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ZELLA TECH LAW (PTY) LTD

**MANUAL IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO
INFORMATION ACT, 2000**

AUGUST 2025

For concerns or queries, contact the Zella Information Officer:

Komeshni Patrick
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The signatories hereof, confirm their acceptance of the content and authorise the adoption thereof.

Komeshni Patrick

Signature:

20 August 2025

Date

1. PREAMBLE

- 1.1. The objective of the Promotion of Access to Information Act, 2000 ("PAIA") is to give effect to the Constitutional right of access to information (either held by the State or any other person) and where such information is required for the exercise or protection of any right. PAIA therefore gives natural and juristic persons the right of access to Records held by either a private or public body, subject to certain grounds of refusal, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body and in the event that no grounds of refusal apply, the private body must disclose the information if the requester is able to show that the Record is required for the exercise or protection of any rights. PAIA must be read in conjunction with the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 1.2. This Manual constitutes Zella Tech Law's PAIA Manual and serves as an information guide, which sets out the procedures to be followed, as well as the contact details and other relevant information, to allow requesters to give effect to their rights, in terms of PAIA and POPIA. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"). POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of Personal Information.
- 1.3. This Manual is useful for the public to –
 - 1.3.1. Determine which categories of Records are held by Zella Tech Law that are available without a person having to submit a formal PAIA request;
 - 1.3.2. Gain understanding of how to make a request for access to a Record held by Zella Tech Law, by providing a description of the subjects on which Zella Tech Law holds Records, and the categories of Records held on each Data Subject;
 - 1.3.3. Know which Records are held by Zella Tech Law in accordance with any other legislation;
 - 1.3.4. Access to all the relevant contact details of the Information Officer who will assist the public in their requests for access to Records;
 - 1.3.5. Be informed of the Guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to this Guide;
 - 1.3.6. Know whether Zella Tech Law Processes Personal Information, the purpose of Processing Personal Information or categories of information relating thereto;
 - 1.3.7. Know the description of the categories of Data Subjects and the information or categories of information relating thereto;
 - 1.3.8. Know the recipients or categories of recipients to whom the Personal Information may be supplied;
 - 1.3.9. Know whether Zella Tech Law plans to transfer or Process Personal Information outside of the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be supplied; and
 - 1.3.10. Know whether Zella Tech Law has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be Processed.

2. DEFINITIONS

- 2.1. **"Data Subject/s"** shall mean any natural or juristic person to whom the Personal Information relates;
- 2.2. **"Device"** shall mean an electronic gadget including without limitation tablets, mobile phones, desktop computers, laptops, including any accompanying software or hardware;

- 2.3. **"Employee/s"** shall mean any person who works for or provides services to or on behalf of Zella Tech Law and falling under the of employee under section 200A in terms the Labour Relations Act, 1995 as amended from time to time;
- 2.4. **"PAIA"** shall mean the Promotion of Access to Information Act, 2000 including associated regulations and guidance notes as amended from time to time;
- 2.5. **"Personal Information"** shall mean information relating to an identifiable, living, natural person and where it is applicable, to an identifiable, existing juristic person, including but not limited to:
 - 2.5.1. information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 2.5.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.5.3. an identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
 - 2.5.4. the biometric information of the person;
 - 2.5.5. the personal opinions, views or preferences of the person;
 - 2.5.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 2.5.7. the views or opinions of another individual about the person; and
 - 2.5.8. the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person;
- 2.6. **"POPIA"** shall mean the Protection of Personal Information Act, 2013, including any regulations and guidance notes as amended from time to time;
- 2.7. **"Process/Processing"** shall mean any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including: the collection, receipt, recording, organisation, collation, storage, updating or modifications, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution, or making available in any other form, or merging, linking, as well as restriction, degradation, erasures, or destruction of information;
- 2.8. **"Record"** shall mean any recorded information, in any form, including Personal Information, created or received and maintained by the Responsible Party in the course of providing the Services;
- 2.9. **"Responsible Party"** shall mean a public or private body or any other person which alone or in conjunction with others determines the purpose and means for Processing Personal Information and Zella Tech Law is the Responsible Party herein;
- 2.10. **"Services"** shall mean the expert guidance and tailored solution services provided by Zella Tech Law to clients in the technology sector and/or working with different types of technology and include legal advisory, mentoring and coaching as well as research and development;
- 2.11. **"Special Personal Information"** shall mean the same as defined by the Protection of Personal Information Act, 2013; and
- 2.12. **"Zella Tech Law"** shall mean Zella Tech Law (Pty) Ltd, a private company registered in terms of the company laws of the Republic of South Africa situated at 63 Peter Place, Bryanston, Johannesburg.

3. OUR DETAILS

- 3.1. Zella Tech Law's details are set out below:
 - 3.1.1. **Company Name:** Zella Tech Law (Pty) Ltd
 - 3.1.2. **Registration Number:** 2021/921952/07
 - 3.1.3. **Our Director:** Komeshe Patrick

Zella Tech Law (Pty) Limited
Reg. No: 2021/921952/07
The Station,
63 Peter Place, Bryanston,
Sandton, 2021

- 3.1.4. **Postal address:** The Station, 63 Peter Place, Bryanston, Sandton, 2021
- 3.1.5. **Street address:** The Station, 63 Peter Place, Bryanston, Sandton, 2021
- 3.1.6. **Phone number:** 011 100 7641
- 3.1.7. **Email Address:** connect@zellatl.co.za

4. CONTACT DETAILS OF THE INFORMATION OFFICER

- 4.1. Our Information Officer's details are on our website, available on request, and set out below. Our Information Officer is **Komeshni Patrick**.
- 4.2. The contact details of the Information Officer are as follows:
 - Email address:** komeshni.patrick@zellatl.co.za
 - Postal address:** The Station, 63 Peter Place, Bryanston, Sandton, 2021
 - Street address:** The Station, 63 Peter Place, Bryanston, Sandton, 2021
 - Phone number:** 011 100 7641

5. A GUIDE ON PAIA AND THE INFORMATION REGULATOR

- 5.1. Section 10 of PAIA provides for a Guide on how to use the PAIA. This Guide provides information on the objectives of the Act, information on public and private bodies, all remedies in law that are available in the event of a failure to act in terms of a right or duty conferred or imposed by PAIA, information regarding fees to be paid in respect of requests for access to a Record etc.
- 5.2. This Guide is available in each official language of South Africa and has been published on the website of the South African Information Regulator and can be accessed [here](#).
- 5.3. Further information on the Information Regulator can be accessed on its website at: www.inforegulator.org.za.

6. NOTICES IN TERMS OF SECTION 52(2) OF PAIA

- 6.1. In terms of section 52(1) of PAIA, a private body may, on a voluntary basis, provide the Minister with information regarding categories of Records that are automatically available without a person having to request access in terms of PAIA. In terms of section 52(2), the Minister must, by notice in the Gazette, publish such information. As yet, no such notice has been published. Therefore, except for the Records listed in Section 7.2 below, we will grant access to our Records only in terms of this Manual.

7. OUR RECORDS

- 7.1. [Records available in terms of other legislation](#)
We hold Records for the purposes of PAIA in accordance with the legislation listed under **Annexure A** attached hereto.
- 7.2. [Records automatically available without a PAIA request](#)

The Records that are located on the Zella Tech Law website are automatically available and accessible to any person. It is not necessary to apply for access thereto in terms of PAIA.

7.3. Other Records (subject to a PAIA request)

We hold Records that are not automatically available without request in terms of PAIA. A request must be made in terms of PAIA for Records listed under **Annexure A** for any of the listed categories thereto, and please note that such request may be refused in accordance with any of the grounds of refusal set out in PAIA.

8. PROCESSING OF RECORDS

- 8.1. In the course of Zella Tech Law providing the Services, Zella Tech Law Processes Records which include the Personal Information of Data Subjects. Zella Tech Law highly values the right to privacy as found in section 14 of the Constitution of the Republic of South Africa, 1996 ("Constitution"), and accordingly Processes Personal Information in accordance with the conditions for lawful processing as set out in the Protection of Personal Information Act, 2013 ("POPIA").
- 8.2. Zella Tech Law Processes the Records held by it in accordance with the provisions of our Privacy Policy which is available on our [website](#).

9. PROCESS FOR REQUESTING ACCESS TO A RECORD IN TERMS OF PAIA

- 9.1. Complete the prescribed form [here](#) ("Request for Access to Information")

PLEASE NOTE:

- The requestor must provide sufficient detail to the Information Officer regarding the identity of the Record(s) requested and of the requestor.
- The requestor must indicate which form of access is required, identify the right that he/she is seeking to exercise or protect and provide an explanation of why the requested Record is required for the exercise or protection of that right.
- If the request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request, to the reasonable satisfaction of the Information Officer.

- 9.2. Submit the completed form to the Information Officer via the contact details provided in clause 4 above:

PLEASE NOTE:

- PAIA makes provision for certain grounds upon which a request for access to information must be refused. On this basis, the Information Officer will decide whether or not to grant a request for access to information.

10. TIME-PERIODS AND FEES

- 10.1. Zella Tech Law will inform the requester within 30 (thirty) calendar days after receipt of the request of its decision whether or not to grant the request. The aforementioned period may be extended by a further period of not more than 30 (thirty) calendar days if the request is for a large number of Records or requires a search through a large number of Records and compliance with the

original period would unreasonably interfere with the business activities of Zella Tech Law and/or the Records are not located at Zella Tech Law's offices.

- 10.2. In terms of section 50 of PAIA, a Data Subject has the right to request Zella Tech Law to confirm, free of charge, whether or it holds Personal Information about the Data Subject and request from Zella Tech Law the Record or a description of the Personal Information held, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information: –
 - 10.2.1. within a reasonable time,
 - 10.2.2. at a prescribed fee (if any),
 - 10.2.3. in a reasonable manner and format, and
 - 10.2.4. in a form that is generally understandable.
- 10.3. Please note that under PAIA, there are two types of fees payable in respect of a request made for access to information in terms of PAIA:
 - 10.3.1. a request fee, which will be a standard non-refundable administration fee, payable prior to the request being considered; and
 - 10.3.2. an access fee, payable when access is granted which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as courier costs, if applicable.
- 10.4. After receiving a request, the Information Officer shall by notice require the requester, to pay the Prescribed Request Fee, before further Processing of the request. Please see the associated fees [here](#) ("Outcome of Request and Fees Payable").
- 10.5. Where the time required to search for and prepare the requested Record exceeds the prescribed hours in terms of applicable regulations, Zella Tech Law shall require the requester to pay a deposit, being the prescribed portion of the access fee that would be payable if access is granted, prior to further processing of the request.
- 10.6. Zella Tech Law may withhold a Record until the requester has paid the fees indicated in clause 10.3 above.
- 10.7. A requester whose request has been granted must pay the applicable access fee for search, preparation, reproduction, and for any extra time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure, including making arrangements to make it available in the requested form.

11. GROUNDS OF REFUSAL IN RESPECT OF A REQUEST FOR ACCESS TO INFORMATION

- 11.1. Section 62 to 69 of PAIA provide for the following grounds of refusal in respect of a request for access to information:
 - protection of privacy to a third party who is a natural person (section 63);
 - protection of the commercial information of a third party (section 64);
 - protection of certain confidential information of a third person (section 65);
 - protection of the safety of individuals and the protection of property (section 66);

- protection of Records privileged from production and legal proceedings (section 67);
- the commercial information and activities of Zella Tech Law (section 68);
- the protection of research information of a third party and of Zella Tech Law (section 69); and
- any other ground legally available on which to refuse access to the information requested.

11.2. In the event that the requester is dissatisfied with the Information Officer's decision, the requester may, within 30 (thirty) calendar days after notification of the refusal, apply to a relevant Court for the appropriate relief.

11.3. Please note that PAIA provides that, notwithstanding any provisions contained in the PAIA, a request must be granted if the disclosure of the Record would reveal evidence of:

11.3.1. substantial contravention of, or failure to comply with the law;

11.3.2. imminent and serious public safety or environment risk; and

11.3.3. the public interest, if disclosing the Record clearly outweighs the harm contemplated in the provision in question.

12. ACCESSABILITY OF THE MANUAL

12.1. Zella Tech Law's PAIA Manual is available in both electronic and hard copy format in English only. Hard copies are available at the physical address of Zella Tech Law and the electronic version is, available on our [website](#).

ANNEXURE A - RECORDS WE HOLD

APPLICABLE LEGISLATION

- 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;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Income Tax Act 58 of 1962;
- Labour Relations Act 66 of 1995;
- Legal Practice Act 28 of 2014;
- Occupational Health and Safety Act 85 of 1993;
- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002.

* Please note that this is not an exhaustive list.

CATEGORIES OF RECORDS

TYPE OF RECORD	DESCRIPTION
Company Records	Incorporation documents Records relating to the appointment of directors, auditors and other officers. Shareholder information Financial Records (bank statements, tax-related information and financial reports) Compliance Records (policies, procedures, reports)
Employee Records	Employee CVs Reference Letters Next of Kin Information Information generated from Background checks Employee contract of employment Employee disciplinary and performance information
Third Party Records (Clients and Service Providers)	Full identity details (full names, identity and/or registration numbers, address, contact information) Financial Information (banking details, and VAT numbers, if applicable) Compliance Records (policies, procedures, and applicable legal agreements and/or documentation)