

JUCHEPI GROUP

PAIA MANUAL

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

Juchepi Group (Pty) Ltd

CIPC Reg. No. 2024/476642/07

Information Regulator Reg. No. 2026-066959

| Document control                     | Details                                                                                  |
|--------------------------------------|------------------------------------------------------------------------------------------|
| Version                              | 1.0                                                                                      |
| Effective date                       | 17 September 2026                                                                        |
| Information Officer                  | Pieter Hendrik Pretorius                                                                 |
| Information Officer appointment date | 1 August 2024                                                                            |
| Review cycle                         | At least annually and whenever a material legal, operational or processing change occurs |
| Public URL                           | <a href="https://www.juchepigroup.com/paia/">https://www.juchepigroup.com/paia/</a>      |

PUBLIC COMPLIANCE DOCUMENT

This Manual is intended for public access. It describes how records may be requested from Juchepi Group (Pty) Ltd and summarises the organisation's processing of personal information for purposes of section 51 of PAIA and POPIA.

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### Important scope note

Juchepi Group may operate through brands or trading divisions, including SafeLink Kids. Where a division-specific PAIA or privacy document is published, it is supplementary to this Manual and does not create a separate juristic person. Juchepi Group (Pty) Ltd remains the legal private body unless expressly stated otherwise.

## 1. Acronyms and abbreviations

| Acronym   | Meaning                                                      |
|-----------|--------------------------------------------------------------|
| CEO       | Chief Executive Officer                                      |
| CIPC      | Companies and Intellectual Property Commission               |
| DIO       | Deputy Information Officer                                   |
| IO        | Information Officer                                          |
| PAIA      | Promotion of Access to Information Act 2 of 2000, as amended |
| POPIA     | Protection of Personal Information Act 4 of 2013             |
| Regulator | Information Regulator (South Africa)                         |
| Republic  | Republic of South Africa                                     |

## 2. Purpose and scope of this Manual

This Manual is prepared for Juchepi Group (Pty) Ltd in terms of section 51 of PAIA. It is intended to help members of the public understand what records Juchepi Group holds, how access may be requested, and how Juchepi Group processes personal information for purposes of POPIA-related disclosures required by section 51.

This Manual enables a requester to:

- identify categories of records that may be available without a formal PAIA request;
- understand the subjects on which Juchepi Group holds records and the categories of records held on each subject;
- identify records that Juchepi Group holds in accordance with other legislation;
- obtain the contact details of the Information Officer responsible for PAIA and POPIA matters;
- understand how to make a request for access to a record and what fees may apply;
- understand the categories of data subjects and personal information processed by Juchepi Group;
- understand the recipients, possible transborder flows and general security safeguards relating to personal information; and
- understand the remedies available if a request is refused, delayed or otherwise disputed.

### 2.1 Legal status and business scope

Juchepi Group (Pty) Ltd is a South African private company. Its activities include management consulting, leadership and commercial advisory work, digital and technology solutions, custom software and web development, NFC and smart-product initiatives, and related operational services. The organisation may also operate through trading divisions or brands.

This Manual covers the general corporate and operational records of Juchepi Group. Product- or division-specific records may be described in supplementary PAIA and privacy documents where the processing model or record categories justify additional detail.

## 3. Company details and access-to-information contacts

| Item                                      | Details                                                                 |
|-------------------------------------------|-------------------------------------------------------------------------|
| Legal name                                | Juchepi Group (Pty) Ltd                                                 |
| CIPC registration number                  | 2024/476642/07                                                          |
| Information Regulator registration number | 2026-066959                                                             |
| Organisation type                         | Private Company [(Pty) Ltd]                                             |
| Principal / registered address            | 76 De Waal Street, Brackendowns, Alberton, Gauteng, 1448, South Africa  |
| Postal address                            | 76 De Waal Street, Brackendowns, Alberton, Gauteng, 1448, South Africa  |
| Organisation telephone                    | +27 87 807 8602                                                         |
| General email                             | info@juchepigroup.com                                                   |
| Website                                   | <a href="https://www.juchepigroup.com">https://www.juchepigroup.com</a> |

### 3.1 Information Officer

| Item                                         | Details                                                    |
|----------------------------------------------|------------------------------------------------------------|
| Name                                         | Pieter Hendrik Pretorius                                   |
| Capacity                                     | Chief Executive Officer and registered Information Officer |
| Appointment date recorded with the Regulator | 1 August 2024                                              |
| Email                                        | pieter@juchepigroup.com                                    |
| PAIA / general information requests          | info@juchepigroup.com (use subject line: PAIA REQUEST)     |
| Telephone                                    | +27 87 807 8602                                            |
| Fax                                          | Not applicable                                             |

### 3.2 Deputy Information Officer(s)

No Deputy Information Officer is recorded in this version of the Manual. Requests should be directed to the Information Officer using the contact details above. If a Deputy Information Officer is designated in future, this Manual will be updated.

## 4. Guide on how to use PAIA

The Information Regulator has, in terms of section 10 of PAIA, made available a Guide explaining how PAIA may be used. The Guide is intended to assist persons who wish to exercise rights contemplated in PAIA and POPIA.

The Regulator makes the Guide available in the official languages of the Republic and in Braille. It explains, among other things, the objects of PAIA and POPIA, how to make requests, available assistance, remedies, fees, and the operation of PAIA manuals.

**Official PAIA information and Guide:** <https://inforegulator.org.za/paia/>

**Information Regulator eServices:** <https://eservices.inforegulator.org.za/>

### 4.1 Information Regulator contact details

| Item             | Details                                                                         |
|------------------|---------------------------------------------------------------------------------|
| Physical address | Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191      |
| Postal address   | P.O. Box 31533, Braamfontein, Johannesburg, 2017                                |
| Telephone        | 010 023 5200                                                                    |
| Toll-free        | 0800 017 160                                                                    |
| Email            | enquiries@inforegulator.org.za                                                  |
| Website          | <a href="https://www.inforegulator.org.za">https://www.inforegulator.org.za</a> |

## 5. Records available without a formal PAIA request

The following categories of records are generally available without submitting Form 2, subject to the record being current and already intended for public access. Their listing here does not waive any lawful restriction that may apply to a specific record.

| Category                              | Examples                                                                                          | Mode of access                         |
|---------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------------|
| Corporate and contact information     | Legal name, registration number, principal address, public contact details                        | Website; public registers; on request  |
| Website service information           | About, services, solutions, public portfolio/work, published contact information                  | Website                                |
| Published legal and privacy notices   | Privacy Notice, Terms of Use, Cookie Policy when published, direct-marketing information          | Website                                |
| PAIA materials                        | This PAIA Manual and public PAIA landing page                                                     | Website; on request; office inspection |
| Published insights and communications | Articles, public announcements, brochures and marketing material intended for public distribution | Website or on request                  |
| Published vacancies                   | Vacancy notices, where applicable and current                                                     | Website or advertised channel          |

Records that are publicly available may still be subject to copyright, contractual terms, confidentiality undertakings, security limitations or other lawful restrictions on reuse.

## 6. Records available in accordance with other legislation

Juchepi Group may create, receive or retain records in accordance with the following legislation, to the extent applicable to its activities. The inclusion of legislation in this table does not mean that every record is automatically accessible to the public; access remains subject to the relevant law and PAIA.

| Legislation                                                                                         | Examples of records that may be held                                                                                                     |
|-----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Companies Act 71 of 2008 and Companies Regulations                                                  | Incorporation and CIPC records, Memorandum of Incorporation, director/shareholder records, resolutions, accounting and corporate records |
| Promotion of Access to Information Act 2 of 2000                                                    | PAIA Manual, PAIA request register, request forms, decisions and related correspondence                                                  |
| Protection of Personal Information Act 4 of 2013                                                    | Privacy notices, processing records, consent/objection records, data-subject requests, operator records, security-compromise records     |
| Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011                                     | Tax records, supporting schedules, accounting records and tax correspondence                                                             |
| Value-Added Tax Act 89 of 1991, where applicable                                                    | VAT invoices, VAT returns and supporting records                                                                                         |
| Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995, where applicable | Employment agreements, remuneration, leave, working-time, disciplinary and employment-relations records                                  |

| Legislation                                                                              | Examples of records that may be held                                                              |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Unemployment Insurance Act 63 of 2001 and COIDA 130 of 1993, where applicable            | UIF and occupational injury/compensation records                                                  |
| Employment Equity Act 55 of 1998 and Skills Development Act 97 of 1998, where applicable | Employment equity and skills/training records where statutory thresholds or duties apply          |
| Consumer Protection Act 68 of 2008                                                       | Consumer-facing terms, transaction and complaint records, where applicable                        |
| Electronic Communications and Transactions Act 25 of 2002                                | Electronic transaction, website, communication and electronic record information where applicable |
| Copyright Act 98 of 1978 and other intellectual-property legislation, where applicable   | Copyright works, licences, assignments, brand and intellectual-property records                   |

## 7. Subjects on which Juchepi Group holds records

| Subject                                   | Categories of records                                                                                                                                                               |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Corporate governance                      | CIPC and incorporation records; Memorandum of Incorporation; director/shareholder information; resolutions; governance records; registers; policies                                 |
| Finance and accounting                    | Budgets; invoices; quotations; purchase records; bank and payment records; accounting ledgers; annual financial records; expense records                                            |
| Tax                                       | Income-tax, VAT and other statutory tax records; supporting schedules; correspondence with tax authorities                                                                          |
| Clients and prospective clients           | Contact information; enquiries; proposals; quotations; contracts; statements of work; project files; correspondence; support records; billing records                               |
| Suppliers, contractors and operators      | Supplier onboarding; contact details; agreements; operator/data-processing terms; invoices; bank/tax records; due-diligence and service records                                     |
| Employees, contractors and applicants     | Recruitment records; employment/contractor agreements; payroll and remuneration; leave; performance; training; qualifications; disciplinary records where applicable                |
| Technology, software and digital projects | Requirements; designs; architecture; source-code/project repositories; test records; deployment records; configuration information; support logs; technical documentation; licences |
| Intellectual property and digital assets  | Domains; websites; software; designs; content; copyrights; licences; assignments; brand records                                                                                     |
| Marketing and communications              | Campaigns; prospect records; mailing lists; consent records; opt-outs/suppression lists; public communications; analytics where lawfully used                                       |
| Website and information security          | Website logs; access logs; security alerts; backups; administrative records; vulnerability and incident records; system and service-provider information                            |
| Legal and compliance                      | Contracts; legal correspondence; POPIA compliance records; PAIA records; risk assessments; retention schedules; policies; complaints; data-subject requests                         |

| Subject                      | Categories of records                                                                                                                                                     |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Trading divisions / products | Records connected with a Juchepi Group trading division or product. Additional categories may be described in supplementary division-specific PAIA and privacy documents. |

### Security and commercial sensitivity

The fact that a category is listed in this Manual does not mean that a requester is entitled to every record in that category. Source code, security architecture, trade secrets, confidential client information, privileged legal material, personal information and other protected records may be refused or redacted where PAIA permits or requires this.

## 8. How to request access to a record

### 8.1 Right of access to records of a private body

Section 50 of PAIA provides that a requester must be given access to a record of a private body where the record is required for the exercise or protection of a right, the procedural requirements are met, and access is not refused under a lawful ground in PAIA.

### 8.2 Prescribed request form

A request must be made using the prescribed Form 2 - Request for Access to Record. The current prescribed form is available from the Information Regulator.

Official PAIA forms: <https://inforegulator.org.za/paia/>

### 8.3 Information to include

- sufficient particulars to identify the requester and the record requested;
- the form of access required;
- contact details for communication with the requester;
- the right the requester seeks to exercise or protect and an explanation of why the record is required for that purpose;
- proof of the capacity or authority in which a request is made on behalf of another person, where applicable; and
- any additional information reasonably required to locate the record or verify identity/authority.

### 8.4 Submission

Requests may be submitted electronically to [info@juchepigroup.com](mailto:info@juchepigroup.com) with the subject line "PAIA REQUEST", or delivered to the principal address stated in section 3. For efficient handling, electronic submission is preferred.

### 8.5 Decision period

Juchepi Group will decide a PAIA request as soon as reasonably possible and, subject to the Act, within 30 days after receiving a complete request. PAIA permits one extension of up to a further 30 days in specified circumstances, including requests involving a large volume of records, searches across locations, necessary consultation, or where the requester agrees to an extension.

## 8.6 Outcome

Where access is granted, Juchepi Group will notify the requester of the form of access and applicable access fee, if any. Where access is refused, the notice will provide adequate reasons based on PAIA without improperly revealing the content of the protected record, and will explain the available remedies.

## 9. Fees applicable to PAIA requests

PAIA permits prescribed request and access fees. Juchepi Group will apply the fee schedule published by the Information Regulator from time to time. As at the compilation date of this Manual, the private-body request fee is R140.00. Additional reproduction, search, preparation and transfer costs may apply as set out in Appendix A.

Where a lawful deposit is required because search and preparation are expected to exceed the prescribed threshold, Juchepi Group will notify the requester in accordance with PAIA. If a request is refused after a deposit has been paid, the deposit will be repaid as required by PAIA.

### Fee schedule changes

The statutory fee schedule may be amended. If this Manual conflicts with a later fee schedule published by the Information Regulator, the current official fee schedule prevails.

## 10. Grounds for refusal and remedies

PAIA contains mandatory and discretionary grounds on which access to a record of a private body may or must be refused. These may include, depending on the record and circumstances:

- protection of the privacy of a third party who is a natural person;
- protection of trade secrets, financial, commercial, scientific or technical information of a third party;
- protection of confidential information supplied by a third party;
- protection of the safety of individuals and security of property or systems;
- records privileged from production in legal proceedings;
- commercial information and trade secrets of Juchepi Group;
- research information of a third party or Juchepi Group; and
- other grounds expressly provided for in PAIA.

Where only part of a record is protected and the remainder can reasonably be severed, Juchepi Group will apply the severability provisions of PAIA and provide access to the non-protected portion where required.

### 10.1 Public-interest override

Where the requirements of section 70 of PAIA are satisfied, the public-interest override may require disclosure notwithstanding an otherwise applicable ground for refusal.

### 10.2 Complaint and court remedies

A requester dissatisfied with a decision of a private body may lodge a complaint with the Information Regulator using the prescribed Form 5, subject to the time periods and requirements in PAIA and the Regulations. The Regulator currently states that complaints relating to private bodies should generally be lodged within 180 days of the refusal or non-response, or after the applicable decision period has elapsed. A requester may also seek appropriate relief from a court in accordance with PAIA.

## 11. Processing of personal information

### 11.1 Purposes of processing

Juchepi Group processes personal information where reasonably necessary for its lawful business activities, including:

- responding to enquiries and managing client/prospect relationships;
- preparing quotations, proposals, contracts and statements of work;
- delivering consulting, technology, software, digital and operational services;
- managing suppliers, contractors, operators and professional advisers;
- billing, accounting, tax and financial administration;
- recruitment, employment and contractor administration where applicable;
- operating, securing, supporting and improving websites, software and systems;
- managing information-security events, fraud, misuse and legal claims;
- complying with legal, regulatory and contractual obligations;
- conducting lawful direct marketing and maintaining marketing preferences/objections; and
- operating specific Juchepi Group products or trading divisions where Juchepi Group acts as responsible party, subject to any supplementary notice.

### 11.2 Categories of data subjects and personal information

| Category of data subject                     | Personal information that may be processed                                                                                                                                                                  |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Clients and prospective clients              | Names; contact details; employer/organisation; role; business requirements; quotations; contracts; billing/transaction information; correspondence; project and support records; consent/preferences        |
| Suppliers, operators and contractors         | Names; business contact details; organisation/registration information; VAT/tax information; banking/payment details; agreements; due-diligence and service records                                         |
| Directors and shareholders                   | Identity and contact information; CIPC/statutory information; governance and shareholding records; declarations; financial or banking information where required                                            |
| Employees, contractors and applicants        | Identity and contact details; CVs; qualifications; employment history; remuneration; bank/tax information; leave/performance/training records; special personal information only where lawfully required    |
| Website visitors                             | IP address; device/browser information; server/security logs; cookie or similar identifiers where used; enquiry information; website interaction data where lawfully collected                              |
| Business contacts                            | Name; role; organisation; business email/telephone; correspondence; meeting and relationship records                                                                                                        |
| Users of Juchepi-operated services/platforms | Account and contact details; authentication/account records; service usage; technical/device/log data; support information; transaction information where applicable                                        |
| Children or other protected categories       | Not intentionally processed in general Juchepi corporate activities. Where a specific product/division lawfully requires such processing, the relevant supplementary privacy and consent framework applies. |

### 11.3 Recipients or categories of recipients

| Category of personal information / purpose     | Recipients or categories of recipients                                                                                                                           |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Business administration and service delivery   | Authorised Juchepi personnel; contractors; professional advisers; relevant clients or project parties where necessary                                            |
| Hosting, cloud, email, software and IT support | Hosting providers; cloud and SaaS providers; email providers; IT/security service providers acting as operators or independent responsible parties as applicable |
| Payments and finance                           | Banks; payment providers; accountants; auditors; tax advisers; SARS and other authorities where lawfully required                                                |
| Legal and compliance                           | Legal advisers; insurers; regulators; courts; law-enforcement or other competent authorities where lawfully required                                             |
| Marketing communications                       | Authorised marketing/email service providers and internal marketing personnel, subject to applicable consent/objection requirements                              |
| Verification or due diligence                  | Relevant verification bodies or service providers where lawful and necessary, with appropriate safeguards                                                        |

### 11.4 Planned transborder flows of personal information

Juchepi Group may use cloud hosting, email, backup, software-development and SaaS providers whose infrastructure, support teams or data centres are located outside South Africa. The jurisdictions may vary by provider and service configuration. Before or when such processing occurs, Juchepi Group will apply section 72 of POPIA and assess the lawful basis and safeguards for the transfer, including adequate protection, binding contractual obligations, consent where appropriate, or another basis permitted by POPIA.

Juchepi Group maintains or will maintain internal operator and transborder-processing records identifying material service providers and, where reasonably ascertainable, relevant processing locations. A requester is not automatically entitled to security-sensitive provider or architecture information merely because it falls within this category.

### 11.5 General description of information-security safeguards

Juchepi Group applies a risk-based set of technical and organisational safeguards appropriate to the nature of the information and the reasonably foreseeable risks. Depending on the system and processing activity, safeguards may include:

- access controls and least-privilege practices;
- password and account-management controls, with multi-factor authentication where supported and appropriate;
- HTTPS/TLS and other encryption controls where appropriate;
- secure hosting, malware protection, firewall/security controls and system hardening where deployed;
- software updates, vulnerability management and change control;
- backup, recovery and business-continuity measures;
- logging, audit trails and security monitoring appropriate to the relevant system;
- data minimisation, retention and secure deletion/disposal practices;
- operator/vendor due diligence and contractual security obligations where required;
- confidentiality obligations for personnel and contractors; and
- security-compromise identification, assessment, escalation and notification procedures.

Security controls are reviewed and adjusted in light of the nature of the information, technology changes, operational requirements and identified risks. No public version of this Manual is intended to disclose detailed security architecture that could undermine the confidentiality, integrity or availability of Juchepi systems or data.

## 12. Availability of this Manual

A copy of this Manual is available:

- on the Juchepi Group website at <https://www.juchepigroup.com/paia/>;
- at Juchepi Group's principal place of business for public inspection during normal business hours, subject to reasonable appointment and security arrangements;
- to any person upon request and upon payment of any reasonable prescribed reproduction amount where applicable; and
- to the Information Regulator upon request.

An electronic copy may be requested from [info@juchepigroup.com](mailto:info@juchepigroup.com).

## 13. Updating and governance of this Manual

The Information Officer will review this Manual on a regular basis and update it when required by legal, regulatory, organisational, technological or material processing changes. Juchepi Group will endeavour to review the Manual at least annually and whenever a material change affects the information required by section 51 of PAIA.

Juchepi Group should maintain a PAIA request register and retain sufficient records to support any annual PAIA reporting required by the Information Regulator.

## 14. Approval and issue

This Manual is issued on behalf of Juchepi Group (Pty) Ltd by its registered Information Officer and Chief Executive Officer.

| Approval item                             | Details                                         |
|-------------------------------------------|-------------------------------------------------|
| Name                                      | Pieter Hendrik Pretorius                        |
| Title                                     | Chief Executive Officer and Information Officer |
| Information Regulator registration number | 2026-066959                                     |
| Effective date                            | 17 September 2026                               |
| Version                                   | 1.0                                             |

Signature: \_\_\_\_\_

**Pieter Hendrik Pretorius**

Chief Executive Officer and Information Officer

## Appendix A. Current PAIA fee schedule for private bodies

The table below reflects the Information Regulator's PAIA fee structure published in 2026 for private bodies. The current official schedule prevails if it is amended after the date of this Manual.

| Item | Description                                                                    | Current amount                                                       |
|------|--------------------------------------------------------------------------------|----------------------------------------------------------------------|
| 1    | Request fee payable by every requester                                         | R140.00                                                              |
| 2    | Photocopy or printed black-and-white copy, per A4 page or part thereof         | R2.00                                                                |
| 3    | Printed copy of an A4-size page                                                | R2.00                                                                |
| 4    | Copy in computer-readable form on requester-provided flash drive               | R40.00                                                               |
| 4    | Copy in computer-readable form on requester-provided CD                        | R40.00                                                               |
| 4    | Copy in computer-readable form on CD supplied by the body                      | R60.00                                                               |
| 5    | Transcription of visual images                                                 | Outsourced; quoted cost                                              |
| 6    | Copy of visual images                                                          | Outsourced; quoted cost                                              |
| 7    | Transcription of audio record, per A4 page                                     | R24.00                                                               |
| 8    | Copy of audio record on requester-provided flash drive                         | R40.00                                                               |
| 8    | Copy of audio record on requester-provided CD                                  | R40.00                                                               |
| 8    | Copy of audio record on CD supplied by the body                                | R60.00                                                               |
| 9    | Search and preparation for each hour or part thereof, excluding the first hour | R145.00                                                              |
| 9    | Maximum search and preparation fee                                             | R435.00                                                              |
| 10   | Deposit where the search exceeds 6 hours                                       | One-third of the applicable amount calculated under prescribed items |
| 11   | Postage, email or other electronic transfer                                    | Actual expense, if any                                               |

Official current fee information: <https://inforegulator.org.za/paia-fees-structure/>

## Appendix B. Official PAIA forms and regulatory resources

| Resource                                     | Purpose / note                                                                                   |
|----------------------------------------------|--------------------------------------------------------------------------------------------------|
| Form 2 - Request for Access to Record        | Prescribed form for requesting access to a record under Regulation 7.                            |
| Form 3 - Outcome of request and fees payable | Prescribed form for notifying a requester of the outcome and applicable fees under Regulation 8. |
| Form 5 - Complaint Form                      | Form used to lodge a PAIA complaint with the Information Regulator under Regulation 10.          |
| PAIA Guide                                   | Regulator guide explaining how PAIA operates and how rights may be exercised.                    |

| Resource                          | Purpose / note                                                                                                              |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Private Body PAIA Manual Template | Regulator template used as the structural basis for this Manual.                                                            |
| Information Regulator eServices   | Portal for PAIA/POPIA services, Information Officer registration, complaints, PAIA annual reporting and PAIA manual upload. |

**Official PAIA page:** <https://infoeregulator.org.za/paia/>

**PAIA Manual upload / eServices:** <https://eservices.infoeregulator.org.za/paiamanuals/>

**Information Regulator contact page:** <https://eservices.infoeregulator.org.za/contact.aspx>

### Regulatory basis used for this Manual

This Manual was prepared against section 51 of PAIA, the Information Regulator's Private Body PAIA Manual Template, the Regulator's current PAIA forms/FAQ guidance, and the 2026 PAIA fee structure. It should be updated if the law, Regulations, Regulator guidance, company structure or processing activities materially change.

END OF MANUAL