

PAIA MANUAL

Promotion of Access to Information Act, 2000

(Act No. 2 of 2000)

Thuthu (Pty) Ltd

trading as

myPilotPost

Registration Number: 2025/102758/07
Compiled in terms of Section 51 of PAIA

Effective Date: February 07, 2026

TABLE OF CONTENTS

1. Introduction
2. Purpose of this Manual
3. Key Contact Details and Information Officer

4. Guide of the South African Human Rights Commission
 5. Categories of Records Held
 6. Records Automatically Available
 7. Grounds for Refusal of Access
 8. Procedure to Request Access to Records
 9. Fees
 10. Remedies Available
 11. Availability of this Manual
- Annexure A: Request for Access to Record Form
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1. INTRODUCTION

This Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA" or "the Act") for Thuthu (Pty) Ltd trading as myPilotPost ("the Company").

PAIA gives effect to the constitutional right of access to information held by another person and that is required for the exercise or protection of any rights. Section 32 of the Constitution of the Republic of South Africa provides that everyone has the right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights.

PAIA was enacted to give effect to this constitutional right and sets out the procedural and substantive requirements that must be complied with when requesting access to information.

2. PURPOSE OF THIS MANUAL

This Manual is designed to facilitate access to information held by the Company by:

- Providing sufficient information about the Company to enable requesters to exercise their rights under PAIA
- Identifying the categories of records held by the Company
- Explaining the procedure to be followed when requesting access to records
- Outlining the fees payable for access to records
- Setting out the grounds on which the Company may refuse access to records
- Providing contact details for making requests

Such requests may be subject to justifiable limitations, including the protection of privacy, commercial confidentiality, and mandatory protection of certain records.

3. KEY CONTACT DETAILS AND INFORMATION OFFICER

3.1 Company Details

Registered Name: Thuthu (Pty) Ltd

Trading Name: myPilotPost

Registration Number: 2025/102758/07

Registration Date: 7 February 2025

Type: Private Company

Status: In Business

3.2 Registered Office Address

Physical Address:

23 Fielding Crescent

Mondeor Green

Johannesburg

Gauteng

2091

South Africa

Postal Address:

23 Fielding Crescent

Mondeor Green
Johannesburg
Gauteng
2091
South Africa

3.3 Information Officer

In terms of Section 51(1)(a) of PAIA, the Company has appointed an Information Officer who is responsible for:

- Receiving and processing requests for access to information
- Deciding whether to grant or refuse access to requested information
- Ensuring compliance with the provisions of PAIA
- Maintaining and updating this PAIA Manual

Name: Littchel Nhlalo Mathuthu

Position: Director

Email: info@mypilotpost.com

Telephone: [To be added]

Postal Address: 23 Fielding Crescent, Mondeor Green, Johannesburg, Gauteng, 2091

3.4 Deputy Information Officer (if applicable)

The Company may appoint a Deputy Information Officer in the future. Details will be updated in this Manual when appointed.

4. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION (SAHRC)

Section 10 of PAIA requires the SAHRC to compile a Guide on how to use PAIA. The Guide is available in all official languages and contains information to facilitate the exercise of the right of access to information from private bodies.

The Guide is available from the SAHRC and can be obtained from:

South African Human Rights Commission
PAIA Unit (The Research and Documentation Department)

Postal Address:

Private Bag X2700
Houghton
2041

Physical Address:

Braampark Forum 3
33 Hoofd Street
Braamfontein

Telephone: +27 11 877 3600

Fax: +27 11 403 0625

Email: PAIA@sahrc.org.za

Website: www.sahrc.org.za

5. CATEGORIES OF RECORDS HELD

The Company holds various categories of records. This section provides an overview of the main categories of records held, though it is not exhaustive. The inclusion of any category of records should not be taken to mean that a request for access to such records will automatically be granted.

5.1 Records Held in Terms of Legislation

The Company is required to maintain certain records in terms of various legislation, including but not limited to:

- Companies Act, 2008 (Act No. 71 of 2008)
- Income Tax Act, 1962 (Act No. 58 of 1962)
- Value-Added Tax Act, 1991 (Act No. 89 of 1991)
- Basic Conditions of Employment Act, 1997 (Act No. 75 of 1997)
- Labour Relations Act, 1995 (Act No. 66 of 1995)
- Employment Equity Act, 1998 (Act No. 55 of 1998)
- Skills Development Act, 1998 (Act No. 97 of 1998)
- Unemployment Insurance Act, 2001 (Act No. 63 of 2001)
- Occupational Health and Safety Act, 1993 (Act No. 85 of 1993)

- Compensation for Occupational Injuries and Diseases Act, 1993 (Act No. 130 of 1993)
- Protection of Personal Information Act, 2013 (Act No. 4 of 2013)
- Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)
- Consumer Protection Act, 2008 (Act No. 68 of 2008)
- Broad-Based Black Economic Empowerment Act, 2003 (Act No. 53 of 2003)

5.2 Personnel Records

"Personnel" refers to any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive remuneration, and any other person who assists in carrying out or conducting the business of the Company. This includes, without limitation:

- Directors (executive and non-executive)
- All permanent, temporary, and part-time staff
- Prospective employees
- Contract workers and independent contractors
- Consultants and advisors

Personnel records include:

- Personal information (identity documents, contact details, emergency contacts)
- Employment contracts and appointment letters
- Job descriptions and employment terms
- Salary and benefits information
- Tax certificates and declarations
- Leave records
- Performance evaluations and reviews
- Disciplinary records
- Training records and certifications
- Resignation letters and exit documentation
- Correspondence related to employment

5.3 Client/Customer Records

A "client" or "customer" refers to any natural or juristic entity that receives services from the Company and includes all prospective clients and customers.

Client records include:

- Client registration and account information
- Contact details and personal information
- Records and data provided by clients
- Service agreements and contracts
- Transactional records and billing information
- Payment records and invoices
- Communication records (emails, messages, support tickets)
- Content posted or uploaded by clients
- Usage data and analytics
- Subscription and service history
- Records provided by third parties about clients

5.4 Financial Records

- Annual financial statements
- Management accounts
- Tax returns and assessments
- VAT records and returns
- Banking records and statements
- Invoices and receipts
- Payment records
- Debtor and creditor records
- Asset registers
- Budgets and forecasts
- Audit reports and working papers
- Payroll records

5.5 Operational Records

- Business plans and strategies
- Product and service development records
- Marketing and promotional materials
- Market research and analysis
- Customer service records
- Quality assurance records
- Operational policies and procedures
- Risk management records
- Insurance policies and claims
- Compliance records

- Corporate governance records

5.6 Information Technology Records

- IT policies and procedures
- System documentation
- Database records
- Website and application data
- Server logs and analytics
- Software licenses
- IT contracts and agreements
- Backup and disaster recovery records
- Cybersecurity policies and incident reports
- User access and authentication records

5.7 Statutory and Corporate Records

- Certificate of Incorporation
- Memorandum of Incorporation
- Shareholders' agreements
- Directors' registers and resolutions
- Minutes of board meetings
- Share certificates and registers
- CIPC annual returns
- Licenses and permits
- Regulatory correspondence

5.8 Contractual and Legal Records

- Service agreements with clients
- Supplier and vendor contracts
- Non-disclosure agreements
- Partnership and collaboration agreements
- Terms and conditions
- Privacy policies
- Legal opinions and advice
- Litigation records
- Dispute resolution records
- Intellectual property records (trademarks, copyrights)

5.9 Third-Party Records

The Company may hold records pertaining to third parties, including:

- Supplier and vendor information
- Service provider records
- Partner and affiliate records
- Contractor information
- Third-party agreements and contracts
- Records provided by third parties about the Company

5.10 Internal Correspondence

- Internal emails and memoranda
- Meeting minutes and notes
- Internal reports
- Project documentation
- Strategic planning documents

6. RECORDS AUTOMATICALLY AVAILABLE

The following categories of records are automatically available for inspection, purchase, or photocopying and do not require a formal PAIA request. These documents can be obtained from our Information Officer:

- This PAIA Manual
- Company registration certificate
- Publicly available marketing materials
- Newsletters and announcements
- Brochures and pamphlets
- Service descriptions and pricing (publicly displayed)
- Terms and Conditions
- Privacy Policy
- Refund Policy
- Other public-facing policies

The Minister may publish a Notice in the Government Gazette describing additional records which are freely available. As of the date of this Manual, no such Notice has been published that applies to the Company.

7. GROUNDS FOR REFUSAL OF ACCESS

In terms of PAIA, there are justifiable grounds for the Company to refuse or limit access to information. The grounds for refusal are set out in Chapter 4 of PAIA and include, but are not limited to:

Mandatory Protection of Privacy of Third Parties (Section 63): Access must be refused if disclosure would involve the unreasonable disclosure of personal information about a third party

Mandatory Protection of Commercial Information (Section 64): Access must be refused if the record contains trade secrets, financial/commercial/technical information that would harm the commercial/financial interests of a third party

Mandatory Protection of Confidential Information (Section 65): Access must be refused if the record was provided in confidence

Mandatory Protection of Safety of Individuals and Property (Section 66): Access must be refused if disclosure could endanger the life or physical safety of an individual

Protection of Commercial Information of Private Body (Section 68): Access may be refused if disclosure would result in financial loss or competitive disadvantage

Protection of Research Information (Section 69): Access may be refused if disclosure would compromise research or the competitive position of researchers

Protection of Privileged Information (Section 67): Access may be refused for legally privileged documents

Manifestly Frivolous or Vexatious Requests (Section 45): Requests that are clearly unreasonable may be refused

The Company will exercise its discretion in applying these grounds and will only refuse access where it is justifiable to do so.

8. PROCEDURE TO REQUEST ACCESS TO RECORDS

8.1 Submission of Request

A requester must use the prescribed form (Form C) to request access to a record. The form is attached as Annexure A to this Manual and is also available:

- From the SAHRC website: www.sahrc.org.za
- From the Department of Justice website: www.justice.gov.za
- On request from our Information Officer at: info@mypilotpost.com

The completed form must be submitted to:

Email: info@mypilotpost.com (preferred method)

Postal Address: 23 Fielding Crescent, Mondeor Green, Johannesburg, Gauteng, 2091

Physical Delivery: By appointment only - contact Information Officer

8.2 Requirements for Request

The request must:

- Be made on the prescribed form (Form C)
- Provide sufficient detail to enable the Company to identify the record(s) requested
- Indicate the preferred form of access (inspection, copy, etc.)
- Specify the postal address or email address for correspondence
- Identify the right the requester is seeking to exercise or protect
- Provide an explanation of why the record is required to exercise or protect that right
- If the request is made on behalf of another person, include proof of the capacity in which the request is made

8.3 Processing Timeline

The Company will process requests according to the following timeline:

- Acknowledgment: Within 7 days of receipt

- Decision: Within 30 days of receipt (may be extended by an additional 30 days if the request is complex or voluminous)
- Notification: The requester will be notified of the decision to grant or refuse access
- Access: If granted, access will be provided within a reasonable time after payment of fees (if applicable)

8.4 Decision Notice

The Information Officer will notify the requester whether access is granted or refused. If access is granted, the notice will state:

- The access fee payable (if any)
- The form in which access will be provided
- When and how access will be provided

If access is refused, the notice will:

- State adequate reasons for the refusal
- Reference the applicable provisions of PAIA
- Advise the requester of their right to lodge an application with a court against the refusal
- State the procedure for lodging such an application

8.5 Third-Party Notification

If the requested record contains information about a third party, the Company may be required to notify the third party and allow them to make representations regarding the disclosure of their information.

9. FEES

PAIA provides for two types of fees:

9.1 Request Fee

A request fee of R50.00 is payable by all requesters **except personal requesters** (i.e., those seeking access to records about themselves). This fee must be paid before the request is processed.

9.2 Access Fee

An access fee is payable by **all requesters** in respect of the search, preparation, and provision of records. The access fee will be calculated according to the rates prescribed in the PAIA Regulations.

Current prescribed fees (as per PAIA Regulations):

Service	Fee
Photocopies (per page)	R1.10
Printed copies (per page)	R0.75
Copy on flash drive	R60.00 + cost of drive
Copy on compact disc	R70.00 + cost of disc
Search and preparation time (per hour or part thereof)	R30.00
Postage (actual cost)	Variable

Payment Methods:

- Electronic Funds Transfer (EFT) - details provided upon request
- Direct deposit
- Cash (for in-person payments by appointment)

Note: Access will only be granted once the applicable fees have been paid in full.

10. REMEDIES AVAILABLE

10.1 Internal Appeal

PAIA does not provide for an internal appeal mechanism. However, requesters who are dissatisfied with a decision may contact the Information Officer to discuss their concerns before pursuing legal remedies.

10.2 Court Application

A requester who is aggrieved by a decision of the Information Officer may, within 30 days of notification of the decision, apply to a court of competent jurisdiction for appropriate relief.

The application may be brought in:

- The High Court having jurisdiction
- A Magistrate's Court having jurisdiction (where the decision being challenged relates to a record other than a record of the private body)

10.3 Complaints to the Information Regulator

Requesters may also lodge a complaint with the Information Regulator regarding alleged interference with the protection of personal information or any other complaints relating to PAIA and POPIA.

Information Regulator (South Africa)

Email: infoeregulator@justice.gov.za

Website: www.justice.gov.za/infoereg

Telephone: +27 10 023 5207

11. AVAILABILITY OF THIS MANUAL

This Manual is available:

- On our website: www.mypilotpost.com
- For inspection at our registered office (by appointment)
- On request via email: info@mypilotpost.com
- As a downloadable PDF from our website

Inspection of this Manual is **free of charge**. Copies may be requested, and a fee may be charged for photocopying and postage.

Updates: This Manual will be updated as required to reflect any changes in the Company's structure, operations, or applicable legislation. The current version is available on our website.

This PAIA Manual was compiled and approved by the Board of Directors of Thuthu (Pty) Ltd on behalf of myPilotPost.

Approved by:

Littchel Nhlalo Mathuthu
Director
Information Officer

Date: February 07, 2026

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