PAIA & POPIA MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and the Protection of Personal Information Act 4 of 2013

- **Approved by Information Officer:** Alexander Melck
- **Designation:** Statutory Information Officer
- **Last Reviewed & Published:** August 2026

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1. Introduction

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA") and updated in accordance with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

PAIA grants requesters access to records held by private and public bodies, provided such access is required for the exercise or protection of any rights. It also sets out the procedural requirements that requests must comply with.

The purpose of this Manual is to assist potential requesters in requesting access to information held by ***Phlogiston Conductive Industries (Pty) Ltd.*** and to describe the personal information processing operations conducted by the company.

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2. Company Contact Details & Information Officer

In terms of Section 55(1) of POPIA and PAIA, the Managing Director / Executive Officer automatically fulfills the statutory role of Information Officer unless formally delegated in writing.

Entity Name	Phlogiston Conductive Industries (Pty) Ltd.
Trading As Names	A Brand on Purpose, The Video Crew, & Molo Mollo
Registration Number	2014/107502/07
Registered Address	Molo Mollo House 216 Sisulu Street Pretoria Central 0002 South Africa
Information Officer	Alexander Melck
Contact Email	alexander@phlogiston.co.za
Website	www.phlogiston.co.za

3. Guide of the Information Regulator

The Information Regulator (South Africa) has compiled a Guide, in terms of Section 10 of PAIA, containing information to assist individuals who wish to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each official language on the Information Regulator's website:

- **Website:** https://inforegulator.org.za/
- **Email for General Enquiries:** enquiries@inforegulator.org.za
- **Email for PAIA Complaints:** PAIAComplaints@inforegulator.org.za

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4. Records Available without Formal Request (Section 51(1)(c))

The following categories of records are automatically available without a requester having to request access in terms of PAIA. These records may be accessed via the company website or requested directly via email:

- Public marketing materials, brochures, and brand guides.
- Public website content and legal disclaimers.
- Published whitepapers, articles, and public project profiles.
- General corporate identity guidelines.

5. Records Kept in Accordance with Other Legislation (Section 51(1)(d))

Phlogiston Conductive Industries (Pty) Ltd. maintains records in terms of the following legislation, where applicable:

- Companies Act 71 of 2008
- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Value Added Tax Act 89 of 1991

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6. Description of Subjects & Categories of Records Held (Section 51(1)(e))

Access to the records specified below must be formally requested using the statutory PAIA request process detailed in Section 8 of this Manual.

Category of Records	Description & Contents
Corporate & Legal Records	Memorandum of Incorporation, share registers, company secretarial documents, board resolutions, lease agreements, operational policies, and corporate governance frameworks.
Financial & Tax Records	Audited financial statements, management accounts, accounting records, VAT returns, tax assessments, bank statements, asset registers, and supplier invoices.
Client & Operational Records	Client contracts, consultancy scope agreements, brand handbooks, project repositories, correspondence, service delivery proposals, and non-disclosure agreements (NDAs).
Personnel & Employment Records	Employment contracts, payroll records, statutory employee returns, training records, internal performance notes, and leave records.
Technology & Intellectual Property	Website development files, design assets, software licenses, domain registrations, IT security protocols, and proprietary methodology documentation.

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7. Protection of Personal Information Act (POPIA)

7.1 Purpose of Processing Personal Information

Phlogiston Conductive Industries (Pty) Ltd. collects and processes personal information for the following specific purposes:

- To render professional consulting, brand strategy, design, and communications services to clients.
- To fulfill contractual obligations and process billing/invoicing.
- To comply with legal, tax, and administrative statutory requirements.
- To maintain client relations, communications, and project progress updates.
- To process job applications and manage contractor or employee records.

7.2 Categories of Data Subjects and Information Processed

Data Subject Category	Categories of Personal Information Processed
Clients & Prospects	Contact details (names, emails, telephone numbers), physical addresses, business registration details, billing details, VAT numbers, and contract documentation.
Employees & Contractors	Identity numbers, contact information, physical addresses, banking details, tax numbers, qualification records, and contract terms.
Suppliers & Vendors	Business contact details, banking details, tax numbers, BEE certificates, and contract documentation.
All Stakeholders (CRM & Profiling)	Detailed CRM records, interaction history, meeting touchpoints, preference tracking, and internal qualitative assessments, observations, or deductions regarding stakeholder engagement and communication dynamics.

7.3 Recipients to whom Personal Information may be Supplied

Personal information may be disclosed to third parties under the following circumstances:

- Statutory bodies and regulatory authorities (e.g., SARS) where required by law.
- Third-party service providers and sub-processors bound by strict confidentiality agreements (e.g., accounting software providers, cloud storage providers, web hosting services).
- Professional advisors, including legal counsel and auditors.

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7.4 Planned Cross-Border Transfers of Personal Information

In delivering services, personal information may be stored or processed using secure cloud service providers (such as Google Workspace, Claude, GitHub, or specialized analytics platforms) whose servers may be situated outside South Africa. All cross-border data transfers comply with Section 72 of POPIA, ensuring the recipient jurisdiction or provider offers an adequate level of data protection.

7.5 Information Security Measures

Phlogiston Conductive Industries (Pty) Ltd. employs appropriate, reasonable technical and organizational measures to protect personal information against loss, damage, unauthorized destruction, or unlawful access. Measures include:

- Role-based access controls and strong password policies.
- Encrypted cloud infrastructure and secure document repositories.
- Regular review of internal data access permissions.
- Non-disclosure agreements executed with employees, sub-contractors, and partners.

8. Request Procedure for PAIA Records

8.1 How to Submit a Request

A requester must submit a completed **Form 2 (Request for Access to Record)** as prescribed by the Information Regulator, addressed to the Information Officer at alexander@phlogiston.co.za.

The request must clearly set out the following:

1. Sufficient detail to enable the Information Officer to identify the requested record(s).
2. Sufficient detail to identify the requester (including contact details).
3. Which right the requester is seeking to exercise or protect, and an explanation of why the record is required for that purpose.
4. The form or format of access requested.

8.2 Decision and Notice

The Information Officer will process the request within **30 calendar days** of receipt and notify the requester in writing of the decision. The 30-day period may be extended by a further 30 days if the request involves a large volume of records or requires a search through geographically dispersed records.

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8.3 Fees

Statutory prescribed fees may be applicable before a request is processed or records are disclosed:

- **Request Fee:** A non-refundable fee payable upon submission of a request (if applicable under PAIA regulations).
- **Access Fee:** Payable for searching, preparing, and reproducing the requested records.

8.4 Grounds for Refusal of Access

PAIA sets out imperative grounds under which a request for access to records must or may be refused. These include:

- Mandatory protection of the privacy of a third party who is a natural person.
- Mandatory protection of commercial information of a third party or the company (trade secrets, financial information).
- Mandatory protection of confidential information governed by contract or agreement.
- Protection of legal professional privilege or research/technical safety information.

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