

Manual under section 51 of the Promotion of Access to Information Act

Firearmdesk, estate firearm administration

Attestra Tech (Pty) Ltd, registration number 2026/296939/07, trading as Firearmdesk

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1. Purpose of this manual

- 1.1 Firearmdesk is a trading name of Attestra Tech (Pty) Ltd, a private company and a private body under the Promotion of Access to Information Act 2 of 2000 (PAIA) and a responsible party under the Protection of Personal Information Act 4 of 2013 (POPIA).
- 1.2 This manual tells a person:
 - (a) how to request access to a record we hold, what it costs and what remedies exist;
 - (b) which records are available without a request and which are kept under other legislation;
 - (c) the subjects on which we hold records and the categories of records held on each subject; and
 - (d) how we process personal information: the purposes, the people concerned, the recipients, transfers outside South Africa and the security measures in place.

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

- 2.1 Head of the private body and Information Officer: Wayne de Jager, director.
- 2.2 Street address: 97 Davidson Road, George, Western Cape, 6529. Postal address: the same.
- 2.3 Telephone: 081 770 2885. Fax: none. Email: support@firearmdesk.co.za, the address for every request under PAIA or POPIA; it reaches the Information Officer directly. Website: <https://firearmdesk.co.za>.

- 2.4 No Deputy Information Officer has been designated. Requests, objections and complaints go to the Information Officer at the address above.
- 2.5 The Information Regulator (South Africa): Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; P.O. Box 31533, Braamfontein, 2017; telephone 010 023 5200 or 0800 017 160; enquiries@inforegulator.org.za; PAIA complaints PAIAComplaints@inforegulator.org.za; POPIA complaints POPIAComplaints@inforegulator.org.za; <https://inforegulator.org.za>; eServices portal <https://eservices.inforegulator.org.za>.

3. The Guide on how to use PAIA (section 10)

- 3.1 The Information Regulator has published, under section 10(1) of PAIA, the Guide on how to use the Promotion of Access to Information Act 2 of 2000, as amended (Notice 1504 of 2021, Government Gazette 45492, 16 November 2021). The Guide explains in plain language the objects of PAIA and POPIA, how to make a request to a public or private body, the help available from the Regulator, and every remedy, including complaints to the Regulator and applications to court.
- 3.2 The Guide is available in all eleven official languages and in braille from the Regulator's website at <https://inforegulator.org.za/paia/>, at the Regulator's office during office hours, and from us on request to the Information Officer. Copies of the Guide in English and Afrikaans may be inspected at our address during business hours, by arrangement with the Information Officer.

4. Records available without a request (section 52 and regulation 5)

- 4.1 The following records are published on <https://firearmdesk.co.za> and may be read or downloaded without a request and without charge:
- (a) this manual;
 - (b) the privacy notice, the terms of service, and the security and chain-of-custody page;
 - (c) the fee schedule for estate firearm administration;
 - (d) the legal basis and updates page, with the judgment of the High Court in case 2025-104362 of 15 September 2026;
 - (e) the capability statement, the sample closure pack and the custody partner pack;
 - (f) the custody partner agreement, linked from the partner sign-up page; and
 - (g) the guides, frequently asked questions, about and contact pages.

5. Records held under other legislation (section 51(1)(b)(iii))

5.1 We keep the following records because legislation requires them. Access to them is given as that legislation and PAIA provide.

Category of records	Legislation
Memorandum of incorporation, registers of directors and shareholders, resolutions, annual returns, accounting records and financial statements	Companies Act 71 of 2008
Tax registrations, returns, assessments and supporting records; value-added tax records once registered	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991
Records of each estate firearm, its custody, movement, valuation and lawful disposal, kept as the executor's agent; section 21 and Registrar correspondence and evidence of external steps	Firearms Control Act 60 of 2000 and its regulations
Letters of executorship, executors' instructions and mandates, settlement statements and closure packs	Administration of Estates Act 66 of 1965
Supplier identity on the website and in documents; electronic records, signatures and signing logs	Electronic Communications and Transactions Act 25 of 2002
This manual, the privacy notice, consents, records of processing, requests and objections	PAIA; POPIA
Employment and contractor records, payroll, tax and statutory registrations, where applicable	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993

6. Subjects on which we hold records and the categories of records held (section 51(1)(b)(iv))

6.1 The records below are held in the secure portal and in the company's files. Records of a matter are available to the referring firm and the executor through the portal without a request.

Subject	Categories of records
Company and governance	Incorporation and CIPC documents, resolutions, decisions register, policies, insurance policies, agreements with service providers and advisers
Finance and tax	Bank statements and imports, invoices and credit notes, payments and allocations, charges and fee schedules, settlement accounts and statements, custody partner statements, invoices and payouts, storage statements, accounting records, tax returns
Referrals and matters	Referrals, matter records and status history, estate details, executor and beneficiary records, tasks, exceptions, notifications sent, consents, external steps with the South African Police Service, the Central Firearms Registry, the Registrar and the Master, with their evidence
Documents	Letters of executorship, identity evidence, firearm licences and competency certificates, valuation reports, signed instructions, document versions and malware-scan verdicts, generated closure packs, template versions
Firearms and custody	Firearm records and photographs, custody sites and their credentials, storage areas and positions, storage assignments and site allocations, custody events (receipt, movement, release), stocktakes and capacity records, delivery authorities and signatures, section 21 deposits and holders' requests, release authorisations, surrender hand-ins and police receipts, dispositions in place, heirs' keeping records and consent letters, refused-entry reports
Transport	Transport bookings and quotes, handoff records, transporter invoices and insurance details
Valuation and disposal	Valuation assignments and valuations, disposition instructions, sale transactions, heirs' approvals, executor mandates and their wording versions, custody mandate endings

Subject	Categories of records
Custody partners	Applications and sign-ups, agreements and acceptance records, onboarding and credential submissions, designated firearms officer agreements, staff training records, payout accounts, confirmations, indemnity claims and reserve confirmations
Users and security	User accounts, roles and memberships, sessions, passkeys and trusted devices, invitations, sign-in attempts, recovery codes (stored as hashes)
Legal rules and audit	Legal rules and their versions with sources and approvals, the append-only audit trail, integration and idempotency records
Staff and contractors	Contracts, identity, tax and payroll records, training and security briefings, access records
Correspondence and complaints	Email and letters, meeting notes, support requests, complaints, PAIA and POPIA requests and responses
Website and outreach	Public site content, aggregate page statistics, outreach records with firms and licensed dealers

7. How to request a record (sections 50 and 53 to 61)

- 7.1 A person has a right of access to a record we hold if the record is required for the exercise or protection of a right, the request complies with PAIA and no ground for refusal applies (section 50(1)). A person asking for his or her own personal information uses the same form and is dealt with under section 23 of POPIA (clause 7.6).
- 7.2 Complete Form 2 (Request for access to record) prescribed by regulation 7 of the PAIA Regulations, 2021, available from <https://inforegulator.org.za/paia/> or from us on request, and send it to the Information Officer by email to support@firearmdesk.co.za or by post or hand to 97 Davidson Road, George, Western Cape, 6529. The form must:
- identify the record clearly enough for us to find it, and identify the requester, with proof of identity attached;
 - state the form of access wanted (inspection, printed copy, electronic copy), a postal address or fax number in South Africa, and the manner in which you wish to be told of the decision;
 - identify the right you seek to exercise or protect and explain why the record is required for it; and
 - where the request is made for another person, attach proof of the authority to act.

- 7.3** Fees are those prescribed in Annexure B, Part II, of the PAIA Regulations, 2021 (Government Notice R757, Government Gazette 45057, 27 August 2021):
- (a) a request fee of R140.00, payable before the request is processed (section 54(1));
 - (b) access fees: R2.00 per A4 page for a photocopy or printed copy; R40.00 for a copy on a flash drive supplied by the requester; R40.00 for a copy on a compact disc supplied by the requester or R60.00 on one supplied by us; R24.00 per A4 page for a transcription of an audio record; a transcription or copy of visual images at the service provider's quotation; and postage, email or other electronic transfer at actual cost, if any;
 - (c) search and preparation: R145.00 for each hour or part of an hour after the first hour, to a maximum of R435.00; and
 - (d) a deposit of one third of the access fee where the search and preparation will exceed six hours (section 54(2)).
- 7.4** We decide the request as soon as reasonably possible and in any event within 30 days of receiving it, or of receiving the particulars in clause 7.2 and the request fee, and notify you in writing (section 56). The period may be extended once by up to 30 days in the circumstances section 57 allows, with written notice of the reasons. Where a record contains information about a third party, we must first notify that party and consider its representations (sections 71 to 74). A request not decided within the period is taken to have been refused (section 58).
- 7.5** Access may or must be refused on the grounds in Chapter 4 of Part 3 of PAIA, among them the unreasonable disclosure of another person's personal information (section 63); a third party's commercial information (section 64); information held in confidence (section 65); records whose disclosure could endanger a person's life or safety or the security of property (section 66), which covers records showing where firearms are held and the identity of a custody site; legally privileged records (section 67); and our own commercial information (section 68), unless the public interest override in section 70 applies. Where part of a record can be severed, the rest is given (section 59).
- 7.6** Personal information about yourself: under section 23 of POPIA you may ask, free of charge, whether we hold personal information about you, and ask for a description of it and the identity of those who have had access to it. We do not charge the request fee or access fees for giving a person a copy of his or her own personal information. You may ask for correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete or misleading information, or for the destruction of a record we are no longer authorised to keep (section 24, POPIA Form 2), and object to processing (section 11(3), POPIA Form 1). Some records must be kept notwithstanding, for example a signed instruction or a chain-of-custody receipt, and we will say so.

7.7 Remedies: there is no internal appeal against the decision of the head of a private body. A requester or a third party aggrieved by our decision may, within 180 days of it, lodge a complaint with the Information Regulator on Form 5 (regulation 10) by email to PAIAComplaints@inforegulator.org.za or through the eServices portal (section 77A), or apply to a court within 180 days (section 78). A complaint about the handling of personal information goes to the Regulator at POPIAComplaints@inforegulator.org.za (section 74 of POPIA).

8. Processing of personal information (section 51(1)(c))

8.1 Purposes of processing. We process personal information to:

- (a) open, administer and close each estate firearm matter a firm refers: verifying the executor's authority, arranging licensed custody, transport, valuation, the executor's instruction, the lawful disposal and the closure pack, under the Administration of Estates Act 66 of 1965 and the Firearms Control Act 60 of 2000;
- (b) conclude and perform agreements with custody partners, transporters and valuers, check their credentials and pay or recover what is due;
- (c) invoice, receive payment, reconcile settlements and keep the financial and tax records the law requires;
- (d) keep the chain-of-custody, audit and legal-rule records that evidence who did what and when;
- (e) secure the platform and its users: sign-in, two-factor verification, malware scanning, rate limiting and the audit trail;
- (f) send status notifications and secure links, and contact firms about the service;
- (g) run the company: employment and contracting, suppliers, advisers, insurance, banking, tax and regulatory obligations; and
- (h) count visits to the public pages in aggregate and answer requests, objections and complaints.

8.2 Categories of data subjects and of information.

Data subjects	Personal information processed
Staff of referring firms: attorneys, fiduciary practitioners, trust company and bank staff	Name, role, firm, email address, mobile number, file reference, sign-in and activity records

Data subjects	Personal information processed
Executors	Name, email address and telephone number, identity number and identity document, letters of executorship, signatures and signing records (time, IP address, browser), the estate account that receives sale proceeds
Heirs, legatees, surviving spouses and other beneficiaries	Name, identity number, contact details, firearm licence details, consents, approvals and keeping records
Buyers and transferees	Name, contact details, licence and competency details, evidence of payment
Persons holding or delivering firearms: section 21 holders, relatives, licensed heirs	Name, identity number, authorisation and licence details, the address where firearms are kept, identity confirmed at handoff
The deceased (estate information, not personal information in law, protected with the same care)	Name, date of death, Master's reference, licences, firearm details
Custody partners: owners, directors, signatories, designated firearms officers and named staff	Names, capacities, identity number of a sole proprietor, contact details, acceptance records, training records, bank account and tax details
Transporters: contact persons and named staff	Names, contact details, permit and identity details, insurance details, invoices
Valuers	Name, qualifications, contact details, bank details
Our employees and contractors	Identity, contact, tax, bank, contract, training and access records
Suppliers and professional advisers	Contact persons, contracts, invoices
Website visitors and partner applicants	Aggregate page statistics without the IP address; the details given on the partner sign-up page
Requesters and complainants	Name, contact details, proof of identity, correspondence

8.3 Recipients or categories of recipients. Personal information may be supplied to:

- (a) the referring firm, for its own matters, and the executor, for the matter he or she is invited to;
- (b) the licensed custody partner allocated to the matter and the valuer briefed on the firearms, for their part only;
- (c) a permitted transporter booked for the estate, for what its permit, the consignment note and the collection and delivery require;
- (d) buyers, heirs and their licensing steps, only where the executor's signed instruction leads there;
- (e) the South African Police Service, the Central Firearms Registry, the Registrar of Firearms, the Master of the High Court and the courts, where the law requires it or the executor's instruction leads to an application;
- (f) our hosting and email provider, which acts on our instructions (clause 8.5), and our bank, accountants, auditors, attorneys and insurers, for our own operations; and
- (g) the South African Revenue Service, the Information Regulator and other authorities where the law requires.

8.4 Personal information is never sold, and is not shared with marketers, data brokers or third-party analytics or advertising services.

8.5 Planned transborder flows. The platform, its database, document storage and email run on a server operated for us by Hetzner Online GmbH in Helsinki, Finland, in the European Union, with encrypted backup copies held on separate Hetzner storage in Germany. Hetzner is subject to the General Data Protection Regulation, which upholds principles substantially similar to POPIA and restricts onward transfer, and processes the information under a written data processing agreement with us (section 72(1)(a) of POPIA). No other transfer of personal information outside South Africa is planned.

8.6 General description of the security measures that ensure confidentiality, integrity and availability:

- (a) encryption in transit on every connection; uploaded documents, photographs and generated documents encrypted at rest with AES-256; identity numbers and authenticator secrets encrypted in the database; passwords stored only as salted hashes;
- (b) access scoped on the server to the firm, the matter and the role; two-factor verification for administrative, finance, compliance and custody-management roles, with a second person's approval for sensitive actions; executors sign in by secure link and one-time code;
- (c) every upload scanned for malware before it can be opened; documents served through signed links that expire within minutes;

- (d) an append-only audit trail enforced in the database: firearms, custody events, financial records, legal-rule history and audit events cannot be edited or deleted in place, and corrections are superseding records;
- (e) no serial number, identity number or document content in email or SMS, because the notification templates refuse those fields; custody partners' premises addresses and storage positions shown only to those who need them;
- (f) nightly encrypted backups to a separate location, with a restore tested on 2 October 2026;
- (g) staff and contractors sign a security briefing and have only the access their role needs; and
- (h) retention: matter records, custody events, invoices and the audit trail kept for at least five years after a matter closes (ten years where the matter had exceptions, waivers or a legal hold) and financial records for the period the tax and company laws require (eight years from their own date); at the end of the period the identifying details of living persons are removed under a two-person approval, while the records of the estate, the firearms, the custody chain, the finances and the audit trail are kept; and signed documents stay unaltered until ten years after the last custody event, or ten years after closure where no firearm entered custody, and are then destroyed.

9. Availability and updating of this manual (sections 51(2) and 51(3))

9.1 This manual is available:

- (a) on our website at <https://firearmdesk.co.za/paia>;
- (b) at 97 Davidson Road, George, Western Cape, 6529, for public inspection during business hours by arrangement with the Information Officer;
- (c) to any person on request, at R2.00 per A4 page (Annexure B, Part II, item 2) plus postage at cost, or free of charge by email; and
- (d) to the Information Regulator on request.

9.2 The Information Officer reviews and updates this manual when our details, our records or our processing change, and at least once a year. Each version carries its date.

10. Issued by

10.1 Wayne de Jager, Director, Attestra Tech (Pty) Ltd trading as Firearmdesk, head of the private body and Information Officer. George, 8 October 2026.