MASHIANE ATTORNEYS INC.

Access to Information Manual

PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended by the Protection of Personal Information Act 4 of 2013

BODY	Mashiane Attorneys Inc.
	Registration number 2026/308502/21
	Legal Practice Council practice number 75395
INFORMATION OFFICER	Jabu Mashiane, Managing Director
	Registered with the Information Regulator: 2026-008466
MAKE A REQUEST	www.mashianeattorneys.co.za/contact-us
VERSION	Version 2.0 · October 2026 · Next review: October 2027

PAIA AT A GLANCE

Asking us for a record

The Promotion of Access to Information Act lets you ask for a record we hold when you need it to exercise or protect a right.

First, which route is yours?

IT IS ABOUT ME

My own personal information

Use the POPIA route. It is free, and you need no Form 2. See the POPIA page.

IT IS A RECORD YOU HOLD

A record of the firm

Use the PAIA route, set out below: Form 2 and a request fee of R140.

The PAIA route in five steps

1. **Check first**
   Some records are free on our website. No request needed.
2. **Complete Form 2**
   Get it from the Regulator's website, or ask us for it.
3. **Send it online**
   Contact Us page, PAIA option. You get a reference at once.
4. **Pay the R140 fee**
   We tell you how. No fee for your own personal information.
5. **Get our decision**
   In writing, within 30 days of your request.

How long it takes

Day 0
We receive your request

Day 30
Our decision, in writing

Day 60
The latest date, if we extend once and tell you why

What it costs

R140
request fee, when you ask

R2
for each page we copy

R145
an hour to search, after the first hour. Never more than R435.

R0
request fee, when you ask for your own personal information

If we say no

1. **We give you our reasons** and the section of PAIA we rely on.
2. **Complain to the Regulator** within 180 days. It is free.
3. **Then, apply to court** only after the Regulator's process.

START HERE

Make your request on our website

www.mashianeattorneys.co.za/contact-us

Cannot use the website? Email paia@mashianeattorneys.co.za, or deliver your form to 13 Lesar Road, Fairleads, Rynfield, Benoni, 1514. Every route is equally valid.

Open the form →

POPIA AT A GLANCE

Your information, your rights

The Protection of Personal Information Act gives you rights over the personal information we hold about you.

Your rights

Be told
SECTION 18

Know when we collect your information, and why.

See it
SECTION 23

Ask whether we hold information about you, and ask for a copy.

Fix or delete it
SECTION 24

Ask us to correct or delete what is wrong, out of date or no longer needed.

Object
SECTION 11(3)

Tell us to stop using your information, on reasonable grounds.

Stop marketing
SECTION 69

Say no to direct marketing, at any time.

Complain
SECTION 74

Complain to the Information Regulator if you think we got it wrong.

How to use a right

1. **Tell us**
   Contact Us page, POPIA option. You get a reference at once.
2. **We check it is you**
   We may ask for proof of identity. Please do not put ID documents in the form.
3. **We act and reply**
   We reply within 30 days and tell you what we did.
4. **Still not satisfied?**
   Complain to the Information Regulator.

What it costs

Free to object, and to have information corrected or deleted

Free to ask whether we hold information about you

R2 a page if you want copies of a record

How we look after it

- Only the people who need your information for their work can see it.
- It is encrypted when it travels over the internet.
- If it is ever compromised, we tell you and the Information Regulator.

START HERE

Use your rights on our website

www.mashianeattorneys.co.za/contact-us

Cannot use the website? Email popia@mashianeattorneys.co.za. Complaints to the Information Regulator go to POPIAComplaints@inforegulator.org.za.

Open the form →

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1 Definitions

Term	Meaning
Data subject	The person to whom personal information relates.
Form 2	The form for requesting access to a record, prescribed by regulation 7 of the PAIA Regulations.
Guide	The guide on how to use PAIA, published by the Regulator under section 10 of PAIA.
Information Officer	The head of the firm, who is responsible for this manual and for requests made under it.
PAIA	The Promotion of Access to Information Act 2 of 2000.
PAIA Regulations	The Regulations relating to the Promotion of Access to Information, 2021.
Personal requester	A person asking for a record that contains personal information about themselves.
POPIA	The Protection of Personal Information Act 4 of 2013.
Regulator	The Information Regulator of South Africa.
Requester	Any person, including a public body, who asks for access to a record we hold.
We, us, the firm	Mashiane Attorneys Inc.

2 Purpose of this manual

The Constitution gives everyone a right of access to information held by another person when that information is required to exercise or protect a right. PAIA gives effect to that right. This manual explains how to use it in relation to the firm.

The manual tells you:

- who to contact at the firm about access to information;
- where to find the Regulator's Guide on using PAIA;
- which records you can get without a formal request;
- which records we hold, by subject and category;
- how we process personal information, as section 51(1)(c) of PAIA requires;
- how to make a request, what it costs and how long it takes; and
- what you can do if we refuse.

3 The firm and its contact details

Mashiane Attorneys Inc. is an incorporated law practice and a private body under PAIA.

Detail	Information
Name of the body	Mashiane Attorneys Inc.
Registration number	2026/308502/21
Legal Practice Council practice number	75395
Head of the body and Information Officer	Jabu Mashiane, Managing Director
Information Officer registration (Information Regulator)	2026-008466
Deputy Information Officer	None designated
Street address	13 Lesar Road, Fairleads, Rynfield, Benoni, 1514
Postal address	13 Lesar Road, Fairleads, Rynfield, Benoni, 1514
Telephone	+27 81 041 1940
Fax	None
Website	www.mashianeattorneys.co.za
Main channel for enquiries and personal-information requests	The Contact Us page of our website: www.mashianeattorneys.co.za/contact-us
Email for access to information requests	paia@mashianeattorneys.co.za
Email for personal information matters	popia@mashianeattorneys.co.za

Our website is our main channel. Please send enquiries, and requests about your own personal information, through the Contact Us page of our website. You receive a reference number at once, and your request goes straight to the person who must deal with it. For a request for access to a record under PAIA, follow section 9. A request sent to one of the email addresses above, or delivered to our street address, is equally valid.

4 The Regulator's Guide on how to use PAIA

The Regulator has published a Guide, under section 10 of PAIA, that explains in plain language how to use PAIA and POPIA. It covers the purpose of both Acts, how to request a record from a public or a private body, the help the Regulator offers, and the remedies available if a request is refused. The Guide is available in each official language and in braille.

You can get the Guide:

- from the Regulator's website, www.inforegulator.org.za;
- from the Regulator's offices, during office hours; or

- by asking our Information Officer, who will make a copy available for inspection.

The Information Regulator	
Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 · toll-free 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

5 Records available without a request

No notice has been published under section 52(2) of PAIA. The records below are nonetheless freely available on our website, and you do not need to make a request for them.

- This manual.
- Our Privacy Policy, Cookie Policy and Terms of Service.
- Our Data Subject Rights page, which explains how to use your rights under POPIA.
- Information about the firm, its practice areas and its published articles.

6 Records available under other legislation

We keep records that the following laws require, to the extent that each applies to the firm. A record kept under one of these laws is not automatically available to the public. Unless the law in question gives you a right to it, you ask for it under PAIA.

- Legal Practice Act 28 of 2014, with its Rules and Code of Conduct
- Financial Intelligence Centre Act 38 of 2001
- Prevention of Organised Crime Act 121 of 1998
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Tax Administration Act 28 of 2011
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Compensation for Occupational Injuries and Diseases Act 130 of 1993

- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Electronic Communications and Transactions Act 25 of 2002
- Cybercrimes Act 19 of 2020
- Consumer Protection Act 68 of 2008
- Broad-Based Black Economic Empowerment Act 53 of 2003

7 Records we hold, by subject and category

The table lists the subjects on which we hold records and the categories under each. Listing a record here does not mean that access will be given. Every request is decided under PAIA, and the grounds for refusal in section 12 of this manual apply. Most client and matter records are protected by legal professional privilege and by our duty of confidentiality.

Subject	Categories of records
Clients and matters	Mandate and fee agreements; instructions; advice and opinions; correspondence; pleadings and court documents; agreements drafted or reviewed; matter files and notes.
Client due diligence	Identification and verification records; risk assessments; screening results; conflict-of-interest checks; records of reports made under the law.
Enquiries	Enquiries received through the website; our replies; records of notices shown and acknowledgements given.
Finance	Invoices and statements; trust and business account records; receipts and payments; accounting records; tax records; annual financial statements.
Company and governance	Incorporation documents; statutory registers; resolutions; Legal Practice Council and Fidelity Fund records; insurance policies.
People	Employment and candidate attorney records; payroll; training records; job applications and CVs.
Suppliers and service providers	Agreements; correspondence; invoices; operator agreements.
Information governance	This manual; privacy notices; records of requests under PAIA and POPIA; records of security incidents; retention and disposal records; audit logs.
Website and systems	Website content; consent and preference records; system and access logs.

8 How we process personal information

Section 51(1)(c) of PAIA requires this manual to describe our processing of personal information. Our Privacy Policy, on our website, gives the full notice. If the two ever differ, tell the Information Officer.

8.1 Why we process personal information

- To respond to enquiries and to decide whether we can act.

- To take on clients, including identifying them and checking for conflicts of interest, as the law requires.
- To give legal advice and services and to carry out our clients' instructions.
- To bill for our services and to keep trust and business accounts.
- To meet our duties under the Legal Practice Act, the Financial Intelligence Centre Act, tax law and other laws.
- To consider job applications and to manage people who work for the firm.
- To manage suppliers and service providers.
- To run, secure and improve our website and systems.
- To send legal updates to people who have asked for them.
- To protect the firm's legal interests and to deal with complaints, claims and insurers.

8.2 Whose information we hold, and what kind

Data subjects	Information
Clients and prospective clients (people and organisations)	Names and contact details; identity and registration numbers; verification documents; details of the matter; financial and billing details; correspondence.
People who send an enquiry through our website	Name, contact details, the content of the enquiry and any document attached to it.
Other parties in a matter, witnesses and their representatives	Names, contact details and the information about them that the matter requires.
Job applicants	Name, contact details, CV, qualifications, work history and references.
People who work for the firm	Identity and contact details; employment, payroll, tax and training records.
Suppliers and service providers	Names and contact details of the business and its representatives; banking and tax details; agreements.
Website visitors	Technical information such as IP address, device and pages visited; cookie choices.

Some matters require us to process special personal information, or information about children. We do that only where POPIA allows it.

8.3 Who may receive personal information

- Advocates, correspondent attorneys and experts we instruct on a matter.
- Courts, tribunals, arbitrators and mediators.
- The other parties in a matter and their legal representatives, where the matter requires it.
- Regulators and public bodies where the law requires it, including the Legal Practice Council, the Financial Intelligence Centre, the South African Revenue Service and the Information Regulator.
- Service providers that process information for us (operators), such as hosting, email and practice-systems providers.

- Our auditors, insurers, bankers and professional advisers.

8.4 Transfers outside South Africa

We use cloud services, so some personal information is stored or processed outside South Africa. Where it is held depends on the service.

Where	What is held or processed there
South Africa	Our email, documents and calendar (Microsoft 365).
European Union (Ireland)	The database behind our website enquiries and our client portal.
United States of America	Our website hosting, the processing of forms sent through our website, and the artificial intelligence services we use, including the assistant on our website.

We transfer personal information to another country only where section 72 of POPIA allows it. That includes where the recipient is bound by a law or an agreement that protects the information to a standard substantially similar to POPIA, where you consent, and where the transfer is necessary to perform a contract with you.

8.5 How we keep information secure

The measures below are a general description, so that you can form a preliminary view of their suitability. We review them as our systems and the risks change.

- Access to information is limited to people who need it for their work, through individual accounts.
- Information is encrypted when it travels over the internet, and our hosting providers encrypt it where it is stored.
- Our practice systems keep tamper-evident records of important actions.
- Our practice database is backed up every day, and we test that a backup can be restored.
- Operators may process personal information only with our authority and must keep it confidential and secure, as sections 20 and 21 of POPIA require.
- If personal information is accessed or acquired by an unauthorised person, we will notify the Regulator and the people affected, as section 22 of POPIA requires.

9 How to request access to a record

You may ask for any record we hold if you need it to exercise or protect a right.

1. Complete Form 2. It is available from the Regulator's website, www.inforegulator.org.za, under PAIA forms, and from our Information Officer. Complete every part, including your identity number or passport number. Describe the record clearly enough for us to find it, say in what form you want access, and state the right you want to exercise or protect and why you need the record for that.
2. Attach proof of your identity: a copy of your identity document or passport. If you are asking on behalf of someone else, also attach proof of your authority, for example a power of attorney.

3. Send them to our Information Officer by email to paia@mashianeattorneys.co.za, or deliver them to our street address. If you would rather not send identity documents by email, tell the Information Officer and we will arrange another way. We acknowledge your request within five business days.
4. We confirm who you are before we act. We do not release a record, or say whether we hold one, until we have done so. If we cannot confirm your identity, we tell you what is missing.

Once we have your request, we tell you how to pay the request fee, if one applies. If you cannot complete the form because you cannot read or write, or because of a disability, tell us and the Information Officer will help you to complete it.

> Asking for your own personal information? You are a personal requester and pay no request fee. Choose "POPIA — my data rights" on the same Contact Us page. Our Data Subject Rights page explains your rights.

10 Fees

The fees are prescribed by Annexure B of the PAIA Regulations. We will tell you the amount, in writing, before you have to pay it.

Item	Fee
Request fee, payable when you make the request (not payable by a personal requester)	R140.00
Photocopy or printed black and white copy of an A4 page	R2.00 a page or part of a page
Copy on a flash drive that you provide	R40.00
Copy on a compact disc: if you provide the disc / if we provide it	R40.00 / R60.00
Transcription of visual images, or a copy of visual images	The service provider's quoted cost
Transcription of an audio record, for each A4 page	R24.00
Copy of an audio record: on your flash drive / on your disc / on our disc	R40.00 / R40.00 / R60.00
Searching for and preparing the record, for each hour or part of an hour after the first hour	R145.00, up to a maximum of R435.00
Deposit, if the search and preparation will take more than six hours	One third of the access fee
Postage, email or other electronic transfer	The actual cost, if any

11 When and how we decide

- We decide within 30 days of receiving your request and tell you the decision in writing (section 56).

- We may extend that period once, by up to 30 days, for the reasons in section 57, for example where the request covers a large number of records. We will tell you before the first 30 days end, with the reason.
- If the record contains information about another person or organisation, we must give them notice and a chance to respond before we decide (sections 71 to 73).
- If we cannot find the record, or it does not exist, we will tell you so by affidavit or affirmation, setting out the steps we took to find it (section 55).
- If we do not decide in time, PAIA treats that as a refusal (section 58).
- If we grant the request, we will tell you the access fee, if any, and the form in which access will be given.

12 When we must or may refuse

PAIA sets out the only grounds on which a private body may refuse a request. If we refuse, we will give you our reasons and the section we rely on.

Section	Ground
63	We must protect the privacy of another person, including a person who has died, where disclosure would be unreasonable.
64	We must protect another party's trade secrets and its financial, commercial, scientific or technical information, where disclosure would be likely to harm that party.
65	We must refuse where disclosure would breach a duty of confidence we owe to another party under an agreement.
66	We must refuse where disclosure could endanger a person's life or physical safety. We may refuse where it would prejudice the security of a building, system or other property.
67	We must refuse access to a record that is privileged from production in legal proceedings, unless the person entitled to the privilege has waived it. This covers most client and matter records.
68	We may protect the firm's own trade secrets and its financial, commercial, scientific or technical information, where disclosure would be likely to harm the firm.
69	We must protect research information of another party, and may protect the firm's own, where disclosure would expose the research or the researcher to serious disadvantage.

Two rules limit these grounds. Under section 70 we must give access, despite a ground of refusal, where the record would reveal evidence of a substantial breach of the law or an imminent and serious risk to public safety or the environment, and the public interest in disclosure clearly outweighs the harm. Under section 59, where only part of a record may be refused, we give access to the rest.

13 If you are not satisfied with our decision

PAIA provides no internal appeal against the decision of a private body. The remedies are a complaint to the Regulator and, after that, an application to court.

1. Complain to the Regulator first. You may complain within 180 days of our decision, on Form 5 of the PAIA Regulations (section 77A). Send it to PAIAComplaints@inforegulator.org.za. A complaint costs nothing and is usually quicker than going to court.
2. Apply to court if you are still not satisfied. Section 78 of PAIA allows an application to a court with jurisdiction only after the complaints procedure before the Regulator has been exhausted. The application must be made within the 180 days that section 78 allows.

The same remedies are open to a third party who is aggrieved by a decision to grant access to a record that concerns them.

14 Availability of this manual

- On our website, www.mashianeattorneys.co.za, free of charge.
- At our street address, for inspection during business hours, by prior arrangement with the Information Officer.
- From the Information Officer, on request. A printed copy costs the prescribed fee for copies.
- To the Regulator, on request.

15 Updates to this manual

The Information Officer reviews this manual every year, and sooner if the law, the prescribed forms or fees, or our records change in a way that affects it.

Version	Date	What changed
1.0	March 2026	First publication.
2.0	October 2026	Rebuilt against the 2021 PAIA Regulations: Form 2, current fees and the correct remedies. Added the head's full contact details, the Guide, records available without a request, records kept under other laws, and the POPIA processing section. Updated the Regulator's details. Made the Contact Us page of our website the main channel for enquiries and personal-information requests. Set out the proof of identity required with every request for access.

Approved by the Information Officer

Jabu Mashiane, Managing Director

Signature: _____

Date: _____