DANÈL NORTJE INC.
REGISTRATION NUMBER: 2020/858389/21
(The "Company")

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

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1. INTRODUCTION

Danèl Nortje Incorporated is an incorporated entity which conducts business as a law firm. We provide general legal services which include, but are not limited to litigation, notarial, conveyancing, company, matrimonial, labour, commercial, ICT, intellectual property, estate planning and social media law to our clients.

2. CONTACT DETAILS OF INFORMATION OFFICER

Name of Private Body	Danèl Nortje Incorporated
Information Officer	Edith de Beer

Deputy Information Officer	Anneke van der Merwe
Street Address	13B Queen Street, Irene, Centurion, 0157
Postal Address	13B Queen Street, Irene, Centurion, 0157
Telephone Number	086 111 4661
Email	edith@Danelinc.com; anneke@Danelinc.com
Website Address	www.Danelinc.com

3. PAIA and POPIA

3.1. The Promotion of Access to Information Act 2 of 2000 ("PAIA") grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in public interest.

3.2. The Protection of Personal Information Act 4 of 2013 ("POPIA") gives effect to the constitutional right to privacy. One of the data processing principles under POPIA is that of data subject participation, which allows data subjects to access and correct their personal information held by a responsible party. This manual provides data subject to request this information from the Company.

4. REQUESTS FOR INFORMATION

4.1. Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the prescribed rates provided. The forms and tariff are dealt with in Regulations 6 and 7 promulgated in terms of PAIA.

4.2. The information will only be made available subject to the provisions of PAIA and access to records may also be refused due to attorney-client privilege.

4.3. Proof of payment of the said prescribed fee must accompany the completed application form.

5. THE GUIDE

5.1. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission ("SAHRC"), which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC in all the official languages.

5.2. The contact details of the SAHRC are:

Postal Address	PAIA Unit, The Research and Documentation Department, Private Bag 2700, Houghton, 2041
Telephone Number	+27 11 877 3600
Fax Number	+27 11 403 0625
Email Address	PAIA@sahrc.org.za
Website	www.sahrc.org.za

6. LATEST NOTICE IN TERMS OF SECTION 52(2) (IF ANY)

6.1. At this stage no notice has been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

7. INFORMATION AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is held and maintained by the Company in compliance with the following legislation:

- Administration of Estates Act, No. 66 of 1965
- Arbitration Act No. 42 of 1965
- Basic Conditions of Employment No. 75 of 1997
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
- Consumer Protection Act No. 68 of 2008
- Copyright Act No. 98 of 1978
- Electronic Communications Act No. 36 of 2005
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Financial Intelligence Centre Act No. 38 of 2001
- Income Tax Act No. 95 of 1967
- Insurance Act No 27 of 1943
- Intellectual Property Laws Amendments Act No. 38 of 1997
- Labour Relations Act No. 66 of 1995
- Legal Practice Act No. 28 of 2014
- Long Term Insurance Act No. 52 of 1998
- National Credit Act No. 34 of 2005
- Occupational Health & Safety Act No. 85 of 1993
- Prescription Act No. 68 of 1969
- Prevention and Combating of Corrupt Activities Act No.12 of 2004

- Prevention of Organized Crime Act No. 121 of 1998
- Protection of Personal Information Act No. 4 of 2013
- Short Term Insurance Act No. 53 of 1998
- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Trademarks Act No. 194 of 1993
- Unemployment Contribution Act No. 4 of 2002
- Unemployment Insurance Act No. 30 of 1996
- Value Added Tax Act 89 of 1991

8. SCHEDULE OF RECORDS OF THE COMPANY

The records held by the Company, both those that can be accessed without an application in terms of PAIA and otherwise, are listed in Schedule 1.

9. SCHEDULE OF PERSONAL INFORMATION PROCESSED BY THE COMPANY

9.1. Schedule of Personal Information. The personal information processed by the Company in terms of POPIA is set out in Schedule 2.

9.2. Planned and actual transborder flows of personal information. The Company may use hosting or cloud services to store and process personal information that are not located in the RSA. If it does so, it will ensure that the level of protection given to the personal information is at least as good as that provided for under RSA Law, either by means of a binding contract with the service provider, or by using a service provider located in a country with privacy laws of similar or stronger effect.

9.3. Information Security Measures.

The Company employs appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control, which include the following:

9.3.1. Ensuring physical security measures are always in place, including, but not limited to, having an alarm system in place; locking all doors to the office;

9.3.2. Keeping all physical client files (including FICA documentation) in cabinets located in access-controlled offices;

9.3.3. Archiving client files securely with a third-party storage services provider;

9.3.4. Backing up and storing all client information and files to the password protected cloud storage provided by Microsoft and protected by security processes set up by Microsoft;

9.3.5. Shredding of all client information and files once closed and digital backups made;

9.3.6. Ensuring each desktop computer used by staff is password protected;

9.3.7. Ensuring each laptop computer used by staff is password protected and encrypted;

9.3.8. Ensuring firewall and anti-virus software is installed on all computers and laptops and always running;

9.3.9. Identifying reasonably foreseeable internal and external risks to personal and other information in its possession or under its control;

9.3.10. Establishing and maintaining appropriate safeguards against the risks identified;

9.3.11. Regularly verifying that the safeguards are effectively implemented;

9.3.12. Ensuring that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards;

9.3.13. Ensuring compliance by all staff of its strict security policy contained in its Electronic Communications Policy, which includes:

9.3.13.1. All information relating to the Company's clients and business operations, whether paper-based or electronic, is confidential and must be treated with utmost care;

9.3.13.2. Staff are strictly prohibited from performing any act which may damage or threaten the functioning, security and/or integrity of the Company's electronic communications system;

9.3.13.3. Staff must:

- Maintain exclusive control over and use of any password or access code used to gain access to the electronic communications system, and protect it from inadvertent disclosure to others;
- Take care not to open any unsolicited messages or messages from unknown senders, especially when such messages include attachments;
- Ensure that the information or data under their control is properly safeguarded according to its level of sensitivity;
- Make back-ups of all sensitive, critical and valuable data files as often as is deemed reasonable by the system controller;
- Keep all confidential information secure and use it only for the purposes intended and not disclose it to any unauthorised third party;
- When working remotely, password protects any work which relates to the

Company's business to prevent unauthorised access thereof.

- Install (or allow the IT service provider to install) and run backup software on devices if provided to them by the Company for business use;
- Install and use virus detection software on any device connected to the Company's electronic communications system; and
- Not use knowledge of passwords, codes or loopholes in the Company's electronic communications system to damage resources, obtain extra resources, take resources from other users, gain unauthorised access to other parts of the system or otherwise make use of the system in a manner for which proper authorisation has not been given;

9.3.13.4. Copies of confidential information should be printed out only as necessary, retrieved from the printer immediately, and stored or destroyed in an appropriate manner;

9.3.13.5. If any sensitive or confidential information is lost or disclosed to unauthorised parties, or suspected to be lost or disclosed to unauthorised parties, the system controller must be notified immediately; and

9.3.13.6. Any incident that appears or is likely to compromise the security of the Company's electronic communications system must be reported to the system controller or the IT service provider. This will include missing data, virus infestations, and unexplained transactions.

10. OTHER PRESCRIBED INFORMATION

10.1. At the time of the compilation of this manual, no further information has been prescribed.

11. AVAILABILITY OF MANUAL

11.1. This manual is available free of charge for inspection at the above- mentioned address; and at the South African Human Rights Commission.

11.2. Copies of the manual may be obtained, subject to the prescribed fees.

11.3. The manual may also be accessed on the Company's website or alternatively a copy is available upon request directly from the SAHRC.

12. RESERVATION OF RIGHTS

12.1. Nothing in this manual is to be construed as a waiver of the right to the confidentiality of any document or any legal privilege or right of non-disclosure attaching to any document mentioned herein, whether in terms of any statute or under the common law. All rights in this regard are fully reserved.

Schedule 1 – Records Available in Terms of PAIA

Category	Subject	Availability
Communication	Promotion of Access to Information Act Manual	**Available**
	Internal and external correspondence	**May not be disclosed**
	News and publications	**Available**
Human Resources	Employment contracts	**May not be disclosed**
	Disciplinary records	**May not be disclosed**
	Employment equity plan	**Limited disclosure only on request**
	Skills development program	**Limited disclosure only on request**
	Salaries and wages records	**May not be disclosed**
	Documents relating to employee benefits	**May not be disclosed**
	Disciplinary code	**Limited disclosure only on request**
	Personnel Guidelines, Policies and Procedures	**Limited disclosure only on request**
	Leave records	**May not be disclosed**

	Personal information of past, present and prospective employees and officer / directors	**May not be disclosed**
	Banking details	**May not be disclosed**
	PAYE records	**May not be disclosed**
	Documents issued to employees for income tax purposes	**May not be disclosed**
	Records of payments made to SARS on behalf of employees	**May not be disclosed**
	UIF records	**May not be disclosed**
Client Records	Records provided by clients, including documentary information required in compliance with FICA	**May not be disclosed**
	Records provided by a client to a third party acting for and on behalf of the Company	**May not be disclosed**
	Records provided by third parties	**May not be disclosed**
	Client files, including correspondence with clients	**May not be disclosed**
	Correspondence with third parties	**May not be disclosed**
	Fee agreements, quotations and mandates	**May not be disclosed**
Immovable and Movable Property	Asset register	**Limited disclosure only on request**
	Agreements for the lease of immovable property	**May not be disclosed**

	Agreements for the lease or sale of movable property Credit sale agreements and/or hire purchase agreements Other agreements for the purchase, ordinary sale, conditional sale or hire of assets	**May not be disclosed May not be disclosed** **May not be disclosed**
Financial Information	Financial and accounting records Banking details Insurance records Tax compliance documents and tax returns accounting records Bank statements Invoices in respect of creditors and debtors Details of auditors Auditors' reports in respect of audits conducted	**May not be disclosed Available upon request May not be disclosed** **May not be disclosed** **May not be disclosed** **May not be disclosed** **May not be disclosed Available upon request** **Limited disclosure only on request**
Information Technology	Computer software, support and maintenance agreements Other documentation pertaining to computer systems and computer programs	**May not be disclosed** **May not be disclosed**
Information relating to legal proceedings	Records relating to legal proceedings involving the Company	**May not be disclosed**
General Records	Client, supplier and document databases	**May not be disclosed**

	Legal Practice Council records, including Fidelity Fund Certificate	**Limited disclosure only on request**
	BBBEE Certificate	**Available upon request May not be**
	Commercial agreements Statutory records	**disclosed Available upon request**
	Organisational structure	
Intellectual Property	Records relating to domain names	**Available upon request**
Company Records	Documents of incorporation	**Available upon request**
	Memorandum and Article of Association	**Limited disclosure only on request**
	Minutes of Board of Directors meetings	**May not be disclosed**
	Records relating to the appointment of directors/ auditor/ secretary/ public officer and other officers	**May not be disclosed**
	Share Register and other statutory registers	**May not be disclosed**

Schedule 2 – Personal Information Processed in Terms of POPIA

Personal Information	**Purpose of Processing**	**Data Subjects it relates to**	**Valid Recipients**
Employee Personal Information, including: - Full name - Identity Number - Physical address - Cellphone number - Personal Email address - Banking details - Tax information	Managing employment relationships. As required by statutory obligations in terms of the relevant employment legislation. As required by SARS for tax purposes.	Past and current employees of the company.	Management of the Company. Accounts department of the Company. SARS. Statutory bodies and courts in terms of legislation or court orders.
Supplier and Third-Party Contractors' Personal Information, including: - Full name - Identity Number - Company name - Company Registration Number - Physical address - Contact details - VAT number - Banking details	Managing supplier/contractor relationship for services to be provided. To make payments for services rendered. As required by statutory obligations in terms of the relevant legislation.	Past and current suppliers/contractors of the Company.	Management of the Company. Accounts department of the Company. SARS. Statutory bodies and courts in terms of legislation or court orders.
Client Personal Information, including: - Full name - Identity Number	Managing client relationships. To render legal services to client.	Past and current clients of the Company.	Management of the Company.

- Company/Entity name - Company/Entity Registration Number - Company/Entity incorporation documentation - Physical address - Contact details - VAT / Income Tax number - Banking details - Documentation / information provided by the client relating to their legal matter	To comply with obligations in terms of FICA. Making payments to clients where required. As required by statutory obligations in terms of the relevant legislation.		Financial Intelligence Centre. Staff working on the client's matter. Accounts department of the Company. Courts where the client's matter is to be heard. Third party suppliers like correspondent attorneys. Opposing attorney, with consent of the client. SARS. Statutory bodies and courts in terms of legislation or court orders.
Personal Information collected from COVID19 sign-in register	Required to be obtained and kept in accordance with the relevant Regulations in terms of the Disaster Management Act.	Any person entering the Company's office.	Management of the Company. Statutory bodies and courts in terms of legislation or court orders.

Personal Information obtained from contact requests or queries submitted on the Company's website, including: - Name - Cellphone number - Email address	Used to contact the prospective client about the query.	Any person submitting a contact request or query on the Company's website.	Management of the Company. Staff dealing with the contact request or query. Statutory bodies and courts in terms of legislation or court orders.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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):		Facsimile:	
	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)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

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 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	

TYPE OF RECORD
*(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	

Records are held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(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	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED
If the provided space is inadequate, please continue 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 right:	

FEES	
a) A request fee must be paid before the request is 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

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE

Note [Regulation 8]

1. If your request is granted the—
(a) amount of the deposit, (if any), is payable before your request is processed; and
(b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____
_____
_____
_____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body *(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)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

Printed copies of the information *(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 information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

3. To be submitted:

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)*	

Kindly note that your request has been: ☐ Approved

Denied, for the following reasons: ☐

4. Fees are payable regarding your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes ☐ No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

The amount must be paid in the following Bank account:

Name of Bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____this _____day of _____2026

_____
SIGNATURE BY INFORMATION OFFICER

_____
SIGNATURE BY DEPUTY INFORM