PAIA MANUAL

Prepared for NINETY8 PROJECTS (PTY) LTD

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

Legal entity	NINETY8 PROJECTS (PTY) LTD
Registration number	2025/784588/07
Information Officer	Junior Machwisa Maduane Maraatsile, Sole Director
Business email	letswork@ninety8projects.co.za
Director email	junior@ninety8.co.za
Telephone	065 887 4301
Registered office	20 Jan Steyl Avenue, Roodewal, Bloemfontein, Free State, 9301
Version	Version 1.0
Effective date	8 March 2026

Important note: This manual is tailored to the information presently available for NINETY8 PROJECTS (PTY) LTD and is drafted to be operationally robust and aligned to the official PAIA framework. It should be reviewed whenever the company expands, appoints staff, changes systems, launches new digital tools, or materially changes how records and personal information are processed.

Approved for signature by the Information Officer on the signature page at the end of this manual.

Contents

1. Introduction and purpose

This manual has been prepared for NINETY8 PROJECTS (PTY) LTD in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended (“PAIA”). The purpose of the manual is to assist any person who wishes to request access to records held by the company and to describe, in a practical and transparent way, the categories of records held by the company, the manner in which requests may be made, the applicable fees, the applicable time periods, and the remedies available where access is refused or not granted within the prescribed period.

This manual also records, at a high level, how the company processes personal information for purposes aligned to the Protection of Personal Information Act 4 of 2013 (“POPIA”). The POPIA components of this manual are included to improve transparency and to support lawful, responsible, and secure processing of personal information within the business.

Nothing in this manual creates a right of automatic access to every record held by the company. Access will be considered strictly in accordance with PAIA, POPIA, any other applicable law, and all lawful limitations and refusal grounds that protect confidential, personal, privileged, commercially sensitive, or otherwise protected information.

2. Definitions and interpretation

Unless the context indicates otherwise, the following expressions bear the meanings commonly assigned to them in PAIA and POPIA:

“Company” means NINETY8 PROJECTS (PTY) LTD, registration number 2025/784588/07.

“Information Officer” means the head of the private body or a duly authorised person who performs the duties contemplated in PAIA and POPIA. For this manual, the Information Officer is Junior Machwisa Maduane Maraatsile.

“Requester” means any person making a request for access to a record of the company in terms of PAIA.

“Personal requester” means a requester seeking access to a record containing personal information about the requester.

“Record” includes any recorded information regardless of form or medium, whether created by the company or not, that is in the company’s possession or under its control.

“Personal information” has the meaning assigned in POPIA and includes information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person.

“Operator” means a person or entity that processes personal information for the company in terms of a contract or mandate, without coming under the direct authority of the company.

3. Company details and Information Officer

3.1 Company particulars

Full legal name	NINETY8 PROJECTS (PTY) LTD
Registration number	2025/784588/07
Nature of body	Private company / private body for purposes of PAIA
Business status	In Business
Registered office	20 Jan Steyl Avenue, Roodewal, Bloemfontein, Free State, 9301
Primary contact email	letswork@ninety8projects.co.za
Director contact email	junior@ninety8.co.za
Telephone	065 887 4301

3.2 Information Officer

Full name	Junior Machwisa Maduane Maraatsile
Title	Sole Director and Information Officer
Postal / delivery address for PAIA requests	20 Jan Steyl Avenue, Roodewal, Bloemfontein, Free State, 9301
Email for PAIA-related communication	letswork@ninety8projects.co.za
Alternative email	junior@ninety8.co.za
Telephone	065 887 4301
Deputy Information Officer	No Deputy Information Officer has been appointed at the date of this manual.

Where this manual refers to delivery to the Information Officer, this includes delivery by email. A requester remains responsible for ensuring that the request is complete, legible, properly supported, and actually reaches the company.

4. PAIA Guide issued by the Information Regulator

The Information Regulator has made available the official PAIA Guide to help persons understand how to exercise their rights under PAIA and POPIA. The Guide explains the objects of PAIA and POPIA, how to make requests, how to access the prescribed forms, what fees may apply, what remedies are available, and how the Information Regulator may be approached.

Information Regulator physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Information Regulator postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

The PAIA Guide and the official PAIA forms may be obtained from the Information Regulator's website. A requester may also request assistance from the Information Officer of the company regarding the process to make a request, but the company is not responsible for legal advice to the requester.

5. Records automatically available without a formal PAIA request

Certain records may be made available without a formal PAIA request, subject always to operational practicality, confidentiality, legal restrictions, and whether the record is already in the public domain or intended for public circulation. Availability does not mean that every record in a category will automatically be disclosed in every case.

Category	Examples	Availability basis
Public corporate identity information	Company name, registration number, public business contact details, general service information	Generally available on request and/or via company channels.

Marketing and profile material	Company profile, capability information, service descriptions, promotional material, general contact details	Generally available unless withdrawn, outdated, or commercially restricted.
Compliance credentials for tendering or due diligence	B-BBEE certificate, CSD summary extracts, tax compliance status confirmation where lawfully shareable	May be made available at the company's discretion, subject to redaction and lawful use.
Website and customer contact content	Website contact details, inquiry channels, published policies or notices	Available through public channels when published.

Where a record is made available informally, the company may still require reasonable proof of identity, authority, purpose, or confidentiality undertakings before releasing the record.

6. Records available in terms of other legislation

Records may be created, retained, disclosed, limited, or withheld in accordance with legislation applicable to the company from time to time. The list below is not exhaustive and must be read as a general indication of the legal environment within which the company operates.

Legislation	Illustrative relevance to the company
Companies Act 71 of 2008	Company registration, governance, certain statutory records, director and shareholder records.
Promotion of Access to Information Act 2 of 2000	Requests for access to records held by the company.
Protection of Personal Information Act 4 of 2013	Lawful processing, safeguarding, retention, and data subject rights.
Basic Conditions of Employment Act 75 of 1997	Employment records, remuneration, leave, contracts, and statutory labour records if and when staff are employed.
Labour Relations Act 66 of 1995	Employment and labour relations records if and when applicable.

Employment Equity Act 55 of 1998	Employment equity records if and when thresholds and legal obligations apply.
Occupational Health and Safety Act 85 of 1993	Health and safety records where operationally applicable.
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax registrations, submissions, supporting records, and financial documentation.
Value-Added Tax Act 89 of 1991	VAT records if and when the company registers as a VAT vendor.
Electronic Communications and Transactions Act 25 of 2002	Electronic records, communications, data messages, and e-commerce related matters.
Consumer Protection Act 68 of 2008	Consumer-facing records and compliance where applicable.
Broad-Based Black Economic Empowerment Act 53 of 2003 and related codes	B-BBEE records and status evidence.
Public Finance and procurement frameworks	Tender and supplier records where the company participates in public procurement.

7. Categories of records held by NINETY8 PROJECTS (PTY) LTD

The company maintains records in physical and electronic form. The inclusion of a category below does not mean that every record in that category exists at all times, nor that access will necessarily be granted. Records may exist historically, currently, or prospectively as the business grows.

7.1 Corporate and statutory records

Category	Examples
Incorporation and governance	Registration certificate, CIPC records, director records, shareholder records, minute books, resolutions, registers, compliance records.

Licences, registrations, and approvals	Tax registration records, CSD registration, B-BBEE status documents, statutory correspondence, compliance confirmations.
Policies and manuals	PAIA manual, privacy notices, website legal notices, internal policies, governance documents.

7.2 Financial, tax, and commercial records

Category	Examples
Accounting and finance	Invoices, quotations, purchase orders, receipts, bank confirmations, payment records, budgets, ledgers, reconciliations.
Tax records	Income tax records, supporting schedules, returns, assessments, submissions, correspondence with SARS, tax compliance documents.
Insurance and asset records	Asset registers, warranties, insurance schedules, claims records, maintenance records where applicable.

7.3 Client, supplier, and project records

Category	Examples
Client and prospect records	Enquiries, contact details, proposals, quotations, statements of work, service records, correspondence, project files.
Supplier and contractor records	Onboarding records, quotations, vendor forms, contracts, banking confirmations, compliance documents, correspondence.
Tender and procurement records	Bid submissions, bid responses, pricing schedules, declarations, supporting credentials, project administration records.

7.4 Human resources and people records

Category	Examples
Founder and management records	Director identity and appointment records, compliance and governance records, authorised signatory details.
Recruitment and personnel	CVs, applications, interview records, contracts, payroll records, leave records, disciplinary records, medical certificates, training records, if and when the company appoints staff or contractors.

7.5 Information technology and communications records

Category	Examples
Electronic systems and communications	Emails, attachments, backups, cloud-stored documents, device logs, website contact submissions, metadata, security logs where applicable.
Website and digital records	Domain records, hosting information, website content, cookies-related records, analytics records where implemented, contact form submissions.

Records are retained for as long as is reasonably necessary for lawful business purposes, contractual performance, dispute management, audit, evidentiary use, and compliance with statutory retention periods. When no longer required, records should be deleted, destroyed, anonymised, or archived in a manner permitted by law and aligned with operational needs.

8. Processing of personal information under POPIA

8.1 Purpose of processing

- to establish and manage relationships with clients, suppliers, contractors, and service providers;
- to respond to enquiries, quotations, tenders, onboarding, and project administration;
- to comply with legal, tax, accounting, procurement, and regulatory obligations;
- to maintain internal business records, governance, and risk management processes;
- to operate digital communications, websites, and business systems;
- to protect the company's lawful interests, rights, property, and security;

- to recruit, contract with, or manage workers and service providers when applicable.

8.2 Categories of data subjects and personal information

Data subject category	Typical personal information
Clients and prospective clients	Names, contact details, business details, project details, correspondence, billing details, service history.
Suppliers, contractors, and service providers	Names, contact details, company details, banking confirmations, compliance records, correspondence.
Employees, applicants, and temporary workers, where applicable	Identity and contact details, CVs, qualifications, employment information, payroll and statutory records, attendance and leave records.
Website users and enquirers	Names, contact details, enquiry content, technical data, cookies or analytics data where implemented.
Directors, authorised representatives, and beneficial owners	Identity details, addresses, appointment records, signatures, statutory and compliance information.

8.3 Possible recipients of personal information

- banks, payment processors, accountants, auditors, legal advisers, and business advisers;
- regulators, government departments, courts, tribunals, law enforcement, and organs of state where legally required;
- clients, suppliers, subcontractors, or counterparties where disclosure is necessary for a contract, tender, or project;
- technology, hosting, email, document management, communications, and security service providers acting as operators or service providers;
- insurers, brokers, and claims administrators where reasonably necessary.

8.4 Planned trans-border information flows

The company may from time to time use digital tools, cloud hosting, email services, software platforms, communications services, or website tools that store or process information outside South Africa. Where cross-border processing occurs, the company will take reasonable steps to ensure that such transfer is lawful and that an adequate level of protection or another recognised legal justification exists under POPIA.

8.5 Security safeguards

- use of password protection and controlled access to business devices, accounts, and systems;
- need-to-know access principles and role-based restrictions as the business scales;
- reasonable technical and organisational measures to prevent loss, unauthorised access, destruction, or unlawful processing;
- secure storage, backup, and record-handling practices appropriate to the sensitivity of the information;
- review, deletion, destruction, or anonymisation of records when they are no longer lawfully required.

8.6 Data subject rights

Subject to POPIA and any lawful limitation, data subjects may request confirmation of whether the company holds personal information about them, may request access to such information, and may request correction, deletion, or destruction in circumstances recognised by law. Requests must be supported by sufficient proof of identity and authority, and the company may decline requests where a lawful basis exists to do so.

9. How to request access to records under PAIA

A requester who seeks access to a record of the company must submit the prescribed Form 2, together with sufficient detail to enable the company to identify the record and evaluate the request. The request should be directed to the Information Officer using the contact details in this manual.

1. Complete the prescribed Form 2: Request for Access to Record.
2. Identify the record with enough detail to enable the company to locate it with reasonable effort.
3. State the right that the requester seeks to exercise or protect, and explain why the requested record is required for that purpose, where the request concerns a private body.
4. Indicate the form of access requested, for example inspection, copy, electronic copy, or another applicable form.
5. Attach proof of identity and, where applicable, proof of authority to act on behalf of another person or entity.
6. Pay the prescribed request fee if applicable. A personal requester is not required to pay the request fee.
7. Deliver the request by email or physical delivery to the Information Officer.

The company may request further particulars where the request is vague, overbroad, incomplete, unintelligible, or unsupported. The statutory time period will be calculated in accordance with PAIA and may be affected until the request is properly regularised, where lawfully permitted.

9.1 Assistance to persons who require help

A person who requires reasonable assistance to complete the prescribed request form may contact the Information Officer. Assistance does not mean that the company must formulate the requester's case, provide legal advice, or waive lawful requirements.

10. Fees payable for requests to a private body

The fees applicable to requests to a private body are prescribed by law. At the date of this manual, the request fee for a request to a private body is R140.00, except where the requester is a personal requester. Access fees may also be payable for reproduction, search, preparation, transcription, storage media, and actual transmission costs.

The company may require payment of a deposit where permitted by law, including where search and preparation are expected to exceed the prescribed threshold.

Fee item	Amount / basis
Request fee for a private body (not payable by a personal requester)	R140.00
Photocopy or printed A4 page	R1.50 per page or part thereof
Copy in computer-readable form on flash drive supplied by requester	R40.00
Copy in computer-readable form on compact disc supplied by requester	R40.00
Copy in computer-readable form on compact disc supplied by body	R60.00
Transcription of visual images	Outsourced cost based on service provider quotation
Transcription of audio record, per A4 page	R24.00
Copy of audio record on flash drive supplied by requester	R40.00
Copy of audio record on compact disc supplied by requester	R40.00

Copy of audio record on compact disc supplied by body	R60.00
Search and preparation after the first hour	R100.00 per hour or part thereof, capped at R300.00
Deposit where search exceeds 6 hours	One-third of the amount payable for access, as prescribed
Postage, email, or other electronic transfer	Actual expense, if any

Any update to fees prescribed by regulation will automatically prevail over the amounts reflected in this manual. The company may withhold release of a record until all lawful fees have been paid.

11. Decision timelines, extensions, transfer, and deemed refusal

The Information Officer must decide the request within 30 calendar days after receipt of a valid request, subject to PAIA. The period may be extended once for a further period of up to 30 calendar days where the request is for a large volume of records, requires searches at another location, involves consultation, or where another lawful ground for extension exists.

If the request is granted, access will be provided in the manner requested unless that manner would unreasonably interfere with the company's operations, damage the record, infringe copyright, or otherwise be impracticable or unlawful. In such cases, access may be granted in another lawful form.

If the Information Officer fails to make a decision within the applicable period, the request is deemed to have been refused, and the requester may use the available remedies under PAIA.

12. Grounds upon which access may be refused or limited

The company may refuse access, in whole or in part, on any ground recognised by PAIA or any other applicable law. Without limiting the scope of the law, refusal grounds may include the following:

- protection of personal information of a third party where disclosure would be unreasonable or unlawful;
- protection of commercial information of the company or a third party, including trade secrets, confidential research, financial, technical, pricing, tender, or strategic information;
- protection of confidential information supplied by a third party under an obligation of confidence;
- protection of privileged records or legally privileged communications;
- protection of safety, security, property, systems, infrastructure, or anti-fraud measures;

- records requested for the purpose of civil or criminal proceedings after commencement of such proceedings where PAIA does not apply;
- manifestly frivolous, vexatious, repetitive, or unduly burdensome requests to the extent recognised by law;
- records that do not exist, cannot reasonably be found, or are not in the company's possession or under its control.

Where a record contains both disclosable and protected information, the company may grant partial access by severing or redacting the protected portions where this is reasonably possible and lawful.

13. Remedies, complaints, and court applications

There is no internal appeal against the decision of a private body under PAIA. A requester who is dissatisfied with the outcome of a request, or with a deemed refusal, may lodge a complaint with the Information Regulator and/or apply to a court of competent jurisdiction for appropriate relief, subject to the Act and the applicable rules.

Complaint route	Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za
Relevant forms	Form 05 (Complaint Form) and any other form or process prescribed by the Information Regulator

The requester should retain proof of submission, proof of identity, proof of payment of fees if applicable, and all correspondence exchanged with the company.

14. Availability, updating, and internal governance of this manual

This manual shall be made available as required by PAIA and may be published on the company's website, kept at the registered office, or made available on request in an accessible form where reasonably practicable.

The manual must be reviewed from time to time and updated whenever there is a material change in the company's legal structure, contact details, records environment, digital systems, staffing, processing practices, or applicable law. All future versions replace earlier inconsistent versions to the extent of any inconsistency.

The Information Officer remains responsible for reasonable oversight of PAIA and POPIA compliance within the company, including the receiving of requests, record-keeping around requests, and ensuring that appropriate internal controls develop as the business scales.

15. Approval and signature

Signed by or on behalf of the Information Officer of NINETY8 PROJECTS (PTY) LTD.

Full name	Junior Machwisa Maduane Maraatsile
Capacity	Sole Director and Information Officer
Signature	
Date	08/03/2026

Appendix A. PAIA fees summary

This appendix is a working summary of the prescribed fee position for private bodies reflected in official PAIA materials available at the date of this manual. The governing law and any updated regulation always prevail.

Item	Amount
Request fee for private body	R140.00
A4 photocopy or printed page	R1.50
Flash drive copy supplied by requester	R40.00
Compact disc supplied by requester	R40.00
Compact disc supplied by body	R60.00
Audio transcription per A4 page	R24.00
Search and preparation after first hour	R100.00 per hour or part thereof
Maximum search and preparation charge	R300.00
Deposit if search exceeds 6 hours	One-third of prescribed access amount
Transmission / postage	Actual expense, if any

Appendix B. Practical request checklist

- Use the official Form 2.
- Attach proof of identity.
- If acting for another person or company, attach proof of authority.
- Describe the exact record requested and the dates or period, where known.
- For a private body request, explain the right being exercised or protected and why the record is required.
- Indicate the form of access requested.
- Pay the applicable request fee if you are not a personal requester.
- Keep proof of delivery and proof of payment.

Appendix C. Key legislative references

- Constitution of the Republic of South Africa, 1996, section 32.
- Promotion of Access to Information Act 2 of 2000, as amended.
- Protection of Personal Information Act 4 of 2013.
- PAIA Regulations published under Government Notice 757 in Government Gazette 45057 of 27 August 2021.
- Official PAIA Guide and forms published by the Information Regulator.

Official source note

This manual was drafted with reference to the official PAIA private body template and guidance of the Information Regulator, the text of PAIA published by the Department of Justice and Constitutional Development, official PAIA forms and fee references, and verified company particulars supplied in the company registration, B-BBEE, SARS, and CSD records provided to the drafter.