

PAIA AND POPIA MANUAL



Symphonia Leadership Development (Pty) Ltd

Registration number: 2006/029313/07

VAT number: 4200252031

Manual in terms of section 51 of the Promotion of Access to Information Act, 2000, as amended, and including information required under the Protection of Personal Information Act, 2013.

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1. Introduction and purpose

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 (Act 2 of 2000), as amended (PAIA), and includes information relevant to the Protection of Personal Information Act, 2013 (Act 4 of 2013) (POPIA).

The purpose of this Manual is to assist members of the public, clients, delegates, employees, suppliers and other stakeholders to understand the categories of records held by Symphonia Leadership Development (Pty) Ltd, the procedure to request access to records, and how Symphonia processes and protects personal information.

Symphonia Leadership Development (Pty) Ltd is a leadership and organisational development practice that works with leaders and organisations to strengthen connection, thinking, collaboration, culture and purposeful action. The name Symphonia means the sounding together of voices, reflecting the ethos that meaningful organisational change starts when people are able to think well together and be heard.

Access to records is not automatic. A request will be considered in accordance with PAIA, POPIA and any other applicable legislation. Access may be granted, partially granted, deferred or refused on lawful grounds.

2. Company details

Field	Details
Registered company name	Symphonia Leadership Development (Pty) Ltd
Registration number	2006/029313/07
VAT number	4200252031
Physical address	Springfield Office Park, 109 Jip de Jager, Bellville, 7530, South Africa
Postal address	Not applicable
Telephone number	021 913 3507
General email address	johleen@symphonia.net
Website	www.symphonia.net
Main business description	Leadership and organisational development, training, coaching, consulting, change and culture services.

3. Information Officer and Deputy Information Officer

The Information Officer is responsible for overseeing Symphonia's compliance with PAIA and POPIA, including receiving and coordinating requests for access to records and engaging with the Information Regulator where required.

Role	Details
Information Officer / Head of Private Body	Louise van Rhyn Managing Director Email: johleen@symphonia.net Telephone: 021 913 3507 Address: Springfield Office Park, 109 Jip de Jager, Bellville, 7530, South Africa
Deputy Information Officer	Johleen van Dyk Service Delivery Officer Email: johleen@symphonia.net Telephone: 021 913 3507 Address: Springfield Office Park, 109 Jip de Jager, Bellville, 7530, South Africa

4. Guide on how to use PAIA

The Information Regulator has made available a guide on how to use PAIA. The guide explains how to exercise the right of access to information and how to request access to records from public and private bodies.

The guide and prescribed PAIA forms may be accessed from the Information Regulator website:

<https://inforegulator.org.za/paia/>

PAIA Manual templates and upload facilities are also available through the Information Regulator eServices portal: <https://eservices.inforegulator.org.za/paiamanuals/default.aspx>

5. How to request access to records

5.1 Submitting a PAIA request

Any person wishing to request access to a record held by Symphonia must complete the prescribed Form 02: Request for Access to Record, and submit it to the Information Officer or Deputy Information Officer using the contact details in this Manual.

1. Complete Form 02 with sufficient detail to enable Symphonia to identify the requested record.
2. Specify the right that the requester seeks to exercise or protect, and explain why the requested record is required for that purpose.
3. Provide proof of identity and, where the request is made on behalf of another person or entity, proof of authority to act on their behalf.
4. Submit the request by email to johleen@symphonia.net or deliver it to the physical address listed in this Manual.
5. Pay any prescribed request fee or access fee, where applicable, after being notified by Symphonia.

5.2 Form of access

A requester should indicate the preferred form of access, for example inspection, copy, electronic copy, transcript or other available format. Symphonia will provide access in the requested form where reasonably possible and lawful. If a requester is prevented by a disability from accessing a record in a particular form, the requester should state the disability and the form in which access is required.

5.3 Fees

PAIA allows a private body to require payment of prescribed request and access fees in certain circumstances. A personal requester seeking access to a record containing their own personal information may not be required to pay the request fee. Access fees may include reproduction, search, preparation, postage, email or other electronic transfer costs. No records will be released until applicable fees have been paid in full.

5.4 Decision period

Symphonia will consider requests and notify the requester of the outcome within the period prescribed by PAIA. The period may be extended where PAIA permits an extension, for example where the request is for a large number of records, requires a search through a large number of records, or consultation with a third party is required.

5.5 Grounds for refusal

A request for access to records may be refused on any ground permitted under PAIA. These may include, among others, the protection of personal information of third parties, confidential commercial information, confidential information supplied by third parties, safety or security considerations, privileged records, research information, or records that are otherwise protected by law.

5.6 Remedies if access is refused

If a requester is dissatisfied with the outcome of a PAIA request, the requester may lodge a complaint with the Information Regulator using the prescribed complaint form, or may seek relief from a competent court in accordance with PAIA.

6. Categories of records automatically available

The following categories of records may be available without a formal PAIA request, usually through Symphonia's website, public communication channels, direct request or normal business processes:

Category	Availability
Website information	Available on the website
Workshop adverts and brochures	Available publicly or on request
Public event information	Available publicly or on request
Company profile	Available on the website
Public newsletters and mailers	Available to recipients and on request, where applicable
Social media content	Available on public social media channels
PAIA Manual	Available on the website, at the office and on request
Privacy notice or privacy policy	Available on the website
B-BBEE certificate or affidavit	Available on the website
Tax compliance information	Available only when shared for tenders, proposals or lawful business requirements

Automatically available records may still be subject to copyright, confidentiality, terms of use, privacy restrictions or other lawful limitations.

7. Records held in terms of other legislation

Symphonia may hold records in accordance with the following legislation, where applicable to its operations:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008, where applicable
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998, where applicable
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

This list is not exhaustive. Symphonia may hold records under other laws depending on the nature of a transaction, contract, employee matter, client engagement, supplier relationship or statutory obligation.

8. Subjects and categories of records held by Symphonia

The subjects on which Symphonia holds records and the categories of records within each subject are listed below. A requester is not automatically entitled to access these records. Access will be considered in accordance with PAIA, POPIA and any other applicable legislation.

Subject	Categories of records
Company records	Company registration documents, governance documents, statutory records, resolutions, director and shareholder records, minutes and related corporate records.
Financial records	Invoices, statements, supplier records, accounting records, tax records, VAT records, management accounts, bank-related records, asset records and audit/accounting workpapers.
Human resources records	Employee files, employment contracts, payroll records, leave records, training records, policies, performance records, recruitment information and statutory employment records.
Client records	Client contact details, proposals, contracts, purchase orders, invoices, correspondence, service delivery records and relationship management records.
Delegate and participant records	Registration forms, attendance registers, dietary and access requirements, certificates, workshop feedback, correspondence and related programme participation records.
Programme and workshop records	Workshop material, facilitator notes, schedules, learning content, venue arrangements, event logistics, evaluation records and operational planning records.
Facilitator and associate records	Contracts, profiles, correspondence, commission records, banking details, tax information and programme delivery records.
Supplier records	Venue agreements, supplier invoices, service provider correspondence, payment records and procurement information.
Sales and marketing records	Mailchimp lists, marketing preferences, campaign records, newsletters, brochures, social media content, public relations material, enquiries and event promotion records.
CRM records	HubSpot records, contact history, company records, deal records, pipeline information and communication history.
Website and IT records	Website content, access logs, system records, software records, user access records, security records and support records.
POPIA and privacy records	Consent records, data subject requests, breach records, privacy notices, access control records, security measures and internal compliance procedures.
Legal and contractual records	Client agreements, supplier agreements, facilitator agreements, confidentiality undertakings, intellectual property agreements, licence agreements and legal correspondence.
Intellectual property records	Workshop materials, programme content, copyright records, licences, know-how, methods, training content and related IP arrangements.

9. Processing of personal information under POPIA

9.1 Purpose of processing personal information

Symphonia processes personal information for lawful and legitimate business, contractual, operational and compliance purposes. These purposes may include:

- providing leadership development, organisational development, training, coaching, consulting, change and culture services;

- registering delegates and communicating workshop, coaching or programme information;
- issuing confirmations, reminders, certificates, feedback forms and related programme communication;
- managing client relationships, proposals, contracts, invoicing and service delivery;
- maintaining CRM, marketing and communication records, including marketing preferences;
- managing employees, facilitators, associates, suppliers and service providers;
- processing payments, commissions, payroll, tax and financial records;
- complying with legal, regulatory, accounting, audit and governance obligations;
- protecting Symphonia's systems, records, intellectual property and business interests; and
- responding to PAIA, POPIA or other lawful requests, complaints or regulatory engagements.

9.2 Categories of data subjects and personal information processed

Data subject category	Personal information processed	Purpose
Employees	Name, ID/passport details, contact details, banking details, tax information, employment records, payroll records, leave records, performance and training records.	Employment administration, payroll, statutory compliance, HR management and operational communication.
Clients	Names, job titles, email addresses, telephone numbers, company details, billing information, correspondence and service records.	Service delivery, contracts, invoicing, relationship management, client communication and reporting.
Delegates / participants	Name, surname, contact details, company, job title, attendance records, dietary or access requirements, certificates, feedback and communication history.	Workshop registration, logistics, communication, delivery, certification, feedback and reporting.
Facilitators / associates	Contact details, profiles, contracts, correspondence, banking details, tax information, commission or payment records.	Contracting, payment, programme delivery, planning and administration.
Suppliers / service providers	Contact details, company information, banking details, invoices, agreements and correspondence.	Procurement, payment, service management and legal compliance.
Website users	Contact form details, website usage information, cookies or analytics data where applicable.	Website functionality, enquiries, analytics, communication and service improvement.
Marketing contacts	Name, email address, company, job title, communication preferences, campaign activity and consent or unsubscribe records.	Sending relevant workshop, event, leadership development and organisational development information.

Special personal information may be processed only where necessary, lawful and relevant. Examples may include dietary, health or accessibility information voluntarily supplied for workshop or venue logistics, or other information required for legal compliance.

9.3 Recipients of personal information

Symphonia may share personal information with the following recipients where necessary, lawful and appropriate:

- accountants, auditors and professional advisers;
- SARS and other statutory or regulatory bodies where required;
- banks and payment service providers;
- payroll providers and HR administration service providers;
- IT, hosting, software, security and support service providers;
- CRM and database providers, including HubSpot;
- email marketing and communication service providers, including Mailchimp;
- venues, but only the information required for attendance, access, dietary or logistical arrangements;

- facilitators, coaches and associates, where required for programme preparation and delivery;
- legal advisers, insurers or consultants where required; and
- law enforcement, courts or regulatory authorities where legally required or permitted.

9.4 Cross-border transfers of personal information

Personal information may be transferred to, stored or processed in countries outside South Africa where Symphonia uses cloud-based platforms, software providers or international service providers. These may include HubSpot, Mailchimp, Microsoft 365, Outlook, OneDrive, Zoom, Teams and similar service providers used for ordinary business operations.

Where cross-border processing occurs, Symphonia will take reasonable steps to ensure that appropriate safeguards, security measures, contractual obligations or other lawful mechanisms are in place, as required by POPIA.

9.5 Security measures used to protect personal information

Symphonia applies reasonable organisational and technical safeguards to protect personal information, including:

- password-protected systems;
- restricted user access and role-based access where appropriate;
- antivirus and endpoint protection;
- cloud backups;
- access control to accounting, CRM and operational systems;
- staff confidentiality obligations;
- secure disposal of records;
- POPIA awareness and internal procedures; and
- physical access controls at the office.

9.6 Rights of data subjects

Subject to POPIA and other applicable laws, data subjects may request access to their personal information, request correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete or unlawfully obtained personal information, object to certain processing, withdraw consent where processing is based on consent, and lodge a complaint with the Information Regulator.

10. Availability and updating of this Manual

This Manual is available for inspection, free of charge, at Symphonia's offices during normal business hours, on the Symphonia website where published, and on request from the Information Officer or Deputy Information Officer.

Symphonia may also submit or upload this Manual through the Information Regulator eServices portal where required or appropriate.

This Manual will be reviewed and updated periodically, and whenever there are material changes to Symphonia's contact details, Information Officer details, business operations, records, processing activities or legal requirements.

11. Signatory

We confirm, to the best of our knowledge and belief, the accuracy and completeness of the information provided in this Manual.

Signatory item	Details
Name	Louise van Rhyn
Capacity	Managing Director / Information Officer
Signature	
Date	2026-06-30

Annexure A: Prescribed PAIA forms

The following PAIA forms are available from the Information Regulator and should be used where applicable:

Form	Purpose
Form 01	Request for a Guide from the Regulator or request for a copy of the Guide from an Information Officer
Form 02	Request for Access to Record
Form 03	Outcome of request and of fees payable
Form 04	Internal Appeal Form, generally applicable to public bodies
Form 05	Complaint Form
Form 13	PAIA Request for Compliance Assessment Form

Forms page: <https://inforegulator.org.za/paia-forms/>

Annexure B: Prescribed fees in respect of private bodies

The fees below are based on the PAIA Regulations, 2021 and may be amended from time to time. Symphonia will apply the fee amounts prescribed by law at the date of the request.

Item	Description	Amount
1	Request fee payable by every requester, where applicable	R140.00
2	Photocopy or printed black and white copy of an A4-size page or part thereof	R2.00 per page or part thereof
3	Printed copy of an A4-size page or part thereof	R2.00 per page or part thereof
4	Copy in computer-readable form on a flash drive provided by the requester	R40.00
4	Copy in computer-readable form on compact disc, if provided by the requester	R40.00
4	Copy in computer-readable form on compact disc, if provided to the requester	R60.00
5	Transcription of visual images per A4-size page	Service to be outsourced, based on quotation from service provider
6	Copy of visual images	Service to be outsourced, based on quotation from service provider
7	Transcription of an audio record per A4-size page	R24.00
8	Copy of an audio record on a flash drive provided by the requester	R40.00
8	Copy of an audio record on compact disc, if provided by the requester	R40.00
8	Copy of an audio record on compact disc, if provided to the requester	R60.00
9	Search and preparation for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R145.00 per hour, not to exceed R435.00
10	Deposit if search exceeds six hours	One third of the amount per request calculated in terms of the applicable access fee items
11	Postage, email or other electronic transfer	Actual expense, if any

Regulations: [Government Notice R.757 of 27 August 2021](#)