

## PAIA

### PAIA Manual

This PAIA Manual has been prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) for Specialised Film Services (Pty) Ltd ("Specialised Film Services", "we", "us", "our"). It describes the categories of records we hold, how to request access, our Information Officer and contact details, processing of personal information, fees and procedures, and other matters required by PAIA.

#### 1. Definitions

- "Act" or "PAIA" means the Promotion of Access to Information Act, No. 2 of 2000 (as amended).
- "POPIA" means the Protection of Personal Information Act, No. 4 of 2013.
- "Information Officer" means the person designated to receive and manage PAIA requests for Specialised Film Services.
- Other capitalised terms have the meanings given in PAIA or POPIA.

#### 2. Purpose of this Manual

- To assist members of the public to: identify records held by Specialised Film Services that may be available without a formal PAIA request; understand how to make a request for access to records; identify the Information Officer and how to contact that officer; and understand the categories of personal information we process and how it is managed.

#### 3. Company Details and Contact Information

- Company name: Specialised Film Services (Pty) Ltd.
- Registration number: [2025/248324/07].
- Head office street address: [insert physical address].
- Postal address: [insert postal address].
- General email: [accounts@specialisedfilmservices.co.za].
- Telephone: [insert telephone number].
- Website: [insert website URL].
- Information Officer: [name of Information Officer]
- Information Officer email: [info officer email]
- Information Officer telephone: [info officer telephone]
- Requests in terms of PAIA must be directed to the Information Officer at the contact details above.

#### **4. Records Held and Categories of Records**

The following is a non-exhaustive list of categories of records that Specialised Film Services may hold and that can be requested under PAIA:

- Administration records: general correspondence, permits, licences, compliance records, internal policies and procedures, management minutes.
- Corporate records: company registration and incorporation documents, memorandum and articles, shareholders' register, directors' resolutions.
- Financial records: quotations, invoices, payment records, banking details, financial statements, asset registers.
- Contracts and agreements: hire agreements, supplier agreements, service contracts, nondisclosure agreements.
- Human resources records: employment contracts, payroll records, personnel files, disciplinary records, training records, employment equity information.
- Client and project records: booking records, production schedules, equipment inventories, condition reports, delivery and collection records.
- Insurance and claims records: insurance policies, claims correspondence, excess details and settlement information.
- IT and electronic records: email correspondence, system logs, backup records, software licences and maintenance agreements.
- Legal records: litigation files, legal opinions, correspondence with legal advisors.
- Health and safety records: incident reports, risk assessments, safety checklists and training records.
- Other records relevant to the business operations of Specialised Film Services.

The existence of a listed category does not guarantee disclosure; access is subject to PAIA grounds for refusal and other applicable law (including POPIA).

#### **5. How to Request Access to a Record**

- Requests for access to records must be made on the prescribed form as required by PAIA and must be submitted to the Information Officer at the contact details above.
- The request must provide sufficient particulars to enable the record to be identified and must specify the form of access required (e.g., copy, inspection, electronic format).
- If the request is made on behalf of another person, proof of the requester's authority to act must be provided.

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- The requester should state the right sought to be exercised or protected and explain why the requested record is required for the exercise or protection of that right.
- A request for access to a record containing the requester's personal information is treated as a "personal requester" request and attracts a reduced fee in accordance with PAIA procedures.

## **6. Fees and Payment**

- A personal requester is not required to pay the PAIA application fee. Other requesters must pay the prescribed request fee (currently R50) before processing of the request continues.
- If the request is granted, additional access fees may apply for searching, reproduction, preparation time in excess of prescribed hours, and postage or electronic delivery costs. Fees will be notified to the requester in writing before further processing.
- Fees and payment methods will follow the rules and tariff prescribed under PAIA and related regulations.

## **7. Decision Timeframes and Process**

- Specialised Film Services will process PAIA requests in accordance with the timeframes set out in PAIA and will notify the requester of the decision in the prescribed form.
- If access is refused in whole or in part, the decision will include reasons and inform the requester of any internal appeal procedures and the right to approach a court or the Information Regulator, as applicable.
- Where records contain information of third parties, Specialised Film Services will consider the third parties' interests and applicable grounds for refusal under PAIA.

## **8. Assistance, Internal Appeal and External Remedies**

- The Information Officer will provide reasonable assistance to a requester to submit a compliant request and to identify the records sought.
- If a requester is dissatisfied with a decision, an internal appeal may be lodged in terms of PAIA within the prescribed period. Details of how to lodge an internal appeal will be supplied with any refusal decision.
- Requesters have the right to approach the Information Regulator or a court if dissatisfied with the outcome of an internal appeal or if the Information Officer fails to comply with PAIA timeframes.

## **9. Guide on How to Use PAIA**

- The Guide on how to use PAIA, published by the Information Regulator, explains the procedure for requesting access and is available from the Information Regulator's website and from the Information Officer on request. The guide is available in official languages and in alternative formats on request.

## **10. Processing of Personal Information**

- Categories of data subjects whose personal information we process include clients, customers, suppliers and service providers, employees and prospective employees, contractors, and other individuals connected to our business activities.
- Typical personal information processed includes names, contact details, identity or registration numbers, banking details for payments, employment and remuneration information, qualifications, and project-related information necessary for contractual performance.
- Recipients of personal information may include auditors, insurers and their advisers, carriers and logistics providers, professional advisors, credit bureaus and debt collection agents, and law enforcement where required by law.
- Where we transfer personal information across borders we will apply appropriate safeguards and comply with POPIA requirements and industry practice.

## **11. Protection of Personal Information and Security Measures**

- Specialised Film Services uses reasonable organisational, technical and physical measures to protect personal information against loss, unauthorised access, disclosure, alteration or destruction. Security measures include access controls, password protections, encryption where appropriate, firewalls and staff training.
- While we endeavour to protect personal information, absolute security cannot be guaranteed; residual risks remain and will be managed in accordance with our internal policies and applicable law.

## **12. Records Available Without a PAIA Request**

- Certain categories of records may be made available without a formal PAIA request (voluntary disclosure), for example public company information, published policies and standard terms and conditions, privacy policy and contact details. Where possible these documents will be published on our website or made available for inspection at our head office.

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### **13. Availability of the Manual and Copies**

- A copy of this manual is available for inspection at our head office during normal business hours, will be provided to the Information Regulator on request, and will be made available to any person on request subject to the payment of a reasonable fee for copying as prescribed by PAIA regulations.

### **14. Updating of this Manual**

- This manual may be amended or updated from time to time to reflect organisational changes, updated contact details, or changes in statutory requirements. The date of the latest update will be recorded on the front page.

### **15. Miscellaneous**

- Nothing in this manual derogates from the provisions of PAIA or POPIA, and where any inconsistency arises the statutory provisions prevail.  
- For all PAIA requests, appeals and related correspondence, use the Information Officer contact details set out in section 3.

Signed by Information Officer

Name:

Signature: \_\_\_\_\_

Date:

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