

CUBEP2P (PTY) LTD

PAIA MANUAL

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

PRIVATE BODY | APPROVED FOR WEBSITE PUBLICATION

Document detail	Information
Legal entity	CUBEP2P (PTY) LTD
CIPC registration	2026/647630/07
Information Regulator reference	2026-065064
Date of compilation	24 August 2026
Date of revision	24 August 2026
Status	Approved for website publication following professional PAIA/POPIA review

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1. List of acronyms and abbreviations

Acronym	Meaning
CEO	Chief Executive Officer or equivalent head of a private body
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of this PAIA manual

This manual assists the public to understand the records held by CubeP2P and the process for seeking access where PAIA applies. It is intended to help a requester:

- identify categories of records that may be available without a formal PAIA request;
- understand how to make a PAIA request for a record required to exercise or protect a right;
- identify the Information Officer and the access-to-information contact route;
- understand the categories of personal information CubeP2P processes, the purposes of processing, and categories of recipients; and
- understand that access may be refused or limited only where PAIA or another applicable law permits this, with reasons and remedies explained.

3. Key contact details for access to information

The Information Officer registered with the Information Regulator is responsible for this manual and for managing PAIA/POPIA access requests.

Contact detail	Information
Private body	CUBEP2P (PTY) LTD
CIPC registration number	2026/647630/07
Information Officer	Yusuf Muyis
Designation	Director and Information Officer
Information Officer telephone	021 301 0523
Information Officer email	privacy@cubep2p.com
Deputy Information Officer	None appointed as at 24 August 2026
PAIA request email	paia@cubep2p.com
General business email	hello@cubep2p.com
Website	https://cubep2p.com

3.1 Head office and postal address

Address type	Address
Physical address	1st Floor, Foyer 3, The Colosseum, Century Way, Century City, 7441, Cape Town, South Africa
Postal address	1st Floor, Foyer 3, The Colosseum, Century Way, Century City, 7441, Cape Town, South Africa
General telephone	021 301 0523

This is CubeP2P's designated head-office and postal address for PAIA correspondence. CubeP2P will update this manual if that address changes.

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

The Information Regulator has published a PAIA/POPIA Guide explaining how people may exercise rights under PAIA and POPIA, including access-request procedures, complaints, fees and available remedies. The Guide is available from the Information Regulator's website and may also be requested from CubeP2P's Information Officer.

Resource	Information
Regulator website	https://inforegulator.org.za/paia/
CubeP2P request route	https://cubep2p.com/privacy-requests
Languages for public inspection	English and Afrikaans

5. Categories of records available without a formal request

The following records are intended to be made available on CubeP2P's public website or on request without a formal PAIA request, subject to applicable law:

Category	Types of record	Website	On request
Legal and privacy notices	Terms of service, privacy policy, legal information and this PAIA manual.	Yes	Yes
How to contact CubeP2P	Public contact information and the privacy/PAIA request process.	Yes	Yes
Public marketplace information	Publicly visible platform information and public listing information, where the relevant user has chosen it to be public.	Yes	No
Regulatory information	Information Officer registration certificate and statutory notices where disclosure is appropriate.	No	Yes - where appropriate and lawful

CubeP2P will not disclose personal information, confidential business information, security information, payment data, or records subject to a lawful refusal ground merely because a category is listed above.

6. Records available in accordance with other legislation

Category of records	Applicable legislation
Memorandum of Incorporation and company records	Companies Act 71 of 2008
PAIA manual and PAIA access records	Promotion of Access to Information Act 2 of 2000
Personal-information and data-subject request records	Protection of Personal Information Act 4 of 2013
Electronic transaction and platform communications records	Electronic Communications and Transactions Act 25 of 2002
Consumer-facing marketplace records, where applicable	Consumer Protection Act 68 of 2008
Tax, accounting and employment records, where applicable	Applicable tax, labour and financial-recordkeeping laws

7. Subjects on which CubeP2P holds records and categories of records

Subject	Categories of records
Company governance and	Incorporation and governance records; Information Officer registration;

compliance	compliance policies; legal and regulatory correspondence.
Marketplace operations	Listings, storage booking requests, host responses, moving-assistance requests, workflow records, support and dispute records.
Accounts and authentication	Account profiles, role/approval records, authentication and security records, consent and communication preferences.
Payments and finance	Payment references, transaction status, invoices/receipts where issued, reconciliation and refund records where applicable. CubeP2P does not intend to store full payment-card details.
Suppliers and service providers	Contracts, onboarding records, invoices, due-diligence and operational correspondence.
Security and incident management	Access-control records, audit/security logs, risk assessments, incident and complaint records.
People and workforce	Employee, contractor or applicant records only where CubeP2P creates or receives them.

8. Processing of personal information

8.1 Purpose of processing

- create and administer user accounts and role-based marketplace access;
- facilitate storage bookings, hosting, moving-assistance and related support workflows;
- communicate about requests, bookings, account safety, service changes and support matters;
- protect the platform, prevent fraud or abuse, investigate incidents and meet legal obligations;
- administer agreements with service providers, staff and professional advisers; and
- maintain records needed for legal, accounting, audit, dispute-resolution and regulatory purposes.

8.2 Data subjects and categories of personal information

Data subjects	Personal information that may be processed
Visitors and prospective users	Contact details, enquiry content, technical/session data where collected, and marketing preferences where consent is obtained.
Registered renters, hosts and moving partners	Account/profile information; contact details; identity/verification information where required; listing, booking and moving-workflow information; communications; payment status or reference information.
Administrators and approved professional reviewers	Identity and contact details, role/approval records, administrative activity and security/audit records.
Property contacts and booking-related third parties	Contact, location and transaction information provided for a booking, listing or moving request.
Suppliers, contractors and advisers	Business contact details, contract, invoice, compliance and correspondence information.
Employees or applicants, if any	Recruitment, employment, payroll and statutory information only where applicable.

8.3 Recipients or categories of recipients

Category of information	Recipients or categories of recipients
Marketplace and account information	Authorised CubeP2P personnel and service providers acting under contract and only as needed to operate, secure or support the platform.
Booking and moving-workflow information	The relevant renter, host, moving partner and authorised support/administrative personnel, limited to the workflow need.
Payment-transaction information	Approved payment-service providers and authorised finance/reconciliation personnel, limited to the transaction need.
Legal/compliance information	Professional advisers, insurers, regulators, law-enforcement bodies or courts where disclosure is required or lawful.

8.4 Planned transborder flows

CubeP2P will verify and keep under review the countries/regions and data flows for every enabled cloud, database, payment, email and analytics provider, and will update this manual if material practices change.

Any cross-border transfer of personal information will occur only where permitted by section 72 of POPIA, with appropriate contractual, organisational and technical safeguards, including access controls and encryption in transit where applicable.

8.5 General information-security measures

CubeP2P's security measures are designed to protect confidentiality, integrity and availability. The following measures are applied as appropriate to the service and risk context:

- role-based access controls and least-privilege administration;
- authentication controls for user and administrative access;
- encryption in transit and provider-supported encryption at rest where available;
- secure development, change-control and vulnerability-management practices;
- logging, audit trails, backup/recovery and incident-response procedures appropriate to the service; and
- contractual and organisational safeguards for authorised processors and personnel.

9. Availability of this manual

A current copy of this manual will be made available:

- on CubeP2P's website, <https://cubep2p.com>, under the Legal and Privacy/PAIA information area;

- at CubeP2P's designated head office for inspection during normal business hours, subject to reasonable access and security arrangements;
- to any person on request, subject to a reasonable prescribed fee for copies where applicable; and
- to the Information Regulator on request and through the applicable eServices upload process.

A request for a record should use the prescribed PAIA process. A request must describe the record sought and explain the right the requester seeks to exercise or protect. CubeP2P may request information needed to verify identity, authority, scope and the applicable process.

10. Updating this manual

The Information Officer will review and update this manual regularly and when material changes occur to CubeP2P's legal entity details, contact channels, information-processing practices, service providers, security measures, records or legal obligations.

Issued by	Details
Issued by	Yusuf Muyis
Title	Director and registered Information Officer
Issue status	Approved for website publication following professional PAIA/POPIA review