

PAIA MANUAL 2026

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the PAIA Regulations, 2021, and aligned with the Protection of Personal Information Act 4 of 2013 ("POPIA")

DETAILS

O'HAGAN & ASSOCIATES INC.

Information Officer: Sharon O'Hagan (Duly registered with the Information Regulator)

Email: sharon@ohagan.co.za

Telephone: 011 029 6050

Physical address: 46 Waterford Office Park, Waterford Drive, Fourways

AVAILABILITY OF THIS MANUAL

This manual is available for inspection at the business premises during normal business hours, on request from the Information Officer, and is published on the company website.

INFORMATION REGULATOR

The Information Regulator (South Africa)

Website: <https://www.justice.gov.za/inforeg>

Email: enquiries@inforegulator.org.za

General enquiries: 010 023 5200

PURPOSE OF THIS MANUAL

This manual is prepared in terms of Section 51 of PAIA to facilitate access to records and outline how personal information is processed under POPIA.

GUIDE ON HOW TO USE PAIA

A guide to using PAIA, as compiled by the Information Regulator in terms of Section 10 of PAIA, is available from the Regulator's website or on request from the information Officer.

RECORDS AVAILABLE WITHOUT REQUEST

Certain records are available without a formal request, including company contact details, public available regulatory filings, and published policies.

RECORDS HELD BY THE COMPANY

Categories of records:

- Financial records (accounting, tax, banking)
- Client records (contracts, mandates, KYC documents)
- Employee records (HR, payroll, disciplinary)
- Regulatory records (FSCA, SARS, compliance reports)
- IT records (emails, system data, backups)

PROCESSING OF PERSONAL INFORMATION (POPIA)

Categories of data subjects: Clients, employees, service providers, and regulatory bodies.

Categories of personal information: Identification details, contact details, financial information, employment information, and correspondence.

Lawful basis for processing: Processing is based on consent, contractual necessity, legal obligations, and legitimate business interests.

Purpose of processing: Client service delivery, regulatory compliance, risk management, and internal administration.

Recipients of information: SARS, FSCA, banks, auditors, and service providers.

Data subject rights - Request access to personal information - Request correction of personal information - Request deletion of personal information where lawful - Object

to processing - Withdraw consent where processing is based on consent - Lodge a complaint with the Information Regulator.

Security measures: The organisation implements appropriate, reasonable technical and organisational measures to prevent loss, damage, or unauthorised access to personal information.

Record retention: Records are retained in accordance with legal, regulatory, and operational requirements and securely destroyed thereafter.

DIRECT MARKETING

The organisation processes personal information for direct marketing only in compliance with Section 69 of POPIA.

Direct marketing will occur only with consent or where a legitimate client relationship exists.

Data subject may opt out or withdraw consent anytime.

CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

Personal information may be transferred internationally in accordance with POPIA Section 72 and only where adequate data protection safeguards exist.

GROUNDINGS FOR REFUSAL OF ACCESS (PAIA)

Access to records may be refused on the following grounds:

1. Protection of personal information of third parties
2. Commercially sensitive information
3. Legal privilege
4. Safety and security considerations

COMPLAINTS PROCEDURE

Any person may lodge a complaint with the Information Regulator:

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

REQUEST PROCEDURE

Requests must be submitted using Form 2 to the Information Officer. Requests must be in writing and provide sufficient detail to identify the record. A request fee may apply. The Company will respond within 30 days and notify the requester of the outcome.

ANNEXURE A – FORM 2

Request must be submitted to the Information Officer using **Form 2**.



form 2.pdf

ANNEXURE B – FEES (PAIA REGULATIONS 2021)

Request fee (non-personal requester):	R140.00
Photocopy (A4 per page):	R1.50
Printed copy:	R1.50
USB/CD:	R80.00

POLICY GOVERNANCE

Reviewed annually by the Information Officer.