



PAIA MANUAL

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

**DATE OF COMPILATION: 17/06/2025
DATE OF REVISION: 17/06/2025**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“CIO”	Chief Information Officer
1.3	“IO”	Information Officer
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 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
- 2.10 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. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PHYTO ANDRO PTY LTD

3.1. Chief Information Officer

Name:	Hakam Ali Ibrahim Herzallah (CEO)
Tel:	+27 21 930 1915
Email:	hakim@phytoandro.co.za
Fax number:	not applicable

- 3.2. Information Officer *(NB: if more than one information officer is designated, please provide the details of every information officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Hakam Ali Ibrahim Herzallah (CEO)
Tel: +27 21 930 1915
Email: hakim@phytoandro.co.za
Fax number: not applicable

3.3 Access to information general contacts

Email: *accounts@phytoandro.co.za*

3.4 National or Head Office

Postal Address: 10 John Vorster Avenue, Platteklouf 1, Cape Town, 7500
Physical Address: 10 John Vorster Avenue, Platteklouf 1, Cape Town, 7500
Telephone: +27 21 930 1915
Email: accounts@phytoandro.co.za
Website: www.phytoandro.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The 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.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

- 4.3.2.2. every Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as Responsible Pharmacists as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as Responsible Pharmacists as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

decision by the Regulator or a decision of the head of a private body;

- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. 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 Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;

⁵ Section 14(1) of PAIA- The Responsible Pharmacist of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The Responsible Pharmacist of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The Responsible Pharmacist of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-
(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the Responsible Pharmacist of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF PHYTO ANDRO PTY LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.

Category of records	Types of the Record	Available on Website	Available upon request
Non-confidential or publicly available records	Contact information	X	
	CIPC registration information		X
	SARS VAT registration number		X
	Banking details		X
	Proof of address		X

6. DESCRIPTION OF THE RECORDS OF PHYTO ANDRO PTY LTD WHICH ARE AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT [SECTION 51(1)(C)]

Record Type	Description
Companies Act Records	▪ Trust deeds ▪ Documents of Incorporation ▪ Index of names of Directors ▪ Memorandum of Incorporation

	▪ Minutes of meetings of the Board of Directors ▪ Minutes of meetings of Shareholders ▪ Proxy forms ▪ Register of debenture-holders ▪ Register of directors' shareholdings; Share certificates ▪ Share Register and other statutory registers and/or records and/or documents ▪ Special resolutions/Resolutions passed at General and Class meetings ▪ Records relating to the appointment of Auditors, Directors, Prescribed Officers, Public Officers and Secretary.
Financial Records	▪ Accounting Records ▪ Annual Financial Reports ▪ Annual Financial Statements Asset Registers ▪ Bank Statements ▪ Banking details ▪ Banking Records ▪ Debtors / Creditors statements and invoices ▪ General ledgers and subsidiary ledgers ▪ General reconciliation ▪ Invoices ▪ Paid Cheques ▪ Policies and procedures ▪ Rental Agreements ▪ Tax Returns
Income Tax Records	▪ PAYE Records ▪ Documents issued to employees for income tax purposes ▪ Records of payments made to SARS on behalf of employees

	▪ Statutory compliances including: ○ VAT ○ Regional Services Levies ○ Skills Development Levies ○ UIF ○ Workmen's Compensation
Personal documents and records	▪ Accident books and records ▪ Address Lists ▪ Contact lists ▪ Disciplinary Records ▪ Employee benefits arrangements rules and records ▪ Employment Contracts ▪ Employment Equity Plan Forms and Applications ▪ Grievance Procedures ▪ Leave Records ▪ Medical Aid Records ▪ Payroll reports/ Wage register ▪ Pension Fund Records ▪ Safety, Health and Environmental records ▪ Salary Records ▪ SETA records ▪ Standard letters and notices ▪ Training Manuals ▪ Training Records ▪ Workplace and Union agreements and records
Procurement Department	▪ Standard Terms and Conditions for the supply of services and products ▪ Contractor agreements ▪ Supplier agreements ▪ Client agreements ▪ List of suppliers ▪ List of clients
Sales Department	▪ Customer details

	▪ Credit application information ▪ Information and records provided by a third party ▪ Sales policies
Marketing Department	▪ Advertising material ▪ Promotional material ▪ Marketing Policies
Risk Management and Audit	▪ Audit reports ▪ Risk management frameworks ▪ Risk management plans
Safety, Health and Environment	▪ Safety, Health and Environment Risk Assessment ▪ Environmental Management Plans ▪ Inquiries records ▪ Inspections records ▪ Authority examination records
IT Department	▪ Hardware asset registers ▪ Information security standards and procedures ▪ Information technology systems and user manuals ▪ Project implementation plans ▪ Software licensing ▪ System documentation and manuals
Corporate Social Responsibility (CSR)	▪ CSR schedule of projects ▪ Record of organisations that receive funding Reports ▪ Books, publications and general information related to CSR spend ▪ Records and contracts of agreement with funded organisations
Memorandum of incorporation	▪ Companies Act 71 of 2008
PAIA Manual	▪ Promotion of Access to Information Act 2 of 2000

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PHYTO ANDRO PTY LTD

Subjects on which the body holds records	Categories of records
Corporate Governance	▪ Company registration documents ▪ MOI and resolutions ▪ Board meeting minutes
Financial Management	▪ Financial statements ▪ Budgets and forecasts ▪ Tax returns ▪ Invoices
Human Resources	▪ Employment contracts ▪ Leave and payroll records ▪ EE and skills reports
Product Development	▪ Product formulations ▪ Safety data sheets (SDS) ▪ R&D documentation
Sales and Marketing	▪ Sales reports ▪ Marketing plans ▪ Customer engagement data ▪ Advertisements
Operations and Logistics	▪ Supplier contracts ▪ Inventory logs ▪ Distribution and logistics records
Compliance & Regulatory	▪ SAPHRA/product registration certificates ▪ Import/export documents ▪ Audit reports
Legal and Contracts	▪ Service agreements ▪ Licensing contracts ▪ IP records ▪ Legal correspondence
IT and Data Management	▪ IT policies ▪ Data backup logs ▪ Systems access records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

All personal information is processed lawfully and transparently, and only for the purposes for which it was collected or reasonably related purposes, in accordance with POPIA.

Category or Personal Information	Purpose
Customer Management	▪ To fulfil orders, provide support, and maintain customer records ▪ To communicate product updates, promotions, or recalls (with consent)
Employee Administration	▪ For employment contracts, payroll, tax compliance, and employee benefits ▪ For performance management, training, and regulatory reporting
Supplier and Service Provider Management	▪ To manage procurement, contracts, and payment processes ▪ To ensure compliance with regulatory and tax obligations
Product Development	▪ Product formulations ▪ Safety data sheets (SDS) ▪ R&D documentation
Marketing and Communication	▪ To conduct direct marketing via email, SMS, or social media (in line with consent and opt-out provisions) ▪ To manage loyalty programmes or promotions
Regulatory Compliance	▪ To comply with legal obligations such as SAPHRA, SARS, and industry-specific regulations
Product Safety and Quality Control	▪ To trace and notify individuals in the event of safety issues or recalls ▪ To collect feedback or complaints for quality assurance

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Types / Categories of Personal Information Processed
Customers / Clients	▪ Full name, ID/passport number ▪ Contact details (email, phone, address) ▪ Purchase history ▪ Payment and billing information ▪ Consent preferences (e.g. marketing)
Service Providers Suppliers Contractors	▪ Company details ▪ Contact persons' names and contact details ▪ Tax and banking details ▪ B-BBEE certificates and compliance records
Employees	▪ Full name, ID number, contact details ▪ Employment contracts and records ▪ Payroll and tax information ▪ Bank account details ▪ Performance and disciplinary records ▪ Medical and next-of-kin details
Job Applicants	▪ CVs and qualifications

Categories of Data Subjects	Types / Categories of Personal Information Processed
	▪ ID and contact details ▪ Employment history ▪ References and criminal background checks
Website Users Online Visitors	▪ IP address and device identifiers ▪ Contact form submissions ▪ Cookie data and user analytics (in compliance with privacy notices)
Regulators / Compliance Contacts	▪ Names and contact details of officials ▪ Correspondence and compliance documents

8.3 The recipients or categories of recipients to whom the personal information may be supplied

NB: Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of Personal Information	Recipient / Category of Recipients	Purpose of Dissemination
Customer contact and transaction details	Payment processors and banks	To process payments and refunds
Employee personal and payroll information	SARS Department of Labour Medical Aid and Pension Providers	Statutory compliance and employee benefit administration
Contact details of customers or clients	Marketing service providers (with consent)	To send newsletters, promotions, or product information

Category of Personal Information	Recipient / Category of Recipients	Purpose of Dissemination
Supplier and contractor information	Internal departments (procurement, finance)	To manage contracts and process payments
Regulatory compliance records	Government regulators (e.g., SAPHRA, SARS)	To meet legal and regulatory obligations
Job applicant information	Background screening services (with applicant consent)	To verify qualifications and work history
Website analytics and user behaviour data	IT service providers / Web analytics platforms	To monitor website performance and improve user experience
CCTV footage or security access logs	Security service providers / Law enforcement (if legally required)	For crime prevention, investigations, and access control

8.4 Planned transborder flows of personal information

Phyto Andro (Pty) Ltd does not transfer personal information outside the borders of the Republic of South Africa, either through direct sharing or by using cloud-based storage or processing solutions hosted in foreign jurisdictions. All personal information is stored, processed, and managed within South Africa, in compliance with the Protection of Personal Information Act (POPIA). Should transborder processing become necessary in the future (e.g. through international service providers or cloud storage), Phyto Andro (Pty) Ltd will ensure full POPIA compliance, including safeguards, data subject notification, and lawful processing conditions.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Phyto Andro (Pty) Ltd has implemented appropriate technical, physical, and organisational measures to protect personal information, including:

- Data encryption and access control
- Anti-virus, anti-malware, and firewall protection

- Password policies and two-factor authentication
- Secure physical storage and restricted access to premises
- Employee confidentiality agreements and privacy training
- Regular data backups, system updates, and risk assessments

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available -

9.1.1 on www.phytoandro.co.za, if any;

9.1.2 head office of the Phyto Andro Pty Ltd for public inspection during normal business hours;

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

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of **Phyto Andro Pty Ltd** will on a regular basis update this manual.

Issued by

Hakam Ali Ibrahim Herzallah
Chief Executive Officer