

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of
Access to Information Act 2 of 2000
(as amended)

Ctrl Cut Co (Pty) Ltd

Registration No. 2026/243068/07

Randburg, Gauteng, South Africa

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 "CEO"	Chief Executive Officer
1.2 "DIO"	Deputy Information Officer;
1.3 "IO"	Information Officer: means the person responsible for the applicable information-access and data-protection functions of Ctrl Cut.
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"	means the Information Regulator of South Africa.
1.8 "Republic"	Republic of South Africa
1.9 "CTRL CUT CO"	Ctrl Cut Co (Pty) Ltd.
1.10 "Manual"	This PAIA Manual prepared in terms of section 51 of PAIA.

2. PURPOSE OF THE MANUAL

2.1 This Manual is intended to assist members of the public to identify categories of records held by CTRL CUT CO that may be available without a formal PAIA request.

2.2 This Manual explains how a person may request access to a record held by CTRL CUT CO.

2.3 This Manual describes the subjects on which CTRL CUT CO holds records and the categories of records held under each subject.

2.4 This Manual identifies records maintained by CTRL CUT CO in accordance with applicable South African legislation.

2.5 This Manual provides relevant contact details for CTRL CUT CO's Information Officer and Deputy Information Officer.

2.6 This Manual provides information regarding the Guide on how to use PAIA and explains how the Guide may be obtained.

2.7 This Manual describes the purposes for which CTRL CUT CO processes personal information.

2.8 This Manual describes the categories of data subjects whose personal information CTRL CUT CO may process.

2.9 This Manual describes the categories of personal information CTRL CUT CO may process in relation to those data subjects.

2.10 This Manual describes the recipients or categories of recipients to whom personal information may be supplied or made accessible.

2.11 This Manual describes CTRL CUT CO's planned or anticipated transfers and processing of personal information outside the Republic.

2.12 This Manual provides a general description of the security measures used to safeguard the confidentiality, integrity and availability of personal information processed by CTRL CUT CO.

2.13 This Manual is intended to facilitate transparency and access to records while protecting privacy, confidentiality, intellectual property, commercial interests and other rights recognised by PAIA, POPIA and applicable law.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CTRL CUT CO

Registered entity: Ctrl Cut Co (Pty) Ltd

Trading name: CTRL CUT CO

Registration no.: 2026/243068/07

Information Officer: Sherwin Naidoo

Position: Chief Executive Officer and Information Officer

Email: sherwin@ctrlcutstudio.co.za

Deputy Information Officer: Kineshea Pillay

Position: Director and Deputy Information Officer

Email: kineshea@ctrlcutstudio.co.za

General and access-to-information enquiries: info@ctrlcutstudio.co.za

Telephone: 060 312 2090

[Website](#)

Postal address and Physical address: 31 Keel Street, Olivedale, Randburg, Gauteng, 2118, South Africa

Requests for access to information may be directed to the Information Officer using the contact details above.

4. PAIA GUIDE

4.1 The Information Regulator has, in terms of section 10 of PAIA, made available a Guide explaining how PAIA operates and how persons may exercise rights under PAIA and POPIA.

4.2 The Guide is intended to be available in accessible form and in the official languages made available by the Information Regulator.

4.3 The Guide includes information concerning:

4.3.1 the objects and purpose of PAIA and POPIA;

4.3.2 the contact details of Information Officers and Deputy Information Officers;

4.3.3 the manner and form in which requests for access to records may be made;

4.3.4 the assistance available from Information Officers;

4.3.5 the assistance available from the Information Regulator;

4.3.6 the remedies available where a person is dissatisfied with a decision or failure to act in terms of PAIA;

- 4.3.7 complaints that may be submitted to the Information Regulator;
- 4.3.8 applications that may be made to a competent court;
- 4.3.9 the requirement for public and private bodies to compile PAIA Manuals;
- 4.3.10 voluntary disclosure and automatic availability of records;
- 4.3.11 prescribed fees relating to access requests; and
- 4.3.12 applicable PAIA regulations and procedures.

4.4 A copy of the Guide may be obtained:

- 4.4.1 from the Information Regulator;
- 4.4.2 through the Information Regulator's website;
- 4.4.3 upon request from CTRL CUT CO's Information Officer; or
- 4.4.4 by other means made available by the Information Regulator from time to time.

4.5 The PAIA Guide is available from the Information Regulator in the official languages in which the Regulator makes the Guide available.

4.6 A person requiring access to the Guide may obtain it from the Information Regulator or request assistance from CTRL CUT CO's Information Officer.

5. RECORDS ORDINARILY AVAILABLE WITHOUT A FORMAL PAIA REQUEST

5.1 Certain records may be available without requiring a requester to submit a formal PAIA request.

5.2 PUBLIC BUSINESS INFORMATION

5.2.1 CTRL CUT CO's company name and public-facing business information;

5.2.2 public contact information;

5.2.3 descriptions of services offered by CTRL CUT CO; and

5.2.4 other information intentionally made publicly available.

5.2.5 Access: Generally available through CTRL CUT CO's website or directly from CTRL CUT CO upon request where appropriate.

5.3 WEBSITE AND LEGAL INFORMATION

5.3.1 this PAIA Manual;

5.3.2 Privacy Policy;

5.3.3 Cookie Policy;

5.3.4 Website Terms and Conditions;

5.3.5 Disclaimer;

5.3.6 Acceptable Use Policy; and

5.3.7 other legal notices published by CTRL CUT CO.

5.3.8 Service Cancellation & Refund Policy;

5.3.9 Access: Available through Ctrl Cut's website or upon request where applicable.

5.4 PORTFOLIO AND PUBLICLY RELEASED CREATIVE WORK

5.4.1 portfolio material;

5.4.2 showreels;

5.4.3 publicly released case studies;

5.4.4 selected imagery;

5.4.5 animation or video excerpts; and

5.4.6 other work intentionally published by CTRL CUT CO.

5.4.7 Access: Available through Ctrl Cut's website, public social-media profiles or other authorised public channels.

5.5 MARKETING AND PUBLIC COMMUNICATIONS

5.5.1 published marketing information;

5.5.2 public announcements;

5.5.3 social-media content;

5.5.4 public newsletters or articles; and

5.5.5 promotional material.

5.5.6 Access: Available through the channels on which such material has been published.

5.6 Availability of a record under this section does not grant a requester any licence or right to reproduce, adapt, distribute, commercially exploit or otherwise use CTRL CUT CO's intellectual property.

5.7 Client-owned trademarks, logos, footage, music, photography, written material and other third-party intellectual property remain subject to the rights of the relevant owners.

5.8 Records containing confidential, commercially sensitive, private, privileged, unreleased or otherwise protected information are not automatically available merely because a related project or client relationship has been publicly referenced.

5.9 Where a requested record is not automatically available, the requester may be required to submit a formal request in accordance with section 14 of this Manual.

6. RECORDS MAINTAINED UNDER APPLICABLE LEGISLATION

6.1 CTRL CUT CO may create, maintain or retain records under the legislation listed below, to the extent that the legislation applies to CTRL CUT CO at the relevant time.

6.2 COMPANIES ACT 71 OF 2008, AS AMENDED

- 6.2.1 company incorporation and registration records;
- 6.2.2 memorandum of incorporation and related corporate records;
- 6.2.3 director and governance records;
- 6.2.4 accounting records;
- 6.2.5 statutory registers;
- 6.2.6 annual returns and CIPC-related records; and
- 6.2.7 resolutions and other corporate records required by law.

6.3 PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000, AS AMENDED

- 6.3.1 this PAIA Manual;
- 6.3.2 PAIA access requests;
- 6.3.3 supporting documents submitted with requests;
- 6.3.4 decisions relating to requests;
- 6.3.5 fee notices and payment records;
- 6.3.6 correspondence relating to PAIA requests; and
- 6.3.7 records relating to PAIA reporting and compliance.

6.4 PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 AND APPLICABLE POPIA REGULATIONS, AS AMENDED

- 6.4.1 privacy and data-protection policies;
- 6.4.2 Information Officer and Deputy Information Officer records;

6.4.3 data-subject requests;

6.4.4 consent and marketing-preference records;

6.4.5 operator and service-provider arrangements;

6.4.6 personal-information impact and compliance assessments where applicable;

6.4.7 security incident and compromise records;

6.4.8 internal privacy and security procedures; and

6.4.9 records demonstrating compliance with POPIA.

6.5 INCOME TAX ACT 58 OF 1962 AND TAX ADMINISTRATION ACT 28 OF 2011

6.5.1 tax returns;

6.5.2 assessments;

6.5.3 accounting and supporting records;

6.5.4 invoices;

6.5.5 expense records;

6.5.6 payment records; and

6.5.7 correspondence with tax authorities or tax practitioners.

6.5.8 Certain accounting and tax functions are outsourced by CTRL CUT CO to TaxAssist.

6.6 VALUE-ADDED TAX ACT 89 OF 1991, WHERE APPLICABLE

6.6.1 VAT invoices;

6.6.2 VAT returns;

6.6.3 supporting accounting records; and

6.6.4 related tax documentation.

6.7 BASIC CONDITIONS OF EMPLOYMENT ACT 75 OF 1997, AS AMENDED

6.7.1 employment agreements;

6.7.2 remuneration records;

6.7.3 leave records;

6.7.4 working-time records; and

6.7.5 other prescribed employment information.

6.8 LABOUR RELATIONS ACT 66 OF 1995, AS AMENDED

6.8.1 employment-related records;

6.8.2 disciplinary and grievance records where applicable;

6.8.3 workplace policies; and

6.8.4 records concerning employment disputes or proceedings.

6.9 UNEMPLOYMENT INSURANCE ACT 63 OF 2001 AND UNEMPLOYMENT INSURANCE CONTRIBUTIONS ACT 4 OF 2002

6.9.1 employee registration information;

6.9.2 contribution records; and

6.9.3 remuneration information required for UIF purposes.

6.10 ELECTRONIC COMMUNICATIONS AND TRANSACTIONS ACT 25 OF 2002, AS AMENDED

6.10.1 electronic communications;

6.10.2 website-related records;

6.10.3 electronically concluded agreements; and

6.10.4 electronic transaction and business records where applicable.

6.11 CONSUMER PROTECTION ACT 68 OF 2008, WHERE APPLICABLE

6.11.1 client service terms;

6.11.2 quotations and agreements;

6.11.3 complaints and dispute records; and

6.11.4 communications concerning services supplied to qualifying consumers.

6.12 COPYRIGHT ACT 98 OF 1978, TRADE MARKS ACT 194 OF 1993 AND OTHER APPLICABLE INTELLECTUAL-PROPERTY LEGISLATION

6.12.1 copyright ownership and licensing records;

6.12.2 trademark records;

6.12.3 permissions and releases;

6.12.4 intellectual-property assignments;

6.12.5 usage licences; and

6.12.6 records concerning third-party intellectual property.

6.14 The inclusion of legislation in this section does not mean that every listed law applies to every CTRL CUT CO record or activity at all times.

7. SUBJECTS ON WHICH RECORDS ARE HELD

7.1 Corporate and statutory records

These may include incorporation records, company registration documents, governance records, statutory submissions, policies and compliance records.

7.2 Financial, accounting and tax records

These may include invoices, payments, banking records, accounting reports, tax-related records, expense records and supporting documentation.

Tax and accounting functions are outsourced to **TaxAssist**.

7.3 Client and commercial records

These may include enquiries, proposals, quotations, service agreements, scopes of work, purchase orders, correspondence, approvals, project documentation, invoices and payment information.

7.4 Supplier records

These may include supplier contact information, agreements, invoices, tax information, banking information and correspondence.

7.5 Employee and contractor records

These may include employment or contractor agreements, identification and contact information, payroll information, qualifications, performance records and other employment-related documentation where applicable.

7.6 Intellectual-property records

These may include Ctrl Cut branding, design assets, creative-development records, licences, usage rights, releases and records relating to third-party intellectual property.

7.7 Production and project records

These may include source files, project files, footage, photographs, audio, animations, graphics, briefs, feedback, approvals, exports, delivery files and project communications.

7.8 Marketing records

These may include marketing databases, newsletter records, campaign information, consent records, advertising information, social-media content and analytics.

7.9 Website and enquiry records

These may include contact-form submissions, cookie records, consent records, analytics information, technical logs and related communication.

7.10 Data-protection and compliance records

These may include POPIA documentation, PAIA records, PAIA access requests, requests from data subjects, incident records, operator arrangements, consent records and compliance records.

8. PROCESSING OF PERSONAL INFORMATION

8.1 CTRL CUT CO processes personal information where reasonably necessary to operate its business, provide services and comply with applicable law.

8.2 Personal information may be processed for the purpose of receiving and responding to enquiries.

8.3 Personal information may be processed for client onboarding and assessing prospective projects.

8.4 Personal information may be processed for preparing quotations, proposals, scopes of work and service agreements.

8.5 Personal information may be processed for project management, communication and service delivery.

8.6 Personal information may be processed for creative, editing, animation, design, post-production and related production services.

8.7 Personal information may be processed for invoicing, payments, bookkeeping, accounting and tax compliance.

8.8 Personal information may be processed for supplier and service-provider management.

8.9 Personal information may be processed for employee and contractor administration.

8.10 Personal information may be processed for website operation, security, fraud prevention and technical administration.

8.11 Personal information may be processed for website analytics and performance measurement.

8.12 Personal information may be processed for marketing, newsletters and promotional communications where permitted by law and subject to consent or another lawful basis where required.

8.13 Personal information may be processed for maintaining marketing preferences and unsubscribe records.

8.14 Personal information may be processed for legal, regulatory and contractual compliance.

8.15 Personal information may be processed for handling complaints, disputes, claims and legal proceedings.

8.16 Personal information may be processed to establish, exercise or defend legal rights.

8.17 Personal information may be processed for security, recordkeeping, backup and business-continuity purposes.

8.18 Personal information may be processed through appropriately selected cloud, software and AI-assisted tools where reasonably required for CTRL CUT CO's business or creative workflows and subject to applicable safeguards.

9. CATEGORIES OF DATA SUBJECTS AND INFORMATION

Prospective clients and contacts	names, company information, contact details, service interests, enquiry details and correspondence.
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Clients	contact information, contractual information, project information, communications, billing and payment records.
Individuals appearing in client-supplied material	images, likeness, voice, recordings and other personal information contained in footage, photographs, interviews or production assets.
Website visitors	device information, IP addresses, browsing activity, cookie information, advertising identifiers and consent preferences.
Newsletter and marketing contacts	contact details, organisation information, consent and marketing preferences.
Suppliers and service providers	contact details, business information, registration or tax information, payment information and correspondence.
Employees and contractors	identification, contact, employment, remuneration, qualification and other employment-related records where applicable.

10. CHILDREN AND SPECIAL PERSONAL INFORMATION

10.1 CTRL CUT CO does not intentionally collect personal information relating to children through its general website enquiry process.

10.2 CTRL CUT CO does not intentionally request special personal information through its general website enquiry process.

10.3 Client-supplied production material may nevertheless contain personal information relating to children.

10.4 Client-supplied production material may also contain special or sensitive personal information.

10.5 Such material may arise in footage, photographs, interviews, event recordings, employee communications, voice recordings or other production assets provided by a client.

10.6 Where CTRL CUT CO processes personal information relating to children or special personal information on behalf of a client, the client will ordinarily remain responsible for establishing the lawful basis and authority for collecting and providing that material, subject to the parties' actual roles and applicable law.

10.7 CTRL CUT CO will process such information in accordance with applicable law, relevant contractual obligations, authorised client instructions and appropriate technical and organisational safeguards.

11. RECIPIENTS OF PERSONAL INFORMATION

11.1 Personal information may be accessed by authorised CTRL CUT CO employees, directors or personnel where access is reasonably necessary for their work.

11.2 Personal information may be processed by cloud productivity and email service providers.

11.2.1 Such services may include:

11.2.1.1 Google Workspace;

11.2.1.2 Gmail;

11.2.1.3 Google Drive; and

11.2.1.4 Microsoft 365.

11.3 Personal information may be processed through project, storage and production platforms.

11.3.1 Such services may include:

11.3.1.1 ClickUp;

11.3.1.2 WeTransfer;

11.3.1.3 Frame.io;

11.3.1.4 Adobe;

11.3.1.5 Webflow; and

11.3.1.6 cloud storage or rendering services.

11.4 Personal information may be processed through accounting, bookkeeping and tax service providers.

11.4.1 Such services may include:

11.4.1.1 Xero; and

11.4.1.2 TaxAssist.

11.5 Personal information may be processed through communication and scheduling services.

11.5.1 Such services may include:

11.5.1.1 Calendly; and

11.5.1.2 WhatsApp.

11.6 Personal information may be processed through AI-assisted technology services where appropriate.

11.6.1 Such services may include OpenAI/ChatGPT and other AI tools approved for use by CTRL CUT CO.

11.7 Personal information may be supplied to or processed by banks, payment service providers or other financial institutions where reasonably necessary.

11.8 Personal information may be supplied to legal advisers, accountants, auditors, insurers or other professional advisers where reasonably necessary.

11.9 Personal information may be supplied to the Information Regulator, courts, law-enforcement bodies, tax authorities or other public authorities where required or authorised by law.

11.10 Personal information may be supplied to another party where:

11.10.1 the data subject has consented;

11.10.2 disclosure is necessary for performance of an agreement;

11.10.3 disclosure is required or permitted by law; or

11.10.4 another lawful basis exists.

11.11 CTRL CUT CO may engage authorised external creative specialists, technical service providers and production partners where reasonably necessary to deliver agreed services.

11.12 Access to personal information by such parties will be limited to what is reasonably necessary for the authorised purpose and will be subject to applicable confidentiality, contractual, access-control and data-protection arrangements.

11.13 Where a third party processes personal information as an operator on behalf of CTRL CUT CO, appropriate safeguards will be applied in accordance with POPIA and the relevant contractual arrangements.

11.14 The categories of service providers and recipients may change as CTRL CUT CO's systems, services and operational requirements develop. Material changes will be reflected in the relevant privacy documentation.

CTRL CUT CO does not presently routinely share client production information with freelance production subcontractors.

12. CROSS-BORDER PROCESSING

12.1 CTRL CUT CO uses certain international cloud, software, hosting, communications, analytics, AI and production service providers.

12.2 Personal information may therefore be stored, transmitted, supported, accessed or otherwise processed outside the Republic of South Africa.

12.3 Personal information involved in such international processing may include:

12.3.1 business contact information;

12.3.2 email communications;

12.3.3 client and project information;

12.3.4 production assets;

12.3.5 website information;

12.3.6 analytics and technical information;

12.3.7 supplier information; and

12.3.8 other information reasonably necessary for the relevant service.

12.4 The specific foreign jurisdiction may depend on:

12.4.1 the service provider used;

12.4.2 the configuration of CTRL CUT CO's account;

12.4.3 the location of the relevant data centre;

12.4.4 the provider's support infrastructure; and

12.4.5 the provider's authorised subprocessors.

12.5 Where personal information is transferred outside South Africa, CTRL CUT CO seeks to ensure that the transfer complies with section 72 of POPIA.

12.6 Appropriate grounds for cross-border processing may include:

12.6.1 a recipient being subject to a law, binding corporate rules or agreement providing an adequate level of protection;

12.6.2 a transfer being necessary for performance of a contract;

12.6.3 consent where legally appropriate;

12.6.4 another ground permitted by POPIA; or

12.6.5 appropriate contractual or organisational safeguards.

12.7 CTRL CUT CO will periodically review its material cloud and technology providers as its systems and service-provider arrangements change.

13. GENERAL SECURITY SAFEGUARDS

13.1 CTRL CUT CO implements reasonable technical and organisational measures intended to protect the confidentiality, integrity and availability of personal information.

13.2 Security controls are selected having regard to the nature of the information, the systems concerned and reasonably foreseeable risks.

13.3 Measures may include user access controls.

13.4 Measures may include password and authentication controls.

13.5 Measures may include multi-factor authentication where available and appropriate.

13.6 Measures may include role-based or permission-based access restrictions.

13.7 Measures may include encryption or secure transmission technologies where available.

13.8 Measures may include anti-virus, anti-malware and endpoint security measures.

13.9 Measures may include cloud-provider security controls.

13.10 Measures may include secure backup and recovery arrangements.

13.11 Measures may include limitations on access to project and client data.

13.12 Measures may include confidentiality obligations applying to personnel and service providers.

13.13 Measures may include contracts, data-protection terms or operator arrangements with relevant service providers where appropriate.

13.14 Measures may include security-incident and compromise-management procedures.

13.15 Measures may include retention, archiving and secure-deletion controls.

13.16 Measures may include internal policies and staff awareness regarding privacy, information security and appropriate information handling.

13.17 CTRL CUT CO's privacy and information-security compliance framework will be monitored, maintained, reviewed and improved as appropriate.

13.18 Security measures will be updated where reasonably necessary having regard to changes in technology, business operations, legal requirements and identified risks.

14. MAKING A PAIA REQUEST

14.1 In terms of section 50 of PAIA, a requester may obtain access to a record held by a private body where:

14.1.1 the record is required for the exercise or protection of a right;

14.1.2 the requester complies with PAIA's procedural requirements; and

14.1.3 access is not refused under an applicable ground of refusal contained in PAIA.

14.2 PRESCRIBED FORM

14.2.1 A request for access must be made using the prescribed Form 2: Request for Access to Record.

14.2.2 The current prescribed form is available from the Information Regulator.

14.2.3 The completed request should be submitted to CTRL CUT CO's Information Officer.

14.3 REQUESTER IDENTIFICATION

14.3.1 The requester must provide sufficient information to enable CTRL CUT CO to identify the requester.

14.3.2 Proof of identity should accompany the request where required by the prescribed form or reasonably necessary to verify the requester.

14.4 REQUESTS ON BEHALF OF ANOTHER PERSON

14.4.1 Where a request is made on behalf of another person, proof of the requester's authority or capacity to act for that person must be supplied.

14.5 IDENTIFICATION OF THE RECORD

14.5.1 The requester must provide sufficient particulars to enable CTRL CUT CO to identify the requested record.

14.5.2 Where available, the requester should provide relevant project names, dates, correspondence references, file descriptions or other identifying information.

14.6 RIGHT TO BE EXERCISED OR PROTECTED

14.6.1 Because CTRL CUT CO is a private body, the requester must identify the right the requester seeks to exercise or protect.

14.6.2 The requester must explain why the requested record is required for the exercise or protection of that right.

14.7 FORM OF ACCESS

14.7.1 The requester should indicate the form in which access is required.

14.7.2 The form of access requested may be subject to PAIA, practicality, security, intellectual-property considerations and the form in which the relevant record exists.

14.8 SUBMISSION DETAILS

14.8.1 Requests may be submitted to:

Sherwin Naidoo

Information Officer

CTRL CUT CO (Pty) Ltd

Email: sherwin@ctrlcutstudio.co.za

14.8.2 A copy may also be sent to:

info@ctrlcutstudio.co.za

14.9 DECISION PERIOD

14.9.1 Subject to PAIA and any applicable statutory extension, CTRL CUT CO will communicate its decision on a valid request for access within 30 days of receiving the request, as calculated in accordance with PAIA.

14.10 EXTENSION

14.10.1 PAIA permits the original 30-day period to be extended once for a further period not exceeding 30 days in circumstances allowed by PAIA.

14.10.2 Such circumstances may include:

14.10.2.1 a request involving a large number of records;

14.10.2.2 a search across a substantial volume of information;

14.10.2.3 records located at another office;

14.10.2.4 necessary consultation with another division or body;

14.10.2.5 a combination of relevant circumstances; or

14.10.2.6 written consent by the requester.

14.10.3 Where an extension is used, the requester will be notified as required by PAIA.

14.11 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

14.11.1 If all reasonable steps have been taken to locate a requested record and there are reasonable grounds to believe that the record cannot be found or does not exist, the requester will be notified in the manner required by PAIA.

14.11.2 Where required by section 55 of PAIA, such notification will be made by affidavit or affirmation containing an account of the steps taken to locate the record.

14.11.3 If the record is subsequently found, access will be considered in accordance with PAIA.

14.12 GROUNDS FOR REFUSAL

14.12.1 Access may be refused where a mandatory or discretionary ground of refusal under PAIA applies.

14.12.2 Relevant grounds may include protection of:

14.12.2.1 the privacy of a third party who is a natural person;

14.12.2.2 trade secrets or commercial information of a third party;

14.12.2.3 confidential information supplied by a third party;

14.12.2.4 the safety of individuals or protection of property;

14.12.2.5 legally privileged records;

14.12.2.6 Ctrl Cut's commercial information;

14.12.2.7 research information; or

14.12.2.8 other information protected under PAIA.

14.12.3 Any applicable public-interest override under PAIA will be considered where required.

14.13 SEVERABILITY

14.13.1 Where only part of a record is protected from disclosure, CTRL CUT CO will consider whether the protected information can reasonably be separated from the remainder of the record.

14.13.2 Where PAIA requires severance, access may be granted to the portion that may lawfully be disclosed.

14.14 OUTCOME OF A REQUEST

14.14.1 If access is granted, the requester will be notified of:

14.14.1.1 any applicable access fee;

14.14.1.2 the form in which access will be given; and

14.14.1.3 applicable rights of complaint or court application.

14.14.2 If access is refused, the requester will be given adequate reasons as required by PAIA without disclosing information that would itself defeat the purpose of the refusal.

14.14.3 Where applicable, the outcome of a request and prescribed fees payable will be communicated using Form 3 or another legally permitted method consistent with the applicable PAIA requirements.

14.15 COMPLAINTS AND EXTERNAL REMEDIES

14.15.1 PAIA does not require an internal appeal process for a private body such as CTRL CUT CO.

14.15.2 A requester or affected third party who is dissatisfied with a relevant decision, refusal, deemed refusal, fee, extension or other matter may have the right to lodge a complaint with the Information Regulator in accordance with PAIA.

14.15.3 Complaints to the Information Regulator are presently made using prescribed Form 5.

14.15.4 Current Information Regulator guidance states that, for private bodies, a complaint concerning refusal or non-response should generally be lodged within 180 days of the relevant decision, refusal or expiry of the applicable response period.

14.15.5 A person may also have the right to approach a competent court in accordance with PAIA and applicable court procedures.

15. PRESCRIBED PAIA FEES

15.1 Requests for access to records held by CTRL CUT CO may be subject to the prescribed fees applicable to private bodies under PAIA and its regulations.

15.2 Fees may include a prescribed request fee, applicable access or reproduction fees, reasonable search and preparation charges, and other charges permitted by the regulations.

15.3 Where a requester qualifies for an exemption from an applicable fee, that exemption will be applied in accordance with PAIA and the regulations.

15.4 Where permitted by law, CTRL CUT CO may require payment of an applicable request fee or deposit before processing or granting access to a requested record.

15.5 Where a fee or deposit is payable, the requester will be notified of the amount and relevant payment arrangements in accordance with the prescribed procedures.

15.6 The applicable fees will be those prescribed by law at the time of the request. The current fee structure may be obtained from the Information Regulator or requested from CTRL CUT CO's Information Officer.

15.7 A requester may exercise any rights available under PAIA to challenge an applicable fee or related decision.

16. AVAILABILITY OF THIS MANUAL

The Manual will be made available through the CTRL CUT CO website.

A copy may also be requested from the Information Officer and will be made available to the Information Regulator where required.

Physical inspection will be facilitated in accordance with PAIA at CTRL CUT CO's designated business address during appropriate business hours and by prior arrangement.

17. UPDATING THE MANUAL

CTRL CUT CO will review and update this Manual periodically and when material changes to its information-processing activities, organisational details or legal obligations make an update necessary.

Issued by:

Sherwin Naidoo

Chief Executive Officer and Information Officer

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[Ctrl Cut Co \(Pty\) Ltd](#)