

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

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

Private Body – CASIA

Document Field	Detail
Private body	CASIA
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A. APPROVAL AND DOCUMENT CONTROL

Role	Name	Approval / Responsibility	Signature	Date
Head of Private Body / Director	Isaac Itshekang Modikwe	Approves section 51 Manual and ensures public availability		10 September 2026
Information Officer	Ayanda Diya	Administers PAIA/POPIA access requests and regulatory obligations		10 September 2026

Version Control

Version	Date	Change	Approved By
1.0	10 September 2026	Initial comprehensive PAIA Manual	Head of Private Body

Availability Control

- Publish the current Manual on CASIA's website if it has one.
- Keep a copy available for public inspection at the head office during normal business hours.
- Upload the Manual on the Information Regulator eServices PAIA Manual facility.
- Keep the Regulator's PAIA Guide available at the head office in at least two official languages.
- Review the Manual when categories of records, contact details, processing activities or legislation change.



B. TABLE OF CONTENTS

1	Acronyms and definitions
2	Introduction and purpose
3	About CASIA
4	Key contact details
5	Guide on how to use PAIA
6	Categories of automatically available records
7	Records available under other legislation
8	Subjects and categories of records held
9	Processing of personal information under POPIA
10	Recipients of personal information
11	Cross-border transfers
12	Security safeguards
13	How to request access
14	Request fees and access fees
15	Decision process and timeframes
16	Grounds for refusal
17	Third-party notification
18	Remedies and complaints
19	Records that cannot be found / do not exist
20	Forms and communication templates
21	Internal PAIA request-handling SOP
22	Request register and annual reporting
23	Availability and languages
24	Updating this Manual
25	Annexures and registers
26	Regulatory reference register



1. ACRONYMS AND DEFINITIONS

Term	Meaning
CASIA	CASIA, Registration No. 2025/009960/07
DIO	Deputy Information Officer
HPB	Head of Private Body
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Requester	A person requesting access to a record under PAIA
Personal requester	A requester seeking a record containing personal information about that requester
Record	Recorded information in any form under the control of CASIA, whether created by CASIA or another person

2. INTRODUCTION AND PURPOSE

Section 32 of the Constitution provides for a right of access to information, subject to legislation giving effect to that right. PAIA gives effect to the constitutional right of access to information and regulates access to records held by public and private bodies. This Manual is prepared for CASIA as a private body under section 51 of PAIA.

- Explain what categories of records CASIA holds.
- Identify records that may be available without a formal PAIA request.
- Explain how to request access to records.
- Provide contact details for the person responsible for PAIA requests.
- Describe records held under other legislation.
- Describe CASIA's processing of personal information for the section 51/POPIA disclosure requirements.
- Explain fees, refusal grounds, remedies and complaints.
- Support transparent and consistent handling of access requests.

3. ABOUT CASIA

CASIA is a South African private company/business operating technology-enabled business and service platforms. Its activities include company-registration and startup administration services, digital/platform operations, client support, sales/marketing, finance, human resources, compliance, supplier management and related business administration.

3.1 Nature of records

CASIA holds records in electronic and physical form. Records may be located in email, cloud platforms, internal systems, accounting systems, HR systems, customer relationship management tools, project/document repositories, paper files and third-party systems used on CASIA's behalf.



4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Function	Details
Head of Private Body	Isaac Itshekang Modikwe – Director [confirm HPB registration/details]
Information Officer	Ayanda Diya
Deputy Information Officer(s)	n/a
PAIA request email	hello@casia.africa
General telephone	072 902 6673
Physical address	First Floor, 353 Festival Street, Hatfield, Pretoria
Postal address	First Floor, 353 Festival Street, Hatfield, Pretoria
Website	www.casia.africa

A requester should direct PAIA requests and related correspondence to the Information Officer / Head of Private Body using the details above. CASIA will assist a requester with reasonable procedural guidance without providing legal advice.

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator has published a Guide in terms of section 10 of PAIA explaining how PAIA and relevant POPIA access rights work, how to submit requests, available remedies, applicable forms and fees, and the contact details of information officers. The Guide is available through the Information Regulator and its website/eServices resources.

- The Guide is available in all official languages and in accessible formats made available by the Regulator.
- Members of the public may inspect or request access to the Guide from the Regulator and may request assistance from CASIA's Information Officer.
- CASIA must keep the Guide available for public inspection at its head office in at least two official languages.

CASIA languages for public inspection: 1) [INSERT LANGUAGE] 2) [INSERT LANGUAGE].

6. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Under section 52, a private body may voluntarily make categories of records automatically available. The following records are generally intended to be accessible without a formal PAIA request, subject to confidentiality, intellectual-property, security and third-party restrictions.

Category	Examples	Website	On Request
Corporate/public information	Company profile, public contact information, public product/service information	Yes	Yes
Marketing/publications	Brochures, public social-media content, press releases, public campaigns	Yes	Yes
Public policies	Published privacy notice, website terms, cookie notice, PAIA Manual	Yes	Yes



Public vacancies	Job adverts and publicly issued role descriptions	Where published	Yes
Public compliance information	Public registration or compliance statements intended for public distribution	Where published	Yes

Automatic availability does not mean every document within a category is public. CASIA may withhold information that is confidential, personal, privileged, commercially sensitive, security-sensitive or otherwise protected by law.

7. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Legislation	Examples of Records
Companies Act 71 of 2008	Memorandum of Incorporation, company registers, director/company records, annual-return/beneficial-ownership supporting records as applicable
Income Tax Act 58 of 1962 / Tax Administration Act 28 of 2011	Tax returns, assessments, supporting tax records, correspondence
Value-Added Tax Act 89 of 1991	VAT records where registered/applicable
Basic Conditions of Employment Act 75 of 1997	Employment conditions and required employment records
Labour Relations Act 66 of 1995	Employment relations, disciplinary and dispute records
Employment Equity Act 55 of 1998	Employment equity records where applicable
Skills Development Act 97 of 1998 / SDL Act 9 of 1999	Training, skills and levy records where applicable
Unemployment Insurance Act 63 of 2001 / Contributions Act 4 of 2002	UIF records where applicable
Compensation for Occupational Injuries and Diseases Act 130 of 1993	COIDA registration, assessment and claim records where applicable
Occupational Health and Safety Act 85 of 1993	Health and safety records where applicable
Consumer Protection Act 68 of 2008	Consumer terms, complaints and transaction records
Electronic Communications and Transactions Act 25 of 2002	Electronic transaction and website-related records
POPIA 4 of 2013	Privacy governance, data-subject requests, security incident and processing records
PAIA 2 of 2000	PAIA Manual, request/decision/complaint records
FIC Act 38 of 2001	FIC registration, RMCP, CDD/KYC, risk, reporting and training records for in-scope accountable-institution activities

The inclusion of legislation does not imply every statute applies in every circumstance. CASIA maintains records required by laws applicable to its operations at the relevant time.

8. SUBJECTS AND CATEGORIES OF RECORDS HELD BY CASIA

Subject	Categories of Records
Corporate governance	CIPC documents, MOI, director/shareholder records, resolutions, registers, policies, company correspondence
Strategy and operations	Business plans, operating procedures, project plans, meeting records, management reports, SOPs, workflow documents



Finance and accounting	Banking records, invoices, receipts, payment records, budgets, management accounts, ledgers, expense records, audit/accounting records
Tax	SARS correspondence, tax returns, assessments, registration certificates and supporting records
Human resources	Employment contracts, job applications, CVs, payroll, leave, disciplinary, performance, training, benefits, employee personal records
Customers/clients	Applications, contracts/terms, contact details, identification, mandates, service records, invoices, communications, complaints, support records
Company-registration clients	CIPC instructions, name reservations, director/shareholder data, beneficial-ownership records, mandates/LPOAs, issued company documents
FIC/FICA compliance	goAML registration, RMCP, KYC/CDD, BO, risk ratings, TFS/PEP screening, EDD, reporting evidence, training and monitoring
Suppliers/contractors	Supplier onboarding, contracts, quotes, purchase orders, invoices, bank details, due diligence
Sales/CRM	Leads, opportunity records, quotations, proposals, communications and pipeline reports
Marketing	Brand guidelines, campaign plans, social-media records, content, analytics, consent/preferences
Technology and security	System documentation, user/access records, logs, architecture, incidents, backups, vendor information, development records
Intellectual property	Brand assets, trademarks, copyright works, software/source-code records, designs, confidential know-how
Legal/compliance	Policies, agreements, legal advice, disputes, complaints, regulatory correspondence, registers
POPIA/privacy	Information Officer records, privacy notices, consent where relevant, operator agreements, data-subject requests, incident records, retention schedules
PAIA	Manual versions, requests, fee notices, decisions, correspondence, request register, annual reporting evidence

9. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

9.1 Purposes of processing

- Provide, administer and support products/services.
- Register companies and carry out client instructions under mandate.
- Perform CDD/KYC, beneficial-ownership, sanctions/PEP and other legal compliance checks.
- Open/manage client accounts and communicate with clients.
- Process payments, invoices, refunds and accounting.
- Recruit, employ and manage staff/interns/contractors.
- Manage suppliers and service providers.
- Marketing and communications where lawful.
- Security, fraud prevention, audit and access control.
- Handle complaints, disputes, legal claims and regulatory obligations.
- Maintain corporate, tax and statutory records.
- Operate, improve and secure technology platforms and websites.



9.2 Categories of data subjects and personal information

Data Subject	Personal Information That May Be Processed
Clients/customers	Names, ID/passport, DOB, nationality, contact/address, company/business details, financial/payment information, service records, communications, signatures, CDD/KYC and BO data
Directors/shareholders/beneficial owners	Identity, contact/address, ownership/control, nationality, screening/compliance information
Employees/interns/applicants	Identity/contact, CV, qualifications, employment, payroll/bank/tax, leave, performance, training, disciplinary and emergency-contact information
Suppliers/contractors	Names, contact, registration/VAT/tax information, contracts, bank/payment details, due diligence
Website/platform users	Account identifiers, device/log data, usage, support interactions, cookies/online identifiers where used
Business contacts/leads	Names, role, employer/company, contact details, communications and preferences
Visitors	Access/security records and CCTV where applicable
Complainants/requesters	Identity/contact, request/complaint content, correspondence and evidence

9.3 Special personal information / children

CASIA will only process special personal information or information about children where a lawful basis and appropriate safeguards exist. Healthcare-related services may involve sensitive information in specific contexts; such processing must be governed by the relevant privacy notice, contractual controls and access restrictions.

10. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Information	Possible Recipients
Company registration/client data	CIPC and other authorities/service providers required to perform instructed registration services
Tax/business onboarding information	SARS, banks or authorised professional/service providers where instructed and lawful
FIC compliance information	Financial Intelligence Centre and other authorised supervisory/law-enforcement bodies where legally required
Employee/payroll information	Payroll providers, banks, SARS, UIF/COIDA and benefit/service providers where applicable
Payment information	Banks, payment processors, accounting providers
Technology data	Hosting/cloud/security/IT service providers acting under appropriate arrangements
Legal/dispute information	Legal advisers, insurers, courts, regulators or dispute-resolution bodies where necessary
Marketing data	Approved communications/CRM providers where lawful

CASIA does not disclose personal information merely because a third party requests it. Disclosure must have a lawful basis and comply with PAIA, POPIA, contractual duties and confidentiality obligations.



11. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

CASIA may use cloud, software, communications, security or support providers whose infrastructure or personnel are located outside South Africa. Before transferring personal information outside the Republic, CASIA will assess the applicable POPIA section 72 requirements and implement an appropriate lawful transfer mechanism and safeguards.

Potential Transfer	Safeguard
Cloud hosting/storage	Contractual data-protection and security terms; provider assessment; access controls
SaaS/communications	Data-processing terms; transfer safeguards; minimum necessary data
Technical support	Restricted access, confidentiality, logging where possible
International business counterparties	Purpose limitation and lawful basis; contract where appropriate

12. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

- Role-based access and least privilege.
- Strong passwords and multi-factor authentication where available.
- Secure cloud/storage configuration.
- Encryption in transit and at rest where appropriate/available.
- Anti-malware, endpoint and patch management.
- Backup and recovery processes.
- Logging/monitoring proportionate to risk.
- Confidentiality undertakings and staff awareness.
- Vendor/operator due diligence and agreements.
- Secure disposal and retention controls.
- Security-compromise response and regulatory notification procedures where required.

13. HOW TO REQUEST ACCESS TO A RECORD

A requester seeking access to a record of a private body must satisfy section 50 of PAIA: the record must be required for the exercise or protection of a right, procedural requirements must be met, and no applicable refusal ground may justify refusal.

1. Use the prescribed Form 2 (Request for Access to Record) or a substantially compliant request where the Regulator permits/accepts it.
2. Submit the request to CASIA's Information Officer/Head of Private Body at the contact details in this Manual.
3. Identify the record with enough detail for CASIA to locate it.
4. Identify the right the requester seeks to exercise/protect and explain why the requested record is required for that purpose.
5. State the preferred form of access and contact method.
6. Provide proof of identity and, if acting for another person, proof of authority.
7. Pay any prescribed request fee/access fee when lawfully required, subject to exemptions.

13.1 Assistance to requesters

If a request is defective or unclear, CASIA should provide reasonable assistance to help the requester comply rather than rejecting it solely for remediable procedural defects, subject to PAIA.

14. REQUEST FEES AND ACCESS FEES

PAIA permits prescribed request and access fees in specified circumstances. CASIA will use the current fee schedule prescribed under PAIA and the current Information Regulator/Ministerial fee notices. A personal requester may be exempt from the request fee in circumstances provided by law. Reproduction, search/preparation and other access costs may be payable as prescribed.

CASIA will issue the prescribed outcome/fee notice (Form 3 or current prescribed equivalent) where fees are payable. No outdated fee amount should be hard-coded into operational use without verifying the current official fee schedule.

15. DECISION PROCESS AND TIMEFRAMES

- Record the date the valid request is received.
- Acknowledge receipt and identify any missing information promptly.
- Determine whether fees/deposit are payable and issue the prescribed notice.
- Search for and assess responsive records.
- Identify any third-party interests requiring notice.
- Apply PAIA grounds for access/refusal and sever exempt material where possible.
- Communicate the decision in writing within the statutory period, subject to any lawful extension.
- If extending the period, give the requester written notice and reasons as required by PAIA.

The operational target is to decide a properly submitted request within 30 days unless PAIA permits an extension. The responsible person must track statutory dates in the PAIA Request Register.

16. GROUNDS FOR REFUSAL OF ACCESS

Access is not automatic. Chapter 4 of Part 3 of PAIA contains mandatory and discretionary refusal grounds for private bodies. CASIA will assess each request individually and will not refuse merely because a record is inconvenient or confidential in a general sense.

Ground	Examples / Considerations
Privacy of a third party who is a natural person	Unreasonable disclosure of another person's personal information, subject to statutory exceptions
Commercial information of a third party	Trade secrets, financial/commercial information or information whose disclosure could cause commercial harm
Confidential information of a third party	Information supplied in confidence where disclosure would breach a duty/confidentiality protected by PAIA
Safety of individuals / protection of property	Records whose disclosure could endanger safety or security
Privileged records	Legally privileged communications and records where privilege has not been waived
Commercial information of CASIA	CASIA trade secrets, financial/commercial/scientific/technical information or information whose disclosure could cause commercial harm
Research information	Research-related information protected by PAIA where applicable
Other statutory refusal grounds	Any other mandatory/discretionary ground applicable under PAIA

16.1 Severability

Where only part of a record is protected, CASIA will consider whether the protected portion can reasonably be severed and the balance disclosed.



16.2 Public-interest override

Where PAIA's public-interest override applies, CASIA will assess it even if a refusal ground would otherwise apply.

17. THIRD-PARTY NOTIFICATION

Where a request concerns information that may affect a third party, CASIA will follow PAIA's third-party notification and representation procedures. The third party may be invited to make representations or consent/oppose disclosure within the statutory process. The final decision remains CASIA's responsibility under PAIA.

18. REMEDIES, COMPLAINTS AND COURT PROCEEDINGS

A private body does not have the same internal-appeal mechanism as a public body. A dissatisfied requester or affected third party may use the remedies available under PAIA, including a complaint to the Information Regulator and, where applicable, court proceedings after or in accordance with the statutory process.

- Complaint to the Information Regulator using the prescribed complaint process/form.
- Court application where permitted by PAIA.
- Direct engagement with CASIA to clarify or correct administrative issues does not remove statutory rights or deadlines.

19. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If a requested record cannot be found after reasonable steps or is believed not to exist, CASIA will document the search undertaken and provide the requester with the response/affidavit or affirmation required by PAIA, including relevant information about the steps taken and whether the record may later become available.

20. FORMS AND COMMUNICATION TEMPLATES

20.1 Required official forms

- Form 2 – Request for Access to Record.
- Form 3 – Outcome of Request and Fees Payable.
- Form 5 – Complaint Form to the Information Regulator, where applicable.
- Any updated prescribed form replacing the above must be used once effective.

20.2 CASIA acknowledgement template

Subject: Acknowledgement of PAIA Request – [Reference]

CASIA acknowledges receipt of your request for access to information on [date]. Your reference is [reference]. We will process the request in terms of PAIA. If additional information, proof of identity/authority or prescribed fees are required, we will contact you.

Information Officer / Head of Private Body

20.3 Clarification / missing information template

CASIA is unable to identify or process the request fully because the following information is missing/unclear: [details]. Please provide the information by [date]. We will provide reasonable assistance to enable a compliant request.

20.4 Decision – access granted template

Your request dated [date] has been granted [in full/in part]. Access will be provided in the following form: [form]. Prescribed access fees of [amount, if any] are payable before access is provided. Any redactions/severance are explained below: [reasons].



20.5 Decision – refused/partially refused template

Your request dated [date] has been [refused/partially refused]. The applicable ground(s) under PAIA are: [section/ground]. Reasons: [concise reasons]. You may exercise the remedies available under PAIA, including complaint to the Information Regulator and/or court proceedings as applicable.

21. INTERNAL PAIA REQUEST-HANDLING SOP

Step	Owner	Action	Evidence
1 Receive	Information Officer / designated intake	Date-stamp, allocate reference, capture requester/contact/record	Request register
2 Validate	IO	Check form, identity, authority, right asserted, record description	Validation checklist
3 Fees	IO/Finance	Assess current prescribed fee/deposit and issue notice if applicable	Form 3/fee notice
4 Locate	Record owner	Search systems/files; preserve responsive records	Search log
5 Third party	IO	Identify and notify affected third parties where required	Notice/representations
6 Assess	IO + Legal/Compliance if needed	Apply access/refusal grounds, severability and public-interest override	Decision worksheet
7 Approve	HPB/IO per delegation	Approve final decision	Signed decision
8 Respond	IO	Send decision/access; explain fees/remedies	Response record
9 Close	IO	Update register, archive working papers	Closed file
10 Report	IO/HPB	Include request statistics in annual PAIA reporting when required/requested by Regulator	Annual report evidence

22. PAIA REQUEST REGISTER AND ANNUAL REPORTING

CASIA must maintain a request register sufficient to track requests, deadlines, outcomes, fees, third-party notices, complaints and closure. The Information Regulator eServices platform supports PAIA annual reporting. Heads of Private Bodies / DIOs may be requested to submit annual reports under section 83(4), and current Regulator notices/eServices instructions should be followed.

Ref	Received	Requester	Record/Subject	Outcome	Decision Date	Complaint	Closed



22.1 Annual-report working statistics

- Requests received.
- Access granted in full.
- Access granted in part.
- Requests refused.
- Requests withdrawn.
- Requests transferred/otherwise dealt with if applicable.
- Average/actual response times.
- Extensions used.
- Complaints received/outcomes.
- Outstanding requests at period end.

23. AVAILABILITY, LANGUAGES AND PUBLIC ACCESS

The current Manual must be made available through the channels required by PAIA and current Information Regulator requirements. CASIA will keep a physical/electronic copy at its head office for public inspection during normal business hours and publish it on its website if it has one. CASIA will also use the Regulator eServices PAIA Manual upload facility.

CASIA will maintain the PAIA Guide at the head office in at least two official languages for public inspection. The Manual itself will be made available in the language versions required by current regulatory guidance/assessment expectations. Translation versions must be controlled so that amendments are reflected consistently.

24. UPDATING THIS MANUAL

This Manual will be reviewed at least annually and updated when material details change, including IO/HPB contact information, record categories, laws, personal-information processing, recipients, cross-border transfers, security measures or request procedures. The current version will replace outdated public copies and be re-uploaded/published as necessary.

25. ANNEXURES AND REGISTERS

ANNEXURE A – PAIA REQUEST VALIDATION CHECKLIST

- ☐ Request received/date stamped
- ☐ Form 2/current prescribed format
- ☐ Requester identity verified
- ☐ Authority verified if representative
- ☐ Record sufficiently described
- ☐ Right to be exercised/protected identified
- ☐ Why record is required explained
- ☐ Preferred access form captured
- ☐ Contact details captured



- ☐ Fee status assessed

ANNEXURE B – SEARCH LOG

Date	System/Location Searched	Search Terms/Method	Person	Result/Evidence

ANNEXURE C – DECISION WORKSHEET

- ☐ Responsive records identified
- ☐ Third-party interests assessed
- ☐ Refusal grounds considered section-by-section
- ☐ Severability considered
- ☐ Public-interest override considered
- ☐ Privilege considered
- ☐ POPIA/confidentiality considered
- ☐ Fees/access format confirmed
- ☐ Decision reasons drafted
- ☐ Remedies stated
- ☐ Statutory deadline checked

ANNEXURE D – THIRD-PARTY NOTICE REGISTER

Request Ref	Third Party	Notice Date	Representations Due	Received	Decision Notice



ANNEXURE E – PAIA COMPLAINT / LITIGATION REGISTER

Ref	Requester	Issue	Regulator/Court Ref	Outcome	Action/Date

ANNEXURE F – MANUAL PUBLICATION CHECKLIST

- ☐ Website copy published
- ☐ Head-office inspection copy available
- ☐ Regulator eServices upload completed
- ☐ Guide available in at least two official languages
- ☐ Contact details verified
- ☐ Translation versions aligned
- ☐ Staff know where to route requests
- ☐ Annual review date diarised

ANNEXURE G – DATA SUBJECT / RECORD CATEGORY REVIEW

Business Area	Data Subjects	Records	Retention Basis	Access Owner	Last Review
Corporate					
Clients					
HR					
Finance/Tax					
FIC/FICA					
Technology					



Marketing					
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26. REGULATORY REFERENCE REGISTER

Reference	Purpose
Promotion of Access to Information Act 2 of 2000, as amended	Primary access-to-information statute
Protection of Personal Information Act 4 of 2013	Personal-information processing and access/correction context
PAIA Regulations and prescribed forms	Procedures, forms and fees
Information Regulator PAIA Guide	Public guidance on using PAIA/POPIA access rights
Information Regulator private-body PAIA Manual template	Section 51 manual structure/content
Information Regulator eServices – PAIA Manuals	Manual upload/publication administration
Information Regulator eServices – PAIA Annual Reporting	Annual reporting administration and submission windows/notices

CASIA should verify current forms, fees, submission windows and Regulator contact details at the time of use because these may change after this Manual is approved.