BEANTECH (PTY) LTD t/a OATHS.CO.ZA™

PAIA Manual

Manual of a private body, published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Private body	Beantech (Pty) Ltd, registration number 2010/008997/07
Trading as	Oaths.co.za™
Information Officer	Mr J.M. van der Westhuizen
Version	2.0 – 14 October 2026
Replaces	Version 1.2 (25 May 2026), which is withdrawn

1. Purpose of this manual

The Promotion of Access to Information Act 2 of 2000 ("PAIA") gives effect to the right of access to information in section 32 of the Constitution. Section 51 of PAIA requires a private body to compile a manual describing the records it holds and how access to them may be requested.

This manual also contains the information that section 51 of the Protection of Personal Information Act 4 of 2013 ("POPIA") requires a manual to include about the processing of personal information.

It applies to **Beantech (Pty) Ltd**, registration number 2010/008997/07, which operates the **Oaths.co.za™** platform.

2. Particulars of the private body

Name of private body	Beantech (Pty) Ltd
Company registration number	2010/008997/07
Trading name	Oaths.co.za™
Head of the private body	Mr J.M. van der Westhuizen, Managing Director
Information Officer	Mr J.M. van der Westhuizen
Designations	Professional Accountant (SA); Commissioner of Oaths (ex officio)
Physical address	Regus Cradlestone Mall, Entrance 5, L2, 17 Hendrik Potgieter Road, Krugersdorp, Gauteng, 1739, South Africa
E-mail	compliance@oaths.co.za
Website	https://oaths.co.za

3. The PAIA Guide

The Information Regulator has published a guide in terms of section 10 of PAIA explaining how to exercise the rights the Act gives you. It is available free of charge.

Information Regulator (South Africa)	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll free	0800 017 160
E-mail	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za
The Guide	Published on the Information Regulator's website. A copy may also be requested from the Regulator using Form 01 (Regulation 2), or from our Information Officer using Form 01 (Regulation 3).

4. Records held by Beantech

4.1 Records available without a request

These are published on https://oaths.co.za and may be accessed without any PAIA request:

- Company and service overview, and the "how it works" description
- Pricing and frequently asked questions
- Terms and Conditions
- Privacy Policy
- Prohibited Use Policy
- Consent and registration notices applicable to users aged 16 and 17
- This manual

4.2 Records available in terms of other legislation

Certain records are available under other laws, and a PAIA request is not the route to them:

Legislation	Records
Companies Act 71 of 2008	Statutory company records available from the Companies and Intellectual Property Commission
Protection of Personal Information Act 4 of 2013	A data subject's own personal information, requested under section 23 of POPIA through our Information Officer
Tax Administration Act 28 of 2011	Tax records, through the South African Revenue Service

4.3 Subjects and categories of records held

Subject	Categories of records
Certification	Certification records; the documents certified; verification references and their status; Commissioner of Oaths records
Users and accounts	Registration and account records; identity verification results; consent records and the authentication trail
Minors	Guardian consent records and related correspondence

Compliance	Screening results; policies, procedures and registers; regulatory correspondence
Technology	System, access and audit logs; configuration and change records; backup and recovery records
Commercial	Contracts with suppliers and service providers; subscription and payment records
Corporate	Statutory, financial, accounting and tax records; insurance records
Employment	Records of employees and contractors

Listing a category here does not mean access will be granted. Most of these records contain the personal information of third parties, or are confidential, and PAIA requires or permits refusal in those cases. See section 7.

5. Information required by POPIA

5.1 Purpose of processing

Beantech processes personal information in order to administer user accounts; verify the identity of a person before a document is certified in that person's name; perform the certification and issue the certified document and its verification reference; allow a certified document to be checked afterwards; keep the records of the certification act; record and manage guardian consent for users aged 16 and 17; take and confirm payment; prevent impersonation and fraud; respond to queries and complaints; and comply with legal obligations.

5.2 Categories of data subjects and of personal information

Data subjects	Categories of personal information
Users and subscribers	Identity information; contact details; the documents submitted for certification; biometric information captured during identity verification; verification and screening results; consent records; technical and usage information
Users aged 16 and 17	As above, together with the record of guardian consent
Parents and legal guardians	Name, identity number, contact details, relationship to the minor, and the consent record
Commissioners of Oaths	Identity, professional registration and certification activity records
Employees and service providers	Contact, contractual and access records

Biometric information is special personal information under section 26 of POPIA, as is information about alleged criminal behaviour which compliance screening may reveal. Beantech processes both only with the **explicit consent of the data subject under section 27(1)(a)**, which is sought separately and may be refused or withdrawn.

5.3 Recipients of personal information

- The Commissioner of Oaths performing the certification.
- Our identity verification partner, which performs identity, liveness and screening checks as our operator.
- Our payment provider, for taking and confirming payment.
- Microsoft, as operator of the cloud infrastructure on which the platform runs.
- A person to whom a certified document is given, who may check its verification reference. That check discloses the certification details only.
- Professional advisers, auditors and insurers, under confidentiality obligations.
- Regulators, courts and law enforcement agencies where disclosure is required by law.

Where a third party processes personal information on behalf of Beantech, it is bound by written agreement to process only on Beantech's instruction, to keep the information confidential and to maintain appropriate security safeguards.

5.4 Cross-border transfer

Beantech does transfer limited personal information outside the Republic, and says so plainly. The platform and its records are hosted on Microsoft Azure in the **South Africa North** region. However, identity verification, biometric

liveness confirmation and compliance screening are performed by **Didit**, which processes in the **European Union** under the General Data Protection Regulation. The information sent to Didit is limited to identity document details and the facial image captured for the check. Certified documents and certification records are not sent. The transfer is made with the **consent of the data subject in terms of section 72(1)(b) of POPIA**, which is sought expressly before the check is performed and may be refused.

5.5 Security safeguards

Beantech applies the following technical and organisational measures. They are described as they actually operate.

- Encryption of personal information in transit and at rest.
- Access control through Microsoft Entra ID, with multi-factor authentication for administrative access and secrets held in a managed key vault.
- A tamper-evident ledger: key records are written to database ledger tables which cryptographically chain each change to the one before it, so that alteration or deletion can be detected. Cryptographic digests are stored separately.
- Write-once storage: certified documents and associated records are written to immutable storage under a retention lock and cannot be altered or deleted by anyone, including Beantech's own administrators, until the retention period expires.
- Separation of building from operating: those who build the platform have no access to live personal information, and the operator of the service cannot alter the enforcing code without approval by a second person.
- Logging and monitoring of system access and administrative activity.
- Additional safeguards, including restricted access and separate handling, apply to the personal information of users aged 16 and 17.

The underlying infrastructure is operated by Microsoft and is independently certified to ISO/IEC 27001, 27017, 27018 and 27701 and subject to an annual SOC 2 Type 2 examination. **Those are certifications of Microsoft's platform, not of Beantech. Beantech does not hold ISO 27001 or ISO 27701 certification.**

6. How to request access to a record

1. Complete **Form 02, "Request for Access to Record"**, prescribed by Regulation 7 of the Regulations Regarding the Promotion of Access to Information, 2021. The form is available on the Information Regulator's website and from our Information Officer on request.
2. Provide sufficient detail to enable the record to be identified, and state the form of access required and how you wish to be informed of the decision.
3. Identify the right you are seeking to exercise or protect, and explain why the record is required to exercise or protect it. **Section 50 of PAIA requires this**, and a request that does not do so must be refused.
4. Attach proof of identity, and proof of authority if you are acting for someone else. A request on behalf of a person aged 16 or 17 must include verified guardian consent.
5. Send the completed form to **compliance@oaths.co.za**, or deliver it to the address in section 2.

6.1 Fees

Fee	When payable
Request fee	A requester other than a personal requester must pay the prescribed request fee before the request is processed. A personal requester – a person requesting a record about themselves – pays no request fee.
Access fee	Where access is granted, an access fee may be payable for reproduction, search and preparation, and postage, calculated at the rates prescribed under PAIA.
Deposit	Where search and preparation are expected to exceed the prescribed hours, a deposit may be required before the request is processed.

The prescribed amounts are set out in the PAIA Regulations and are available from the Information Regulator. Beantech does not charge more than the prescribed fees.

6.2 Time for a decision

The Information Officer will decide on the request and notify you **within 30 days** of receiving it, as section 56 of PAIA requires. That period may be extended by a further period of not more than 30 days in the circumstances set out in **section 57** of PAIA, in which case you will be notified of the extension and the reasons for it.

7. Grounds on which access may or must be refused

PAIA requires or permits a private body to refuse access in defined circumstances. The grounds relevant to the records Beantech holds include:

Section	Ground
63	Unreasonable disclosure of personal information about a third party, including a deceased person – **the most common ground applicable to our records**
64	Commercial information of a third party, including trade secrets and information that could harm their commercial or financial interests
65	Information supplied in confidence, where disclosure could reasonably be expected to prejudice future supply of similar information
66	Information that could endanger the life or physical safety of an individual, or prejudice the security of

	property or a system
67	Privileged information in legal proceedings
68	Beantech's own commercial information, including trade secrets and computer programmes
69	Research information of Beantech or a third party
70	Despite sections 63 to 69, access must be granted where disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm – the **public interest override**

8. If you are not satisfied

There is no internal appeal against a private body. The internal appeal procedure in PAIA applies to public bodies only. If Beantech refuses your request, fails to respond in time, or you are dissatisfied with the fee or the form of access, your remedies are the two below.

- **Complain to the Information Regulator** using **Form 05 (Regulation 10)**, within 180 days. Contact details are in section 3.
- **Apply to a court** with jurisdiction, in terms of section 78 of PAIA.

You may also contact our Information Officer at compliance@oaths.co.za at any time. We would prefer the opportunity to resolve a complaint directly, but you are not obliged to come to us first.

9. Availability of this manual

This manual is available free of charge:

- on our website at https://oaths.co.za;
- by e-mail from compliance@oaths.co.za on request; and
- for inspection at our physical address during business hours, by arrangement.

It is reviewed at least annually and whenever our processing or record-keeping changes materially.

10. Revision history

Version	Date	Summary of change
1.0	01 March 2025	Initial manual issued.
1.1	19 October 2025	Updated for minor and guardian provisions.
1.2	25 May 2026	General updates. **Withdrawn.**
2.0	14 October 2026	Corrected and reissued. Request procedure updated to Form 02 (Regulation 7) under the 2021 Regulations, replacing the superseded Form C reference. The section 10 Guide is now obtained from the Information Regulator rather than the South African Human Rights Commission, and the Regulator's current address is given. Extension of time corrected to section 57, which applies to private bodies. Grounds for refusal and remedies set out. Security measures restated to describe only measures actually in place. Cross-border processing by the verification partner disclosed under section 72. Biometric and screening processing identified as special personal information requiring explicit consent under section 27(1)(a).

Approved by **Mr J.M. van der Westhuizen**, Information Officer and Managing Director, Beantech (Pty) Ltd.