

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

DRAFT - Before publication, replace the formal physical/postal address placeholder.

Private body	Ruan de Witt trading as Phoenix Photography
Business type	Sole proprietor / individual trading as Phoenix Photography
Information Officer / Head	Ruan de Witt
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Contents

1. List of acronyms and abbreviations
2. Purpose of this PAIA Manual
3. Key contact details for access to information
4. Guide on how to use PAIA and obtain access to the Guide
5. Records available without a formal PAIA request
6. Records available in accordance with other legislation
7. Subjects on which Phoenix Photography holds records
8. Processing of personal information
9. Availability of the Manual
10. Updating of the Manual
- A. Practical procedure for requesting access to a record

1. List of acronyms and abbreviations

Abbreviation	Meaning
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of this PAIA Manual

This Manual is intended to help members of the public understand the records held by Phoenix Photography and the process for requesting access to records under PAIA.

- identify records that are already publicly available without a formal PAIA request;
- understand the subjects on which Phoenix Photography holds records and the categories of records held;
- find the Information Officer contact details needed to make an access request;
- understand the Information Regulator's PAIA Guide and where to obtain the current forms;
- understand how Phoenix Photography processes personal information, who may receive it, possible cross-border processing, and the general security measures used; and
- understand where this Manual is available and how it is kept up to date.

3. Key contact details for access to information

Phoenix Photography is operated by Ruan de Witt as a sole proprietor. For PAIA purposes, Ruan de Witt is the head of the private body and, for POPIA purposes, acts as the Information Officer. A Deputy Information Officer has also been designated and registered with the Information Regulator.

Information Officer / Head	Ruan de Witt
Private body	Ruan de Witt trading as Phoenix Photography
Deputy Information Officer	Designated and registered
PAIA / privacy email	privacy@phoenixphotography.co.za
General email	info@phoenixphotography.co.za
Telephone / WhatsApp	079 369 2037 / +27 79 369 2037
Website	https://phoenixphotography.co.za
Physical address	[FORMAL BUSINESS / CORRESPONDENCE ADDRESS TO BE INSERTED BEFORE PUBLICATION]
Postal address	[FORMAL BUSINESS / CORRESPONDENCE ADDRESS TO BE INSERTED BEFORE PUBLICATION]

Information Regulator registration reference: 2026-067193.

4. Guide on how to use PAIA and obtain access to the Guide

The Information Regulator has published the Guide contemplated in section 10 of PAIA. The Guide explains how PAIA and POPIA access rights work, the prescribed forms, applicable remedies and the assistance available from the Regulator.

Current Guide and PAIA forms: <https://infoeregulator.org.za/paia/>

Phoenix Photography intends to keep the Guide available for inspection in English and Afrikaans, and will direct requesters to the Regulator for other official-language versions and accessible formats.

5. Records available without a formal PAIA request

The following records are intentionally made public and may be accessed without a formal PAIA request:

Category	Examples	How to access
Website information	Service pages, published portfolio work, investment/pricing information where published, contact details.	phoenixphotography.co.za
Legal and privacy information	Privacy & POPIA Notice, Cookie Notice, Website Terms and PAIA information.	Website footer / legal pages
Public portfolio and marketing material	Photographs, stories and social-media material intentionally made public with the applicable permission.	Website and Phoenix Photography public social-media accounts

Private client records, private galleries, unpublished photographs, confidential correspondence and internal business records are not automatically available merely because Phoenix Photography holds them.

6. Records available in accordance with other legislation

Depending on the circumstances, Phoenix Photography may create or retain records in accordance with the following legislation, among others:

Legislation	Examples of relevant records
Promotion of Access to Information Act 2 of 2000	This PAIA Manual and records relating to PAIA requests.
Protection of Personal Information Act 4 of 2013	Privacy, data-protection and personal-information records.
Tax Administration Act 28 of 2011 and Income Tax Act 58 of 1962	Accounting, tax, invoices, receipts and supporting business records where applicable.
Consumer Protection Act 68 of 2008	Client agreements, service information and relevant consumer transaction records where applicable.
Electronic Communications and Transactions Act 25 of 2002	Electronic communications and website/electronic transaction records where applicable.
Copyright Act 98 of 1978	Records concerning copyright ownership, licensing, permissions and use of photographic works where applicable.

This is not intended to be an exhaustive list of every law that may apply to a particular record.

7. Subjects on which Phoenix Photography holds records

The records actually held by Phoenix Photography change over time and may include the following:

Subject	Categories / examples of records
Enquiries and clients	Enquiry messages, correspondence, shoot details, quotations, booking forms, contracts, schedules and delivery communications.
Photography and galleries	RAW files, edited photographs, exports, galleries, gallery access information, image metadata, working files and backups.
Finance and tax	Invoices, receipts, payment records, expense records, accounting information and tax-supporting records.
Portfolio and marketing	Published images, social-media content, client permissions relating to publication and marketing material.
Website and technical administration	Website source files, security and operational records, analytics information where consented to, hosting information and technical correspondence.
Service providers	Supplier correspondence, service arrangements, invoices, account information and contact details.
Legal and compliance	Privacy and POPIA records, PAIA records, policies, complaints and correspondence with regulators or professional advisers.

8. Processing of personal information

8.1 Purpose of processing personal information

- responding to enquiries and communicating with prospective clients;
- preparing quotations, booking forms and contracts;
- planning, photographing, editing and delivering photography services;
- managing client galleries and delivery arrangements;
- keeping financial, tax and business records;
- protecting client information, photographic files, accounts, devices and website systems;
- publishing portfolio or promotional material where the applicable client agreement or separate permission allows it;
- handling privacy, PAIA, complaint or legal requests; and
- measuring website use through optional analytics only where the visitor has allowed analytics.

8.2 Categories of data subjects and information processed

Data subjects	Personal information that may be processed
Prospective clients and clients	Name, email, telephone/WhatsApp details, event/session information, correspondence, contracts, invoices, payment-related records and photographs.
Guests and other people photographed	Photographs or video where applicable, image metadata and contextual event information.
Website visitors	Technical and analytics information where optional analytics is allowed, together with the browser-stored consent preference.
Service providers and business contacts	Names, contact details, account information, correspondence, invoices and service/contract records.
Requesters / complainants	Identity and contact details, request or complaint information, verification information and related correspondence.

8.3 Recipients or categories of recipients

Information / purpose	Recipients or categories of recipients
Website and business email infrastructure	Domains.co.za and other necessary hosting/technical providers.
Optional website analytics	Google Analytics, only where the visitor has actively allowed analytics.
Communications chosen by the person	WhatsApp / Meta or other communication platforms when the person chooses to use that channel.
Professional administration	Accountants, legal advisers, insurers or technical specialists where reasonably necessary.
Legal or regulatory disclosure	The Information Regulator, SARS, courts, law-enforcement or other authorities where disclosure is required or permitted by law.

8.4 Planned transborder flows of personal information

Some third-party technology services may route or process information outside South Africa. Google services used by the website may involve international processing when optional analytics is enabled. Phoenix Photography takes reasonable steps to use service providers and arrangements consistently with POPIA's cross-border requirements.

Phoenix Photography does not currently use permanent third-party cloud storage as the primary archive for client photographic files. If normal processing changes materially, this Manual and the Privacy & POPIA Notice will be updated.

8.5 General information-security measures

- restricted access to client information and photographic files;
- account passwords and available account-security controls;
- maintained operating systems, software and anti-malware protection;
- HTTPS and reasonable website security controls;
- controlled access to client galleries where galleries are used;

- backups where reasonably appropriate;
- limiting disclosure to people or providers who reasonably need the information; and
- reviewing safeguards when systems, services or risks change.

No system can be guaranteed completely secure. Security safeguards are reviewed in proportion to the sensitivity of the information and the risks reasonably identified.

9. Availability of the Manual

A copy of this Manual is intended to be available on the Phoenix Photography website, from the Information Officer upon request, and to the Information Regulator upon request.

A physical copy will be made available for inspection at Phoenix Photography's formal business/correspondence address once that address has been finalised for publication and compliance records.

- English version: available as a downloadable PDF from the Phoenix Photography website.
- Afrikaans version: available as a downloadable PDF from the Phoenix Photography website.
- Electronic requests: privacy@phoenixphotography.co.za.
- Any fee for reproduction of the Manual or requested records will be handled in accordance with the applicable PAIA regulations and prescribed fee schedule.

10. Updating of the Manual

The head of Phoenix Photography will review and update this Manual when there are material changes to the business, records held, service providers, personal-information processing, contact details or applicable legal requirements.

Issued by:

Ruan de Witt

Information Officer / Head of the private body

Issued: 19 September 2026

Signature: _____

Annexure A. Practical procedure for requesting access to a record

PAIA gives a requester a right of access to a record of a private body where the requirements of PAIA are met. Access is not automatic in every case, and statutory grounds for refusal may apply.

1. Obtain the current Form 2: Request for Access to Record from the Information Regulator's PAIA page.
2. Describe the requested record clearly enough for Phoenix Photography to identify and locate it.
3. Identify the right you seek to exercise or protect and explain why the record is required for that purpose.
4. Provide the identity, authority and contact details required by the prescribed form.
5. Send the completed request to privacy@phoenixphotography.co.za.
6. If the prescribed request or access fee applies, pay the amount after receiving the required notice.
7. Phoenix Photography will consider the request in accordance with PAIA, including the statutory grounds for refusal and severability of protected material.

Fees

Prescribed request, access, reproduction, search or preparation fees may apply where permitted by PAIA and the current regulations. Phoenix Photography will notify the requester where a prescribed fee is payable.

Decision period

A properly completed request will be considered within the period prescribed by PAIA, ordinarily 30 days, subject to any lawful extension permitted by the Act.

Complaints and remedies

If a private-body request is refused, or if no response is received within the applicable period, the requester may use the remedies available under PAIA, including a complaint to the Information Regulator and, where applicable, an application to court. There is no internal appeal procedure against the decision of the head of a private body.

Current PAIA Guide, Form 2 and complaint forms: <https://infoeregulator.org.za/paia/>

Information Regulator eServices Portal: <https://eservices.infoeregulator.org.za/>