



P8N DEFENSE

KDP CONCEPTS (PTY) LTD · PSIRA 4514957

PAIA MANUAL

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

P8N-GOV-002 · Rev 7 · Public Document · 28 August 2026

Field	Detail
Private Body.	KDP Concepts (Pty) Ltd, trading as P8N Defense.
Registration Number.	2022/464772/07.
Other Registration.	Private Security Industry Regulatory Authority, No. 4514957.
Head of the Private Body.	Cyril Paton, Founder and Executive Director.
Information Officer.	Cyril Paton. Information Officer Registration No: 2026-065397.
Date of first issue.	27 August 2026.
Next review.	27 August 2027, or earlier on any material change.

1. Acronyms and abbreviations

the Company	KDP Concepts (Pty) Ltd t/a P8N Defense.
IO	Information Officer.
PAIA	Promotion of Access to Information Act 2 of 2000.
POPIA	Protection of Personal Information Act 4 of 2013.
the Regulator	The Information Regulator (South Africa).
the Guide	The guide contemplated in Section 10 of PAIA, published by the Regulator.

2. Purpose of this manual

This Manual, is published so that any person may establish what records the Company holds, how a request for access to a record may be made, and how the Company processes personal information. It is prepared in terms of Section 51 of PAIA and follows the template published by the Regulator for private bodies.

The Company is a Small Private Body. It develops and publishes capture and record-keeping standards for policing and for the private security industry. It does not hold records of the public at large, and the categories described below reflect that.

3. Contact details

Head of the private body and Information Officer.	Cyril Paton, Founder and Executive Director.
Information Officer Registration No:	2026-065397.
Deputy Information Officer.	None designated. The Information Officer carries the function personally.
Physical Address.	11 Mignon Place, Morningside, Durban, 4001.
Postal Address.	11 Mignon Place, Morningside, Durban, 4001.
Telephone.	+27 31 316 5158.
Email.	info@p8ndefense.com
Website.	p8ndefense.com



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3.1. The Information Regulator.

These details were taken from the Regulator's own contact page and from the complaint forms it publishes, and were verified on 28 August 2026. The Regulator's template does not carry them, although PAIA requires that a requester be able to reach the Regulator, so they are supplied here. The Regulator publishes no separate postal address: the physical address below is the address given on its own forms. Re-verify before each annual review.

The Information Regulator (South Africa).	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
Postal Address.	<i>The Regulator publishes no separate postal address. Use the physical address above.</i>
Email for PAIA matters.	<i>PAIAComplaints@inforegulator.org.za</i>
Email for complaints.	<i>POPIAComplaints@inforegulator.org.za</i>
Telephone.	010 023 5200, and toll free 0800 017 160. General enquiries: <i>enquiries@inforegulator.org.za</i>
Website.	<i>inforegulator.org.za</i>

4. The Guide on how to use PAIA.

The Regulator has published a guide in terms of Section 10 of PAIA, in an easily comprehensible form, to assist a person who wishes to exercise a right under the Act. It is available in each of the official languages and in braille, and may be obtained from the Regulator at the address in 3.1 or from its website.

The Guide contains, among other things:

- 4.1 The objects of PAIA;
- 4.2 The contact details of the Information Officer of every public body and the head of every private body;
- 4.3 The manner and form of a request for access to a record of a private body;
- 4.4 The assistance available from the Information Officer of a public body, and from the Regulator;
- 4.5 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA, including how to lodge a complaint with the Regulator and how to bring an application to court;
- 4.6 The provisions of Sections 14 and 51 requiring a manual to be compiled and made available;
- 4.7 The notices issued in terms of Sections 15 and 52 regarding records automatically available without a request;
- 4.8 The schedules of fees payable in terms of Sections 22 and 54; and
- 4.9 The regulations made under PAIA.

The procedure for making a request, the fees payable, the period for a decision, the grounds on which access may be refused and the remedies available are set out in the Guide and in PAIA itself, and are not reproduced in this manual.

5. Records available without a request.

No notice has been published by the Company in terms of section 52(2) of PAIA. The following records are nevertheless made available voluntarily and may be obtained without following the request procedure.

Record	How it is obtained
This Manual.	On the Company website, and at the Company's premises.
Company Profile and General Marketing Material.	On the Company website, or on request.
Material the Company has expressly issued free of charge to the South African Police Service.	On request, and subject to the terms on which it was issued.



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6. Records held in terms of other Legislation.

Records are held under the legislation below to the extent that it applies to the Company. Several of these apply only once the Company employs staff or crosses a registration threshold. Delete any that do not apply before this manual is published, rather than leaving them in as a precaution.

<i>Companies Act 71 of 2008.</i>	<i>Income Tax Act 58 of 1962.</i>
<i>Private Security Industry Regulation Act 56 of 2001.</i>	<i>Value-Added Tax Act 89 of 1991.</i>
<i>Protection of Personal Information Act 4 of 2013.</i>	<i>Tax Administration Act 28 of 2011.</i>
<i>Promotion of Access to Information Act 2 of 2000.</i>	<i>Basic Conditions of Employment Act 75 of 1997.</i>
<i>Trade Marks Act 194 of 1993.</i>	<i>Labour Relations Act 66 of 1995.</i>
<i>Copyright Act 98 of 1978.</i>	<i>Unemployment Insurance Act 63 of 2001.</i>
<i>Occupational Health and Safety Act 85 of 1993.</i>	<i>Unemployment Insurance Contributions Act 4 of 2002.</i>
<i>Compensation for Occupational Injuries and Diseases Act 130 of 1993.</i>	<i>Skills Development Levies Act 9 of 1999.</i>

7. Subjects and Categories of Records held.

Subject	Categories of records	Availability
<i>Company Secretarial and Statutory.</i>	<i>Founding documents, registration certificates, resolutions, statutory registers.</i>	<i>On request, subject to PAIA.</i>
<i>Financial and Tax.</i>	<i>Accounting records, financial statements, invoices, tax returns and assessments, banking records.</i>	<i>On request, subject to PAIA.</i>
<i>Human Resources.</i>	<i>Employment contracts, personnel records, remuneration records, statutory returns. Held only where the Company has employees.</i>	<i>On request, subject to PAIA.</i>
<i>Clients and Engagements.</i>	<i>Correspondence, proposals, agreements, licences granted, and records of work performed.</i>	<i>On request, subject to PAIA.</i>
<i>Suppliers and Service Providers.</i>	<i>Contracts, correspondence, invoices.</i>	<i>On request, subject to PAIA.</i>
<i>Intellectual Property.</i>	<i>Trademark applications and correspondence, copyright material, the specifications and instruments the Company has authored.</i>	<i>On request, subject to PAIA.</i>
P8N Suspect Linkage Programme™.	<i>The standard, the forms, the workbooks and the training material. The Company holds no incident record captured under the Programme; those are police records held by the South African Police Service.</i>	<i>On request, subject to PAIA and to the classification of each document.</i>



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Subject	Categories of records	Availability
P8N Verify™ Credential Register.	The Specification and the design records. The register is not operational and holds no personal information at the date of this manual.	On request, subject to PAIA.
Information Governance.	This Manual, the documentation of processing operations, the compliance framework, impact assessments, the register of requests, and correspondence with the Regulator.	On request, subject to PAIA.
Marketing and Enquiries.	Website content, Published Material, and Enquiries Received.	On request, subject to PAIA.
Information Technology and Security.	System Records, Access Control Records and Audit Logs.	On request, subject to PAIA.

8. Processing of Personal Information.

8.1. Purposes of Processing.

The Company processes personal information to administer its own business — to contract with clients and suppliers, to employ and pay staff where it has staff, to meet its statutory and tax obligations, to protect its intellectual property, to respond to enquiries, and to develop and support the standards and instruments it publishes.

8.2. Categories of Data Subjects and of Personal Information.

Category of data subject	Personal information processed
Employees, and Applicants for Employment.	Identifying and contact details, identity number, banking and remuneration details, qualifications and employment history, and statutory records.
Clients and their Representatives.	Names, positions, contact details, and correspondence.
Suppliers and Service Providers.	Names, contact details, banking details, and correspondence.
Enquirers and Recipients of Published Material.	Names, contact details, and correspondence.
Persons issued with, or Named on, a Firearm Permit.	Name, identity number, competency and licence details, permit serial number, and the particulars and dates of issue and return.
Persons at a Site under the Company's contracted guarding service.	Name, vehicle particulars, and time of entry and exit recorded in an access register, and whatever an incident reasonably requires to be recorded.
Principals under Close Protection, and members of their household.	Identifying and contact details, addresses, movement and routine, vehicle particulars, and information volunteered for operational planning.
Persons whose Credentials are presented to the P8N Verify™ register.	No such information is processed at the date of this manual. Processing will not begin until the register is hosted and access-controlled, and, in the case of the outcome of a criminal record check, not until the Regulator has granted prior authorisation under Section 57(1)(b) of POPIA.

Where the law requires the screening of a person for registration or employment as a security officer, the outcome of a criminal record check is information concerning the criminal behaviour of that person, and Section 26 of POPIA applies to it. Apart from that, and from the documents contemplated in the **P8N Verify™** entry above, the Company holds no special personal information and no biometric information of any person.



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8.3. Recipients of Personal Information.

Regulators and organs of State.	Where a return, a registration or a lawful request requires it — including the South African Revenue Service, the Companies and Intellectual Property Commission, the Private Security Industry Regulatory Authority and the Regulator.
Professional Advisers.	Accountants, auditors and attorneys, under an obligation of confidence.
Service Providers.	Banking, hosting and information technology providers, under written terms requiring appropriate safeguards.
Nobody else.	The Company does not sell, rent or trade personal information, and does not disclose it for the purposes of direct marketing by any other party.

8.4. Trans-border Flows.

The Company's records divide, and the division matters. The security files — employment and security officer registration, firearms administration and permits, contracted guarding, close protection, and screening — are kept in hard copy in a secure and orderly manner at the administrative office, in the form Regulation 10 of the Private Security Industry Regulations, 2002 requires and the Authority inspects. Nothing in them is scanned or sent by email, and they do not leave the Republic. The Company's email, however, is hosted outside the Republic: kdpconcepts.com on Google Workspace Business Starter, which does not support data regions, and p8ndefense.com on Hostinger, which operates no South African data centre and which forwards into the same Google inbox. Personal information received, sent or held by email is therefore transferred outside the Republic. That transfer is made on a basis permitted by Section 72 of POPIA — a binding agreement with each provider, being Google's Cloud Data Processing Addendum and Hostinger's data processing addendum, both signed — and the Company records the location at which each service holds its information. Where hosting for the P8N Verify™ register is procured it will be procured within the Republic, so that the Section 72 question does not arise for the filed documents rather than having to be argued.

8.5. Security Safeguards.

The Company applies access control, encryption in transit and at rest, backup with a tested restore, and managed and encrypted devices. Systems that hold personal information are designed to authenticate every user, to generate their own timestamps rather than accept them from a device, to keep records in a form that cannot be altered without detection, and to log every access. Those requirements are specified in full in the Company's production specifications and are conditions of acceptance rather than aspirations.

8.6. Rights of the Data Subject.

A data subject may ask what personal information the Company holds about them and request access to it; may request that it be corrected or deleted where it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; may object to the processing on reasonable grounds; and may lodge a complaint with the Regulator. Requests are made to the Information Officer at the address in Section 3, on the forms prescribed under PAIA and POPIA.

9. Availability of this Manual.

On the Company website.	p8ndefense.com
At the Company's Premises.	During ordinary business hours, at the address in section 3.
On Request.	From the Information Officer, without charge, in electronic form.
To the Regulator.	On request.



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10. Updating of this Manual.

This manual is reviewed by the Information Officer at least once a year, and whenever there is a material change in the Company's operations, in the records it holds, or in the law. The date of the current issue and of the next review appear on the first page.

11. Approval.

Information Officer: Cyril Paton	Date: 30 August 2026
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Cyril Paton, Head of the private body and Information Officer, KDP Concepts (Pty) Ltd t/a P8N Defense.

Sab'lutho — Fear Nothing

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