



PAIA Manual

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

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Private body	IndigoSat (South Africa) (Pty) Ltd
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Information Officer	Gareth Willers
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Document control

Version	Date	Change	Approved by
1.0	15 July 2026	Initial IndigoSat PAIA Manual	Gareth Willers

Important request information

A person requesting access to a record of a private body must follow the procedure prescribed by PAIA, identify the right to be exercised or protected and explain why the requested record is required for that purpose. Access remains subject to the grounds for refusal and other provisions of PAIA.

1. Acronyms and abbreviations

Acronym	Meaning
AWS	Amazon Web Services
DIO	Deputy Information Officer
IO	Information Officer
MFA	Multi-factor authentication
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa

2. Purpose of this Manual

This Manual assists members of the public to understand the records held by IndigoSat (South Africa) (Pty) Ltd (“IndigoSat”), how to request access, the legislation under which records are maintained, and how IndigoSat processes and protects personal information.

- Identify records available without a formal PAIA request.
- Explain how to request access to other records.
- Provide the Information Officer’s contact details.
- Describe the categories of records and data subjects.
- Describe recipients, transborder flows and security safeguards.
- Explain where this Manual and the Regulator’s PAIA Guide are available.

3. Key contact details for access to information

Field	Details
Information Officer	Gareth Willers
Capacity	Director
Email	info@indigosat.com
Telephone	+27 (0) 10 035 0348
Fax	Not applicable
Deputy Information Officer	Gareth Willers
General access-to-information email	info@indigosat.com
Postal address	7 Shamrock Street, Ferndale, 2194
Physical address	7 Shamrock Street, Ferndale, 2194
Website	https://indigosat.com/
Regulator registration number	2026-013021

4. Guide on how to use PAIA and how to obtain access to the Guide

The Information Regulator has prepared and made available a Guide explaining how to exercise rights under PAIA and POPIA. It includes the objects of the Acts, request procedures, prescribed forms and fees, remedies, complaints and court applications.

- The Guide and current PAIA information are available from the Information Regulator at <https://infoeregulator.org.za/paia/>.
- A request to a private body is made using the current prescribed Form 2 and submitted to the Information Officer.
<https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- Current forms, fees and contact channels should be confirmed from the Information Regulator before submission.
- The Guide is available from the Regulator in official languages and accessible formats.

Current forms available at
<https://infoeregulator.org.za/paia/>

5. Records available without a formal request

The following public records may generally be accessed through the IndigoSat website or requested by email without submitting a formal PAIA request. Availability does not override copyright, confidentiality, security or other legal restrictions.

Category	Examples	Website	Email request
Company information	About IndigoSat, contact information and business address	Yes	Yes
Products and services	Public brochures, product descriptions, coverage and service information	Yes	Yes
Aircraft tracking	Public information about aircraft-tracking products and Mitrac access	Yes	Yes
Privacy and website documents	Privacy policy and published notices	Yes	Yes
PAIA Manual	Current version of this Manual	Yes	Yes
News and insights	Public articles, announcements and sector information	Yes	Yes

6. Records available in accordance with other legislation

IndigoSat creates or retains records under the following legislation where applicable to its activities and circumstances. Inclusion does not mean every record is automatically available to a requester.

Category of records	Applicable legislation
Company incorporation, ownership and governance	Companies Act 71 of 2008
Accounting, tax and supporting financial records	Companies Act 71 of 2008; Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Employment, payroll, leave and workplace records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998, where applicable; Unemployment Insurance legislation; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Consumer and transaction records	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002, where applicable
Personal information and security-compromise records	Protection of Personal Information Act 4 of 2013
PAIA Manual and access-request records	Promotion of Access to Information Act 2 of 2000, as amended

7. Subjects and categories of records held

Subject	Categories of records
Corporate and governance	Registration documents, memorandum of incorporation, ownership and director records, policies, resolutions and statutory correspondence.
Finance and tax	Accounting records, invoices, quotations, credit notes, tax records, bank-related business records and management accounts.
Customers and sales	Customer contact details, quotations, contracts, orders, correspondence, service and support records.
Aircraft tracking and technical services	Aircraft and device identifiers, positions, flight tracks, alerts, platform access records, configuration, installation and support records.
Human resources	Employment contracts, payroll, leave, performance, training, confidentiality and compliance records.
Suppliers and operators	Supplier contracts, contact details, due-diligence records, service information and data-processing/security terms.
Marketing and website	Enquiries, mailing preferences, website content, cookie/analytics information and campaign records.
Legal and compliance	POPIA framework, PAIA Manual, privacy notices, risk assessments, incidents, requests, retention and training records.
Information technology and security	Accounts, permissions, device and system records, backups, access logs and incident records.

8. Processing of personal information

8.1 Purposes of processing

- Provide aircraft-tracking, satellite-communication and related products and services.
- Administer quotations, contracts, customer accounts, installations, support and billing.
- Operate Mitrac and associated aircraft-tracking functions on customer instructions.
- Manage employees, payroll, leave, training and legal obligations.
- Respond to website enquiries and conduct lawful direct marketing.
- Procure services and manage suppliers.
- Maintain security, prevent misuse, investigate incidents and meet legal requirements.
- Establish, exercise or defend legal rights and comply with lawful requests.

8.2 Categories of data subjects and information

Data subjects	Personal information that may be processed
Customers, prospects and customer personnel	Names, employer, position, contact details, addresses, account, service, support, correspondence and marketing-preference information.
Pilots, crew, owners, operators and tracking users	Names/contact details where supplied, aircraft/device identifiers, time-stamped positions, flight tracks, alerts, usage and access information.
Employees	Contact, employment, payroll, tax, leave, performance, training and security information.
Suppliers and service-provider personnel	Names, contact, contractual, service, tax and business information.
Website visitors and enquirers	IP address, device/browser information, cookies or analytics information, enquiry details and preferences.
Other correspondents	Names, contact details and information contained in communications or legal/compliance requests.

8.3 Recipients or categories of recipients

Information category	Recipients
Customer and service information	Authorised IndigoSat personnel, customer-authorised users, relevant suppliers and professional advisers.
Aircraft tracking/location information	Customer-authorised users; Mitrac; AWS as hosting sub-operator; support providers where necessary and authorised.
Employee/payroll information	Sage, authorised payroll/accounting support, government bodies and professional advisers where lawfully required.
Website and enquiry information	Xneelo, Microsoft/OneDrive, website or analytics providers and authorised IndigoSat personnel.
Information required by law	Regulators, revenue authorities, law-enforcement agencies, courts or other authorised bodies where legally required.

8.4 Planned transborder flows

IndigoSat uses cloud and service providers that may store information or permit support access outside South Africa. Transfers will be assessed and managed in accordance with section 72 of POPIA and other applicable law.

Provider/system	Information	Known hosting/access location
Mitrac / AWS	Aircraft tracking, positions, flight tracks, platform and support information	Subject to Mitrac hosting arrangements
Microsoft / OneDrive / Outlook	Business documents, contacts, correspondence and authorised records	Subject to Microsoft hosting arrangements
Sage	Accounting and payroll information	Subject to Sage hosting arrangements
Xneelo	Website, enquiry and hosting information	Subject to Xneelo hosting arrangements
Overseas customers/suppliers	Contact, contractual, service and support information	Relevant customer or supplier country

Appropriate safeguards may include comparable foreign law, binding contractual protections, valid consent where appropriate, contractual necessity, or another basis permitted by POPIA. Hosting and access locations will be updated when supplier confirmations are received.

8.5 Security measures

- Individual accounts, strong passwords and MFA where available.
- Role-based and least-privilege access, with access removal when no longer required.
- Approved OneDrive/company systems and restricted sharing permissions.
- Supported devices, software updates, anti-malware and secure configuration.
- Backups, restoration checks and business-continuity measures.
- Confidentiality obligations, employee training and incident reporting.
- Supplier due diligence and contractual privacy/security safeguards.
- Access logging and monitoring where systems support it.
- Secure retention, deletion and physical-record disposal.
- Security-compromise assessment and notification procedures.

9. Availability of this Manual

A signed copy of this Manual will be available:

- On the IndigoSat website at <https://indigosat.com/>.
- At 7 Shamrock Street, Ferndale, 2194, for inspection during normal business hours by prior arrangement.
- From Gareth Willers at info@indigosat.com upon request.
- To the Information Regulator upon request.

Any copying, request, access or other fee will be charged only where permitted and according to the current prescribed PAIA fee schedule.

How to request access

11. Obtain the current Form 2 and guidance from the Information Regulator.
12. Describe the requested record sufficiently and identify the right to be exercised or protected.
13. Explain why the record is required to exercise or protect that right.
14. Provide proof of identity and authority where acting for another person.
15. Submit the request to Gareth Willers at info@indigosat.com.
16. Pay a prescribed fee only if lawfully requested.
17. IndigoSat will assess the request under PAIA, including applicable grounds for refusal, third-party procedures and remedies.

10. Updating and approval

Gareth Willers, as head of the private body and Information Officer, will review this Manual at least annually and whenever material organisational, legal or processing changes occur.

Field	Completion
Issued by	Gareth Willers
Capacity	Director and Information Officer
Issue date	15/07/2026
Next review date	15/07/2027

Official references and request resources

- Information Regulator PAIA information and current Guide: <https://infoeregulator.org.za/paia/>
- Information Regulator eServices: <https://eservices.infoeregulator.org.za/>
- Information Regulator private-body PAIA Manual template: <https://www.infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Manual-Template-Private-Body.pdf>
- POPIA forms: <https://infoeregulator.org.za/popia-forms/>
- Information Officer guidance: <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-GuidanceNote-IO-DIO-20210401.pdf>

This Manual is an operational compliance document and should be updated when the Regulator changes prescribed forms, fees, contact details or guidance, or when IndigoSat's systems, providers or processing activities change.