



**LAWTONS INC. TRADING AS LAWTONS AFRICA**

**(REGISTRATION No. 1992/006150/21)**

hereinafter referred to as the “**Lawtons Africa**”

**PROMOTION OF ACCESS TO INFORMATION MANUAL**

prepared in accordance with section 51 of the Promotion of Access to Information Act No. 2  
of 2000 (as amended) (“**PAIA**”) read with the Protection of Personal Information Act 4 of  
2013 (“**POPIA**”)

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## 1. INTRODUCTION

- 1.1 Lawtons Africa is a South African law firm situated in Sandton which entered the southern African legal community in 1892 in downtown Johannesburg.
- 1.2 Lawtons Africa provides legal professional services to a broad range of clients across various practice areas including employment, litigation, construction, tax and exchange control, corporate/commercial, transaction advisory, real estate, private equity, competition/anti-trust, business restructuring and insolvency, wills and estates.
- 1.3 This Manual is available –
  - 1.3.1 on the Lawtons Africa website ([www.lawtonsafrica.com](http://www.lawtonsafrica.com));
  - 1.3.2 for inspection at Lawton Africa's premises situated at 140 West Street, Sandown, Johannesburg 2196;
  - 1.3.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 1.3.4 to the Information Regulator upon request.
- 1.4 A fee for a copy of the Manual, as contemplated in Appendix A, shall be payable per each A4-size photocopy made.

## 2. PURPOSE OF PAIA

- 2.1 PAIA was enacted in February 2000 giving effect to the constitutional 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 in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, 1996 (the "**Constitution**"). Where a request is made in terms of PAIA, the body to which the request is made is obliged to give access to the requested information, except where PAIA expressly provides that the information may or must not be released.
- 2.2 The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within Lawtons Africa by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 2.3 In terms of section 51 of PAIA, all private bodies are required to compile an information manual ("**Manual**"). In addition, all Manuals are further required to address the requirements set out in the Schedule to POPIA.
- 2.4 This Manual is useful for the public to-
  - 2.4.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
  - 2.4.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

- 2.4.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.4.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.4.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.4.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.4.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.4.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.4.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### 3. COMPANY DETAILS

The details for Lawtons Africa are as follows:

Head of Lawtons Africa (Chairman of the Management Board)	Jeff Buckland
Physical address	140 West Street Sandown Johannesburg 2196
Postal address	P O Box 78333 Sandton City 2146
Telephone number	(011) 286 6900
Fax number	(011) 286 6901
Email address of Lawtons Africa Information Officer	<a href="mailto:jeff.buckland@lawtonsafrica.com">jeff.buckland@lawtonsafrica.com</a>
Website	<a href="https://www.lawtonsafrica.com/">https://www.lawtonsafrica.com/</a>

#### 4. CONTACT DETAILS OF THE INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

The responsibility for administration of and compliance with PAIA and POPIA have been delegated to the Information Officer and where applicable, the Deputy Information Officer. Requests pursuant to the provisions of PAIA and/or POPIA should be directed to the Information Officer and/or the Deputy Information Officer, as follows:

Information Officer	Jeff Buckland
Physical address	140 West Street Sandown Johannesburg 2196
Postal address	P O Box 78333 Sandton City 2146
Telephone number	011 523 6014
Email address	<a href="mailto:Jeff.buckland@lawtonsafrica.com">Jeff.buckland@lawtonsafrica.com</a>
Website	<a href="https://www.lawtonsafrica.com/">https://www.lawtonsafrica.com/</a>

Deputy Information Officer	Veronica Vurgarellis
Physical address	140 West Street Sandown Johannesburg 2196
Postal address	P O Box 78333 Sandton City 2146
Telephone number	011-2866900
Email address	Veronica.Vurgarellis@lawtonsafrica.com
Website	<a href="https://www.lawtonsafrica.com/">https://www.lawtonsafrica.com/</a>

#### 5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("**Guide**"), in an easily

comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of –
  - 5.3.1 the objects of PAIA and POPIA;
  - 5.3.2 the postal and street address, phone and fax number and, if available, electronic email address of –
    - 5.3.2.1 the Information Officer of every public body; and
    - 5.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
  - 5.3.3 the manner and form of a request for –
    - 5.3.3.1 access to a record of a public body contemplated in section 11 of PAIA; and
    - 5.3.3.2 access to a record of a private body contemplated in section 40 of PAIA;
  - 5.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
  - 5.3.5 the assistance available from the Information Regulator in terms of PAIA and POPIA;
  - 5.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging –
    - 5.3.6.1 an internal appeal;
    - 5.3.6.2 a complaint to the Information Regulator; and
    - 5.3.6.3 an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
  - 5.3.7 the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 5.3.8 the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 5.3.9 the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
  - 5.3.10 the regulations made in terms of section 92 of PAIA.
- 5.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.
- 5.5 The Guide can also be obtained –

- 5.5.1 Upon request to the Information Officer;
- 5.5.2 From the website of the Information Regulator (<https://www.justice.gov.za/infoereg/>).
- 5.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours, at the premises of Lawtons Africa detailed in paragraphs 1.3.2 and 3 above –
  - 5.6.1 Afrikaans; and
  - 5.6.2 Sesotho.

## 6. CONTACT DETAILS OF THE INFORMATION REGULATOR

The contact details of the Information Regulator are:

Physical address	The Information Regulator (South Africa) JD House 27 Siemens Street Braamfontein Johannesburg 2001
Postal address	P.O Box 31533 Braamfontein Johannesburg 2017
Telephone number	(010) 023 5207
Fax number	(011) 403 0668
Complaints email address	<a href="mailto:PAIAComplaints.IR.@justice.gov.za">PAIAComplaints.IR.@justice.gov.za</a>
General email address	<a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a>
Website	<a href="https://www.justice.gov.za/infoereg">https://www.justice.gov.za/infoereg</a>

## 7. TYPES AND CATEGORIES OF RECORDS

### 7.1 CATEGORIES OF RECORDS OF LAWTONS AFRICA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The information available on our website may be automatically accessed without having to go through the formal access request process noted in paragraph 9 below. In addition, the following documentation is also available without a person having to request access thereto in terms of PAIA:

- 7.1.1 Lawtons Africa brochures;
- 7.1.2 Employment equity plan; and

7.1.3 Skills development plan.

7.1.4 Precedent of mandate letter or engagement letter and related terms and conditions.

**7.2 DESCRIPTION OF THE RECORDS OF LAWTONS AFRICA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Lawtons Africa maintains records in terms of the following legislation and regulations, as far as required.

<b>Category of Records</b>	<b>Applicable Legislation</b>
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Company records and annual financial statements	Companies Act 71 of 2008
Employee-related records	Labour Relations Act 66 of 1995
Tax records	Income Tax Act 58 of 1962
POPIA Policy	Protection of Personal Information Act 4 of 2013
Deceased Estates	Administration of Deceased Estates Act 66 of 1965
Employment	Basic Conditions of Employment Act 75 of 1997
Employment	Compensation for Occupational Injuries and Deceases Act 130 of 1993
Employment	Employment Equity Act 55 of 1998
Financial	Finance Act 35 of 2000
Health & Safety	Occupational Health and Safety Act 85 of 1993
Employment	Skills Development Levies of Act 9 of 1999
Employment	Skills Development Act 97 of 1998
Employment	Unemployment Contributions Act 4 of 2002
Employment	Unemployment Insurance Act 63 of 2001
Financial/Tax	Value Added Tax Act 89 of 1991
Legal	Legal Practice Act 28 of 2014
Finance/Risk	Financial Intelligence Centre Act 38 of 2002

Please note that this is not an exhaustive list.



**7.3 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LAWTONS AFRICA**

All records listed below are available upon request, subject to the provisions of POPIA and PAIA, and in particular Chapter 4 thereof.

<b>Subject on which the body holds records</b>	<b>Categories of records</b>
Company secretarial	Documents of incorporation Memorandum of incorporation Shareholders' agreement Shareholder's register Mandates document Director/Shareholders Remuneration policy Records relating to the appointment of directors, auditors and other officers POPIA Policy Risk Management Awareness Policy (FICA) Anti-Bribery and Corruption Policy Anti-Money Laundering Policy Letter of Good standing from the Department of Labour BEE Accreditation Certificate
Finance	Tax returns Annual Financial statements VAT returns Fixed asset register List of creditors and debtors Bank account information Tax Clearance Certificate VAT Clearance Certificate COIDA Clearance Certificate

<p>Operations</p>	<p><b><u>Contracts:</u></b></p> <p>Leases – properties</p> <p>Leases/contracts – suppliers</p> <p>Leases – financial institutions</p> <p>Insurance policies</p> <p><b><u>Support services:</u></b></p> <p>Delivery and collection records</p> <p><b><u>Information Technology:</u></b></p> <p>Disaster recovery plan</p> <p>Cost Recovery usage statistics</p> <p>Information Technology Security Policy</p>
<p>Human Resources</p>	<p>Employee records including letters of appointment, performance appraisals, remuneration, leave register and disciplinary warnings</p> <p>HR Policy document</p> <p>Performance appraisals</p> <p>Criteria for promotions and remuneration for professional staff</p> <p>Recruitment policy</p> <p>Support Staff Remuneration Policy</p> <p>Pension fund rules</p> <p>Medical aid records</p> <p>Travel allowance records/claim records</p> <p>Employment equity policy and plan</p> <p>Skills development plan</p> <p>UIF registration</p> <p>PAYE registration</p> <p>WCA registration</p> <p>Registration as an employer</p>

	<p>COVID-19 Policy</p> <p>Remote working Policy</p> <p>Social Media Policy</p> <p>Moonlighting Policy</p>
Legal	<p>Annual Auditors Certificate in terms of Rule 70.4.1 of the Law Society</p> <p>Rule 78(3) read with Regulation 8 (Interest and bank charges on Trust Accounts)</p> <p>List of Trust investments in terms of S78(2)(a) and (A)</p> <p>Fidelity Fund Certificates</p> <p>Professional indemnity insurance certificates</p>

## 8. PROCESSING DETAILS

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by Lawtons Africa will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

### 8.1 PURPOSE OF THE PROCESSING

8.1.1 POPIA provides that personal information may only be processed lawfully and in a reasonable manner that does not infringe your (the data subject's) privacy. The type of personal information that we process will depend on the purpose for which it is collected. We will disclose to you why the personal information is being collected and will process the personal information for that purpose only.

8.1.2 Lawtons Africa may collect, use, share and/or generally process personal information (including, where applicable special personal information) of the data subject as specified in the Letter of Engagement/mandate letter and related terms and conditions thereto, as agreed to, between Lawtons and the data subject.

8.1.3 Lawtons Africa may collect, use, share and/or generally process personal information of employees as specified in the POPIA privacy policy and procedures.

### 8.2 DESCRIPTION OF CATEGORIES OF DATA SUBJECTS AND THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

8.2.1 Lawtons Africa holds personal information and records on various data subject categories which include but are not limited to the following data subject categories:

Category of data subjects	Personal Information that may be processed
Employees of Lawtons Africa	Subject to the consent of the relevant employee.

Clients of Lawtons Africa	Subject to the consent of the relevant client.
Suppliers and service providers with whom Lawtons Africa conducts business	Subject to the consent of the relevant supplier or service provider.

Please note that this is not an exhaustive list.

### 8.3 **RECIPIENTS TO WHOM PERSONAL INFORMATION WILL BE SUPPLIED**

8.3.1 Lawtons Africa values and respects the confidentiality and privacy of the personal information that data subjects entrust us with. Lawtons Africa will not share or disclose personal information to anyone except as provided in our POPIA Policy and Procedure and/or any contracts, letter of engagement/mandate letter and related terms and conditions agreed with us.

### 8.4 **PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION**

8.4.1 The Document Management System at Lawtons Africa, iManage Share, is a product that allows Lawtons Africa to easily and securely share information with clients and colleagues outside of Lawtons. As it is hosted in the Republic of Ireland, which is covered by the European General Data Protection Regulation, Lawtons Africa obtains permission from the client to share any of their information through iManage Share for that client.

### 8.5 **SECURITY MEASURES**

8.5.1 Securing the personal information that a data subject shares with us is a priority. Lawtons Africa has appropriate and reasonable technical and organisational security measures in place to ensure the confidentiality, integrity and availability of the personal information which it processes and to protect the personal information it processes, in accordance with the requirements of POPIA.

8.5.2 Lawtons Africa employs appropriate technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. These measures include firewalls, virus protection software, encryption methods, physical access control, secure setup of hardware and software making up our information technology infrastructure and outsourced service providers who are contracted to implement security controls.

## 9. **DETAILS ON HOW TO MAKE A REQUEST FOR ACCESS: SECTION 51(e)**

A requester is any person making a request for access to a record of, or held by, Lawtons Africa. The requester is entitled to request access to records, including records pertaining to third parties, but Lawtons Africa is not obliged to grant such access under certain circumstances. Apart from the fact that access to a record can be refused based on the grounds set out in paragraph 10 below, in order to successfully access

information, the requester must fulfil the prerequisite requirements for access in terms of PAIA, including the payment of a request and access fee.

## 9.1 ACCESS REQUEST PROCEDURE

- 9.1.1 The requester requiring access to records held by Lawtons Africa must complete the prescribed Form 2 attached hereto as Appendix B ("**Access Request Form**"), submit it to the Information Officer at the postal or physical address, email address recorded in paragraph 4 above, together with the appropriate request fee and deposit, if applicable.
- 9.1.2 In order to facilitate a timely response to requests for access, all requesters should take note of the following when completing the Access Request Form:
- 9.1.2.1 The Access Request Form must be comprehensively completed.
- 9.1.2.2 Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the Access Request Form, requesters will be required to supply a copy of their identification document.
- 9.1.2.3 Every applicable question must be answered. If a question does not apply "N/A" should be stated in response to that question. If there is no information to disclose in reply to a particular question "Nil" should be stated in response to that question.
- 9.1.3 The Access Request Form must be completed with enough particularity to:
- 9.1.3.1 Provide sufficient particulars to enable the Information Officer to identify the record/s requested and to identify the requester.
- 9.1.3.2 Indicate which form of access is required if the request is granted.
- 9.1.3.3 Specify a postal address or fax number of the requester in the Republic of South Africa.
- 9.1.3.4 Identify the right that the requester 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.
- 9.1.4 If the request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer.
- 9.1.5 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally by contacting the Information Officer or Deputy Information Officer at the telephone numbers listed above. The Information Officer or Deputy Information Officer will subsequently complete the Access Request Form on behalf of the requester and provide a copy thereof to the requester.
- 9.1.6 Please note that all requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA, and where applicable, POPIA. The requester will be informed in writing, or if the requester is illiterate telephonically, whether access has been granted or denied. If, in addition to a written reply, the

requester wishes to be informed of the decision on the request in any other manner, the requester must state that manner and the necessary particulars so required. For further information on the notice of decision to grant or deny access to a record, please refer to paragraph 12 below.

## 10. **GROUND FOR REFUSAL OF ACCESS TO RECORDS**

10.1 Lawtons Africa may refuse a request for records on the following basis:

- 10.1.1 Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- 10.1.2 Mandatory protection of the commercial information of a third party, if the record contains:
  - 10.1.2.1 Trade secrets of that third party;
  - 10.1.2.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
  - 10.1.2.3 Information disclosed in confidence by a third party to Lawtons Africa, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- 10.1.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or local and international legislation;
- 10.1.4 Mandatory protection of the safety of individuals and the protection of property;
- 10.1.5 Mandatory protection of records which would be regarded as privileged in legal proceedings or are protected by attorney-client privilege, which has not been waived;
- 10.1.6 The commercial activities of Lawtons Africa, which may include:
  - 10.1.6.1 Trade secrets of Lawtons Africa;
  - 10.1.6.2 Financial information, which, if disclosed, could put Lawtons Africa at a disadvantage in negotiations or commercial competition;
  - 10.1.6.3 A computer program which is owned by Lawtons Africa and which is protected by copyright.
- 10.1.7 The research information of Lawtons Africa or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage;
- 10.1.8 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused;
- 10.1.9 disclosure could reasonably be expected to endanger the life or safety of an individual; or

10.1.10 for any other lawful reason not specially set out herein.

## **11. PRESCRIBED FEES: SECTION 51(1)(f)**

11.1 The following applies to all requests:

11.1.1 Under Section 54 of PAIA, private bodies are entitled to levy a prescribed request fee to a requester before the private body may process the request for information or records. Fees levied are published by the Minister and are displayed in Appendix A to this Manual. PAIA provides for two types of fees, namely a request fee, which will be a standard fee; and an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

11.1.2 When the request is received by the Information Officer, the Information Officer will by notice require the requester to pay the prescribed request fee (if any), before further processing of the request (refer to Appendix A of this Manual).

11.1.3 Payment details can be obtained from the Information Officer and can be made either via a direct deposit, by bank guaranteed cheque or by postal order. Proof of payment must be supplied when the Access Request Form is submitted.

11.1.4 The Information Officer will withhold a record until the requester has paid the fees as indicated. A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any 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.

11.1.5 If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer will repay the deposit to the requester.

### **11.2 REQUEST FEE**

An initial "request fee" is payable on submission of the Access Request Form. The prescribed fee is set out in Appendix A. Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the request fee.

### **11.3 ACCESS FEE**

If the request for access is successful, an access fee must be paid. This fee is for the search, reproduction and/or preparation of the record(s). The access fee will be calculated based on the prescribed fees set out in Appendix A. Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the access fee.

## 11.4 DEPOSIT

- 11.4.1 If the search for, and the preparation of, the record for disclosure would, in the opinion of the Information Officer, require more than 6 hours, the requester may be required to pay as a deposit of one third of the access fee (the fee which will be payable if the request is granted). The Information Officer will inform the requester accordingly should a deposit be required, using the prescribed Form 3 annexed hereto as Appendix C ("**Outcome of Request and Fees Payable Form**").
- 11.4.2 Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the deposit. If a deposit has been paid in respect of a request for access which is subsequently refused, then the Information Officer must refund the deposit to the requester. The requester must pay the prescribed fee before any processing, or any further processing, can take place.

## 12. NOTIFICATION OF DECISION

- 12.1 The Information Officer will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect. The decision will be communicated to the requester using the prescribed Outcome of Request and Fees Payable Form.
- 12.2 The 30 day period, within which the Information Officer has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the information cannot reasonably be obtained within the original 30 day period. For example, the time period may be extended if the request is for a large volume of information, or the request requires Lawtons Africa to search for information held at other premises.
- 12.3 The Information Officer will notify the request in writing should an extension be required. The requester may lodge a complaint to the Information Regulator or an application with a court against the extension.

## 13. REMEDIES AVAILABLE WHEN LAWTONS AFRICA REFUSES A REQUEST FOR INFORMATION

### 13.1 INTERNAL REMEDIES

Lawtons Africa does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.

### 13.2 EXTERNAL REMEDIES

All complaints, by a requester or a third party, can be made to the Information Regulator or a court, in the manner prescribed below.



**13.2.1 COMPLAINTS TO THE INFORMATION REGULATOR**

- 13.2.1.1 The requester or third party, as the case may be, may submit a complaint in writing to the Information Regulator, within 180 days of the decision, alleging that the decision was not in compliance with the provisions of PAIA.
- 13.2.1.2 The Information Regulator will investigate the complaint and reach a decision – which may include a decision to investigate, to take no further action or to refer the complaint to the Enforcement Committee established in terms of POPIA.
- 13.2.1.3 The Information Regulator may serve an enforcement notice confirming, amending or setting aside the impugned decision, which must be accompanied by reasons.

**13.2.2 APPLICATION TO COURT**

- 13.2.2.1 An application to court may be brought in the ordinary course. For purposes of PAIA, any reference to an application to court includes an application to a Magistrates' Court.

**14. UPDATING OF THE MANUAL**

The Information Officer will on a regular basis, as and when needed, update this Manual.

Signed by the Chairman of the Management Board, Jeff Buckland, on this the \_\_\_\_\_ day of October 2021 at Sandton.

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**JEFF BUCKLAND**  
**Chairman of the Management Board**  
**Lawtons Inc. trading as Lawtons Africa**

## Appendix A: Prescribed fees

### 1. REQUEST FEES

Where a requester submits a request for access to information held by Lawtons Africa, the request fee is payable up-front before Lawtons Africa will further process the request received.

The request fee payable by every requester referred to in Annexure B of the Regulations relating to PAIA, is R140,00.

### 2. ACCESS AND REPRODUCTION FEES

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 54(8) of PAIA.

The applicable fees which will be payable are:

Item	Description	Fees to be charged
1.	For every photocopy or printed black and white copy of an A4-size page	R2,00
2.	For every printed copy of an A4-size page	R2,00
3.	<b>For a copy in a computer-readable form on:</b>	
	a. Flash drive (to be provided by the requester)	R40,00
	b. Compact disk	
	i. If provided by the requester	R40,00
	ii. If provided to the requester	R60,00
4.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
5.	For a copy of visual images	Service to be outsourced. Will depend on quotation from service provider.
6.	For a transcription of an audio record per A4-size page	R24,00
7.	For a copy of an audio record on:	R30,00
	a. Flash drive (to be provided by the requester)	R40,00

	b. Compact disk i. If provided by the requester ii. If provided to the requester	R40,00 R60,00
8.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation  To not exceed a total cost of	R145,00  R435,00

When a copy of the record must be posted, e-mailed or transferred electronically to a requester, the requester shall be liable to pay the actual postage, e-mail or any other electronic transfer expense incurred, if any.

### 3. DEPOSITS

Where Lawtons Africa receives a request for access to information held on a person and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 hours, a deposit is payable by the requester. The amount of the deposit is equal to one third of the amount per request calculated in terms of items 1 to 7 above.

### Appendix B: Form 2 – Access Request Form

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<b>PARTICULARS OF RECORD REQUESTED</b>			
<p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

<b>FEES</b>	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d) If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**

### Appendix C: Form 3 – Outcome of Request and Fees Payable Form

**NOTE:**

1. If your request is granted the –  
 (a) amount of the deposit, (if any), is payable before your request is processed; and  
 (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> ) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

**2. You requested:**

Printed copies of the information ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i> )	
Transcription of soundtrack ( <i>written or printed document</i> )	
Copy of information on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format ( <i>including transcriptions</i> )	
E-mail of information ( <i>including soundtracks if possible</i> )	
Cloud share/file transfer	
Preferred language: ( <i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i> )	



Kindly note that your request has been:

Approved

Denied, for the following reasons:


**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of page/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requester (ii) Compact disc • If provided by requester • If provided to the requester	R40,00  R40,00 R60,00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24,00		
Copy of an audio record (i) Flash drive • To be provided by requester (i) Compact disc • If provided by requester • If provided to the requester	R40,00  R40,00 R60,00		
Postage, e-mail or any other electronic transfer	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

Yes

No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
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The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch Code: \_\_\_\_\_

Reference Nr: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
Information Officer