

NAZUI INSTITUTE (PTY) LTD

PAIA MANUAL

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

Incorporating the personal-information processing provisions of the Protection of
Personal Information Act 4 of 2013

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Definitions and Acronyms

Term	Meaning
"the Institute"	Nazui Institute (Pty) Ltd, registration number 2026/449990/07, a private company incorporated in South Africa under the Companies Act 71 of 2008.
"PAIA"	The Promotion of Access to Information Act 2 of 2000 (as amended).
"POPIA"	The Protection of Personal Information Act 4 of 2013.
"the Regulations"	The Regulations relating to the Promotion of Access to Information, 2021 (Government Notice No. R.757 of 27 August 2021), as amended.
"Information Officer" / "IO"	The information officer of the Institute designated in terms of PAIA and POPIA, identified in section 2.1.
"the Regulator"	The Information Regulator established under section 39 of POPIA.
"the Guide"	The guide compiled by the Regulator in terms of section 10 of PAIA, described in section 3 of this Manual.
"personal information"	Personal information as defined in section 1 of POPIA.
"data subject"	A data subject as defined in section 1 of POPIA.
"record"	A record as defined in section 1 of PAIA, being any recorded information in the possession or under the control of the Institute, regardless of form or medium.
"requester"	Any person making a request for access to a record of the Institute in terms of PAIA, including a person acting on behalf of another.

In this Manual, words importing one gender include the others, and headings are for convenience only.

1. Purpose and Scope of this Manual

PAIA gives effect to the constitutional right of access to information held by the State and by private bodies, where that information is required for the exercise or protection of any rights. Section 51 of PAIA requires every private body to compile a manual describing the records it holds and the procedure for requesting access to them.

This Manual is the section 51 manual of Nazui Institute (Pty) Ltd. Its purposes are to:

- describe the Institute and provide the contact details of its Information Officer;
- explain how a person may obtain the Regulator's guide to using PAIA;
- describe the categories of records that are available without a formal PAIA request;
- describe the subjects and categories of records held by the Institute;
- list the legislation in terms of which the Institute is required to retain records;
- set out the information required by section 51(1)(c) of PAIA on the processing of personal information under POPIA;
- explain how to request access to a record, the prescribed fees, the grounds on which a request may be granted or refused, and the remedies available to a requester; and
- state how this Manual is made available and kept up to date.

This Manual applies to all records in the possession or under the control of the Institute. It is not itself a guarantee that any particular record will be disclosed: every request is considered on its own merits in terms of PAIA, as explained in sections 8 to 10.

Nazui Institute is an applied AI research, digital-transformation and advisory organisation. Its work also extends to responsible emerging-technology implementation, innovation and capability development.

The Institute was incorporated in 2026. Some record categories described in this Manual are included on a forward-looking, where-applicable basis, because a newly established organisation may not yet hold records in every category; the inclusion of a category is not a representation that records in that category currently exist.

2. Key Contact Details

2.1 Information Officer

The Information Officer of the Institute is:

Role	Details
Information Officer	Dr Mothepane Sebeela Tshabalala
Designation	Information Officer (PAIA and POPIA)
Email	privacy@nazuiinstitute.com
Telephone	087 265 1177 (international: +27 87 265 1177)

No Deputy Information Officer has been designated. All PAIA and POPIA enquiries may be directed to the Information Officer.

2.2 Requests for Access to Records

Requests for access to records, and other correspondence concerning this Manual, may be directed to the Information Officer using the details in section 2.1, or delivered to the Institute's administrative and records-access address:

Nazui Institute (Pty) Ltd
60 Totius Road, Amorosa
Roodepoort, 1724
South Africa

Physical access to records is available by prior written appointment only.

Item	Details
Postal address	Same as the administrative and records-access address above
General enquiries	info@nazuiinstitute.com
Website	https://nazuiinstitute.com

The address above is the Institute's administrative and records-access address only. It is not a public office or walk-in location, and no operating hours are published for it.

2.3 The Information Regulator

The Information Regulator oversees compliance with PAIA and POPIA. Its contact details are:

Item	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

3. Guide on How to Use PAIA

Section 10 of PAIA requires the Regulator to compile a guide containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA or POPIA. The Guide explains, in plain language, what PAIA is, how to request records from public and private bodies, the fees payable, and the remedies available when a request is refused.

The Guide is available from the Regulator free of charge, in each of the official languages, and may be obtained:

- from the Regulator's website (<https://infoeregulator.org.za>)
- by emailing ; or enquiries@infoeregulator.org.za
- by contacting the Regulator at the address or telephone number in section 2.3.

A copy of the Guide is also available for inspection at the Institute's administrative and records-access address, by prior written appointment, at no charge. In terms of regulation 3(3) of the Regulations, the Institute keeps copies of the Guide for inspection in at least two official languages, namely English and Sesotho.

4. Categories of Records Available Without a Request

Certain information about the Institute is made available to the public without the need for a PAIA request:

- institutional information published on the Institute's website (<https://nazuiinstitute.com>), including its research agenda, contact routes and this Manual;
- the Institute's Privacy Notice, published on the website; and
- research outputs and publications that the Institute chooses to release publicly from time to time.

No notice has been published by the Minister under section 52(2) of PAIA prescribing categories of records of the Institute that are automatically available, and the Institute has not published a voluntary disclosure notice under section 52(1). If such a notice is published in future, this section will be updated.

5. Subjects and Categories of Records Held

The Institute holds, or may in the ordinary course of its establishment and operations come to hold, records in the following subjects and categories. As noted in section 1, the listing of a category is not a representation that records in that category currently exist; several categories apply only where the underlying activity takes place. Access to any record remains subject to PAIA, POPIA, confidentiality obligations and intellectual-property rights, and may be refused on the grounds described in section 10.

Subject	Categories of records
Statutory and governance	Incorporation and CIPC registration records; statutory registers; director and governance records; minutes and resolutions of governance bodies.
Financial and accounting	Accounting records, bank records, budgets, financial statements and audit or review documentation, where applicable.
Tax	Tax registrations, returns and correspondence with the South African

Subject	Categories of records
	Revenue Service, where applicable.
Personnel and contractors	Records relating to employees, workers and independent contractors, where applicable, including contracts and statutory payroll records.
Research administration, ethics and outputs	Research proposals, project administration records, ethics considerations and approvals where applicable, working papers, datasets and published or unpublished research outputs.
Advisory and engagement	Records of advisory, consulting or engagement activities, including scoping documents and deliverables, where and when such activities take place.
Contracts and commercial correspondence	Agreements with suppliers, service providers and counterparties; commercial correspondence.
Intellectual property and innovation development	Records relating to the Institute's intellectual property, including copyright in research outputs and records concerning platforms or tools in development, subject to confidentiality and the grounds of refusal in section 10.
Website, enquiries and communications	Website content records, enquiry correspondence and communication records, including records generated through the website contact form.
Information security and technology administration	System administration, hosting and security-management records. Detailed security controls are not described in this Manual and are protected on the grounds in section 10.
Privacy and PAIA compliance	This Manual and its revisions, PAIA request records, POPIA compliance documentation and correspondence with the Regulator.

6. Records Available in Terms of Other Legislation

The Institute retains records, where applicable to its circumstances, in terms of legislation including the following. The list is not exhaustive, and the inclusion of a statute does not mean that every requirement of that statute currently applies to the Institute.

Legislation	Typical records
Companies Act 71 of 2008	Incorporation documents, statutory registers, governance records, accounting records.
Promotion of Access to Information Act 2 of 2000	This Manual, request and decision records.
Protection of Personal Information Act 4 of 2013	Processing documentation, consent and objection records,

Legislation	Typical records
	compliance records.
Electronic Communications and Transactions Act 25 of 2002	Records relating to electronic communications and transactions.
Copyright Act 98 of 1978	Records evidencing ownership and licensing of copyright works.
Income Tax Act 58 of 1962 and Value-Added Tax Act 89 of 1991	Tax returns, assessments and supporting records, where applicable.
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993	Employment, payroll, equity, skills and compensation records, where applicable.

Tax and employment records are retained where applicable; registration numbers for tax or employer purposes are not published in this Manual.

7. Processing of Personal Information in Terms of POPIA

Section 51(1)(c) of PAIA requires this Manual to describe how the Institute processes personal information. The Institute processes personal information lawfully and in accordance with the conditions for lawful processing in Chapter 3 of POPIA. Further detail is given in the Institute's Privacy Notice on its website.

7.1 Purpose of Processing

The Institute processes personal information for the following purposes:

- responding to enquiries and correspondence, including enquiries received through the website contact form;
- establishing, administering and performing research collaboration, advisory and other engagements;
- administering relationships with contractors, service providers and, where applicable, employees;
- administering requests made under PAIA and POPIA, and complying with other legal obligations;
- operating, maintaining and securing the Institute's website and information systems; and
- governance, record-keeping and statutory compliance.

7.2 Categories of Data Subjects and Personal Information

Categories of data subjects	Typical categories of personal information
Persons who correspond with the Institute, including website enquirers	Names, contact details, organisation or affiliation where supplied, and the content of the correspondence.
Research collaborators and prospective collaborators or counterparties	Names, roles, contact details, institutional affiliations and engagement-related records.
Contractors and service providers, where applicable	Names, contact details, contractual and payment administration details.
Employees and applicants, where applicable	Information required for recruitment and employment administration, where and when employment relationships exist.
Visitors to the website	Technical information generated by the visit, such as server-log data, as described in the Privacy Notice.

The Institute does not set out to process special personal information or the personal information of children. If such information is received in correspondence, it is handled in accordance with POPIA and is not used for any other purpose.

7.3 Recipients of Personal Information

Personal information may be made available to the following categories of recipients, only to the extent necessary for the purposes in section 7.1:

- professional advisers (such as legal or accounting advisers), where applicable;
- information-technology and hosting service providers that support the Institute's website and systems, subject to confidentiality and security obligations; and
- regulatory authorities, courts or other bodies where disclosure is required or permitted by law.

7.4 Transborder Flows of Personal Information

The Institute does not itself routinely transfer personal information to recipients outside South Africa. Its website and email services are operated through third-party service providers, and the Institute does not represent that those providers' infrastructure is located exclusively in South Africa. Where personal information is processed or stored across borders as a result, the Institute does so only in accordance with section 72 of POPIA, which requires adequate protection, consent, contractual necessity or another lawful basis.

7.5 Security Safeguards

The Institute maintains appropriate, generally accepted technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control, as required by section 19 of POPIA. Access to personal information is limited to persons who require it for the

purposes described in this Manual. Safeguards are reviewed as the Institute's operations develop. In the interest of security, this Manual does not describe specific security controls; records disclosing them are protected as described in section 10.

7.6 Data-Subject Rights

A data subject may, in the manner provided by POPIA and its regulations:

- request confirmation of whether the Institute holds personal information about them, and request access to it (using the PAIA request procedure in section 8);
- request the correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, using the relevant form prescribed under the POPIA regulations;
- object, on reasonable grounds, to the processing of their personal information, using the relevant form prescribed under the POPIA regulations; and
- complain to the Information Regulator (section 11).

8. Request Procedure and Decision

A request for access to a record of the Institute must be made as follows.

1. Complete a request form that corresponds substantially with Form 2 of Annexure A to the Regulations (Request for Access to Record, regulation 7). Form 2 is available from the Regulator's website and from the Information Officer on request.
2. Address the request to the Information Officer and submit it by email to privacy@nazuiinstitute.com, or deliver or post it to the administrative and records-access address in section 2.2. Please mark the submission clearly as a PAIA request.
3. Provide sufficient particulars to enable the Information Officer to identify the record requested and the requester, including proof of identity where required, and state the form of access required and the postal or email address to which the response should be sent.
4. If the request is made on behalf of another person, submit proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.
5. Describe the right that the requester seeks to exercise or protect and explain why the record is required for that purpose, as required by section 53 of PAIA.
6. Pay the prescribed request fee where applicable (section 9). The request is not processed further until the fee, if payable, has been paid.

The Information Officer will provide reasonable assistance, free of charge, to a requester who cannot complete the form, and will notify a requester whose request does not comply with the formalities, so that the request can be corrected.

The Information Officer must decide the request as soon as reasonably possible and within 30 days of

receipt, and will notify the requester of the decision in a form corresponding substantially with Form 3 of Annexure A to the Regulations. This period may be extended once by up to a further 30 days on the grounds permitted by PAIA, in which case the requester will be notified with reasons. If the request is granted, the access fees in section 9 must be paid before the record is released. If the record cannot be found or does not exist, the requester will be notified by way of affidavit or affirmation as required by PAIA. Where a record of a third party is affected, the Institute will follow the third-party notification procedures required by PAIA before deciding.

A request that does not comply with these requirements will be returned to the requester with an indication of what is required to correct it.

9. Prescribed Fees

The fees that may be charged in respect of requests to private bodies are prescribed by section 54 of PAIA read with the Regulations, and are set out in Annexure B to the Regulations (Government Notice No. R.757 of 27 August 2021). The fees in force at the compilation date of this Manual are:

Item	Amount
Request fee, payable by every requester other than a personal requester (a person seeking access to a record containing their own personal information)	R140.00
Photocopy or printed copy of an A4-size page or part thereof	R2.00 per page
Copy in computer-readable form: flash drive provided by the requester	R40.00
Copy in computer-readable form: compact disc provided by the requester	R40.00
Copy in computer-readable form: compact disc provided by the Institute	R60.00
Transcription of an audio record, per A4-size page or part thereof	R24.00
Transcription or copy of visual images	Outsourced; quoted per service provider
Search for and preparation of the record for disclosure, for each hour or part of an hour reasonably required, excluding the first hour	R145.00 per hour
Maximum total search and preparation fee per request	R435.00
Deposit, where search and preparation is expected to exceed six hours	One third of the applicable access fee
Postage, email or other electronic transfer	Actual expense, if any

Fees are assessed under the prescribed schedule in force at the time of the request; the Information Officer will confirm the applicable fees when a request is received, and payment instructions will be supplied privately to the requester when a fee or deposit becomes payable. The Institute may not charge fees other than those prescribed. Where a deposit has been paid and the request is refused, the deposit

is refundable. Where access is granted, the record will be withheld until the applicable fees have been paid in full.

10. Grounds for Granting or Refusing Access

Access to a record is not automatic. A request will be granted only where it complies with PAIA, the requester has demonstrated that the record is required for the exercise or protection of a right, and no ground of refusal applies. Chapter 4 of Part 3 of PAIA (sections 62 to 70) requires or permits a private body to refuse access in defined circumstances, including where disclosure would involve:

- the unreasonable disclosure of personal information about a third party, including a deceased person (section 63);
- the disclosure of certain commercial information of a third party, including trade secrets and information that could prejudice the third party's commercial or financial interests (section 64);
- the disclosure of information supplied in confidence, where disclosure could reasonably be expected to prejudice the future supply of such information or put the Institute in breach of a duty of confidence (section 65);
- a risk to the safety of individuals or the protection of property (section 66);
- the disclosure of records privileged from production in legal proceedings (section 67);
- the disclosure of certain commercial information of the Institute itself, including trade secrets and information whose disclosure could reasonably be expected to prejudice its commercial or financial interests or put it at a disadvantage in contractual or other negotiations (section 68); or
- the disclosure of certain research information of a third party or of the Institute, where disclosure would be likely to expose the third party, the Institute or the researcher, or the subject matter of the research, to serious disadvantage (section 69).

Access may also be refused where the record does not exist or cannot be found, where the request does not comply with PAIA's procedural requirements, or where disclosure is prohibited by other legislation. POPIA, confidentiality undertakings and the Institute's intellectual-property rights may also require or justify refusal in a given case. Certain grounds of refusal are overridden where disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public-safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70).

Where a record contains both information that may be disclosed and information that may not, the Institute will, where the record can reasonably be severed, grant access to the parts that may lawfully be disclosed. Where a request is refused in whole or in part, the notice of refusal will state adequate reasons and inform the requester of the remedies in section 11.

11. Remedies and Complaints

The Institute does not maintain an internal appeal procedure. A requester who is dissatisfied with a

decision of the Information Officer — including a refusal, a decision on fees, or a decision to extend the response period — or who has received no decision within the required period (which is deemed a refusal) may:

- lodge a complaint with the Information Regulator in terms of section 77A of PAIA, using the complaint channels in section 2.3; and/or
- apply to a court with jurisdiction for appropriate relief in terms of section 78 of PAIA, within the periods prescribed by PAIA.

The Regulator's complaint form and guidance are available from the Regulator at the contact points in section 2.3.

12. Availability, Languages and Updating of this Manual

This Manual:

- is published on the Institute's website (<https://nazuiinstitute.com>);
- is retained for inspection at the Institute's administrative and records-access address, by prior written appointment, at no charge for inspection; and
- may be uploaded through the Information Regulator's eServices facility; where the Manual is uploaded, proof of the upload will be retained by the Institute.

This Manual is compiled in English. Section 51 of PAIA does not prescribe the number of official-language versions for a private body's manual. Copies of the Regulator's Guide are nevertheless kept for inspection in English and Sesotho, as noted in section 3. A requester who requires assistance in another official language is invited to contact the Information Officer, who will provide reasonable assistance.

The Information Officer will review this Manual periodically, and in any event when material changes occur in the Institute's structure, activities, contact details or the applicable law, and will update it as necessary. The current version is identified on the cover and in the table below.

Version	Date	Description	Status
1.0	20 August 2026	Initial approved issue	Approved

13. Approval and Issue

This Manual was approved by the head of the private body and takes effect from the approval date below.

Approval	Details
Approved by	Dr Mothepane Sebeela Tshabalala
Capacity	Head of the Private Body and Information Officer

Approval	Details
Approval date	20 August 2026