

**CHASE WATERFORD (PTY) LTD**

# **PAIA MANUAL**

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

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## **1. LIST OF ACRONYMS AND ABBREVIATIONS**

|     |             |                                                                    |
|-----|-------------|--------------------------------------------------------------------|
| 1.1 | “Director”  | Director and Chief Information Officer                             |
| 1.2 | “DIO”       | Deputy Information Officer;                                        |
| 1.3 | “IO”        | Information Officer;                                               |
| 1.4 | “Minister”  | Minister of Justice and Correctional Services;                     |
| 1.5 | “PAIA”      | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.6 | “POPIA”     | Protection of Personal Information Act No.4 of 2013;               |
| 1.7 | “Regulator” | Information Regulator; and                                         |
| 1.8 | “Republic”  | Republic of South Africa                                           |

## **2. PURPOSE OF PAIA MANUAL**

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CHASE WATERFORD (PTY) LTD**

#### **3.1. Chief Information Officer**

Name: Max Kennett - Director  
Tel: (021) 701 4721  
Email: mkennett@chasewaterford.com

#### **3.2. Deputy Information Officer**

Name: Nicola Evans Kennett - Deputy Information Officer  
Tel: (021) 701 4721  
Email: nevans@chasewaterford.com

#### **3.3 Access to information general contacts**

Email: info@chasewaterford.com

#### **3.4 National or Head Office**

Physical Address: Unit 110, The Cliffs, 3 Niagara Way, Tyger Falls, Bellville, Cape Town, 7530  
  
Telephone: (021) 701 4721  
  
Email: info@chasewaterford.com  
  
Website: www.chasewaterford.com

### **4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of:

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
  - 4.3.2.1. the Information Officer of every public body, and
  - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3.3. the manner and form of a request for-
  - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

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<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained:
- 4.5.1. upon request to the Information Officer;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
- 4.6.1. English and Afrikaans.

## 5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

| Category of records | Types of the Record         | Available on Website | Available upon request |
|---------------------|-----------------------------|----------------------|------------------------|
| Company services    | Lists and descriptions      | x                    | x                      |
| Company details     | Address and contact details | x                    | x                      |

## 6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

| Category of Records         | Applicable Legislation                           |
|-----------------------------|--------------------------------------------------|
| Memorandum of Incorporation | Companies Act 71 of 2008                         |
| PAIA Manual                 | Promotion of Access to Information Act 2 of 2000 |

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

| Subjects on which company holds records                                                       | Categories of records                                                                                                                      |
|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic documents, plans, proposals, client information, financial performance and records. | Annual Reports, Strategic Plan, Annual Performance Plan, Annual Finance Statements.                                                        |
| Human Resources                                                                               | <ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Recruitment records</li> <li>- Employees records</li> </ul> |

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

- Providing Services or Products: To deliver services or products requested by customers or clients.
- Customer Relationship Management: To maintain communication, respond to inquiries, and provide support.
- Compliance with Legal Obligations: To meet regulatory requirements, such as tax reporting or employment laws.

- Employment and HR Management: To manage employee records, payroll, benefits, and performance.
- Marketing and Communication: To inform customers about new products, services, or promotions.
- Security and Fraud Prevention: To ensure the safety of data and prevent unauthorized access or fraudulent activities.

## 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

| Categories of Data Subjects | Personal Information that may be processed                                                |
|-----------------------------|-------------------------------------------------------------------------------------------|
| Customers / Clients         | Name, address, registration numbers or tax numbers, contact information and bank details. |
| Service Providers           | Names, registration number, VAT numbers, addresses, and bank details.                     |
| Employees                   | Address, qualifications and bank details.                                                 |

## 8.3 The recipients or categories of recipients to whom the personal information may be supplied

| Category of personal information                   | Recipients or Categories of Recipients to whom the personal information may be supplied |
|----------------------------------------------------|-----------------------------------------------------------------------------------------|
| Identity number and names, for criminal checks     | South African Police Services                                                           |
| Qualifications for qualification verifications     | South African Qualifications Authority                                                  |
| Credit and payment history, for credit information | Credit Bureaus                                                                          |

## 8.4 Planned transborder flows of personal information

Personal information relating to employees, clients and suppliers may be shared with the company's Group Holding company in the USA for purposes related to their employment, invoicing or payments for services.

## 8.5 General description of Information Security Measures to be implemented by the party responsible to ensure the confidentiality, integrity and availability of the information

The company implements the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- Data Encryption: Encrypt sensitive information to protect it during storage and transmission.
- Anti-virus Solutions: Use software to detect and remove viruses that could compromise data security.
- Anti-malware Solutions: Implement tools to safeguard against malware attacks.
- Access Controls: Restrict access to personal information to authorized personnel only.



- Regular Security Audits: Conduct periodic reviews to identify and address vulnerabilities.
- Secure Storage: Use secure servers or cloud services with robust security protocols.
- Employee Training: Educate staff on data protection policies and best practices.
- Firewalls: Use of a robust firewall to prevent unauthorized access to systems.
- Data Backup: Regularly back up data to prevent loss in case of system failure or cyberattacks.

These measures help protect personal information from unauthorized access, breaches, and cyber threats.

## 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available:

- 9.1.1 on [www.chasewaterford.com](http://www.chasewaterford.com);
- 9.1.2 head office of Chase Waterford (Pty) Ltd for public inspection during normal business hours;
- 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 10. UPDATING OF THE MANUAL

The head of Chase Waterford will, on a regular basis, ensure this manual is updated.

*Issued by*



**Max Kennett**

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**Director**