

BMT Sports PAIA Manual

Public manual prepared under section 51 of PAIA

BMT Sports Pty Ltd

Registration number 2023/175605/07

Version 1.0 • Compiled 29 October 2026

Purpose and scope

This manual explains the categories of records held by BMT Sports Pty Ltd, how to request access, and the processing and protection of personal information. It covers BMT's business records and Player24, including existing development records. Access is considered under PAIA, POPIA and other applicable law, with appropriate protection of confidential and third-party information.

Contents

- 2 Organisation and contacts
- 3 Records and access routes
- 4 Personal information and safeguards
- 5 Requests and decisions
- 6 Remedies and manual availability

Approval and issue

Issued by Jordan Buhrs

Director and registered Information Officer

BMT Sports Pty Ltd

Signature: _____


SIGNED VIA ILOVEDPDF
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Date of signature and issue: 29/10/2026

This edition takes effect on the date of signature and issue above.

Organisation and contacts

1 Purpose and legal framework

This manual is prepared for section 51 of the Promotion of Access to Information Act 2 of 2000, as amended (PAIA). It explains the records BMT holds, its personal information processing and the channels for requesting access. POPIA means the Protection of Personal Information Act 4 of 2013. The Information Regulator oversees these laws.

For access under PAIA to a private body's records, a requester must identify the right to be exercised or protected and explain why the record is required. Access also depends on procedural requirements and applicable grounds for refusal. Listing a record here does not make it automatically public.

2 BMT details

Company: BMT Sports Pty Ltd

Registration number: 2023/175605/07

Director and Information Officer: Jordan Buhrs

Principal business, street and postal address: 33 Athens Road, Table View, Cape Town 7441, South Africa

Telephone: +27 74 589 2536

Email: info@player24.org

Fax: Not available

Website address: <https://player24.org/>

Normal business and inspection hours are 09:00–17:00 South African Standard Time on working weekdays, excluding public holidays. Email is monitored during these hours. Jordan's immediate availability may vary, but he checks remotely during absence and arranges inspection access. This does not suspend statutory deadlines or make inspection subject to an additional mandatory appointment requirement.

3 Information Officer and assistance

Jordan Buhrs, Director and registered Information Officer, receives access requests using the contacts above. No deputy has been appointed. Please contact BMT for practical assistance with inspection or requests; Jordan remains responsible for decisions and timely handling.

Fredylan Marais, acting on behalf of Cyberspace Creation, provides authorised technical support, including retention-process setup, record searches and secure delivery. Jordan remains responsible for record classification, retention exceptions and access decisions.

4 Help using PAIA

The Information Regulator publishes a guide explaining PAIA, personal information access, assistance and remedies. Requesters may obtain it through the Regulator's PAIA page or ask BMT for help obtaining a copy or an appropriate language version. BMT will provide reasonable assistance to describe a record and identify the correct request route.

[Information Regulator PAIA guide and forms](#)

Records and access routes

5 Records available without a formal request

Published website pages, public contact details, the privacy notice, terms and this manual are available without a formal PAIA request. Copies may be requested subject to lawful reproduction charges. The separate Player24 development leaderboard displays limited profile and performance information publicly. Company, tax, sponsorship and private player records are assessed under the applicable access procedure; they are not automatically public.

6 Subjects and record categories

BMT holds the following categories of records, including records held on its behalf. Access to a particular record depends on the applicable law and any lawful protections. Jordan is the contact for identifying the relevant record and custodian.

Company and governance

CIPC registration documentation, company identity documents, director and ownership records, resolutions and statutory company registers.

Correspondence and business operations

Public enquiries and responses, business and supplier correspondence, supplier agreements, invoices, financial and accounting records, tax certificates and related tax records. BMT has no appointed registered accountant; requests are directed to Jordan.

Player24 and editorial work

Development and testing account/profile records, quiz attempts and results, performance and historical guest records, content approvals, administrative records, artwork and intellectual-property records.

Technology and security

Hosting, deployment, access administration, operational and incident records. Listing these categories does not disclose passwords, credentials or detailed security configurations.

Employment and commercial activities

Employment and payroll records, customer records, sponsorship agreements and correspondence, marketing materials and event records. Future Player24 membership or fundraising plans do not imply that those services are publicly available.

7 Records governed by other legislation

Company and governance records are maintained under the Companies Act 71 of 2008. Tax certificates, accounting and supporting tax records fall under the Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011 as applicable. Employment and payroll records are subject to applicable employment law, including the Basic Conditions of Employment Act 75 of 1997. Access-request and personal-information records are governed by PAIA and POPIA. Where another law provides a specific access route, that route and its conditions apply. A duty to retain a record does not make it publicly accessible.

Personal information and safeguards

8 Processing purposes and information categories

Data subjects include enquiry senders, Player24 participants and testers, business contacts, employees, customers, sponsors and authorised administrators. Information includes contact details, correspondence, employment/payment records, account identifiers, profile choices, rugby interests, optional gender, quiz results and operational events. BMT uses these records to administer its business, respond to enquiries and operate, test and improve Player24.

Further use for future products requires an appropriate lawful basis, compatibility assessment and notice where necessary. The informational website has no accounts, forms, advertising or optional analytics; hosting processes technical requests. BMT does not intentionally solicit children's or special personal information for Player24. Any such information identified in records is assessed under the applicable POPIA protections.

Internal service-improvement purposes do not remove the duties to protect information or disclose relevant recipients and processing locations.

9 Recipients and processing locations

AWS provides Player24's application hosting, database, identity and web delivery. The existing development service uses Amazon RDS for records, ECS/Fargate for application processing, Cognito for identity, S3 for web assets and CloudFront for web/API delivery. The informational website uses S3 and CloudFront and has no gameplay database or sign-in. AWS Service Terms section 1.14 incorporates its Data Processing Addendum for Customer Data. Service-specific references: [RDS security](#); [Cognito data protection](#); [S3 data protection](#); [CloudFront data protection](#); [AWS Service Terms](#).

The database and regional application resources are configured in AWS Cape Town; CloudFront is global, and identity email delivery can involve other regions. domains.co.za hosts BMT's email. Its published DPA forms part of its service agreements and addresses operator duties, subprocessors and international transfers. BMT does not claim all processing stays in South Africa. References: [AWS transfer guidance](#); [domains.co.za DPA](#); [domains.co.za Privacy Policy](#).

10 Security and retention

Internal access is restricted to authorised individuals. Project controls include HTTPS, an encrypted private database, restricted network and role access, managed credentials and backups. BMT confirms its mailbox is secured and accessible. Cyberspace Creation provides authorised technical support where access is needed. BMT remains responsible for access permissions, configuration and retention; provider documentation supplements these measures. Limited development leaderboard information is public; no separate commercial data recipients are reported.

BMT's policy requires routine resolved enquiries to be deleted within 12 months after closure, using monthly reviews. Jordan classifies records and approves documented exceptions; Cyberspace Creation is responsible for setup. Each exception records its purpose, owner and review date. Statutory, contractual and dispute records follow their applicable schedules; access requests and legal holds must be preserved. The provider may delete server mail older than 90 days and states that service termination deletes email and disables addresses. Those terms do not guarantee routine deletion at 90 days or specify the expiry of every backup. BMT must preserve records still required independently of reliance on the live mailbox, with authorised access and the same applicable retention controls. See [domains.co.za Standard Terms, clauses 10.7.1, 10.7.4 and 10.7.5](#).

Requests and decisions

11 Submitting a request

Complete the current prescribed PAIA Form 2 and send it to Jordan Buhrs at info@player24.org or to the postal or street address in section 2. Describe the record, identify the requester and contact details, specify the preferred form of access, and explain the right and why the record is needed. A representative must establish authority to act. Contact BMT for assistance where a disability or other difficulty prevents completion.

BMT will verify identity and authority proportionately before disclosing personal or confidential records. Do not send passwords or unnecessary sensitive documents. If further evidence is needed, BMT should explain what is necessary and provide an appropriate secure channel.

12 Timing and fees

BMT must decide as soon as reasonably possible, ordinarily within 30 days of receipt of the request or required particulars, subject to the Act's procedures. PAIA permits a single extension of up to a further 30 days on specified grounds. A written extension notice must be issued within the initial period and explain the reason and available remedies. Third-party notification and representation provisions must also be followed where applicable.

Only fees authorised by current PAIA regulations may be charged. BMT will check applicable exemptions, issue the required fee or deposit notice, and explain the calculation and remedies before requiring payment. Request, search, reproduction and delivery charges must follow the prescribed rules. The prescribed outcome and fee notice is Form 3.

13 Search and outcome

BMT will search relevant records, including those held on its behalf. Where a record cannot be found or does not exist after reasonable steps, the head must provide the affidavit or affirmation required by section 55, explaining the search. A later-discovered record must be dealt with under the Act.

A decision will explain whether access is granted, partly granted or refused, the access arrangements and applicable fees. A refusal must identify the relevant legal ground and reasons without revealing protected information. Consider separable disclosure and redaction, third-party rights and the statutory public-interest override where applicable. The mere fact that a document is internal is not sufficient reason to refuse it.

Potential protections include another person's privacy, protected commercial or confidential information, safety, legal privilege and certain research information. Each requires the Act's actual conditions to be assessed; none is a blanket exemption for BMT's records.

Remedies and manual availability

14 Complaints and review

BMT is a private body and PAIA does not require a compulsory internal appeal before a complaint to the Information Regulator. A requester may contact Jordan to clarify or reconsider an outcome, but this does not replace statutory remedies or pause their time limits.

The Regulator's published procedure provides for a complaint using Form 5, generally within 180 days of the refusal or failure to respond. A late complaint may require condonation. Use the current official guidance to establish the applicable starting date. An absence of a timely decision may constitute a deemed refusal. Court relief is also available under PAIA, subject to its own requirements and time limits; obtain advice rather than assuming the complaint deadline applies to court proceedings.

Information Regulator enquiries: enquiries@inforegulator.org.za

Telephone: 010 023 5200

PAIA complaints: PAIAComplaints@inforegulator.org.za

[Regulator contact details and current submission channels](#)

15 Requests about personal information

A person may also contact BMT to exercise POPIA rights concerning their own information. Subject to proof of identity, confirmation of whether BMT holds personal information is free. Access to the record and applicable fees are governed by POPIA and PAIA. Correction, objection and deletion requests must be assessed under the applicable POPIA provisions and prescribed forms where required. Deletion is not unconditional where a lawful retention obligation applies.

BMT will identify the appropriate legal route for an enquiry, access, correction or deletion request. Existing development account records remain within scope even though the informational website has no accounts. Requests can be made directly to the Information Officer without relying on an automated account-deletion feature.

16 Availability and maintenance

This manual is available from BMT at its principal business address for inspection during 09:00–17:00 SAST on working weekdays, excluding public holidays, and will be published with BMT's public website. Jordan checks remotely when absent and arranges inspection access. Copies are available on request subject to lawful charges, and the manual is supplied to the Information Regulator on request. No additional mandatory appointment condition is imposed on statutory inspection.

Jordan maintains this manual, reviews it at least annually and updates it earlier when contacts, processing or operations change. Production gameplay requires a renewed review. The approved version and issue date appear on the signing page. The Information Regulator's PAIA guidance and prescribed forms are available at the links in this manual.