



PAIA and POPIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”) and in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

This manual applies to

M C Vermeulen Incorporated

Registration number: 2018/469150/21

(hereinafter “Vermeulen Attorneys”)

1. Definitions and Acronyms

1.1. For the purposes of this Manual, unless the context indicates otherwise:

1.1.1. **“Act” or “PAIA”** means the Promotion of Access to Information Act 2 of 2000, as amended.

1.1.2. **“Conditions for Lawful Processing”** means the conditions for the lawful processing of personal information as set out in Chapter 3 of POPIA.

1.1.3. **“Constitution”** means the Constitution of the Republic of South Africa, 1996.

1.1.4. **“Data Subject”** means the person to whom personal information relates as defined in POPIA.

1.1.5. **“Information Officer”** means the head of Vermeulen Attorneys designated as the Information Officer in terms of section 56 of the Protection of Personal Information Act 4 of 2013, responsible for compliance with both POPIA and the Promotion of Access to Information Act 2 of 2000.

1.1.6. **“Information Regulator”** means the Information Regulator established in terms of section 39 of POPIA.

1.1.7. **“Manual”** means this PAIA and POPIA Manual.

1.1.8. **“Personal Information”** has the meaning assigned to it in section 1 of POPIA.

1.1.9. **“POPIA”** means the Protection of Personal Information Act 4 of 2013.

1.1.10. **“Private Body”** means Vermeulen Attorneys as defined in PAIA.

1.1.11. **“Processing”** has the meaning assigned to it in section 1 of POPIA and includes the collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, distribution, or destruction of personal information.

1.1.12. **“Record”** means any recorded information regardless of form or medium, in the possession or under the control of Vermeulen Attorneys.

1.1.13. **“Requester”** means any person requesting access to a record of Vermeulen Attorneys in terms of PAIA.

2. Purpose of this Manual

2.1. This Manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000.

2.2. The purpose of this Manual is to:

2.2.1. describe the structure and functions of Vermeulen Attorneys;

2.2.2. describe the categories of records held by Vermeulen Attorneys;

2.2.3. explain how members of the public may request access to records held by Vermeulen Attorneys in terms of PAIA;

2.2.4. describe how Vermeulen Attorneys processes personal information in accordance with POPIA;

2.2.5. inform data subjects of their rights in relation to personal information processed by Vermeulen Attorneys; and

2.2.6. promote transparency and accountability in the processing of information.

2.3. This Manual is intended to assist requesters in exercising their rights of access to information in terms of PAIA and their rights relating to personal information in terms of POPIA.

3. Details of the Private Body

3.1. **Name of Private Body:** M C Vermeulen Incorporated (trading as Vermeulen Attorneys)

3.2. **Registration Number:** 2018/469150/21

3.3. **Physical Address:** Quadrum 3, Quadrum Office Park, 50 Constantia Boulevard, Floracliffe, Johannesburg, 1709, South Africa

3.4. **Postal Address:** Quadrum 3, Quadrum Office Park, 50 Constantia Boulevard, Floracliffe, Johannesburg, 1709, South Africa

3.5. **Telephone:** 010 109 1089

3.6. **Website:** <https://www.vermeulenlaw.co.za>

3.7. **Email:** mervyn@vermeulenlaw.co.za

4. Information Officer

4.1. In terms of section 56 of the Protection of Personal Information Act 4 of 2013, the head of a private body is designated as the Information Officer for that body. The Information Officer is responsible for ensuring compliance with both POPIA and the Promotion of Access to Information Act 2 of 2000 within Vermeulen Attorneys.

4.2. The Information Officer performs the duties contemplated in PAIA and POPIA and acts as the primary point of contact for requests for access to records and matters relating to the processing of personal information.

4.3. The duties of the Information Officer include:

4.3.1. encouraging compliance with PAIA and POPIA within the organisation;

4.3.2. dealing with requests for access to records;

4.3.3. ensuring that personal information is processed in accordance with POPIA;

4.3.4. working with the Information Regulator in relation to investigations or complaints;

4.3.5. ensuring that appropriate policies and procedures are in place for the protection of personal information; and

4.3.6. assisting data subjects who wish to exercise their rights under POPIA.

4.4. **Contact Details of the Information Officer**

Information Officer:	Mervyn Clark Vermeulen
Registered Address:	Quadrum 3, Quadrum Office Park, 50 Constantia Boulevard, Floracliffe, Johannesburg, 1709
Postal Address:	Quadrum 3, Quadrum Office Park, 50 Constantia Boulevard, Floracliff, Johannesburg, 1709
Telephone Number:	010 109 1089

Website:	https://www.vermeulenlaw.co.za
E-mail Address:	mervyn@vermeulenlaw.co.za

4.5. Deputy Information Officers may be appointed where necessary in order to assist the Information Officer in fulfilling these duties.

5. Guide on How to Use PAIA

5.1. In terms of section 10 of the Promotion of Access to Information Act 2 of 2000, the Information Regulator has compiled a Guide explaining how to use PAIA and how to obtain access to records held by public and private bodies.

5.1.1. The Guide contains information to assist a person who wishes to exercise any right contemplated in PAIA, including:

- 5.1.1.1. the objects of PAIA;
- 5.1.1.2. the manner and form of a request for access to a record;
- 5.1.1.3. the assistance available from Information Officers and Deputy Information Officers;
- 5.1.1.4. the assistance available from the Information Regulator;
- 5.1.1.5. remedies available in law regarding acts or failures to act in respect of rights or duties imposed by PAIA;
- 5.1.1.6. the provisions of PAIA relating to the voluntary disclosure of categories of records;

5.1.1.7. the notices issued regarding fees payable in relation to requests for access to records; and

5.1.1.8. the regulations made under PAIA.

5.1.2. The Guide is available in each of the official languages and in braille.

5.1.3. Members of the public may inspect or obtain a copy of the Guide from the Information Regulator.

5.2. Contact Details of the Information Regulator

5.2.1. **Physical Address:** JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001

5.2.2. **Postal Address:** P.O Box 31533, Braamfontein, Johannesburg, 2017

5.2.3. **Telephone:** 010 023 5200

5.2.4. **Website:** <https://infoeregulator.org.za>

5.2.5. **Email:** enquiries@infoeregulator.org.za

5.3. The Guide may also be obtained:

5.3.1. from the offices of the Information Regulator during normal working hours;
or

5.3.2. from the website of the Information Regulator.

6. **Categories of Records Automatically Available Without a Formal Request**

6.1. Certain records held by Vermeulen Attorneys are available without the need for a formal request in terms of PAIA. These records may be accessed either through the website of Vermeulen Attorneys or upon informal request to the Information Officer.

6.2. The following categories of records are generally available without a formal PAIA request, subject to reasonable administrative requirements such as copying or reproduction costs.

Category of Record	Available on Website	Available Upon Request
PAIA Manual	Yes	Yes
Firm Profile and Practice Areas	Yes	Yes
Public Legal Articles and Publications	Yes	Yes
Marketing and Promotional Material	Yes	Yes
Website Content	Yes	Yes

Category of Record	Available on Website	Available Upon Request
General Information Brochures	Yes	Yes
Contact Information for Vermeulen Attorneys	Yes	Yes

6.3. Access to the above records may be requested from the Information Officer using the contact details provided in this Manual.

6.4. Where copies of such records are requested, Vermeulen Attorneys may charge a reasonable reproduction fee in accordance with the applicable regulations.

6.5. Nothing in this section prevents Vermeulen Attorneys from refusing access to any record where such access would result in the disclosure of confidential information, personal information, or information protected by law.

7. Records Available in Terms of Other Legislation

7.1. Vermeulen Attorneys maintains certain records in accordance with applicable legislation. Where applicable and subject to the requirements of such legislation, these records may be accessed by persons who are entitled to access such information.

7.2. Access to such records will be granted in accordance with the provisions of the relevant legislation.

Applicable Legislation	Categories of Records
Basic Conditions of Employment Act 75 of 1997	Employee contracts, leave records, payroll records, disciplinary records
Companies Act 71 of 2008	Incorporation documents, share registers, director records, minutes of meetings
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Employee injury reports and compensation records
Employment Equity Act 55 of 1998	Employment equity plans and reports
Financial Intelligence Centre Act 38 of 2001	Client identification records, FICA verification documentation
Income Tax Act 58 of 1962	PAYE records, tax returns, tax correspondence
Labour Relations Act 66 of 1995	Disciplinary records, grievance procedures, collective agreements
Legal Practice Act 28 of 2014	Legal practitioner records, trust account records, professional compliance documentation
Protection of Personal Information Act 4 of 2013	Personal information processing records, data subject requests
Promotion of Access to Information Act 2 of 2000	PAIA manual and access request records
Skills Development Act 97 of 1998	Skills development and training records
Unemployment Insurance Act 63 of 2001	UIF contributions and employee records
Value Added Tax Act 89 of 1991	VAT records and financial records

8. Description of the Subjects on Which Vermeulen Attorneys Holds Records and the Categories of Records Held on Each Subject

8.1. Vermeulen Attorneys maintains records relating to its operations, administration, employees, clients, and compliance obligations. These records are classified under the following subjects and categories.

Subject	Categories of Records
Corporate and Governance Records	Incorporation documents; memorandum of incorporation; shareholder records; director records; governance policies; strategic documents; internal policies and procedures; minutes of meetings
Financial Records	Accounting records; annual financial statements; banking records; bank statements; asset registers; invoices; payment records; tax records; VAT records; financial audit reports
Human Resources Records	Employment contracts; employee personal information; payroll records; leave records; disciplinary records; grievance records; training records; employment equity records
Client and Legal Matter Records	Client identification records; FICA documentation; client instructions; pleadings and court documents; legal opinions; correspondence; discovery documents; litigation records; contracts and agreements; case management records
Compliance and Regulatory Records	Records relating to compliance with statutory obligations; regulatory correspondence; risk management frameworks; internal compliance reports; compliance policies
Information Technology Records	IT policies and procedures; system documentation; hardware and software information; cybersecurity policies; electronic communications
Marketing and Business	Marketing materials; website content; promotional material; publications; client newsletters; business development records

Subject	Categories of Records
Development Records	
Administrative Records	General correspondence; operational documents; internal administrative records; service provider records

8.2. The accessibility of the above records may be subject to the grounds of refusal set out in PAIA. Access may also be restricted in terms of:

8.2.1. confidentiality obligations;

8.2.2. legal professional privilege;

8.2.3. protection of personal information;

8.2.4. contractual restrictions; or

8.2.5. other applicable legislation.

9. Procedure for Requesting Access to Records

9.1. A requester who wishes to obtain access to records held by Vermeulen Attorneys must follow the procedure described below.

9.2. Completion of Request Form

9.2.1. A request for access to records must be made using the prescribed request form for private bodies.¹

9.2.2. The request must be submitted to the Information Officer at the contact details provided in this Manual.

9.2.3. The request form must be submitted:

9.2.3.1. by email; or

9.2.3.2. by delivery to the physical address of Vermeulen Attorneys.

9.2.4. The prescribed request form is attached to this Manual as Appendix 1.

9.3. Information Required from the Requester

9.3.1. The request form must be completed with sufficient information to enable the Information Officer to identify:

9.3.1.1. the record or records requested;

9.3.1.2. the identity of the requester;

9.3.1.3. the form of access required; and

¹ At date hereof - FORM 2: REQUEST FOR ACCESS TO RECORD [Regulation 7]

See appendix 1,

or

<https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

9.3.1.4. the postal address or email address of the requester in the Republic.

9.3.2. The requester must also provide sufficient detail regarding the right that the requester seeks to exercise or protect, and explain why the requested record is required for that purpose.

9.4. Requests Made on Behalf of Another Person

9.4.1. If a request is made on behalf of another person, the requester must provide proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.

9.5. Assistance to Requesters

9.5.1. If a requester requires assistance in completing the request form due to illiteracy, disability, or any other reason, the Information Officer will provide reasonable assistance.

9.6. Acknowledgement of Request

9.6.1. Upon receipt of a request, the Information Officer will acknowledge receipt of the request and advise the requester of any applicable request fee.

9.7. Time Period for Responding to Requests

9.7.1. Vermeulen Attorneys will consider the request and notify the requester of its decision within 30 days of receipt of the request.

9.7.2. The Information Officer may extend the period of 30 days for a further period of up to 30 days where:

9.7.2.1. the request is for a large number of records;

9.7.2.2. the request requires a search through a large volume of records;

9.7.2.3. consultation with third parties is required; or

9.7.2.4. the records cannot reasonably be obtained within the original period.

9.7.3. The requester will be notified in writing if an extension is required.

9.8. Outcome of Request

9.8.1. The Information Officer will notify the requester in writing whether the request has been:

9.8.1.1. granted;

9.8.1.2. partially granted; or

9.8.1.3. refused.

9.8.2. Where access is granted, the notice will indicate:

9.8.2.1. the access fee payable (if any);

9.8.2.2. the form in which access will be provided; and

9.8.2.3. the procedure for obtaining the record.

9.8.3. Where a request is refused, the notice will include the reasons for refusal and information regarding available remedies.

9.9. Severability of Records

9.9.1. If a requested record contains information that cannot be disclosed in terms of PAIA, the Information Officer will, where reasonably possible, remove the protected information and grant access to the remainder of the record.

9.10. Records that Cannot be Found

9.10.1. If the Information Officer is unable to locate a requested record, or if the record does not exist, the Information Officer will notify the requester accordingly.

9.10.2. Such notification will be made by way of an affidavit or affirmation explaining that the record could not be found after a reasonable search.

9.10.3. If the record is subsequently located, the requester will be granted access to the record unless access is refused on lawful grounds.

9.11. Identification of Records

9.11.1. A request for access to records must identify the record or records requested with reasonable particularity.

9.11.2. Vermeulen Attorneys is not obliged to conduct open-ended searches through electronic systems, email archives, backup systems, or document repositories where a request is framed in overly broad or vague terms.

- 9.11.3. Where a request does not sufficiently identify the records sought, the Information Officer may require the requester to provide additional detail in order to enable the records to be located with reasonable effort.

9.12. Use of PAIA in Relation to Litigation

- 9.12.1. PAIA may not be used to circumvent discovery procedures, subpoena processes, or other mechanisms for obtaining documents in legal proceedings.

- 9.12.2. Where a request for access to records relates to ongoing or contemplated litigation, Vermeulen Attorneys may require that the request be pursued through the applicable procedural rules governing such proceedings.

10. Grounds for Refusal of Access to Records

- 10.1. Vermeulen Attorneys may refuse access to records where disclosure would fall within one of the grounds for refusal contemplated in Chapter 4 of PAIA.

- 10.2. Each request for access to records will be evaluated on its own merits and in accordance with the provisions of PAIA.

- 10.3. The following are the main grounds upon which Vermeulen Attorneys may refuse access to records.

- 10.3.1. Protection of Personal Information of a Third Party

10.3.1.1. Access to records may be refused where disclosure would involve the unreasonable disclosure of personal information about a third party who is a natural person.

10.3.1.2. Personal information includes, but is not limited to:

10.3.1.2.1. identity numbers;

10.3.1.2.2. contact details;

10.3.1.2.3. employment information;

10.3.1.2.4. financial information; and

10.3.1.2.5. private correspondence.

10.3.1.3. Access may be granted where the third party has consented to the disclosure or where disclosure is otherwise permitted by law.

10.3.2. Protection of Commercial Information of a Third Party

10.3.2.1. Access may be refused where the requested record contains commercial information belonging to a third party, including:

10.3.2.1.1. trade secrets;

10.3.2.1.2. financial, commercial, scientific or technical information where disclosure could cause harm to the commercial interests of the third party; or

10.3.2.1.3. information supplied in confidence by a third party.

10.3.3. Protection of Confidential Information

10.3.3.1. Access may be refused where the record contains confidential information supplied in confidence by a third party, and disclosure would constitute a breach of a duty of confidence owed to that third party.

10.3.4. Protection of the Safety of Individuals and Property

10.3.4.1. Access may be refused where disclosure could reasonably be expected to endanger the life or safety of an individual or prejudice the security of property.

10.3.5. Legally Privileged Records

10.3.5.1. Access must be refused where the requested record is subject to legal professional privilege, unless the person entitled to the privilege has waived that privilege.

10.3.5.2. This includes records such as:

10.3.5.2.1. legal advice;

10.3.5.2.2. litigation strategy;

10.3.5.2.3. privileged correspondence between attorney and client.

10.3.5.2.4. information or records provided by a client to an attorney in the ordinary course of the attorney–client

relationship, or for the purpose of obtaining legal advice, assistance, or representation in a legal matter.

10.3.5.3. For the avoidance of doubt, nothing in this Manual or in PAIA requires Vermeulen Attorneys to disclose information or records that are protected by legal professional privilege arising from the attorney–client relationship.

10.3.6. Litigation and Client File Records

10.3.6.1. Records contained in a client file or litigation file frequently contain information belonging to multiple parties, including the firm’s client, opposing parties, witnesses, experts, and other third parties.

10.3.6.2. Access to such records may be refused where disclosure would reveal privileged communications, confidential legal advice, litigation strategy, or personal or commercial information of third parties.

10.3.7. Protection of Commercial Information of Vermeulen Attorneys

10.3.7.1. Access may be refused where the requested record contains:

10.3.7.1.1. trade secrets of Vermeulen Attorneys;

10.3.7.1.2. financial, commercial, scientific or technical information which disclosure could harm the commercial or other interests of Vermeulen Attorneys;

10.3.7.1.3. information which, if disclosed, could place Vermeulen Attorneys at a disadvantage in contractual negotiations or commercial competition;

10.3.7.1.4. information the disclosure of which could reasonably be expected to compromise the security of Vermeulen Attorneys, its systems, premises, personnel, or operations, or otherwise expose the firm to a risk of damage, loss, or unlawful interference.

10.3.8. Protection of Research Information

10.3.8.1. Access may be refused where the requested record contains research information of Vermeulen Attorneys or a third party and disclosure would expose the research or the researcher to serious disadvantage.

10.3.9. Requests that are Frivolous or Vexatious

10.3.9.1. Vermeulen Attorneys may refuse a request where the request is manifestly frivolous or vexatious, or where processing the request would result in an unreasonable diversion of the resources of the firm.

10.3.10. Mandatory Disclosure in the Public Interest

10.3.10.1. Despite any of the grounds for refusal described above, access to a record may be granted where:

10.3.10.1.1. disclosure would reveal evidence of a substantial contravention of the law; or

10.3.10.1.2. disclosure would reveal an imminent and serious public safety or environmental risk;

and the public interest in disclosure clearly outweighs the harm contemplated in the grounds for refusal.

11. Remedies Available to Requesters

11.1. If a requester is dissatisfied with the decision of the Information Officer of Vermeulen Attorneys, the requester may pursue the remedies described below.

11.1.1. Internal Remedies

11.1.1.1. Vermeulen Attorneys does not provide for internal appeal procedures.

11.1.1.2. Accordingly, the decision made by the Information Officer is final within the organisation.

11.1.2. Complaint to the Information Regulator

11.1.2.1. A requester who is dissatisfied with the response received from Vermeulen Attorneys may lodge a complaint with the Information Regulator.

11.1.2.2. The Information Regulator is empowered to investigate complaints relating to:

11.1.2.2.1. refusal of access to records;

11.1.2.2.2. failure to respond to a request within the prescribed time period;

11.1.2.2.3. unreasonable fees charged for access to records;

11.1.2.2.4. any alleged infringement of PAIA or POPIA.

11.1.2.3. Complaints must be submitted to the Information Regulator in the prescribed form.

11.1.2.4. The contact details of the Information Regulator are set out above.

11.1.3. Application to Court

11.1.3.1. A requester or third party may apply to a competent court for relief where the requester remains dissatisfied after exhausting the available remedies.

11.1.3.2. Such applications may be brought before:

11.1.3.2.1. the High Court of South Africa;

11.1.3.2.2. the Constitutional Court; or

11.1.3.2.3. any other court with jurisdiction as determined by law.

12. Processing of Personal Information

12.1. Vermeulen Attorneys processes personal information in the course of providing legal services and conducting its business operations.

12.2. Vermeulen Attorneys is committed to processing personal information lawfully, fairly and transparently in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

12.3. As a responsible party under POPIA, Vermeulen Attorneys ensures that personal information is processed in accordance with the Conditions for Lawful Processing set out in Chapter 3 of POPIA.

12.4. Purpose of Processing Personal Information

12.4.1. Vermeulen Attorneys processes personal information for various legitimate purposes related to its operations and legal services, including:

12.4.1.1. providing legal services to clients;

12.4.1.2. managing and administering legal matters;

12.4.1.3. complying with statutory and regulatory obligations, including Financial Intelligence Centre Act (FICA) requirements;

12.4.1.4. managing relationships with employees, contractors, suppliers, and service providers;

12.4.1.5. maintaining internal records and operational systems;

12.4.1.6. managing financial and accounting processes;

12.4.1.7. conducting internal risk management and compliance processes; and

12.4.1.8. communicating with clients, service providers, and other stakeholders.

12.4.2. Personal information will only be processed for purposes that are specific, lawful, and directly related to the activities of Vermeulen Attorneys.

12.5. Categories of Data Subjects and Personal Information Processed

12.5.1. Vermeulen Attorneys processes personal information relating to the following categories of data subjects.

Category of Data Subject	Personal Information Processed
Clients	Names, identity numbers, contact details, financial information, FICA Verification Information, legal matter information, correspondence
Employees	Identity details, employment records, payroll information, training records, disciplinary records, tax records
Service Providers	Names, contact details, business registration details, banking information, invoices, statements
Opposing Parties and Related Persons in Legal Matters	Personal details, litigation information, correspondence, documents (including diagrams, photographs, video recordings and/or audio recordings) relevant to the litigation and/or furnished by clients with the intent of obtaining legal advice
Website Users	Contact information submitted through website enquiries

- 12.5.2. Personal information processed may include identification details, contact information, financial information, employment information, and information relating to legal matters handled by the firm.

12.6. Recipients of Personal Information

- 12.6.1. Vermeulen Attorneys may disclose personal information to the following categories of recipients where necessary and lawful to do so:

12.6.1.1. regulatory authorities and government bodies where required by law;

12.6.1.2. courts, tribunals, and dispute resolution bodies;

12.6.1.3. legal counsel and other legal professionals involved in a matter;

12.6.1.4. accountants, auditors, and professional advisers;

12.6.1.5. service providers and operators who assist in delivering services to the firm;

12.6.1.6. financial institutions and payment service providers.

- 12.6.2. Personal information will only be shared where such disclosure is necessary for the legitimate purposes of the firm and/or its clients, or required by law.

12.7. Cross-Border Transfers of Personal Information

12.7.1. Personal information may be transferred outside the Republic of South Africa where necessary for the provision of services or where information is stored on electronic systems hosted outside the country.

12.7.2. Where such transfers occur, Vermeulen Attorneys will take reasonable steps to ensure that the recipient of the information provides an adequate level of protection in accordance with the requirements of POPIA.

12.8. Security Safeguards

12.8.1. Vermeulen Attorneys implements appropriate technical and organisational measures to protect personal information against:

12.8.1.1. loss or damage;

12.8.1.2. unauthorised access;

12.8.1.3. unlawful processing; and

12.8.1.4. unauthorised disclosure.

12.8.2. These safeguards include:

12.8.2.1. controlled access to records and information systems only by duly authorised individuals;

12.8.2.2. password protection and authentication measures, including multifactor authentication where appropriate;

12.8.2.3. secure storage of physical and electronic records;

12.8.2.4. internal policies governing access to personal information;

12.8.2.5. contractual confidentiality and non-disclosure provisions; and

12.8.2.6. ongoing monitoring of security risks.

12.8.3. Rights of Data Subjects

12.8.3.1. In terms of, and subject to the specific provisions and exceptions of POPIA, data subjects have the right to:

12.8.3.1.1. be notified that their personal information is being collected;

12.8.3.1.2. request access to personal information held about them;

12.8.3.1.3. request the correction or deletion of inaccurate or incomplete personal information;

12.8.3.1.4. object to the processing of personal information in certain circumstances;

12.8.3.1.5. object to the processing of personal information for purposes of direct marketing; and

12.8.3.1.6. lodge a complaint with the Information Regulator.

12.8.3.2. Requests by data subjects to exercise their rights may be submitted to the Information Officer using the contact details provided in this Manual.

13. Availability of the Manual

13.1. This Manual is made available in accordance with the requirements of section 51 of the Promotion of Access to Information Act.

13.2. A copy of this Manual is available:

13.2.1. on the website of Vermeulen Attorneys, where applicable;

13.2.2. for inspection at the offices of Vermeulen Attorneys during normal business hours;

13.2.3. upon request to the Information Officer; and

13.2.4. to the Information Regulator upon request.

13.3. Copies of the Manual may be obtained from the Information Officer subject to payment of a reasonable reproduction fee as prescribed in the PAIA Regulations.

14. Updating of the Manual

14.1. Vermeulen Attorneys will review and update this Manual periodically to ensure that it remains accurate and complies with the requirements of PAIA, POPIA, and any applicable regulations.

14.2. Any amendments to this Manual will be published and made available in the same manner as this Manual.

Issued By

Mervyn Clark Vermeulen

Date of First Compilation: 04-2020

Date of Revision: 01-2026

Managing Director and Information Officer

Vermeulen Attorneys

APPENDIX 1 – PAIA FORM 2: REQUEST FOR ACCESS TO RECORD [Regulation 7]

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: <table border="1"><tr><td></td></tr></table>	
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 <i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>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.</i>	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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

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