PAIA Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000 (PAIA)

in respect of

Deneys Reitz Inc, trading as Deneys (Firm)

(Registration number 1984/003385821)

Updated: 18 June 2026

This document is the copyright of Deneys and may not be reproduced in any form or any other exclusive rights exercised without consent from Deneys. The document is for internal use and must not be used or distributed outside Deneys. It remains in force until amended or rescinded by a decision of Deneys.

1 Overview of Deneys

Deneys is a law firm registered in terms of the laws of the Republic of South Africa. Deneys provides the world's preeminent corporations and financial institutions with a full business law service.

2 Contact Details for Access to Information

Name of Private Body	Deneys
Physical address	15 Alice Lane, Sandton, 2196
Postal address	PO Box 784903, Sandton, 2146 **(NB: At the time of this update, the South African postal service is dysfunctional)**
Information Officer	Firm CEO
Deputy Information Officers	Hugh Bisset – Genera Counsel and Director of Firm Isla Swart – General Counsel and Director of Firm
Telephone number	+27 (0) 11 685 8500
Electronic Mail	rsaseniorcompliancegroup@deneys.co.za

3 Purpose of the PAIA Manual

This PAIA Manual is constructed to enable the public to:

3.1 check the categories of records held by the Firm which are available without a formal PAIA request;

3.2 have a sufficient understanding of how to make a request for access to a record for the Firm;

3.3 understand the description of the records of the Firm which are available in accordance with any other law;

3.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;

3.5 understand the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;

3.6 understand whether the Firm 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;

3.7 understand the description of the categories of data subjects and of the information or categories of information relating thereto;

3.8 understanding the recipients or categories of recipients to whom the personal information may be supplied;

3.9 understand whether the Firm has planned to transfer or process personal information outside the Republic of South Africa, the nature and categories of such information and the recipients or categories of recipients to whom the personal information may be transferred; and

3.10 understand whether the Firm has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4 Availability of the PAIA Manual

A copy of the PAIA Manual is available:

4.1 on the Firm's website;

4.2 at the Firm's head office for public inspection during normal business hours;

4.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

4.4 to the Information Regulator.

5 Guide on how to use PAIA and how to obtain access to the PAIA Guide

5.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available a revised guide on how to use PAIA (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 Members of the public can inspect or make copies of the PAIA Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.

5.3 The PAIA Guide can also be obtained from the website of the Information Regulator.

6 Right to access to records of private bodies (Section 50 of PAIA)

A requestor may be given access to any record of the Firm if:

6.1 the record is required for the exercise or protection of any rights;

6.2 the requestor complies with the procedural requirements of PAIA related to a request for access to the record (see paragraph 11: Request for access to records); and

6.3 access to the record is not refused in terms of any ground for refusal contemplated in Chapter 4 of Part 3 of PAIA.

7 Records available without a Request to Access in terms of PAIA

7.1 All information on the Firm's website www.deneys.co.za is freely available and it is therefore not necessary to apply for access thereto in terms of PAIA.

7.2 Further other non-confidential records, such as statutory records maintained at CIPC and the Master's Office, may be accessed without the need to submit a formal application.

8 Description of Records of the Firm which are available in accordance with any other Legislation (Section 51(1)(B)(Iii) of PAIA)

Where applicable, certain records held by the Firm are available in terms of difference pieces of legislation (other than PAIA). The specific records which are available in terms of such legislation are set out therein and these records may in certain instances only be accessed by the persons specified in the relevant legislation. This legislation includes without limitation the following statutes:

8.1 Administration of Estates Act, 1965

8.2 Arbitration Act, 1965

8.3 Basic Conditions of Employment Act, 1997

8.4 Broad Based Black Economic Empowerment Act, 2003

8.5 Close Corporations Act, 1984

8.6 Companies Act, 2008

8.7 Compensation for Occupational Injuries and Health Diseases Act, 1993

8.8 Constitution of South Africa Act, 1996

8.9 Criminal Procedure Act, 1977

8.10 Customs and Excise Act, 1964

8.11 Electronic Communications and Transactions Act, 2002

8.12 Employment Equity Act, 1998

8.13 Environment Conservation Act, 1989

8.14 Estate Agency Affairs Act, 1976

8.15 Explosives Act, 1956

8.16 Financial Markets Act, 2012

8.17 Hazardous Substances Act, 1973

8.18 Income Tax Act, 1962

8.19 Insolvency Act, 1936

8.20 Labour Relations Act, 1995

8.21 Mine Health and Safety Act, 1996

8.22 Minerals Act, 1991

8.23 Mineral and Petroleum Resources Development Act, 2002

8.24 Mineral and Petroleum Resources Royalty (Administration) Act, 2008

8.25 National Credit Act, 2005

8.26 National Dust Control Regulations, 2013 under the National Environmental Management: Air Quality Act, 2004

8.27 National Environmental Management Act, 1998

8.28 National Environmental Management: Waste Act, 2008

8.29 National Water Act, 1999

8.30 Occupational Diseases in Mines and Works Act, 1973

8.31 Occupational Health & Safety Act, 1993

8.32 Pension Funds Act, 1956

8.33 Prevention and Combatting of Corrupt Activities Act, 2004

8.34 Prevention of Organised Crime Act, 1998

8.35 Protected Disclosure Act, 2000

8.36 Promotion of Access of Information Act, 2000

8.37 Promotion of Equality and Prevention of Unfair Discrimination Act, 2000

8.38 Protection of Personal Information Act, 2013

8.39 Skills Development Act, 1998

8.40 Skills Development Levies Act, 1999

8.41 Stock Exchanges Control Act, 1985

8.42 Stock Exchanges Control Amendment Act, 1995 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)

8.43 Tax Administration Act, 2011

8.44 Trade Marks Act, 1993

8.45 Unemployment Insurance Contributions Act, 2002

8.46 Unemployment Insurance Act, 2001

8.47 Value Added Tax Act, 1991

9 Categories of records held by the Firm (Section 51(b)(iv) of PAIA)

9.1 The records held by the Firm, which are set out generically in the table below, which is not all inclusive are:

Category	Subject/Description
Corporate Documents	Memorandum of Association Director and shareholder records Records relating to the Firm's incorporation of Statutory records Minutes and resolutions
Accounting	Accounts, invoices, reconciliations, credit/debit notes, journals, ledgers, balance sheets, income statements, trial balances, payment schedules, cheque runs, cash flow statements, Tax records (the Firm and employees), Annual financial statements, bank statements, Purchase Orders/Invoices, Asset Register Insurance information.
Publications	Updates prepared by various departments within the firm and information booklets on areas of the law in which the firm specialises.
Marketing	Client proposals, copies of seminar papers, copies of various PowerPoint presentations for prospective clients, in-house training, seminars, copies of advertisements placed by the firm, copies of directory listings placed by the firm, copies of articles written by professional staff, content for the firm's website, invitation lists for seminars and other formal company functions, internal newsletter, business card details for professional staff and the marketing database.
Procurement	Order books, waybills, invoices, vendor records, statements, record cards of voice recorders and transcribers, procurement contracts.
Operational	Request for Proposals, Operational reviews Client records, Guidelines, policies and procedure, Contracts, internal and external correspondence, Records provided by a third party, Information technology, Strategic Plans, Marketing materials, Visitor Record, Contact Records

Category	Subject/Description
Administration	Minutes of meetings of various committees within the firm, general correspondence; lease agreements, copies and correspondence relating to various insurance policies, general correspondence, work papers, operating manuals of mechanical and electrical systems; architect drawings, salary work papers, copies of and correspondence with regard to office building leases, voicemail and security systems.
Human Resources	Contracts of employment, documents relating to remuneration structuring, job specifications, format/procedures for advertising positions, policy documents relating to General Conditions of Employment; performance evaluations; Employment Equity Plan and reports; Workplace Skills Plan and reports; personnel files, loan and bursary agreements, documents relating to disciplinary and grievance procedures; all employment applications, forms relating to new staff appointments, vacation employment applications and confidentiality undertakings.
Salaries and benefits	Remuneration schedules, various payroll reports, Workmen's Compensation documentation, Pension Fund documentation, Retirement Plan documentation, Group Life Scheme documentation, medical aid scheme documentation.
Library materials	Publications, precedents, opinions and other information held by the library.
IT	Computer software, support and maintenance agreements.

9.2 A requestor must comply with the procedural requirements prescribed in section 53 of PAIA and as set out in paragraph 15 of this PAIA Manual, in order to obtain access to records held by the Firm, and access to such records will be available only subject to confidentiality and where applicable, legal privilege. We further reserve the right to decline access in respect of documents which are in the public domain, thus publicly available from other sources.

10 Description of personal information processed in terms of POPIA to be maintained by the Firm (Section 51(1)(c) of PAIA read with Section 17 of POPIA)

The Firm has a comprehensive Privacy Policy in place, available publicly on the Firm's website www.deneys.co.za, which details the lawful processing of personal information by the Firm. The Firm's Privacy Policy details the purpose of processing of personal information, the categories of data subjects and information collected in respect of the data subject, planned trans-border flows of information, and a description of information security measures in place.

11 Form Of Request

11.1 The Firm has authorised and designated the Information Officer to deal with all matters relating to and our obligations under PAIA and POPIA.

11.2 A requestor must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.

11.3 A request for access to records held by the Firm in terms of section 50 of PAIA must be made on the form contained in the Regulations regarding the Promotion of Access to Information (PAIA Form 2 – available on the Regulator's website). The request must be made to the Firm at the physical or email address specified in paragraph 2 of this PAIA Manual.

11.4 A requestor must provide sufficient detail on the prescribed form to allow the Firm to identify the record or records which have been requested and the identity of the requestor. If a request is made on behalf of another person or entity, the requestor must submit details and proof of the capacity in which the requestor is making the request, which must be reasonably satisfactory to the Firm. The requestor is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa.

11.5 A requestor will receive a response to a request (PAIA Form 3: Outcome of request and of fees payable) – which will include details of fees payable.

(1) PAIA provides for two types of fees, namely:

(a) a request fee, which will be a standard non-refundable administration fee, payable prior to the request being considered; and

(b) 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 postal costs.

Subsequent to a request being made, the Information Officer, will request (via notice) that the requestor pay the prescribed request fee (if any) before processing of the request.

11.6 The Firm may withhold a record until the requestor has paid the fees as in indicated in PAIA Form 3.

11.7 A requestor will be obliged to pay the applicable access fee for reproduction, search, and preparation as well as 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 request form.

12 Grounds for refusal of access to records (Chapter 4 of PAIA read with Section 23(4)(a) of POPIA)

12.1 PAIA recognises that the right to any information may be limited to the extent that such limitations are reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom as contemplated in Section 36 of the Constitution; and therefore the Firm may refuse to grant a requestor access to records in certain circumstances.

12.2 Subject to Section 70 of PAIA, the Firm may refuse a request for access to records as contemplated by PAIA if the information contained in the record relates to:

(1) Protection of the privacy of a third party, including a deceased individual, if that third party is a natural person, which would involve the unreasonable disclosure of personal information of that natural person (Section 63(1) of PAIA);

(2) Protection of commercial information of a third party as defined by PAIA, if the record contains:

(a) trade secrets of that third party;

(b) financial, commercial scientific or technical information other than trade secrets of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party; and

(c) information disclosed in confidence to the Firm by a third party, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or would prejudice that third party in commercial competition (Section 64 of PAIA).

(3) Protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of an agreement (Section 65 of PAIA);

(4) Protection of safety of individuals and protection of property (Section 66 of PAIA);

(5) Protection of records which would be regarded as privileged in legal proceedings or subject to legal privilege in any other respect, unless the person so entitled to privilege waives the privilege (Section 67 of PAIA);

(6) Protection of commercial activities of the Firm, which includes:

(a) the Firm's trade secrets;

(b) financial, commercial scientific or technical information, disclosure of which could cause harm to the financial or commercial interests of the Firm;

(c) information, which if disclosed, could put the Firm at a disadvantage in negotiations or commercial competition; and

(d) a computer programme owned by the Firm, and which is protected by copyright (Section 68 of PAIA).

(7) The research information of the Firm or a third party on behalf of the Firm if the disclosure would expose the third party, the Firm, the researcher or the subject matter of the research to serious disadvantage (Section 69 of PAIA).

13 Applicable time-periods (Chapter 3 of Part 3 of PAIA)

13.1 The Firm will inform the requestor within 30 days after receipt of the request of its decision whether or not to grant the request, except if the provisions regarding third party intervention apply.

13.2 The 30-day period may be extended by a further period of not more than 30 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 Firm's activities or the records are not located at the Firm, or consultations amongst divisions and/or subsidiaries of the Firm or another private body are required.

14 The outcome of a request (granting or refusing) (Chapter 3 of Part 3 of PAIA)

14.1 Should the request be granted, the notice will state the access fee (if any) to be paid upon access, the form in which access will be given and further that the requestor may lodge a complaint to the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint to the Information Regulator or the court application.

14.2 If a request for access is granted, the requestor must be given access to the record concerned after the expiry of 30 days after notice is given to a third party to whom or which the record pertains, unless a complaint to the Information Regulator or a court application is lodged against the decision within that period.

14.3 Should the request be refused, the notice must state adequate reasons for the refusal, including the provisions of PAIA relied upon, and that the requestor may lodge a complaint to the Information Regulator or an application to a court against the refusal of the request, and the procedure (including the period) for lodging a complaint to the Information Regulator or the court application.

15 Remedies available in refusal of a request for information (Chapter 1A and 2 of Part 4 of PAIA)

15.1 A requestor that has been aggrieved by a decision of the Information Officer, may, after 180 days of the decision, submit a complaint, alleging that the decision was not in compliance with PAIA, to the Information Regulator in the prescribed manner and form for appropriate relief; and thereafter, apply to the court for appropriate relief.

15.2 Should a third party be dissatisfied with the Information Officer's decision to grant a request for information relating to that third party, it (the third party) may after 180 days of the decision, submit a complaint, alleging that the decision was not in compliance with PAIA, to the Information Regulator in the prescribed manner and form for appropriate relief, and thereafter, apply to a court for the appropriate relief.