region	Recipient
Account data, uploaded documents and licence records	Frankfurt, Germany (European Union)	Lovable Cloud
Uploaded licence documents, for reading details and expiry dates	AI processing locations, provider retention and applicable transfer safeguards awaiting written confirmation	Lovable AI Gateway, using Google Gemini
Reminder emails	Ireland (European Union)	Resend

Category of personal information	Country or region	Recipient
Email account data, metadata and logs	United States	Resend
WhatsApp numbers and reminder messages	Outside the Republic, including the United States and European Union	Meta Platforms (WhatsApp) and the messaging provider

Except where noted above as awaiting confirmation, transfers take place only to recipients subject to laws, binding agreements or binding corporate rules that provide an adequate level of protection, as required by section 72 of POPIA.

8.5 General description of information security measures

The Company implements the following measures to ensure the confidentiality, integrity and availability of personal information:

- encryption of data in transit (HTTPS);
- encrypted data storage provided by the hosting provider (details of encryption at rest awaiting the provider's written confirmation);
- access controls on every database table, so that each user, and each company's authorised users according to their role, can only access their own records;
- private document storage, with documents opened only through short-lived, access-checked links that are not cached;
- mandatory two-step login for company owners, company administrators and the Company's own administrators, and optional two-step login for all other users;
- server-side checks on uploaded files, including file type, size and page limits;
- audit records of administrator actions, two-step login resets and account deletions;
- daily database backups, kept for about 14 days;
- payment card details handled by the payment provider and not stored by the Company;
- limiting access to personal information to authorised persons who need it;
- self-service tools that let users download or delete their data and close their account;
- an automated retention schedule that deletes personal information once it is no longer needed; and
- a documented process for identifying, managing and reporting security compromises to the Regulator and affected data subjects, as required by section 22 of POPIA.

9. Availability of the manual

9.1 A copy of this manual is available:

9.1.1 on https://renewtrack.co.za;

9.1.2 at the head office of NEWDUSK (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 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.

10. Updating of the manual

The head of NEWDUSK (Pty) Ltd will update this manual on a regular basis, and whenever material changes are made to the Company's records, processing of personal information or contact details.

Issued by

Sharon Naude

Information Officer, NEWDUSK (Pty) Ltd

Director

Date: 16/11/2026