# PAIA MANUAL

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

**Version 2 – 17 October 2026**

**FREQUENCY OF REVIEW: Annually**

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## 1. DEFINITIONS

1.1. **"CEO"** shall mean the Managing Director of the Company.

1.2. **"Company"** shall mean TrusteeWorks (Pty) Ltd, registration number 2026/825830/07.

1.3. **"DIO"** shall mean the Deputy Information Officer of the Company as defined by POPIA.

1.4. **"IO"** Shall mean the Information Officer of the Company as defined by POPIA.

1.5. **"Minister"** shall mean the Minister of Public Service and Administration, or any other Minister as appointed to be responsible for the administration of PAIA, POPIA, or other relevant governing legislation which may be enacted from time to time.

1.6. **"PAIA MANUAL"** shall mean this document as implemented in accordance with Section 51 of PAIA and the corresponding Regulations, and **"Manual"** shall have the corresponding meaning.

1.7. **"PAIA"** shall mean the Promotion of Access to Information Act No.2 of 2000.

1.8. **"POPIA"** shall mean the Protection of Personal Information Act No.4 of 2013.

1.9. **"Regulator"** shall mean the Information Regulator of the Republic, established in terms of Section 39 of POPIA.

1.10. **"Republic"** shall mean the Republic of South Africa.

## 2. INTRODUCTION

2.1. PAIA was enacted in February 2000, which in turn gave effect to section 32 of the Constitution of the Republic of South Africa, 1996 ("Constitution"). The Constitution affirms this right of access to any personal information held by the state, a company or person.

2.2. PAIA came into operation on 9 March 2001 and gives effect to the abovementioned constitutional right of access to information that may be required in order to exercise or protect rights, subject to justifiable limitations. An example of this would be those rights aimed at the reasonable protection of privacy, commercial confidentiality, as well as effective, efficient and good governance.

2.3. This PAIA Manual is compiled in accordance with PAIA, POPIA, and the associated regulations. POPIA amended certain provisions of PAIA in order to balance the need for access to information, against the need to ensure the protection of Personal Information.

2.4. Records that are excluded from PAIA are those requested for the purpose of criminal or civil proceedings. Where a Record is sought after the commencement of proceedings, and it can be obtained through the rules of discovery, then the Requester will not be entitled to rely on PAIA[1].

2.5. Access to Records should be provided if[2]:

2.5.1. the Record is required for the exercise or protection of any of the Requester's legal rights, or in the public interest (in case of certain public bodies);
2.5.2. the Requester complies with all procedural requirements; and
2.5.3. access is not refused on any ground referred to in PAIA or any other applicable law.

2.6. The purpose of this Manual is to inform the Requester of the procedural and other requirements with which a PAIA request for access to records must comply. It explains the process of how one can object to the processing of Personal Information, as well as requests to delete or destroy such Personal Information and/or Records.

2.7. The Company is dedicated to ensuring compliance with POPIA and PAIA in order to foster a culture of transparency and accountability within the Company. As such, the Company gives effect to the right to information in order to enable and promote the protection of these rights.

## 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE COMPANY

3.1. Information Officer

| | |
|---|---|
| Name: | Gert van den Heever |
| Tel: | 083 463 2226 |
| Email: | info@trusteeworks.co.za |

3.2. Head Office:

[1] Section 7 of PAIA.
[2] Section 50 of PAIA.

| | |
|---|---|
| Physical Address | 169 Haakdoring Street<br>Pebble Rock Golf Estate<br>Burkea Park<br>Gauteng<br>0030 |
| Email: | info@trusteeworks.co.za |
| Tel: | 083 463 2226 |
| Website | trusteeworks.co.za |

## 4. GUIDANCE ON PAIA AND ACCESS TO PAIA GUIDANCE

4.1. The Regulator has made available a guide that can assist in understanding how to exercise these rights under PAIA and POPIA which can be accessed at PAIA Guide - English_Upd 5 Sept

4.2. Contact details of the Regulator:

| | |
|---|---|
| Physical Address | Woodmead North Office Park<br>54 Maxwell Drive,<br>Woodmead,<br>Johannesburg,<br>2191 |
| POPIA Complaints Email: | POPIAComplaints@inforegulator.org.za |
| PAIA Complaints Email: | PAIAComplaints@inforegulator.org.za |
| General Enquiry Email: | enquiries@inforegulator.org.za |
| Tel: | 080 001 7160 |
| Website | https://inforegulator.org.za/ |

## 5. AVAILABILITY OF THIS MANUAL

5.1. This Manual is available in English, and may be accessed by any member of the public in the following manner[3]:

[3] Section 51(1)(a-f) of PAIA states that "*51. (1) Within six months after the commencement of this section or the coming into existence of the private body concerned, the head of a private body must compile a manual containing—*
*(a) the postal and street address, phone and fax number and, if available electronic mail address of the head of the body;*
*(b) a description of the guide referred to in section 10, if available, and how to obtain access to it;*
*(c) the latest notice in terms of section 52(2), if any, regarding the categories of record of the body which are available without a person having to request access in terms of this Act;*
*(d) a description of the records of the body which are available in accordance with any other legislation;*
*(e) sufficient detail to facilitate a request for access to a record of the body, a description of the subjects on which the body holds records and the categories of records held on each*

5.1.1. On the Company's website: trusteeworks.co.za
5.1.2. On request to the Information Officer, subject to payment of the fee as set out in Schedule 1; and
5.1.3. At the Company's head office for inspection from 09:00 – 17:00 during normal business days (excluding Saturday, Sunday, and any public holidays). The address is contained under paragraph 3.2 of this Manual.

## 6. CLASSES OF RECORDS HELD BY THE COMPANY

6.1. Records which are **automatically available** to the public, without having to submit a request as per Section 52(1) of PAIA and Regulation 5(1) of the PAIA Regulations:

- Information freely available on the Company's website: trusteeworks.co.za;
- Promotional brochures;
- News and marketing material;
- Information shared by the Company on their social media platforms intended for public knowledge; and
- Other literature published for public viewing.

6.2. **Records which are held by the Company in terms of other legislation,** which is available subject to limitations provided in terms of such legislation:

- Companies Act No.71 of 2008 as amended;
- Competition Act No.89 of 2008;
- Constitution of the Republic of South Africa, 1996;
- Copyright Act No.98 of 1987;
- Consumer Protection Act No.68 of 2008 (CPA);
- Cyber Crimes Act No.19 of 2020 (CCA);
- Electronic Communications and Transactions Act No.25 of 2002 (ECTA)
- Films and Publications Act No.65 of 1996;
- Income Tax Act No. 58 of 1962;
- Labour Relations Act No.66 of 1995 (LRA);
- Patents Act No.57 of 1987;
- Prevention and Combating of Hate Crimes and Hate Speech Act No.16 of 2023;
- Promotion of Access to Information Act No.2 of 2000 (PAIA);
- Protection of Personal Information Act No.4 of 2013 (POPIA);
- Tax Administration Act No.28 of 2011
- Trademarks Act No.94 of 1993;
- Skills Development Levies Act No.99 of 1999 (SDLA);
- Unemployment Insurance Fund Act No.63 of 2001 (UIFA); and
- Value Added Tax Act No.89 of 1991.

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*subject; and*
*V) such other information as maybe prescribed."*

6.3. Description of subjects which the Company holds records on, and categories of records:

| General |
|---|
| • Customer/Client name, ID/Registration number, and contact details.<br>• Name, surname, cell phone number, and email address of users. |
| **Finance** |
| • Annual Financial Statements.<br>• Bank Statements.<br>• Supplier contracts, quotes, and invoices.<br>• Client contracts, quotes, invoices and correspondence.<br>• Invoices and Proof of Payments |
| **Labour** |
| • Name, surname, employment contracts; qualifications; and ID's<br>• Race, gender, and disability information of employees as required by the labour laws of South Africa.<br>• Personal contact, and emergency contact information of Employees in case of emergencies.<br>• Personal address of Employees in case of emergencies.<br>• Employee tax details for submitting statutory payments.<br>• Banking details of Employees for effecting payment.<br>• Employee disciplinary records as required by labour law. |

## 7. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

7.1. Requests for access to Personal Information protected under POPIA must be made in accordance with the provisions of PAIA as set out in this manual.

7.2. If a Requester is provided with his/her Personal Information, he/she has the right to request the correction, deletion or destruction of his/her Personal Information. The Requester may also object to the processing of his/her Personal Information through the prescribed procedure contained herein.

7.3. POPIA provides that Personal Information may only be processed lawfully and in a reasonable manner that does not infringe a data subject's privacy.

7.4. The type of Personal Information that the Company processes will depend on the purpose for which it is collected. The Company will disclose to the data subject why the personal information is being collected and will process the Personal Information for that purpose only.

7.5. The Company may process the Personal Information of the following categories of Data Subjects, which is a non-exhaustive list that includes current, past, and prospective Data Subjects:

7.5.1. Customers and clients;
7.5.2. Service providers of customers and clients;
7.5.3. Employees and employees' emergency contact details;
7.5.4. Job applicants;
7.5.5. Representatives and agents;
7.5.6. Contractors, suppliers, service providers to and vendors of the Company and employees, representatives, agents, contractors and service providers of such suppliers and service providers;
7.5.7. Contracting parties;
7.5.8. Intermediaries and advisors;
7.5.9. Directors and officers of the Company;
7.5.10. Shareholders;
7.5.11. Visitors to any premises of the Company;
7.5.12. Website and the Company software application end-users; and
7.5.13. Complainants, enquirers and persons corresponding with the Company.

7.6. The nature of Personal Information processed in respect of the above Data Subjects may include, as may be applicable:

7.6.1. Name, identity number, registration number, passport number, symbol, email address, physical address, postal address, telephone number, location information, online identifier or other particular assignment to the person;
7.6.2. Names, contact details and personal information of contact persons, authorised signatories, beneficiaries, ultimate beneficial owners, and next-of-kin;
7.6.3. Founding documents;
7.6.4. Financial information;
7.6.5. Tax related information;
7.6.6. Biometric information;
7.6.7. Information relating to the education, medical or financial information, criminal behaviour and/or criminal Record, pregnancy status, employment history, wellbeing, trade union membership, external commercial interests, and children's name, gender and age;
7.6.8. Information relating to the race, gender, marital status, national origin, age, disability, language, and birth of the Data Subject;
7.6.9. Personal opinions, views or preferences;
7.6.10. Confidential correspondence;
7.6.11. The views or opinions of another individual about the Data Subject;
7.6.12. Electronic identification Data, IP address, log-in Data, cookies, electronic localization Data, GPS Data.

7.7. The Company may supply Personal Information processed in respect of the above Data Subjects and may include, as may be applicable:

7.7.1. Other departments within the Company;
7.7.2. Associated entities;

7.7.3. Regulatory, statutory and government bodies;
7.7.4. Suppliers, service providers, vendors, agents and representatives;
7.7.5. Management;
7.7.6. Employees;
7.7.7. Shareholders and other stakeholders;
7.7.8. Third Party verification agencies and credit bureaux;
7.7.9. Collection agencies;
7.7.10. Banks and other financial institutions; and
7.7.11. Such entities or persons as the Company may be legally obligated or legally entitled to do.

7.8. The Company endeavours to enter into written agreements to ensure that other parties comply with the Company's confidentiality and privacy requirements.

## 8. ACTUAL OR PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION

8.1. The Company may disclose Personal Information it collected to its shareholders, overseas subsidiaries, associate entities and/or Third-Party Service Providers, with whom the Company engages in business or whose services or products the Company elects to use, including cloud services hosted in international jurisdictions.

8.2. The Company undertakes to ensure that Personal Information will only be transferred, or shared across international borders, should the receiving party be in a jurisdiction with the appropriate data protection laws, and should the receiving party have the required appropriate, reasonable technical and organisational measures in place to prevent the loss of, damage to, or unauthorised destruction of Personal Information, and unlawful access to, or processing of Personal Information.

## 9. SECURITY MEASURES IMPLEMENTED TO ENSURE THE CONFIDENTIALITY, INTEGRITY, AND AVAILABLITY OF PERSONAL INFORMATION

9.1. The Company continuously establishes and maintains appropriate reasonable, technical, and organisational measures to ensure that the integrity of personal information in its possession or under its control is secure and that such Information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, or access. This is done by having regard to the requirements set forth in law, within industry practice and/or generally accepted information security practices and/or procedures which apply to the Company.

9.2. The measures as stated above include:

9.2.1. Firewalls;
9.2.2. Virus protection tools and software;
9.2.3. Logical and physical access control; and
9.2.4. Employee device encryption.

## 10. PROCEDURE FOR REQUEST FOR ACCESS

10.1. Section 53 of PAIA prescribes the procedure to be followed in making a request for access to information. Section 23(1) of POPIA[4] also provides the procedure to access Personal Information. The manner of access to Personal Information in terms of section 23 of POPIA should be in accordance with section 53 of PAIA.

10.2. The purpose of paragraphs 11 to 19 of this PAIA Manual is to provide Requesters with guidelines to facilitate a request for access to a record held by the Company. An application for access to Information can be refused on substantive grounds, alternatively, in the event that the application does not comply with the formalities as prescribed by PAIA. In turn, the completion and submission of an access request form does not automatically entitle the Requester to access the requested Record.

## 11. COMPLETION OF THE PRESCRIBED FORMS

11.1. When requesting access to a Record or Personal Information, a Requester must complete the prescribed form, or where applicable submit their requests as set out in this Manual.

11.2. Should a Requester be illiterate or disabled, a request for access to a Record may be made verbally at the Company's head office, where the Information Officer will assist in completing such prescribed access form.

11.3. A Requester can be any person making a request for access to a Record of the Company. PAIA distinguishes between the following two types of Requesters:

[4] Section 23(1) of POPIA provides that a Data Subject, having provided adequate proof of identity, has
the right to - a) request a responsible party to confirm, free of charge, whether or not the responsible
party holds personal information about the Data Subject; and b) request from a responsible Party the
Record or a description of the personal information about the Data Subject held by the responsible
Party, including information about the identity of all Third parties, or categories of Third parties, who
have, or have had, access to the information

11.3.1. A "Personal Requester" is a requester who, having provided adequate proof of identity, is seeking access to a Record containing personal information about the Personal Requester him-/herself. Subject to the provisions of PAIA and POPIA, the Company will provide the requested information or give access to any record with regard to the Personal Requester's Personal Information within a reasonable time, in a reasonable manner and format, and in a form that is generally understandable. The prescribed fee for reproduction of the Personal Information requested will be charged by the Company on application by the Requester;

11.3.2. A person falling in the category of "Other Requester" is entitled to request access to information pertaining to Third Parties. However, the Company is not obliged to grant access prior to the Requester fulfilling the requirements for access to information in terms of PAIA and POPIA. The Form 2, attached hereto as Annexure B, must be addressed and submitted to the Information Officer or the Deputy Information Officer by hand or e-mail. The details of these Information Officers are contained within this Manual under paragraph 3.2.

11.3.3. The prescribed form, or prescribed manner as set out by this Manual must be completed with enough particularity to enable the Information Officer or Deputy Information Officer to identify the following:

11.3.3.1. the identity of the Requester;
11.3.3.2. particulars of the Record requested;
11.3.3.3. the type of Record;
11.3.3.4. form of access required; and
11.3.3.5. the right the Requester is seeking to exercise or protect.

11.4.1. Some additional points to remember when completing the request form furthermore includes:

11.4.1.1. each section of the form contains instructions that should be followed to improve the likelihood of the request being granted with minimal delay being experienced;
11.4.1.2. if Records are requested on behalf of another person, a copy of the mandate authorising the Requester to act on behalf of another person must be provided;
11.4.1.3. a detailed description of the Record being requested must be provided to enable the Information Officer or Deputy Information Officer to identify it accurately;
11.4.1.4. an explanation must be provided of why the requested Record is required for the exercise or protection of the right that the Requester is seeking to enforce or protect;

11.4.2. The Requester must indicate whether the requested Record(s) is preferred in any particular language. If the Record is not available in the preferred language, access may be granted in the language in which the Record is available.

11.4.3. The Requester should indicate the manner in which he/she wishes to be informed of the decision on the request and the necessary particulars to be informed accordingly.

11.4.4. The Requester will receive the information in such manner as indicated. Section 29(3) of PAIA indicates that making available the information will depend on whether the request will not interfere unreasonably with the effective administration of the Company, be detrimental to the preservation of the Record(s) or infringe any copyright not owned by the Company.

11.4.5. A request for access to information will be returned by the Company and will result in undue delay if the prescribed access form is not completed in full, or alternatively, does not comply with this PAIA manual. In such a case, the Company will not be held liable for such delay.

11.4.6. A verbal request for access to a Record(s) may be made if the Requester does not have a formal education or has a disability. The Information Officer or Deputy Information Officer will assist the Requester to complete the prescribed form on behalf of such Requester and provide him/her with a copy of the completed form.

## 12. DUE CONSIDERATION SHOULD BE TAKEN OF THE FOLLOWING INSTRUCTIONS WHEN COMPLETING SUCH PRESCRIBED ACCESS FORM AS THE INFORMATION OFFICER OF THE COMPANY SHALL NOT PROCESS ANY REQUEST FOR ACCESS TO A RECORD UNLESS HE/SHE IS SATISFIED THAT ALL REQUIREMENTS HAVE BEEN MET

### 12.1. THE RELEVANT APPLICATION FORM MUST BE COMPLETED IN ENGLISH

12.1.1. Acceptable proof of identity such as a certified copy of the Requester's identity document, or other documents that the Information Officer may find sufficient, is required to authenticate the Requester's identity. If the Requester acts as an "Agent Requester", such Requester shall provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the Requester, as well as proof of the identity of the Agent Requester as described above.

12.1.2. All Requesters must:

12.1.2.1. Type or print in **BLOCK LETTERS** an answer to every question.

12.1.2.2. If a question does not apply, state "N/A" in response to that question.

12.1.2.3. If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.

12.1.2.4. If there is insufficient space on a printed form in which to answer a question, information may be provided on an additional attached folio.

12.1.2.5. When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

12.1.2.6. Where the Requester is illiterate or disabled and the request for access to a Record was completed by the Information Officer or the Deputy Information Officer, they will provide the Requester with a copy of the completed prescribed access form.

12.1.3. The outcome of a request will be provided to the Requester. The Requester will be informed if a request was granted or refused in accordance with the procedures described within the Manual. Fees payable will also be provided to the Requester.

**12.2. SUBMISSION OF THE COMPLETED FORM**

12.2.1. The completed form11 must be submitted/delivered either via conventional mail, e-mail or by hand to the Company's head office, and be addressed to the Information Officer.

**12.3. PAYMENT OF PRESCRIBED FEES**

12.3.1. Section 54 of PAIA entitles the Company to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

12.3.2. The Requester will be notified of the prescribed fee payable, if any, the method of payment and the office to which he/she can make such payment or submit proof of payment before a request for information is processed further.

12.3.3. If the preparation of the Record for disclosure and related arrangements requires more than the prescribed hours to process, the Requester may be required to pay a prescribed deposit on the request of the Information Officer or the Deputy Information Officer.

12.3.4. If a deposit has been paid in respect of a request for access which is subsequently refused, the deposit will be refunded to the Requester.

12.3.5. Once a decision to grant a request for access to Records has been approved, the Record will only be provided after the required fees have been paid in full.

12.3.6. POPIA provides that a Data Subject (as defined in POPIA) and herein referred to as Personal Requesters, may, upon providing proof of identity,

request the Company to confirm, free of charge, all the information it holds about the Data Subject. Requesters may furthermore request access to such information, including information about the identity of Third Parties, who have or have had access to such information.

12.3.7. POPIA also provides that, where the Data Subject is required to pay a fee for services provided to the Requester, the Company must provide the Data Subject with a written estimate of the amount payable before providing the service. This can include that the Data Subject pay a deposit for all or part of the fee. Records may be withheld until the fees have been paid in full.

**12.3.8. <u>Four types of fees are provided for in PAIA:</u>**

12.3.8.1. **Request Fee:** An initial, non-refundable amount of R140.00 (excluding VAT) is payable upon submission of a request. This fee is not applicable to personal requesters, which is a reference to any person seeking access to records that contain their personal information;

12.3.8.2. **Reproduction Fee:** This fee is payable with regard to all records that are automatically available;

12.3.8.3. **Access Fee:** If the request for access is successful, an access fee may be required to reimburse the Company for the costs involved in the search, reproduction and/or preparation of the relevant record, and will be calculated based on the prescribed fees; and,

12.3.8.4. **Deposit:** A deposit equal to one third (1/3) of the amount of the applicable access fee is payable if the Company receives a request for access to information held on a person other than the Requester himself/herself and the preparation of the record will take longer than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the Requester.

## 12.4. NOTICE TO THIRD PARTIES

12.4.1. The Information Officer or Deputy Information Officer shall as soon as reasonably possible, but within 21 days after a request, inform a Third Party of such a request to whom or to which the request relates.

12.4.2. The Third Party may within the 21-day period make written or verbal representations to the Information Officer or his/her Deputy as to why the request for access should be refused. Should this not be done, the Third Party can be requested to give written consent for the disclosure of the Record.

12.4.3. The Information Officer or the Deputy Information Officer must as soon as reasonably possible, but within 30 days after every Third Party is informed as per 12.4.1 above, after giving due regard to any representations of such Third Party, decide whether to grant the request for access. The Third Party will subsequently be notified of the decision, including the reasons and provisions of PAIA relied upon to justify the granting of access. The Requester will likewise be notified of the decision.

12.4.4. If a Third Party is not informed of a request, despite all reasonable steps having been taken, any decision whether to grant the request for access shall be made with due regard to the fact that the Third Party did not have the opportunity to make representations.

12.4.5. If a request for access to a Record has been granted the Third Party may lodge a complaint to the Information Regulator or bring an application to the relevant court within 30 days of such notice of the outcome of the request for access to information.

## 13. OUTCOME OF REQUEST

13.1. The request for information will be processed by the Information Officer or the Deputy Information Officer within 30 days (the "original period") after receipt of the request. The Information Officer or Deputy Information Officer will then inform the Requester of his/her decision to either grant or reject the request for access to Records. The decision shall, if reasonably possible, be communicated in the manner requested by the Requester.

13.2. The Information Officer or Deputy Information Officer may extend the original period once for a further period of not more than 30 days if:

13.2.1. the request is for a large number of Records or requires a search through a large number of Records, and compliance with the original period would unreasonably interfere with the activities of the Company;
13.2.2. the request requires a search for Records in, or collection thereof from, an office of the Company not situated in the same town or city as the office of the Information Officer and cannot reasonably be completed within the original period;
13.2.3. consultation among divisions of the Company or with another private body is necessary or desirable to decide upon the request and such decision making process cannot reasonably be completed within the original period;
13.2.4. more than one of the circumstances contemplated herein above exist in respect of the request, making compliance with the original period not reasonably possible; or
13.2.5. the Requester provides consent in writing.

13.3. The Information Officer or the Deputy Information Officer will within the original period, notify the requester in writing of the period of the extension and provide the reasons for the extension.

13.4. The original period (or the "extended period") will only commence once a Requester has complied with all the requirements for a request of access to a record to the satisfaction of the Information Officer and/or the Deputy Information Officer.

13.5. The Requester will be informed of the outcome of a request in writing, which written notification will at least contain the reasons for the refusal, the provisions of PAIA relied on, and the details as set out in Form 3.

13.6. If the Requester is not provided with a decision on a request for access within the applicable period, it shall be regarded as a refusal of the request.

13.7. If a request for access has been granted, provided that the necessary fees have been paid (where applicable), access will be provided to the Requester in manner in which the Requester reasonably requested or in such form as the Information Officer of Deputy Information Officer reasonably determines.

13.8. The Requester will be given access to the Record after expiry of the applicable periods should a Third-Party object to the granting of access.

13.9. If a request for access to a Record has been refused, delayed or granted (Subject to unreasonable fees or is granted for an unacceptable form of access), in terms of an unreasonable procedure or in case of an unacceptable extension of the period within which the requester must be informed of the outcome of his application for access, and the Requester may furthermore lodge a complaint to the Information Regulator as set out in the Manual, alternatively, lodge an application in the relevant court within 30 days of such notice of the outcome.

## 14. GROUNDS FOR REFUSAL OF ACCESS AND LIMITATIONS

14.1. Requests may be refused, amongst others, on the following grounds, as set out in PAIA:

14.1.1. Unreasonable disclosure of Personal Information of a third party, including a deceased person;

14.1.2. if the Record contains trade secrets, financial, commercial, scientific or technical information, the disclosure of which would likely cause harm to the financial or commercial interests of the third party or the Company, or is a computer program owned by the Company;

14.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;

14.1.4. if the Record contains trade secrets, financial or sensitive information, or any information that would put the Company at a disadvantage in negotiations, or prejudice the Company in commercial competition;

14.1.5. if disclosure could reasonably be expected to endanger the life or physical safety of an individual;

14.1.6. if disclosure would be likely to prejudice or impair the security of a building, structure or system, (including, but not limited to, a computer or communication system), means of transport or any other property;

14.1.7. if disclosure would be likely to prejudice and/or impair methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public or any part of the public, or the security of a building, structure or system (including, but not limited to a computer or communication system), a means of transport or any other property;

14.1.8. if the Records are privileged or produced during legal proceedings, unless the legal privilege has been waived; and/or

14.1.9. if the Record contains information about research being carried out or to be carried out on behalf of a Third Party or the Company, the disclosure of which would be likely to expose the Third Party or the Company, or a person that is or will be carrying out the research or the Subject matter of the research to a serious disadvantage.

14.2. A Record may not be refused in so far as it consists of information about a Third Party who has consented in terms of section 72 of PAIA or in writing, granting disclosure to the Requester concerned.

14.3. Furthermore, a Record may not be refused in so far as it consists of information about the results of any product or environmental testing or any other investigation supplied by a Third Party, the results of any such testing or investigation carried out by / on behalf of a Third Party, whereas its disclosure would reveal a serious public safety or environmental risk. However, this excludes in so far as it was conducted for the purpose of developing methods of testing or other investigation.

14.4. Disclosure of a Record is compulsory if it would reveal evidence of the following nature:

14.4.1. a substantial contravention of, or failure to comply with, the law; or

14.4.2. imminent and serious public safety or environmental risk; and,

14.4.3. the public interest in the disclosure of the Record in question clearly outweighs the harm contemplated by its disclosure.

14.5. If the request for access to information affects a Third Party, then such Third Party must first be informed within twenty-one (21) days of receipt of the request. The Third Party would then have a further twenty-one (21) days to make representations and/or submissions regarding the granting of access to the Record.

14.6. An application for access to a Record is Subject to certain limitations if the requested Record falls within a certain category as specified in Part 3 of Chapter 4 of PAIA. If it is reasonably suspected that the Requester has obtained access to the Company's Records through the submission of materially false or misleading information, legal proceedings may be instituted against such Requester.

14.7. If a request for access is made to a Record containing information which may or must be refused, every part of the Record which does not contain such information and can be reasonably severed from any part that contains such information shall be disclosed.

14.8. Requests for access to health or similar Records shall be Subject to section 61[5] of PAIA.

[5] 61. (1) If the head of a private body who grants, in terms of section 50, a request for access to a record provided by a health practitioner in his or her capacity as such about the physical or mental health, or well-being—
(a) of the requester; or
(b) if the request has been made on behalf of the person to whom the record relates, of that person, (in this section, the requester and person referred to paragraphs (a) and (b), respectively, are referred to as the "relevant person"), is of the opinion that the disclosure of the record to the relevant person might cause serious harm to his or her physical or mental health, or well-being, the information officer may, before giving access in terms of section 60, consult with a health practitioner who, subject to subsection (2), has been nominated by the relevant person.
(2) If the relevant person is—
(a) under the age of 16 years, a person having parental responsibilities for the relevant person must make the nomination contemplated in subsection (1); or
(b) incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.
(3)(a) If, after being given access to the record concerned, the health practitioner consulted in terms of subsection (1) is of the opinion that the disclosure of the record to the relevant person, would be likely to cause serious harm to his or her physical or mental health, or well-being, the head may only give access to the record if the requester proves to the satisfaction of the head that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm to the relevant person.
(b) Before access to the record is so given to the requester, the person responsible for such counselling or arrangements must be given access to the record.

## 15. REMEDIES AVAILABLE IN THE EVENT OF REFUSAL OF ACCESS AND OF PROVISIONS OF PAIA ARE NOT COMPLIED WITH

### 15.1. External Remedies

15.1.1. Any person may submit a complaint to the Information Regulator in the prescribed manner and form, should he or she be aggrieved by the determination of an adjudicator, or, when alleged that there was interference with the protection of the personal information of a Data Subject. The complaint must be submitted via Form 5.

15.1.2. A Requester or a Third Party that has been aggrieved by a decision in relation to a request for access to a Record of that body, may within 180 days apply to court for appropriate relief in terms of section 82. Such an appeal must be lodged in the High Court of the Republic of South Africa or any other court with the necessary jurisdiction.

## 16. RECORDS THAT CANNOT BE FOUND/DO NOT EXIST

16.1. If the Company has taken all reasonable steps to locate a requested Record and there are reasonable grounds to believe that the Record does not exist or cannot be located, the Requester will be notified thereof by the Company by way of an affidavit or affirmation. This document will provide a full account of all the steps taken in an attempt to locate the Record, including all communications with every person who conducted the search on behalf of the Company.

16.2. The notice above will be regarded, for the purposes of PAIA, as a decision to refuse such request for access to the Record.

16.3. Should the Record in question be located by the Company at any stage thereafter, access will be given to the Requester, in so far as the Requester may continuously be entitled to such access.

## 17. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

17.1. POPIA provides that a Data Subject, a person acting on behalf of the Data Subject, or a Person with sufficient interest in the matter may object, at any time, to the processing of Personal Information by the Company on reasonable grounds relating to the particular situation, unless legislation provides for such processing. In such case the Data Subject must either complete the Form 1(https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf ) and submit same to the Information Officer at the postal or physical address, facsimile number or electronic mail address as contained in paragraph 3.2, or make such an objection per email to the Information Officer by providing details of the objection in said

email with details of the objection containing the same substantiations as in Form 1, if Form 1 is not used.

17.2. Where Form 1 is not used, the Data Subject who objects to the processing of their Personal Information may object, by sending an email to the Information Officer containing the following information:

17.2.1. The full name and surname of the Data Subject;
17.2.2. The Identification Number of the Data Subject;
17.2.3. The address of the Data Subject;
17.2.4. The cell phone number and email address of the Data Subject; and
17.2.5. Their reason(s) for objecting to the processing of their Personal Information.

## 18. CORRECTION OR DELETION OF PERSONAL INFORMATION

18.1. A Data Subject may also request the Company to correct or delete Personal Information relating to the Data Subject in its possession or under its control. This can include information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, and/or obtained unlawfully. This request must stipulate a request to destroy or delete a Record of Personal Information about the Data Subject, indicating that the Company is no longer authorised to retain such information in terms of POPIA's specific retention and restriction provisions.

18.2. A Data Subject that wishes to request a correction or deletion of Personal Information or the destruction or deletion of a Record of Personal Information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out in paragraph 3.2 on Form 2 (https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf ).

18.3. Should the Data Subject, person acting on behalf of the Data Subject, or a party with sufficient interest in the matter, wish to correct of have Personal Information deleted which is held by the Company, the Data Subject may also submit an email to the Information Officer with the following detail, as an alternative to the submission of Form 2:

18.3.1. The Data Subject’s full name and surname;
18.3.2. The Data Subject's Identification Number;
18.3.3. The Data Subject’s address; and
18.3.4. The Personal Information which the Data Subject wishes to delete or correct; and
18.3.5. The Data Subject’s contact details, such as email address and cell phone number.

## 19. REVIEW OF THIS MANUAL

19.1. The Manual shall be reviewed as and when required, but at least annually.

## 20. APPROVAL

20.1. This PAIA Manual has been compiled in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 and has been approved by the head of TrusteeWorks (Pty) Ltd, registration number 2026/825830/07, as recorded below.

| | |
|---|---|
| Company: | TrusteeWorks (Pty) Ltd, registration number 2026/825830/07 |
| Version approved: | Version 2 – 17 October 2026 |
| Name: | Gert van den Heever |
| Capacity: | Director and Information Officer |
| Signature: |  |
| Date: | 2026/10/01 |
| Place: | Pretoria |

## SCHEDULE 1 – FEES

Fees in Respect of Private Bodies

The applicable fees (excl. VAT) (as determined from time to time and Subject to change without notice) for reproduction:

| Item | Description | Amount |
|---|---|---|
| 1. | Request fee, payable by every requester | R140.00 |
| 2. | Photocopy or printed black & white copy for every A4 page | R2.00 per page or part of the page |
| 3. | Printed copy of A4-size page | R2.00 per page or part of the page |
| 4. | For a copy in a computer-readable form on:<br>• a flash drive (provided by the requester)<br>• a compact disc (CD) if the requester provides the CD to us<br>• a compact disc (CD) if we give the CD to the requester | R40.00<br>R40.00<br>R60.00 |
| 5. | For a transcription of visual images, for an A4-size page or part of the page | This service will be outsourced. The fee will depend on the quotation from the service provider. |
| 6. | For a copy of visual images | This service will be outsourced. The fee will depend on the quotation from the service provider. |
| 7. | For a transcription of an audio record, per A4-size page | R24.00 |

| Item | Description | Amount |
|---|---|---|
| 8. | For a copy of an audio record on a flash drive (provided by the requester)<br>For a copy of an audio record on compact disc (CD) if the requester provides the CD to us<br><br>For a copy of an audio record on compact disc (CD) if we give the CD to the requester | R40.00<br>R40.00<br><br>R60.00 |
| 9. | For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure<br>The search and preparation fee cannot exceed | R145.00<br>R435.00 |
| 10. | Deposit: if the search exceeds 6 hours | One-third of the amount per request. It is calculated in terms of items 2 to 8 above. |
| 11. | Postage, email or any other electronic transfer | Actual expense, if any. |

## Request Fee

A request fee of R140.00 (excluding VAT) is payable upfront by every Requester, other than a Personal Requester, when submitting a request for access to a record.[6]

## Access Fee

If a request for access is granted, the access fees payable are those set out in items 2 to 9 of the table at the beginning of this Schedule 1, as prescribed by the Information Regulator.

## Postage Fee

Where a copy of the Record needs to be posted the actual postal fee will be payable in addition to the applicable fees.

[6] (Regulation 11(3)).

## ANNEXURE A – FORM 1: REQUEST FOR COPY OF PAIA GUIDE

## FORM 1

### REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

**TO:** The Information Officer

_____

_____

_____

_____

I,

| | | | | |
|---|---|---|---|---|
| Full names: | ef | | | |
| In my capacity as (mark with "x"): | Information officer | | Other | |
| Name of *public/private body *(if applicable)* | | | | |
| Postal Address: | | | | |
| Street Address: | | | | |
| E-mail Address: | | | | |
| Facsimile: | | | | |
| Contact numbers: | Tel.(B): | | Cellular: | |

Hereby request the following copy (ies) of the Guide:

| | Language *(mark with "X")* | No of copies | | Language*(mark with "X")* | No of copies |
|---|---|---|---|---|---|
| | Sepedi | | | Sesotho | |
| | Setswana | | | siSwati | |
| | Tshivenda | | | Xitsonga | |
| | Afrikaans | | | English | |
| | isiNdebele | | | isiXhosa | |
| | isiZulu | | | | |

Manner of collection *(mark with "x")*:

| Personal collection | Postal address | Facsimile | Electronic communication (Please specify) |
|---|---|---|---|
| | | | |

Signed at _____ this _____ day of _____ 20 _____

## ANNEXURE B – FORM 2: REQUEST FOR ACCESS TO RECORD(S)

# FORM 2

# REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer

_____

_____

_____

_____

*(Address)*

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

| **PERSONAL INFORMATION** | | | | |
|---|---|---|---|---|
| Full Names | | | | |
| Identity Number | | | | |
| Capacity in which request is made *(when made on behalf of another person)* | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-mail Address | | | | |
| Contact Numbers | Tel. (B): | | Facsimile: | |
| | Cellular: | | | |
| Full names of person on whose behalf request is made *(if applicable)*: | | | | |
| Identity Number | | | | |
| Postal Address | | | | |

| | | | | |
|---|---|---|---|---|
| Street Address | | | | |
| E-mail Address | | | | |
| Contact Numbers | Tel. (B) | | Facsimile | |
| | Cellular | | | |

**PARTICULARS OF RECORD REQUESTED**

*Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

| | |
|---|---|
| Description of record or relevant part of the record: | |
| Reference number, if available | |
| Any further particulars of record | |

**TYPE OF RECORD**
*(Mark the applicable box with an "**X**")*

| | |
|---|---|
| Record is in written or printed form | |
| Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)* | |
| Record consists of recorded words or information which can be reproduced in sound | |
| Record is held on a computer or in an electronic, or machine-readable form | |

| **FORM OF ACCESS**<br>*(Mark the applicable box with an "**X**")* | |
|---|---|
| Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)* | |
| Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)* | |
| Transcription of soundtrack *(written or printed document)* | |
| Copy of record on flash drive *(including virtual images and soundtracks)* | |
| Copy of record on compact disc drive*(including virtual images and soundtracks)* | |
| Copy of record saved on cloud storage server | |

| **MANNER OF ACCESS**<br>*(Mark the applicable box with an "**X**")* | |
|---|---|
| Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* | |
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format *(including transcriptions)* | |
| E-mail of information *(including soundtracks if possible)* | |
| Cloud share/file transfer | |
| Preferred language<br>*(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)* | |

| **PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**<br>*If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.* | |
|---|---|
| Indicate which right is to be exercised or protected | |
| | |
| | |

| | |
|---|---|
| Explain why the record requested is required for the exercise or protection of the aforementioned right: | |

| FEES | |
|---|---|
| *a) A request fee must be paid before the request will be considered.*<br>*b) You will be notified of the amount of the access fee to be paid.*<br>*c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*<br>*d) If you qualify for exemption of the payment of any fee, please state the reason for exemption* | |
| Reason | |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication *(Please specify)* |
|---|---|---|
| | | |

Signed at _____ this _____ day of _____ 20 _____

_____

***Signature of Requester / person on whose behalf request is made***

---

***FOR OFFICIAL USE***

| | |
|---|---|
| *Reference number:* | |
| *Request received by: (State Rank, Name And Surname of Information Officer)* | |
| *Date received:* | |
| *Access fees:* | |
| *Deposit (if any):* | |

_____

***Signature of Information Officer***

## ANNEXURE C – FORM 3: OUTCOME OF REQUEST AND OF FEES PAYABLE

### FORM 3
**OUTCOME OF REQUEST AND OF FEES PAYABLE**
[Regulation 8]

*Note:*

1. *If your request is granted the—*
   (a) *amount of the deposit, (if any), is payable before your request is processed; and*
   (b) *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

**TO:** _____
_____
_____
_____

Your request dated _____, refers.

**1. You requested:**

| | |
|---|---|
| Personal inspection of information at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B. | |

**OR**

**2. You requested:**

| | |
|---|---|
| Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form )* | |
| Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)* | |
| Transcription of soundtrack *(written or printed document)* | |
| Copy of information on flash drive *(including virtual images and soundtracks)* | |
| Copy of information on compact disc drive*(including virtual images and soundtracks)* | |
| Copy of record saved on cloud storage server | |

**3. To be submitted:**

| | |
|---|---|
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format *(including transcriptions)* | |
| E-mail of information *(including soundtracks if possible)* | |
| Cloud share/file transfer | |
| Preferred language:<br>*(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)* | |

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

| |
|---|
| |

**4. Fees payable with regards to your request:**

| Item | Cost per A4-size page or part thereof/item | Number of pages/items | Total |
|---|---|---|---|
| Photocopy | | | |
| Printed copy | | | |
| For a copy in a computer-readable form on:<br>(i) Flash drive<br>• To be provided by requestor<br>(ii) Compact disc<br>• If provided by requestor<br>• If provided to the requestor | <br><br>R40.00<br><br>R40.00<br>R60.00 | | |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on the quotation of the service provider | | |
| Copy of visual images | | | |
| Transcription of an audio record, per A4-size | R24.00 | | |
| Copy of an audio record<br>(i) Flash drive<br>• To be provided by requestor<br>(ii) Compact disc<br>• If provided by requestor<br>• If provided to the requestor | <br><br>R40.00<br><br>R40.00<br>R60. 00 | | |
| Postage, e-mail or any other electronic transfer: | Actual costs | | |
| **TOTAL:** | | | |

**5. Deposit payable (if search exceeds six hours):**

☐ Yes ☐ No

| Hours of search | | Amount of deposit *(calculated on one third of total amount per request)* | |
|---|---|---|---|

The amount must be paid into the following Bank account:
Name of Bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

_____
*Information officer*

## ANNEXURE D – FORM 5: COMPLAINT FORM

# COMPLAINT FORM

**FORM 5**

[Regulation 10]

**NOTE:**

1. This form is designed to assist the Requester or Third Party (hereinafter referred to as "the Complainant") in requesting a review of a Public or Private Body's response or non-response to a request for access to records under the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"). Please fill out this form and send it to the following email address: PAIAComplaints@infoRegulator.org.za or complete online complaint form available at https://www.justice.gov.za/inforeg/.
2. PAIA gives a member of the public a right to file a complaint with the Information Regulator about any of the nature of complaints detailed in part F of this complaint form.
3. It is the policy of the Information Regulator to defer investigating or to reject a complaint if the Complainant has not first given the public or private body (herein after referred to as "the Body") an opportunity to respond to and attempt to resolve the issue. To help the Body address your concerns prior to approaching the Information Regulator, you are required to complete the prescribed **PAIA Form 2** and submit it to the Body.
4. A copy of this Form will be provided to the Body that is the subject of your complaint. The information you provide on this form, attached to this form or that you supply later, will only be used to attempt to resolve your dispute, unless otherwise stated herein.
5. The Information Regulator will only accept your complaint once you confirm having complied with the prerequisites below.
6. **Please attach copies of the following documents, if you have them**:
   a. Copy of the form to the Body requesting access to records;
   b. The Body's response to your complaint or access request;
   c. Any other correspondence between you and the Body regarding your request;
   d. Copy of the appeal form, if your compliant relate to a public body;
   e. The Body's response to your appeal;
   f. Any other correspondence between you and the Body regarding your appeal;
   g. Documentation authorizing you to act on behalf of another person (if applicable);
   h. Court Order or Court documents relevant to your complaint, if any.
7. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

| **CAPACITY OF PERSON/PARTY LODGING A COMPLAINT** (Mark with an "X") |
|---|

☐ Complainant Personally

☐ Representative of Complainant

☐ Third Party

| **PREREQUISITES** | | | | |
|---|---|---|---|---|
| Did you submit request (PAIA form) for access to record of a public/private body? | Yes | | No | |
| Has 30 days lapsed from the date on which you submitted your PAIA form? | Yes | | No | |
| Did you exhaust all the internal appeal procedure against a decision of the Information officer of a public body? | Yes | | No | |
| Have you applied to Court for appropriate relief regarding this matter? | Yes | | No | |

| *FOR INFORMATION REGULATOR'S USE ONLY* | | | | |
|---|---|---|---|---|
| *Received by: (Full names)* | | | | |
| *Position* | | | | |
| *Signature* | | | | |
| *Complaint accepted* | *Yes* | | *No* | |
| *Reference Number* | | | | |
| *Date stamp* | | | | |

| Postal address | Facsimile | Other electronic communication *(Please specify)* |
|---|---|---|
| | | |

| **PART A**<br>**PERSONAL INFORMATION OF COMPLAINANT** | | | | |
|---|---|---|---|---|
| Full Names | | | | |
| Identity Number | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-Mail Address | | | | |
| Contact numbers | Tel. (B) | | Facsimile | |
| | Cellular | | | |

| **PART B**<br>**REPRESENTATIVE INFORMATION**<br>*(Complete only if you will be represented. A Power of Attorney must be attached if complainant is represented, failing which the complaint will be rejected)* | | | | |
|---|---|---|---|---|
| Full Names of Representative | | | | |
| Nature of representation | | | | |
| Identity Number / Registration Number | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-mail Address | | | | |
| Contact Numbers | Tel. (B) | | Facsimile | |
| | Cellular | | | |

| **PART C**<br>**THIRD PARTY INFORMATION**<br>*(Please attach letter of authorisation)* | | | | |
|---|---|---|---|---|
| Type of Body | Private | | Public | |
| Name of Public / Private Body | | | | |
| Registration Number (if any) | | | | |
| Name, Surname and Title of person authorised to lodge a complaint | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-mail Address | | | | |

| | | |
|---|---|---|
| Refusal of a request for access (Section 77A(2)*(c)*(i) or 77A(2)*(d)*(i) or 77A(3)*(b)* of PAIA) | *I requested access to information held by a body and that request was refused or partially refused.* | ☐ |
| The body requires me to pay a fee and I feel it is excessive (Sections 22 or 54 of PAIA) | *Tender or payment of the prescribed fee.* | ☐ |
| | *The tender or payment of a deposit.* | ☐ |
| Repayment of the deposit (Section 22(4) of PAIA) | *The information officer refused to repay a deposit paid in respect of a request for access which is refused.* | ☐ |
| Disagree with time extension (Sections 26 or 57 of PAIA) | *The body decided to extend the time limit for responding to my request, and I disagree with the requested time limit extension or a time extension taken to respond to my access request.* | ☐ |
| Form of access denied (Section 29(3) or 60*(a)* of PAIA) | *I requested access in a particular and reasonable form and such form of access was refused.* | ☐ |
| Deemed refusal (Section 27 or 58 of PAIA) | *It is more than 30 days since I made my request and I have not received a decision.* | ☐ |
| | *Extension period has expired and no response was received.* | ☐ |
| Inappropriate disclosure of a record (Mandatory grounds for refusal of access to record) | *Records (that are subject to the grounds for refusal of access) have inappropriately/unreasonable been disclosed.* | ☐ |
| No adequate reasons for the refusal of access (Section 56(3)*(a)* of PAIA) | *My request for access is refused, and no valid or adequate reasons for the refusal, were given, including the provisions of this Act which were relied upon for the refusal.* | ☐ |
| Partial access to record (Section 28(2) or 59(2) of PAIA) | *Access to only a part of the requested records was granted and I believe that more of the records should have been disclosed.* | ☐ |
| Fee waiver (Section 22(8) or 54(8) of PAIA) | *I am exempt from paying any fee and my request to waive the fees was refused.* | ☐ |
| Records that cannot be found or do not exist (Section 23 or 55 of PAIA) | *The Body indicated that some or all of the requested records do not exist and I believe that more records do exist.* | ☐ |
| Failure to disclose records | *The Body decided to grant me access to the requested records, but I have not received them.* | ☐ |
| No jurisdiction (exercise or protection of any rights) (Section 50(1)*(a)* of PAIA) | *The Body indicated that the requested records are excluded from PAIA and I disagree.* | ☐ |
| Frivolous or vexatious request (Section 45 of PAIA) | *The Body indicated that my request is manifestly frivolous or vexatious and I disagree.* | ☐ |
| Other *(Please explain)* | | |

**PART G**
**EXPECTED OUTCOME**

How do you think the Information Regulator can assist you? Describe the result or outcome that you seek.

**PART H**
**AGREEMENTS**

***The legal basis for the following agreements is explained in the Privacy Notice on how to file your complaint document. In order for the Information Regulator to process your complaint, you need to check each one of the checkboxes below to show your agreement:***

☐ *I agree that the Information Regulator may use the information provided in my complaint to assist it in researching issues relating to the promotion of the right of access to information as well as the protection of the right to privacy in South Africa. I understand that the Information Regulator will never include my personal or other identifying information in any public report, and that my personal information is still protected by the Protection of Personal Information Act, 2013 (Act No. 4 of 2013). I understand that if I do not agree, the Information Regulator will still process my complaint.*

☐ *The information in this Complaint Form is true to the best of my knowledge and belief.*

☐ *I authorize the Information Regulator to collect my personal complaint information (such as the information about me in this complaint form) and use it to process my human rights complaint relating to the right of access to information and / or the protection of the right to privacy.*

☐ *I authorise anyone (such as an employer, service provider, witness) who has information needed to process my complaint to share it with the Information Regulator. The Information Regulator can obtain this information by talking to witnesses or asking for written records. Depending on the nature of the complaint, these records could include personnel files or employer data, medical or hospital records, and financial or taxpayer information.*

☐ *If any of my contact information changes during the complaint process, it is my responsibility to inform the Information Regulator; otherwise my complaint could experience a delay or even be closed.*

Signed at _____ this _____ day of _____ 20 _____

_____

***Complainant/Representative/Authorised person of Third party***

## ANNEXURE E – FORM 1: OBJECTION TO PROCESSING OF INFORMATION

**FORM 1**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**

[Regulation 2(1)]

*Note:*

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to thisForm and sign each page.*

Reference Number….

| **A** | **DETAILS OF DATA SUBJECT** |
|---|---|
| Name and surname of data subject: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code ( ) |
| Contact number(s): | |
| Fax number: | |
| E-mail address: | |
| **B** | **DETAILS OF RESPONSIBLE PARTY** |
| Name and surname of responsible party*(if the responsible party is a natural)*: | |
| Residential, postal or business address: | |
| | |
| | |
| | |
| | Code ( ) |
| Contact number(s): | |
| Fax number: | |
| E-mail address: | |

## ANNEXURE F – FORM 2: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION

**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**

[Regulation 3(2)]

*Note:*

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number….

Mark the appropriate box with an "x".

**Request for:**

☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longerauthorised to retain the record of information.

| **A** | **DETAILS OF THE DATA SUBJECT** |
|---|---|
| Surname: | |
| Full names: | |
| Identity number: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code ( ) |
| Contact number(s): | |
| Fax number: | |
| E-mail address: | |
| **B** | **DETAILS OF RESPONSIBLE PARTY** |
| Name and surname of responsible party*(if the responsible party is a natural person)*: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code ( ) |
| Contact number(s): | |
| Fax number: | |
| E-mail address: | |

| | |
|---|---|
| Name of public or private body *(if the responsible party is not a natural person)*: | |
| Business address: | |
| | |
| | |