

**PAIA MANUAL**  
**PREPARED BY WALKER & ASSOCIATES**

**IN COMPLIANCE WITH THE PROVISIONS OF SECTION 51  
OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2  
OF 2000  
(AS AMENDED)**

Date of compilation: 1 September 2024

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

- |      |                               |  |
|------|-------------------------------|--|
| 1.1. | <b>"Data Subject"</b>         | means the person (natural or juristic) to whom the Personal Information relates;   |
| 1.2. | <b>"IO"</b>                   | means the Information Officer as defined in section 1 of PAIA (being, for the purpose of this Manual, the person described in clause 3.1);   |
| 1.3. | <b>"PAIA"</b>                 | means the Promotion of Access to Information Act 2 of 2000;  |
| 1.4. | <b>"Personal Information"</b> | <p>means information relating to an identifiable natural person including but not limited to:-</p> <div style="margin-left: 40px;"> <p>1.4.1. information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;</p> <p>1.4.2. information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;</p> </div> |

- 1.4.3. any identifying number, symbol or other particular assigned to the individual;
- 1.4.4. the address, fingerprints or blood type of the individual;
- 1.4.5. the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;
- 1.4.6. correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- 1.4.7. the views or opinions of another individual about the individual;
- 1.4.8. the view or opinions of another individual about a proposal for a grant, an award or a prize to the individual where it appears with the view or opinions of the other individual; and
- 1.4.9. the name of the individual where it appears with other personal information relating to the individual or where the

disclosure of the name itself would reveal information about the individual, but excludes information about an individual who has been dead for more than 20 years;

- 1.5. **"process(ed)"** shall have the meaning defined in section 2 of the PAIA;
- 1.6. **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013;
- 1.7. **"Private Body"** means a 'private body' as defined in section 1 of PAIA;
- 1.8. **"Public Body"** means a 'public body' as defined in section 1 of PAIA;
- 1.9. **"Records"** of , or in relation to, a Public or Private Body, means any recorded information:-
  - 1.9.1. regardless of form or medium;
  - 1.9.2. in the possession or under the control of that Public or Private Body, respectively; and
  - 1.9.3. whether or not it was created by that Public or Private Body, respectively;
- 1.10. **"Regulator"** means the Information Regulator as defined in section 1 of PAIA;
- 1.11. **"Republic"** means the Republic of South Africa;

- 1.12. **“W&A”** means Walker and Associates, a Private Body being a firm of attorneys, the sole proprietor of which is Dean Thomas Walker.

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

This PAIA Manual is useful for the public to:-

- 2.1. check the categories of records held by W&A which are available without a person having to submit a formal PAIA request;
- 2.2. have a sufficient understanding of how to make a request for access to a Record of W& A, by providing a description of the subjects on which W&A holds Records and the categories of Records held on each subject;
- 2.3. know the description of the records of W&A which are available in accordance with any other legislation;
- 2.4. access all the relevant contact details of the IO who will assist the public with the records they intend to access;
- 2.5. know the description of the guide made available by the Regulator on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. know if W&A will process Personal Information, the purpose of processing of Personal Information and the description of the categories of Data Subjects and of the information and categories of the 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 W&A has planned to transfer or process Personal Information outside the Republic and the recipients or categories of recipients to whom the

Personal Information may be supplied; and

- 2.10. know whether W&A 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 W&A**

3.1. **Proprietor and Information Officer**

Name: Dean Thomas Walker in his capacity as the sole proprietor of W&A, a Private Body for the purposes of PAIA

Telephone: 083 375 0087

E-mail: dean@walkerassociates.co.za

3.2. **Office**

Postal Address: 89 Bernard Road  
Lovemore Heights  
Gqeberha  
6070

Physical Address: 89 Bernard Road  
Lovemore Heights  
Gqeberha  
6070

Telephone: 083 375 0087

Website: www.walkerassociates.co.za

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, updated and made available a 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 or POPIA.

4.2. The Guide is available in each of the official languages and braille.

4.3. The 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 the IO of every Public and Private Body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

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 of PAIA; and

4.3.3.2. access to a record of a Private Body contemplated in section 50 of PAIA;

4.3.4. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.5. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA, including the manner of lodging:-

4.3.5.1. a complaint to the Regulator; and

4.3.5.2. an application with a court against a decision by the IO 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;

4.3.6. the provisions of section 14 and 51 of PAIA requiring a Public Body and Private Body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.7. the provisions of section 15 and 52 of PAIA providing for the voluntary disclosure of categories of Records by a Public Body and Private Body, respectively;

4.3.8. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

4.3.9. the regulations made in terms of section 92 of PAIA.

4.4. The Guide can be obtained:-

4.4.1. upon request to the IO;

4.4.2. from the website of the Regulator  
(<https://www.inforegulator.org.za/paia-guidelines/>).

4.5. A copy of the Guide is also available from the Regulator in the following two official languages, for public inspection during normal office hours:-

4.5.1. English;

4.5.2. Afrikaans.

5. **CATEGORIES OF RECORDS OF W&A WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS USING FORM C IN PAIA**

<b>CATEGORY OF RECORD</b>	<b>TYPE OF RECORDS</b>	<b>AVAILABLE ON WEBSITE</b>	<b>AVAILABLE UPON REQUEST</b>
Contact information of W&A	Physical address, postal address, email address, telephone number and website address	Yes	Yes
Marketing material	Nature of business, profile and services	Yes	Yes
Proprietor of W&A	Name and Surname	Yes	Yes

6. **DESCRIPTION OF THE RECORDS OF W&A WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

W&A is required to retain records as required by applicable legislation. Records are held for the purposes of PAIA in accordance with the following legislation, to the extent applicable:-

- 6.1. Basic Conditions of Employment Act No. 75 of 1997;
- 6.2. Broad-Based Black Economic Empowerment Act No. 53 of 2003;
- 6.3. Companies Act No. 71 of 2008;
- 6.4. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993;
- 6.5. Electronic Communications and Transaction Act No. 25 of 2002;
- 6.6. Employment Equity Act No. 55 of 1998;

- 6.7. Income Tax Act No. 58 of 1962;
- 6.8. Labour Relations Act No. 66 of 1995;
- 6.9. Occupational Health and Safety Act No. 85 of 1993;
- 6.10. Prevention and Combatting of Corrupt Activities Act No. 12 of 2004;
- 6.11. Prevention of Organised Crime Act No. 121 of 1998;
- 6.12. Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004;
- 6.13. Regulation of Interception of Communications and Provision of Communication-Related Information Act No. 70 of 2002;
- 6.14. Skills Development Levies Act No. 9 of 1999;
- 6.15. Skills Development Act No. 97 of 1999;
- 6.16. Unemployment Insurance Act No. 63 of 2001; and
- 6.17. Value Added Tax Act No. 89 of 1991.

7. **DESCRIPTION OF THE SUBJECTS IN RESPECT OF WHICH W&A HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY W&A**

SUBJECTS ON WHICH W&A HOLDS RECORDS	CATEGORIES OF RECORDS
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> <li>• Annual reports</li> <li>• Strategic and business plans</li> <li>• Client proposals</li> </ul>
Accounting	<ul style="list-style-type: none"> <li>• General ledgers</li> <li>• Journals</li> <li>• Statements/invoices</li> <li>• Financial reports</li> <li>• Payroll</li> </ul>

	<ul style="list-style-type: none"> <li>• Budgets</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Policies and procedures</li> <li>• List of employees</li> <li>• Personal information of employees</li> <li>• Salaries of employees</li> <li>• Leave records</li> <li>• Training records</li> </ul>
Contracting	<ul style="list-style-type: none"> <li>• Contracts with clients</li> <li>• Contracts with suppliers</li> <li>• Employee contracts of employment</li> <li>• Personal information of clients, suppliers, shareholder employees</li> </ul>
Risk Managment	<ul style="list-style-type: none"> <li>• Assessments</li> <li>• Registers</li> <li>• Reports</li> </ul>
Compliance and Legal	<ul style="list-style-type: none"> <li>• Assessments</li> <li>• Frameworks</li> <li>• Reviews</li> <li>• Reports</li> <li>• Licences, permits and authorisations</li> </ul>
Corporate Governance	<ul style="list-style-type: none"> <li>• Policies and procedures</li> <li>• Meeting information</li> <li>• Audit reports</li> </ul>

## 8. **PROCESSING OF PERSONAL INFORMATON**

### 8.1. **Purpose of processing Personal Information**

8.1.1. W&A will process your Personal Information in the ordinary course of its business. Primarily, W&A will use your Personal Information only for the purpose for which it was originally or primarily collected. Your Personal Information will only be used for a secondary purpose if such purpose constitutes a legitimate interest and is closely aligned with

the original or primary purpose for which your Personal Information was collected.

8.1.2. W&A processes Personal Information for several reasons, including, but not limited to:-

- 8.1.2.1. providing services requested;
- 8.1.2.2. managing the commercial relationship with clients;
- 8.1.2.3. creating and managing supplier relationships;
- 8.1.2.4. managing contracts, invoices and accounting;
- 8.1.2.5. sending quotation estimates and invoices;
- 8.1.2.6. general human resources and finance functions including those obligations imposed by legislation;
- 8.1.2.7. procurement processes; and
- 8.1.2.8. to allow for proper functioning of its website which includes, amongst others, proper display of content, interface personalisation and ensuring that the website is safe and secure to protect against misuse.

**8.2. Description of categories of Data Subjects and of information or categories of information relating thereto**

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Clients – Natural Persons	Names and surnames, contact details, postal address, date of birth, ID number, tax related information, nationality, gender, confidential correspondence.
Clients – Juristic Persons/ Entities	Names and surnames of contact persons, name of legal entity, physical and postal address and contact details, registration number, founding documents, tax

	related information, authorized signatories, ultimate beneficial owners and all information in that regard
Service Providers/Vendors	Names of contact persons, name of legal entity, physical and postal address and contact details, registration number, founding document, tax related information, authorized signatories, beneficiaries.
Employees	Gender, pregnancy, marital status, ethnicity, age, language, education information, financial information, employment history, ID number, physical and postal address, contact details, criminal behaviour, well-being, CV's.

**8.3. The recipients or categories of recipients to whom the Personal Information may be supplied**

<b>CATEGORIES OF PERSONAL INFORMATION</b>	<b>RECIPIENT OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED</b>
Identity number and names, for criminal checks	South African Police Service
Qualifications, for qualification verification	South African Qualification Authority
Credit and payment history, for credit information	Credit Bureaus
Financial information	Financiers, banks, SARS, audit firms, the Financial Intelligence Centre
Client information	Financiers, law firms, service providers, sub-consultants, the Financial Intelligence Centre
Reference checks	Financiers, service providers

**8.4. Planned transborder flows of Personal Information**

W&A operates in South Africa only and will accordingly not permit the transborder flow of Personal Information.

**8.5. General description of information security measures to be implemented by W&A to ensure the confidentiality, integrity and availability of Personal Information**

W&A shall utilise up to date technology to ensure the confidentiality and integrity of the Personal Information of its clients under its care.

**9. AVAILABILITY OF THE PAIA MANUAL AND PAIA FORMS**

9.1. A copy of the Manual is available:-

9.1.1.1. on W&A's website [www.walkerandassociates.co.za](http://www.walkerandassociates.co.za);

9.1.1.2. the office of W&A for public inspection during normal business hours, by prior appointment;

9.1.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.1.4. to the Regulator upon request.

9.2. A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations issued under PAIA, shall be payable per each A4-sized photocopy made.

**10. UPDATING OF THE PAIA MANUAL**

The proprietor of W&A shall update this Manual on a regular basis.