



Promotion of Access to Information Act Manual

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PAIA MANUAL

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

Private Body: Innovate Management Consultants (Pty) Ltd

Version: V1-1

Effective Date: 2026/04/09

1. Introduction

- 1.1 This Manual is published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”), as amended, to assist persons who wish to request access to records held by Innovate Management Consultants (Pty) Ltd (the “Company”).
- 1.2 This Manual must be read together with PAIA, POPIA, and the Guide issued by the Information Regulator.

2 Company Details

Registered Name: Innovate Management Consultants (Pty) Ltd
Registration Number: 2021/374903/07
Physical Address: Bloemfontein, Free State, South Africa
Telephone: (+27) 82 386 1740
Website: www.innovateconsultants.co.za
General Email: info@innovateconsultants.co.za

3. Information Officer

Information Officer: Mr. DJJ Jacobs
Email: jaco@innovateconsultants.co.za
Telephone: (+27) 82 386 1740
Physical Address: Bloemfontein, Free State, South Africa
Deputy Information Officer(s), if any: N/A
Registration status with Information Regulator: Registered (2026-004980)

4. Guide on How to Use PAIA and POPIA

- 4.1 The Information Regulator has made available a Guide on how to use PAIA and POPIA.
- 4.2 The Guide explains the objects of PAIA and POPIA, how to submit requests, how to access assistance, applicable remedies, and how to lodge complaints.
- 4.3 The Guide may be obtained from the Information Regulator.

Information Regulator (South Africa)

Website: www.inforegulator.org.za
General enquiries email: enquiries@inforegulator.org.za

Complaints email: PAIAComplaints@inforegulator.org.za
Physical address: Woodmead North Office Park,
54 Maxwell Dr,
Woodmead,
Johannesburg,
2191

5. Records Available Without a Formal PAIA Request

- 5.1 The following categories of records may, to the extent they are publicly available and subject to change, be available without a formal PAIA request:
- 5.1.1 Website content;
 - 5.1.2 marketing brochures and company profiles;
 - 5.1.3 service descriptions;
 - 5.1.4 press releases and general announcements;
 - 5.1.5 contact details published by the Company;
 - 5.1.6 publicly available statutory disclosures;
 - 5.1.7 recruitment notices and career pages, where applicable.
- 5.2 Availability is not guaranteed and may be subject to conditions, format limitations, or prior removal from publication.

6 Categories of Records Held by the Company

The Company may hold records in the categories listed below. Inclusion in this Manual does not mean records are automatically available, and access may be refused on any lawful ground.

6.1 Corporate and governance records

- 6.1.1 incorporation documents;
- 6.1.2 share registers and securities records;
- 6.1.3 director and shareholder resolutions;
- 6.1.4 governance frameworks and policies;
- 6.1.5 statutory registers and filings.

6.2 Financial and tax records

- 6.2.1 accounting records;
- 6.2.2 annual financial statements;
- 6.2.3 budgets and management accounts;
- 6.2.4 banking records;
- 6.2.5 invoices and payment records;
- 6.2.6 tax registrations, returns, and supporting records.

6.3 Operational and commercial records

- 6.3.1 proposals, quotations, statements of work, and contracts;
- 6.3.2 service records and project files;
- 6.3.3 supplier and procurement records;
- 6.3.4 internal policies and procedures;
- 6.3.5 business continuity, IT, and security records.

6.4 Human resources records

- 6.4.1 employment contracts;
- 6.4.2 payroll records;
- 6.4.3 leave and attendance records;
- 6.4.4 disciplinary and grievance records;
- 6.4.5 recruitment and training records;
- 6.4.6 employee benefit records.

6.5 Client and customer records

- 6.5.1 client onboarding documents;
- 6.5.2 communications and instructions;
- 6.5.3 due diligence and KYC records;
- 6.5.4 service history;
- 6.5.5 billing and payment history;
- 6.5.6 complaints and support records.

6.6 Information technology records

- 6.6.1 system logs;
- 6.6.2 access records;
- 6.6.3 software licenses;
- 6.6.4 cybersecurity incident records;
- 6.6.5 backup and disaster recovery records.

6.7 Legal and compliance records

- 6.7.1 licenses and permits;
- 6.7.2 litigation and dispute records;
- 6.7.3 regulatory correspondence;
- 6.7.4 insurance records;
- 6.7.5 PAIA, POPIA, health and safety, and compliance records.

6.8 Marketing and communications records

- 6.8.1 mailing lists;
- 6.8.2 campaign data;
- 6.8.3 event records;
- 6.8.4 website analytics;
- 6.8.5 social media records.

7 Records Required in Terms of Other Legislation

- 7.1 To the extent applicable to the Company, records may be maintained under, among others, the following legislation:
 - 7.1.1 Companies Act 71 of 2008;
 - 7.1.2 Close Corporations Act 69 of 1984 (if applicable);
 - 7.1.3 Consumer Protection Act 68 of 2008;
 - 7.1.4 Electronic Communications and Transactions Act 25 of 2002;
 - 7.1.5 Employment Equity Act 55 of 1998; - Basic Conditions of Employment Act 75 of 1997;
 - 7.1.6 Labour Relations Act 66 of 1995;

- 7.1.7 Occupational Health and Safety Act 85 of 1993;
- 7.1.8 Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 7.1.9 Income Tax Act 58 of 1962;
- 7.1.10 Value-Added Tax Act 89 of 1991;
- 7.1.11 Unemployment Insurance Act 63 of 2001;
- 7.1.12 Unemployment Insurance Contributions Act 4 of 2002;
- 7.1.13 Skills Development Act 97 of 1998;
- 7.1.14 Promotion of Access to Information Act 2 of 2000;
- 7.1.15 Protection of Personal Information Act 4 of 2013;
- 7.1.16 Financial Intelligence Centre Act 38 of 2001, where applicable.

8 Processing of Personal Information in Terms of POPIA

8.1 Purpose of processing

- 8.1.1 The Company processes personal information for business administration, service delivery, recruitment, onboarding, communications, compliance, security, finance, legal obligations, and related operational purposes.

8.2 Categories of data subjects

- 8.2.1 The Company may process personal information relating to:
 - 8.2.1.1 - clients and customers;
 - 8.2.1.2 - prospective clients;
 - 8.2.1.3 - employees and job applicants;
 - 8.2.1.4 - directors, shareholders, and beneficial owners;
 - 8.2.1.5 - suppliers and contractors;
 - 8.2.1.6 - website users and visitors;
 - 8.2.1.7 - professional advisers and
 - 8.2.1.8 counterparties.

8.3 Categories of personal information

- 8.3.1 The Company may process identity details, contact details, employment details, financial details, transaction records, compliance records, correspondence, technical data, and any other information reasonably necessary for its business purposes.

8.4 Recipients or categories of recipients

- 8.4.1 Personal information may be disclosed to operators, regulators, banks, insurers, auditors, legal advisers, cloud and software providers, payment service providers, and other parties where disclosure is necessary or legally required.

8.5 Planned trans-border flows

- 8.5.1 Personal information may be transferred to or stored in jurisdictions outside South Africa where cloud, software, hosting, communication, analytics, support, or group infrastructure is used, subject to lawful safeguards.

8.6 General description of security measures

- 8.6.1 The Company maintains reasonable technical and organizational measures, including access controls, confidentiality obligations, password protection, system controls, restricted permissions, backup measures, and contractual safeguards with operators where appropriate.

9 How to Request Access to Records

- 9.1 A requester must complete the prescribed PAIA request form and submit it to the Information Officer at the contact details set out above.
- 9.2 A request should contain sufficient detail to enable the Company to identify:
- 9.2.1 the record requested;
 - 9.2.2 the requester;
 - 9.2.3 the form of access required;
 - 9.2.4 the right sought to be exercised or protected, where applicable;
 - 9.2.5 the basis on which the record is required; and
 - 9.2.6 the requester's contact details.
- 9.3 Requests may be refused if they are vague, defective, abusive, overly broad, or fail to comply with PAIA.

10 Fees

- 10.1 Request fees, access fees, reproduction fees, and deposits may be charged as prescribed under PAIA.
- 10.2 The requester may be required to pay the prescribed fee before the request is processed or before access is granted.

11 Grounds for Refusal of Access

- 11.1 Access may be refused on any lawful ground under PAIA, including where disclosure would involve:
- 11.1.1 unreasonable disclosure of personal information of a third party;
 - 11.1.2 disclosure of trade secrets or commercial information of the Company or a third party;
 - 11.1.3 breach of a duty of confidence owed to a third party;
 - 11.1.4 endangerment of safety or property;
 - 11.1.5 prejudice to law enforcement, legal proceedings, or investigations;
 - 11.1.6 Privileged records;
 - 11.1.7 manifestly frivolous or vexatious requests; or
 - 11.1.8 an unreasonable diversion of Company resources.

12 Remedies Available

12.1 If a request is refused, the requester may exercise any right or remedy available in law, including lodging a complaint with the Information Regulator or applying to court where appropriate.

13 Availability of this Manual

13.1 This Manual is available:

- 13.1.1 on the Company's Website, where applicable;
- 13.1.2 at the Company's registered office for inspection during ordinary business hours by prior arrangement; and
- 13.1.3 on request, subject to applicable reproduction fees.

14 Updating of Manual

14.1 The Company may update this Manual from time to time to reflect operational or legal developments.