

# **PAIA MANUAL**

**FOR: PAUL MOLDOVANOS INCORPORATED**  
**(REG NO. 2024/735206/21)**

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF  
ACCESS TO INFORMATION ACT 2 OF 2000 (AS AMENDED)**

***DATE OF COMPILATION: 05/09/2025***

***DATE OF REVISION:***

## **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 2 of 2000 (as amended)
1.6	“POPIA”	Protection of Personal Information Act 4 of 2013
1.7	“Regulator”	Information Regulator
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 entity 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 entity, by providing a description of the subjects on which the entity holds records, and the categories of records held on each subject;
- 2.3 know the description of the records of the entity 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 entity 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 entity 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 entity 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 PAUL MOLDOVANOS INCORPORATED**

#### **3.1 Chief Information Officer**

Name: Paul Sotiris Moldovanos  
Tel: (011) 472-7430  
Email: info@paulmoldovanos.co.za

#### **3.2 Deputy Information Officer**

Name: N/A  
Tel:  
Email:

#### **3.3 Access to information general contacts**

Email: info@paulmoldovanos.co.za

#### **3.4 National or Head Office**

Postal Address: N/A

Physical Address: 213 Ontdekkers Road  
Roodepoort  
1709

Tel: (011) 472 7430

Email: info@paulmoldovanos.co.za

Website: www.paulmoldovanos.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.
- 4.3 The aforesaid 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-
    - 4.3.2.1 the Information Officer of every public entity, and
    - 4.3.2.2 every Deputy Information Officer of every public and private entity designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3. the manner and form of a request for-
    - 4.3.3.1 access to a record of a public entity contemplated in section 113; and
    - 4.3.3.2 access to a record of a private entity contemplated in section 504;
  - 4.3.4 the assistance available from the IO of a public entity 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-

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<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public entity must, subject to legislation governing the employment of personnel of the public entity concerned, designate such number of persons as deputy information officers as are necessary to render the public entity as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private entity 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.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public entity 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.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private entity 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.

- 4.3.6.1 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 entity, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private entity;
- 4.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public entity and private entity, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public entity and private entity, respectively;
- 4.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92<sup>11</sup>.

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/>).

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public entity must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private entity must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public entity, must make available in the prescribed manner a description of the categories of records of the public entity that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private entity may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private entity that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public entity 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.

<sup>10</sup> Section 54(1) of PAIA- The head of a private entity 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.

<sup>11</sup> 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 entity 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.”

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English

**5. CATEGORIES OF RECORDS OF PAUL MOLDOVANOS INCORPORATED WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

The following are categories of records held by **PAUL MOLDOVANOS INCORPORATED** which are available without a person having to request access by completing Form 2, meaning the types of records that may be requested telephonically or by sending an email

Category of Records	Types of Record	Available on Website	Available on request
Newsletters	Social media		X
Marketing and promotional material	Social media		X

**6. DESCRIPTION OF THE RECORDS OF PAUL MOLDOVANOS INCORPORATED WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Information is available in terms of the following legislation to the persons or entities specified in such legislation:

- Basic Conditions of Employment Act 75 of 1997
- BBEE Act 53 of 2003
- Companies Act, 71 of 2008;
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Employment Equity Act 55 of 1998
- Health Professions Act 56 of 1974
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Information Act 84 of 1982
- Promotion of Access to Information Act 2 of 2000
- South African Revenue Services Act 34 of 1997
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

*Refer Annexure A - Form 2 for request for records held by **PAUL MOLDOVANOS INCORPORATED***

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE ENTITY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PAUL MOLDOVANOS INCORPORATED**

This section sets out the subjects (i.e. Finance or HR) in respect of which **PAUL MOLDOVANOS INCORPORATED** holds records and the categories of records held on each subject, including records which are created and available in accordance with any of the South African legislation. These records are not freely available but can be requested in terms of form 2. The inclusion of any subject of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

Subjects on which the entity holds records	Category of records
Company Secretarial / Statutory Records	<ul style="list-style-type: none"> <li>- Annual Statutory Returns</li> <li>- Beneficial Ownership Register</li> <li>- CIPC Compliance Checklist</li> <li>- Certificate of Change of Name</li> <li>- Certificate of Incorporation</li> <li>- Certificate to commence Business</li> <li>- Dividend register</li> <li>- Directors' attendance register</li> <li>- Memorandum and Articles of Association</li> <li>- Notice and minutes of shareholder's meetings</li> <li>- Minutes of directors' meetings</li> <li>- Minutes of audit committee meetings</li> <li>- Minutes of directors' committee meetings</li> <li>- Register of company secretary and auditors</li> <li>- Register of directors and officers</li> <li>- General resolutions</li> <li>- Special resolutions</li> <li>- Shareholders' register</li> <li>- Securities register / uncertificated securities register</li> <li>- Minutes books</li> </ul>
General	<ul style="list-style-type: none"> <li>- Correspondence</li> </ul>
SARS Registrations	<ul style="list-style-type: none"> <li>- Taxpayer registration</li> <li>- VAT registration</li> </ul>
Accounting Records	<ul style="list-style-type: none"> <li>- Annual financial statements and working papers</li> <li>- General ledger</li> <li>- Subsidiary ledgers (receivables, payables, etc.)</li> <li>- Bank statements</li> </ul>

Subjects on which the entity holds records	Category of records
	<ul style="list-style-type: none"> <li>- Customer and supplier statements and invoices</li> <li>- Fixed asset register</li> <li>- Tax returns and assessments</li> <li>- VAT returns</li> <li>- Lease or instalment sale agreements</li> <li>- Budgets and business plans</li> <li>- Insurance records</li> <li>- Auditor's reports</li> <li>- Internal auditors' report</li> <li>- Compiler's reports</li> <li>- Accounting officer's report</li> <li>- Reviewers report</li> </ul>
Credit Agreements	<ul style="list-style-type: none"> <li>- Credit Provider's documents</li> </ul>
Fixed Property	<ul style="list-style-type: none"> <li>- Leases</li> <li>- Mortgage bonds or other encumbrances</li> <li>- Title deeds</li> </ul>
Health and Safety	<ul style="list-style-type: none"> <li>- Register (record of earnings and particulars of all employees)</li> <li>- Health and safety committee's records of reports made to the inspector</li> <li>- Emergency response plans</li> <li>- Employee public health emergency action plans</li> <li>- Environmental management programs and systems</li> <li>- Industrial hygiene programs, data and audits</li> <li>- Permits, licenses, approvals and registrations for operations of sites/business</li> <li>- Records of assessment and air monitoring and asbestos Inventory</li> <li>- Records of assessment and air monitoring for lead exposure</li> <li>- Records of assessment and air monitoring for hazardous chemical substance</li> <li>- Records of assessment and noise monitoring for noise induced hearing loss</li> <li>- Records of incident reported at work</li> <li>- Records of risk assessment and monitoring results in respect of hazardous biological agents</li> <li>- Records of training given to employees in respect of asbestos exposure</li> <li>- Records of training given to employees in respect to lead exposure</li> <li>- Safety management systems, data and audits</li> </ul>

Subjects on which the entity holds records	Category of records
Information Technology	<ul style="list-style-type: none"> <li>- Hardware</li> <li>- Internet</li> <li>- CaseWare licences</li> <li>- Operating systems</li> <li>- Software packages</li> </ul>
Insurance	<ul style="list-style-type: none"> <li>- Claim records</li> <li>- Details of coverage, limits and insurers</li> <li>- Insurance policies</li> </ul>
Legal, Agreements and Contracts	<ul style="list-style-type: none"> <li>- Agreements with contractors, suppliers and clients</li> <li>- Agreements with shareholders, officers or directors</li> <li>- Material agreements relating to provision of services or Materials</li> <li>- Material licenses, permits and authorisations</li> <li>- Contracts, including lease agreements and finance agreements</li> </ul>
Personnel Records	<ul style="list-style-type: none"> <li>- Disciplinary records</li> <li>- Employee records (incl. evaluation and performance, loans, remuneration, contracts, etc.</li> <li>- Employment equity plan</li> <li>- IRP5 / IT3 certificates</li> <li>- Letters of appointment</li> <li>- Leave applications</li> <li>- Payroll (incl. pension fund info, provident fund info, Medical aid, study assistance schemes)</li> <li>- Personnel file (incl. records of foreign employees, trade unions, employers' organisations)</li> <li>- Policies and procedures</li> <li>- UIF, PAYE and SDL returns</li> </ul>
Sales and marketing	Customers, sales, service and product information
Distribution and Transportation	<ul style="list-style-type: none"> <li>- Permits and licenses</li> <li>- Transportation rights</li> <li>- Contracts</li> </ul>
Tax	<ul style="list-style-type: none"> <li>- Income tax returns</li> <li>- Provisional tax returns</li> <li>- Tax assessments</li> <li>- Documents relating to where the objection and appeal is Lodged</li> <li>- Records relating to taxable gain or assessed capital loss</li> <li>- VAT documents</li> </ul>

Subjects on which the entity holds records	Category of records
	<ul style="list-style-type: none"> <li>- Records of importation goods and documents</li> <li>- Documentary proof substantiating the zero rating of supplies</li> </ul>

**8. PROCESSING OF PERSONAL INFORMATION**

8.1 Purpose of Processing Personal Information

**PAUL MOLDOVANOS INCORPORATED** will only process personal information in line with the Privacy Policy.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

This section specifies the categories of data subjects in respect of whom **PAUL MOLDOVANOS INCORPORATED** processes personal information and the nature or categories of the personal information being processed. The inclusion of any subject of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

Category of Data Records	Types of Record
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details

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
Identity number and names, for criminal checks	South African Police Services

8.4 Planned transborder flows of personal information

Not applicable

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

Refer to **PAUL MOLDOVANOS INCORPORATED** IT manual.

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on website: [www.paulmoldovanos.co.za](http://www.paulmoldovanos.co.za)

9.1.2 head office of **PAUL MOLDOVANOS INCORPORATED** 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.

## **10. UPDATING OF THE MANUAL**

The head of **PAUL MOLDOVANOS INCORPORATED** will on a regular basis update this manual.

*Issued by*



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**PAUL SOTIRIS MOLDOVANOS**

Director

# ANNEXURE A

## FORM 2

### REQUEST FOR ACCESS TO RECORD

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

- Request is made in my own name
- Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Cellular:

Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Cellular
<b>PARTICULARS OF RECORD REQUESTED</b>			
Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			

<b>TYPE OF RECORD</b> (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
<b>FORM OF ACCESS</b> (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
<b>MANNER OF ACCESS</b> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private entity (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	

Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	

Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	
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**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

**FEEES**

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
***Signature of Requester / person on whose behalf request is made***

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**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
***Signature of Information Officer***