

PAIA MANUAL

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

DATE OF COMPILATION: 01/06/2026

DATE OF REVISION: 01/06/2036

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive 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 a 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 MNA INVESTMENTS (PTY) LTD

3.1. Chief Information Officer

Name: Rose Lubisi
Tel: 011 483 1190
Email: rose@mnainvest.co.za

3.2. Access to information general contacts

Email: info@mnainvest.co.za

3.4. National or Head Office

Physical Address: 25 Loots Road, Blairgowrie, Randburg
Tel: 011 483 1190
Email: info@mnainvest.co.za
Website: www.mnainvestments.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, 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 contact details 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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
- 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-
- 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 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ 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.*

² 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.*

³ 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.*

⁴ 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.

- 4.3.8. the provisions of sections 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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-

5. CATEGORIES OF RECORDS OF MNA INVESTMENTS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Available on Website	Available upon telephonic request
Confirmation of Employment		X
PAIA Manual	X	X
BEE Affidavit and status		X

6 & 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY MNA INVESTMENTS (PTY) LTD

Subjects on which the body holds records	Categories of records
Company Documentation	- CIPC Registration - Proof of Banking Details - Proof of VAT Registration - Proof of Tax Compliance
Human Resources	- HR policies and procedures - Employee records (Limited)
Other	- Other documentation as deemed appropriate by the necessary authority and management

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

In providing a service to our clients, MNA Investments (Pty) Ltd may collect and use the following kinds of information:

- o financial;
- o regulatory;
- o other

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 identity numbers, bank details, compliance documentation, regulatory documentation, financial documentation, and other sensitive information and documentation
Service Providers	names, registration number, vat numbers, address, service level agreements, regulatory and compliance documentation bank details and other sensitive information and documentation
Employees	address, identity numbers, qualifications, bank details gender and race and other sensitive information and documentation

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
Documentation of clients for verification checks	Verification Bodies
Other documentation	Authorised recipients as confirmed by management

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

Where MNA Investments (Pty) Ltd discloses your personal information to its agents or sub-contractors for verification or other purposes, the agent or sub-contractor in question will be obligated to use that personal information in accordance with the terms of this manual and applicable legislation including PAIA.

In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, MNA Investments (Pty) Ltd may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

In securing your data, MNA Investments (Pty) Ltd will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. Cross-border data transfers Information that MNA Investments (Pty) Ltd collects may be stored and processed in and transferred between any of the countries in which MNA Investments (Pty) Ltd operates to enable the use of the information in accordance with this privacy policy.

In terms of the Protection of Personal Information Act, 2013 ("POPIA") ("Personal Information") or ("PI") shall mean the definition as given in the POPIA Chapter 1, Section 1.

Definitions:

- 1.1. "divulging party" – the party disclosing confidential information to the other in terms of this agreement;
- 1.2. "receiving party" – the party receiving confidential information from the divulging party;
- 1.3. "the parties" – MNA Investments (Pty) Ltd and the receiving or divulging party.

The Parties may come into contact or have access to Personal Information and other information that may be classified or deemed as private or confidential and for which the other Party is responsible. Such Personal Information may also be deemed or considered as private and confidential as it relates to any third party who may be directly or indirectly associated with these General Terms. Further, it is acknowledged and agreed by the Parties, that they have the necessary consent to share or disclose the Personal Information and that the information may have value.

The Parties agree that they will at all times comply with POPIA's Regulations and Codes of Conduct and that they shall only collect, use and process Personal Information it comes into contact with pursuant to these General Terms in a lawful manner, and only to the extent required to execute the services, or to provide the Goods and to perform their respective obligations in terms of these General Terms.

The Parties agree that it shall put in place, and at all times maintain, appropriate physical, technological and contractual security measures to ensure the protection and confidentiality of Personal Information that it, or its employees, its contractors or other authorised individuals come into contact with pursuant to these General Terms.

Unless so required by law, the Parties agree that it shall not disclose any Personal Information as defined in POPIA to any third party without the prior written consent of the other Party, and notwithstanding anything to the contrary contained herein, shall any party in no manner whatsoever transfer any Personal Information out of the Republic of South Africa.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on the company website

9.1.2 head office of MNA Investments (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.

Issued by:

Rose Lubisi
Information Officer
MNA Investments (Pty) Ltd