



# Reformeer

PAIA Manual for Reformeer (Pty)  
Ltd

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Reformeer

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# PAIA Manual for Reformeer (Pty) Ltd

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## 1. Introduction

Reformeer (Pty) Ltd is a registered private company operating as a Software-as-a-Service (SaaS) provider. We develop and provision digital infrastructure, administrative systems (Kantoor), financial management tools (Finance), and theological research environments (Sinode) specifically for churches.

As a formally registered entity (Pty Ltd), the provision of the Reformeer platform is a structured, commercial, and legally binding service, and must not be seen in light of a "favor" or informal arrangement to any congregation. We strictly adhere to corporate governance and data privacy legislation as mandated by the Republic of South Africa.

## 2. How the PAIA Manual Can Help You

This PAIA Manual guides the public on how to interact with Reformeer's records and helps you understand your rights. It allows you to:

- **Check available records:** Find out exactly what information is already available at Reformeer without needing to submit a formal PAIA request.
- **Learn how to make a request:** Get clear steps on how to request access to any records that are held by Reformeer.
- **Contact the right people:** Find the important contact details of the Information Officer who can assist you.

## 3. Key Contact Details

### 3.1. Reformeer (Pty) Ltd

- **Entity Name:** Reformeer (Pty) Ltd
- **Website:** [reformeer.org](http://reformeer.org)

### 3.2. Information Officer

- **Name:** Arne Verster
- **Email:** [arne@reformeer.org](mailto:arne@reformeer.org)
- **Physical Address:** 862 Barnard Street, Elarduspark, Pretoria, South Africa

## 4. Guide on How to Use PAIA

### 4.1. What is PAIA?

PAIA helps protect your constitutional right to access information. It allows you to request records from private organisations when the information is needed to exercise or protect your rights.

### 4.2. The PAIA Guide

The Information Regulator has created a Guide to make it easier for anyone to use PAIA and POPIA. The Guide explains:

- How to reach Information Officers for help with your requests.
- Step-by-step instructions for accessing records from private bodies.
- Your legal options if your request is denied (appeals, complaints, court).

### 4.3. Where to Find the Guide

The Guide is available in all official languages on the Information Regulator's website ([inforegulator.org.za](http://inforegulator.org.za)).

## 5. Subjects and Categories of Records Held by Reformeer

Reformeer maintains records on the following subjects:

- **Company Records:** Incorporation documents, Memorandum of Incorporation (MOI), director details, statutory registers.
- **Financial Records:** Annual financial statements, tax records, banking details, Paystack transaction histories, accounting records.
- **Customer/Client Records:** Operator Agreements, Terms of Service acceptances, church council subscription records, billing contact information.
- **Information Technology:** Architecture documentation, Google Cloud (Firestore) server logs, security audits, database schemas.

## 6. Categories of Records Available Without a Formal Request

The following records are automatically available without a person having to request access under PAIA:

- Publicly available marketing materials.
- The Terms and Conditions (Terms of Service) published on our website.
- This PAIA Manual and our public Privacy Policy.
- General pricing and subscription details.

## 7. Records Available in Accordance with Other Legislation

Where applicable, Reformeer holds records in terms of the following legislation:

- Companies Act, 71 of 2008
- Value-Added Tax Act, 89 of 1991
- Income Tax Act, 58 of 1962
- Basic Conditions of Employment Act, 75 of 1997
- Electronic Communications and Transactions Act, 25 of 2002
- Protection of Personal Information Act, 4 of 2013

## 8. Processing of Personal Information in Terms of POPIA

### 8.1. Reformeer's Role (Operator vs. Responsible Party)

For the vast majority of personal information processed on the platform (church member details, baptism records, pastoral notes), **the subscribing Church is the Responsible Party** and **Reformeer is the Operator**. PAIA requests for church member data must be directed to the relevant Church, not to Reformeer.

Reformeer acts as the Responsible Party only regarding the billing and subscription details of the church councils and its own internal corporate/employee data.

### 8.2. Purpose of Processing

- To provide access to the Reformeer, Kantoor, Finance, and Sinode applications.
- To manage church subscriptions and role-based access.
- To process subscription payments (via Paystack).
- To ensure the security and integrity of the platform.

### 8.3. Categories of Data Subjects

- **Subscribing Churches:** Council members, administrators, and designated billing contacts.
- **End Users:** Individual church members (processed solely as an Operator).
- **Service Providers:** Sub-operators and independent contractors.

### 8.4. Planned Trans-Border Flows of Personal Information

Data is securely stored on Google Cloud Platform (Firestore), which may involve trans-border data flows to servers located outside of South Africa. All international data transfers are protected by standard contractual clauses (such as Google's Cloud Data Processing Addendum) that provide substantially similar data protection to POPIA.

## 9. Information Security Measures

Reformeer implements stringent technological and operational security measures to protect data:

- **Role-Based Access Control (RBAC):** Implementing the principle of least privilege.
- **Encryption:** Data is encrypted at rest and in transit.
- **Tenant Isolation:** Strict logical separation of data between different subscribing church councils.
- **Audit Trails:** Tracking modifications to records within the platform.
- **Sub-Operator Mandates:** Utilizing industry-leading, secure infrastructure bound by POPIA-compliant written agreements.

## 10. How to Request Access to Reformeer Records

1. **Contact us:** Go to [reformeer.org/help](https://reformeer.org/help)
2. **Provide Details:** Clearly identify the record you are requesting, the right you are seeking to exercise or protect, and how this record assists in protecting that right.
3. **Pay the Fee:** A prescribed request fee may apply before the request is processed. Further access fees may apply for the search, preparation, and reproduction of the records.

## 11. Grounds for Refusal of Access

Reformeer may, and in some instances must, refuse access to records on grounds including:

- Mandatory protection of the privacy of a third party who is a natural person (including children and church members).
- Mandatory protection of commercial information of a third party.
- Mandatory protection of certain confidential information of a third party.
- Protection of Reformeer's own commercial and financial information, trade secrets, or intellectual property (e.g., proprietary AI mapping logic or source code).
- Mandatory protection of records privileged from production in legal proceedings.

## 12. Your Right to Complain to the Information Regulator

If you are unsatisfied with the Information Officer's decision (e.g., a refusal of access, or an unreasonable fee), you have the right to lodge a complaint with the Information Regulator.

### The Information Regulator (South Africa)

- **Website:** <https://inforegulator.org.za>
- **Email for PAIA complaints:**  
[PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)
- **Email for POPIA complaints:** [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)
- **Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.