



Manual in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000

Prepared for the private body that operates MzansiShield, in the form prescribed by the Information Regulator (South Africa). It also carries the information section 51(1)(c) of PAIA requires about the processing of personal information under the Protection of Personal Information Act, 4 of 2013 (POPIA). Version 1.0, 15 September 2026.

1. Purpose of this manual

The Promotion of Access to Information Act (PAIA) gives effect to the constitutional right of access to information held by another person that is required for the exercise or protection of any right. Section 51 requires the head of a private body to compile a manual that tells a person what records the body holds, how to ask for them, what it costs and where to turn if the request is refused. POPIA amended section 51 so that the manual also explains how the body processes personal information. This is that manual for MzansiShield.

MzansiShield is a community safety and service-delivery application for South Africa - a web app at mzansishield.sysrely.com and native apps on the Apple App Store, Android Play Store and Huawei AppGallery - operated by SysRely ("we", "the private body"). It lets members report service issues and lookouts, warn neighbours, raise an SOS beacon, start a Walk-with-me check-in, follow and message one another, and see utilities and weather for their area, in all eleven official languages.

2. Contact details (section 51(1)(a))

Name of the private body	SysRely, operating MzansiShield, SysRely (Pty) Ltd, K2026268641
Head of the private body	Rotshidzwa Mamuthupi, Director
Information Officer	Rotshidzwa Mamuthupi, Director - the head of the private body is the Information Officer by default (POPIA s1 and s55); a Deputy Information Officer may be designated in writing
Deputy Information Officer	None designated
Physical address	Basden Avenue, Die Hoewes, Centurion, 0163
Postal address	Basden Avenue, Die Hoewes, Centurion, 0163
Telephone	079 911 3256
Email for requests and privacy matters	consulting@sysrely.com
Website	https://mzansishieldweb.sysrely.com (the app: https://mzansishield.sysrely.com)

Requests for access to records, and requests, objections or complaints about personal information, are addressed to the Information Officer at the email address above, or in writing to the postal address.

3. The Information Regulator's guide (section 51(1)(b))

The Information Regulator has compiled a guide, in each official language, on how to use PAIA (section 10). It describes the objects of the Act, the contact details of every information officer, the manner and form of a request,



the assistance available from the Regulator, the remedies available in law, and the fees. The guide is available from the Regulator free of charge, and a copy can be requested from our Information Officer.

Information Regulator (South Africa)	
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

4. Records available without a request (section 52(2))

The following are published and may be read by anyone without a PAIA request:

- The MzansiShield Privacy Policy, Terms and Conditions, Child Safety Standards and account-deletion page, at mzansishieldweb.sysrely.com and inside the app.
- This manual.
- Community posts, replies, group descriptions, place listings and live broadcasts that members have chosen to publish, as they are shown in the app to the audience the member selected.
- The app's store listings, marketing pages and public announcements.
- Aggregated, anonymised community-safety statistics shown in the app (Community Stats).

No notice in terms of section 52(2) has yet been published in the Government Gazette; the categories above are made available voluntarily.

5. Records available in terms of other legislation (section 51(1)(d))

Records are kept, and may be available to the persons those Acts entitle, in terms of, among others: the Companies Act 71 of 2008; the Income Tax Act 58 of 1962; the Value-Added Tax Act 89 of 1991; the Basic Conditions of Employment Act 75 of 1997; the Labour Relations Act 66 of 1995; the Unemployment Insurance Act 63 of 2001; the Compensation for Occupational Injuries and Diseases Act 130 of 1993; the Skills Development Levies Act 9 of 1999; the Electronic Communications and Transactions Act 25 of 2002; the Consumer Protection Act 68 of 2008; the Protection of Personal Information Act 4 of 2013; the Promotion of Access to Information Act 2 of 2000; the Films and Publications Act 65 of 1996; the Children's Act 38 of 2005; the Cybercrimes Act 19 of 2020; and the Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002.

6. Subjects and categories of records we hold (section 51(1)(e))

The subjects on which we hold records, and the categories of record under each. Listing a category does not mean access will be granted; each request is decided under Part 3 of Chapter 4 of PAIA.

Subject	Categories of record
Company and governance	Founding documents, registration, resolutions, statutory registers, policies and this manual
Financial	Accounting records, bank statements, invoices, tax returns, hosting and supplier invoices, payment proofs received from service providers and enterprise customers
Human resources and contractors	Contracts, personnel and payroll records, performance and disciplinary records, contractor agreements



Subject	Categories of record
Members (users of the app)	Account records (email or phone number, display name, chosen language, settings), trusted-circle contacts, saved places and alert radii, push-notification subscriptions, sign-in and session records, guardian-consent records for members aged 13-17, child safety-device records
Community content	Posts, replies, confirmations, photos, voice notes, direct messages, group records, place listings, live-broadcast metadata, reports and blocks made by members
Safety records	SOS beacon records and escalation history, Walk-with-me check-ins and their alerts, fake-call bookings, responder acceptances, emergency-inbox entries
Moderation and compliance	Moderation queue and decisions, flags, held content, suspensions, child-safety reports and their onward referrals, retention and deletion logs
Service providers and responders	Registrations, due-diligence documents, accreditation uploads, listings, verification decisions, response statistics
Enterprise customers and data buyers	Agreements, API keys and their scopes, usage records, anonymised insight datasets supplied
Operations	Audit and event logs, security events, job heartbeats, backups and restore drills, uptime records, incident notes
Marketing and communications	Website content, store listings, press material, correspondence with members and the public

7. Processing of personal information (section 51(1)(c) of PAIA; POPIA)

7.1 Purpose of processing

We process personal information to: provide the MzansiShield service (accounts, sign-in, posts, notifications, groups and messages); operate the safety features a member chooses to use (the SOS beacon, Walk-with-me, Fake call, live location, responder alerts); keep the community safe (moderation, abuse prevention, rate limiting, child protection); support members and answer their requests; comply with law (tax, POPIA, child-protection reporting duties, lawful requests); and improve the service using aggregated statistics. Members aged 13-17 hold accounts only with a parent's or guardian's consent; children under 13 are provisioned a safety device by a parent, with no feed or messaging.

7.2 Categories of data subjects and of personal information

Data subjects	Personal information
Members (adults, and 13-17 with guardian consent)	Email address or phone number, display name and optional photo, chosen language, settings; content they post; location while they choose to share it (posts, SOS, Walk-with-me, live pin); trusted-circle contacts; device and IP data for security
Children under 13 on a parent-provisioned safety device	First name, the parent's sign-in credential, the trusted circle the parent set, and location only while SOS, Walk-with-me or a parent-initiated, on-screen location check is active
Trusted contacts named by a member	Name, and the phone number, email or app handle the member gave us, used only to alert them
Service providers, responders, tutors	Identity and business details, accreditation documents, contact details, listing content, response statistics
Enterprise customers and data buyers	Organisation and contact details, API key ownership, usage
Employees and contractors	Employment and payroll information



Data subjects	Personal information
Website visitors and anonymous reporters	Technical data (IP address, device type) used for security and abuse prevention; an anonymous report privately records the device for moderation only

7.3 Recipients

Other members see what a member chooses to publish, under the display name they chose - never their email address or phone number. A member's trusted circle and, for an SOS, nearby members within the chosen radius and registered responders receive the alerts the member triggers; a child's SOS and location reach only their circle and registered responders. Operators (processors) who act on our instructions: Netlify (hosting and database, on Amazon Web Services), Microsoft 365 (email), Twilio (SMS and voice calls), Google (Firebase Cloud Messaging for Android push; Cloud Translation; sign-in), Apple (APNs push; sign-in), Huawei (Push Kit), OpenAI (automated moderation of text and images; alt text for photos; voice-note transcription for moderation), Cloudflare (live video relay), and the map, address, route and weather providers named in the Privacy Policy. Approved organisations receive only anonymised, aggregated insights. We disclose personal information to law enforcement or a court where the law requires or permits it, and we report content that endangers children to the South African Police Service and the Film and Publication Board as the law requires.

7.4 Planned transborder flows

Several operators above process information outside South Africa (principally in the United States and the European Union): Netlify/AWS, Microsoft, Twilio, Google, Apple, Huawei, OpenAI and Cloudflare. Each is bound by contractual terms that require a level of protection substantially similar to POPIA (section 72(1)(a)). Community posts a member chooses to translate are sent to Google's translation service; photos are screened by OpenAI's moderation service before publication.

7.5 Security measures

Access is controlled and role-based; all traffic is encrypted in transit (TLS); passwords are hashed; sign-in uses short-lived tokens with server-side revocation; administrative access requires a separate elevation step; writes to the data store are audited; automated moderation screens text, images and audio; rate limits and daily budgets constrain abuse of SMS and notifications; backups are encrypted, kept off-site and restore-tested weekly; a retention job deletes records at the end of their retention period, and a deleted account is erased seven days after the request. Security incidents that affect personal information are notified to the Regulator and to affected data subjects as section 22 of POPIA requires.

7.6 Retention and data-subject rights

Retention periods are set out in the Privacy Policy and enforced by an automated retention job. A data subject may, free of charge, ask whether we hold personal information about them and request a description of it; request a copy (a fee may apply under the Regulator's fee schedule); request correction or deletion; object to processing; withdraw consent; and complain to the Information Regulator. In the app, members can download their data and delete their account directly; the Information Officer handles every other request.

8. How to request access to a record (sections 53 to 61)

A request is made on **Form 02** (Request for access to record of a private body), obtainable from the Information Regulator's website or from our Information Officer, and sent to the Information Officer by email or post. A request must:

- give enough particulars to identify the record and the requester, including a postal address, email address or fax number in South Africa;



- state which form of access is required (a copy, inspection, a transcript, an electronic copy) and the language preferred;
- identify the right the requester is seeking to exercise or protect, and explain why the record is required for that purpose (section 50(1)(a));
- if made on behalf of another person, provide proof of the capacity in which the requester acts, to the reasonable satisfaction of the Information Officer;
- be accompanied by the request fee, except where the requester is asking for their own personal information (a personal requester pays no request fee).

We must decide a request within **30 days** of receiving it and the fee, and notify the requester in writing (Form 03 sets out the decision and any access fee). We may extend the period once, by up to 30 days, where the request is for a large number of records, requires a search at premises away from our office, or requires consultation with third parties, and we will say why. Access is given once any access fee is paid. Failure to respond within the period is treated as a refusal.

A request may be refused on the grounds in Chapter 4 of Part 3 of PAIA: mandatory protection of the privacy of a third party who is a natural person (section 63); of commercial information of a third party (64); of information supplied in confidence (65); of the safety of individuals and the security of property (66); of records privileged from production in legal proceedings (67); of our own commercial information (68); and of research information (69). Where a record contains some information that may be refused, the rest is severed and released (section 28 read with 61). A record about the requester's own personal information is refused only on the narrower grounds the Act allows.

There is no internal appeal against a decision of a private body. A requester who is aggrieved may lodge a complaint with the Information Regulator (section 77A, on the Regulator's complaint form, within 180 days of the decision) or apply to a court (section 78).

9. Fees (section 54; PAIA Regulations, as published by the Information Regulator)

Item	Fee
Request fee, payable by every requester other than a personal requester	R140.00
Photocopy or printed black-and-white A4 page, or part of a page	R2.00 per page
Copy in a computer-readable form on the requester's flash drive or CD	R40.00
Copy in a computer-readable form on a CD we provide	R60.00
Transcription of visual images, or of an audio record, per A4 page	R24.00 per page
Copy of an audio record on the requester's flash drive or CD / on a CD we provide	R40.00 / R60.00
Search for and preparation of the record, for each hour or part of an hour after the first hour	R145.00 per hour, to a maximum of R435.00
Deposit, where the search is expected to exceed six hours	One third of the estimated access fee
Postage, email or other electronic transfer	Actual cost

Fees are those prescribed in the Regulations relating to PAIA and published by the Information Regulator; if the Regulator amends them, the amended fees apply. Access to a requester's own personal information under POPIA section 23 is free for the confirmation and description, and any fee for a copy is charged at these rates. A requester may ask the Information Officer to waive a fee where the record is required in the public interest.

10. Availability of this manual (section 51(3))

This manual is published on our website at <https://mzansishieldweb.sysrely.com/paia-manual.pdf>, is available for inspection at our principal place of business during office hours, will be provided by email or post on request to the



Information Officer, and is furnished to the Information Regulator on request. It is available in English; a copy in another official language can be requested and will be provided where reasonably practicable.

11. Updating of this manual

The Information Officer reviews this manual at least once a year and whenever the facts in it change - a new operator, a new category of record, a change of address or officer. Each revision carries a new version number and date on its cover.

Version	Date	Change
1.0	15 September 2026	First issue

Signed on behalf of the head of the private body

Name: **Mamuthupi Rotshidzwa** Designation: **Director** Date: **15 Sept-26**

Signature:



Annexure A - Prescribed forms

The prescribed forms are published by the Information Regulator and are available from <https://inforegulator.org.za> (Forms) or from our Information Officer on request:

- **Form 02** - Request for access to a record of a private body (section 53 of PAIA; regulation 7).
- **Form 03** - Outcome of request and of fees payable (regulation 8).
- **Form 05** - Complaint to the Information Regulator (section 77A; regulation 10).
- **Form 01 (POPIA)** - Objection to the processing of personal information (section 11(3)).
- **Form 02 (POPIA)** - Request for correction or deletion of personal information (section 24).

A requester who cannot complete a form - for example because of illiteracy or a disability - may make the request orally, and the Information Officer will complete the form on their behalf and give them a copy (section 53(3)).

Annexure B - Where the public documents are

Document	Address
Privacy Policy	https://mzansishieldweb.sysrely.com/privacy.html
Terms and Conditions	https://mzansishieldweb.sysrely.com/terms.html
Child Safety Standards	https://mzansishieldweb.sysrely.com/childsafety.html
Delete your account	https://mzansishieldweb.sysrely.com/deleteaccount.html
This manual	https://mzansishieldweb.sysrely.com/paia-manual.pdf