

The Compliance Studio

Intentionally Curated Compliance

Unit 15 Silveroaks
77 Hawthorne Avenue
Sunridge Park
Gqeberha
6045

+27 84 549 0162

+27 74 423 6060

PAIA Manual – The Compliance Studio (TCS)

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Last Updated: 5 May 2026

1. Introduction

- 1.1. The Compliance Studio (“TCS”) is a private body as defined in the Promotion of Access to Information Act, 2000 (“PAIA”).
- 1.2. This Manual is prepared in accordance with PAIA and addresses the requirements of the Protection of Personal Information Act 4 of 2013 (“POPIA”), promoting transparency and accountability in how we process personal information and respond to access requests.

2. Contact Details of the Private Body

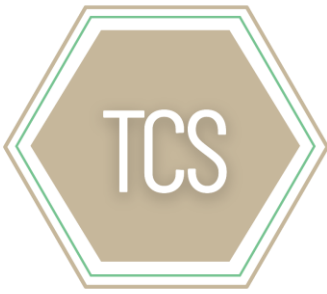
- 2.1. Name of Private Body: The Compliance Studio (TCS)
- 2.2. Information Officer:
 - 2.2.1. Name: Christi Marinus
 - 2.2.2. Email: christi@compliance-studio.co.za
 - 2.2.3. Contact Number: +27 84 549 0162
- 2.3. General Contact Details:
 - 2.3.1. Email: andrea@compliance-studio.co.za
- 2.4. Website: www.compliance-studio.co.za.

3. Guide in Terms of Section 10 of PAIA

- 3.1. A guide on how to use PAIA to access information is available from the Information Regulator.
- 3.2. The guide can be accessed on their website: <https://www.justice.gov.za/inforeg/>

4. Records Automatically Available

- 4.1. The following records may be made available without a formal request, subject to applicable terms:
 - 4.1.1. Information available on our website
 - 4.1.2. Marketing and service information



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4.1.3. Publicly available regulatory disclosures

5. Records Held by TCS

5.1. Personnel Records

5.1.1. Employment contracts

5.1.2. HR policies and procedures

5.2. Client-Related Records

5.2.1. Client agreements

5.2.2. Correspondence

5.2.3. Compliance and advisory records

5.3. Financial Records

5.3.1. Invoices

5.3.2. Accounting records

5.4. Operational Records

5.4.1. Internal policies and procedures

5.4.2. Risk management documentation

5.5. Website and Technical Records

5.5.1. Website usage data (via Google Analytics)

5.5.2. Contact form submissions

6. Processing of Personal Information (POPIA Compliance)

6.1. Purpose of Processing

6.1.1. TCS processes personal information to:

6.1.1.1. Provide compliance and advisory services

6.1.1.2. Communicate with clients and stakeholders

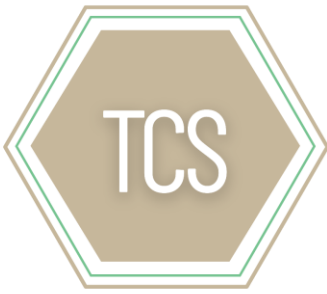
6.1.1.3. Maintain internal records

6.1.1.4. Improve website functionality

6.2. Categories of Data Subjects and Information

6.2.1. *Data Subjects:*

6.2.1.1. Clients



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6.2.1.2. Prospective clients

6.2.1.3. Employees

6.2.1.4. Service providers

6.2.2. *Personal Information:*

6.2.2.1. Contact details

6.2.2.2. Identification information

6.2.2.3. Correspondence

6.2.2.4. Any information voluntarily provided

6.3. Recipients of Personal Information

6.3.1. Personal information may be shared with:

6.3.1.1. Cloud service providers, including Microsoft Corporation (Microsoft 365 / OneDrive)

6.3.1.2. Analytics providers such as Google Analytics

6.3.1.3. Regulatory authorities where required

6.3.1.4. External service providers (operators) where authorised

6.3.2. All operators are contractually required to implement appropriate safeguards.

6.4. Cross-Border Transfers

6.4.1. Personal information may be transferred outside South Africa where service providers are located internationally.

6.4.2. TCS ensures that such transfers comply with POPIA requirements and that adequate safeguards are in place.

6.5. Security Measures

6.5.1. TCS implements appropriate, reasonable technical and organisational measures, including:

6.5.1.1. Secure cloud storage (Microsoft 365 / OneDrive)

6.5.1.2. Access controls

6.5.1.3. System monitoring

7. Request Procedure

2018/458197/07
Managing Director – C. Marinus



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7.1. To request access to records, a requester must:

- 7.1.1. Complete the prescribed PAIA request form
- 7.1.2. Submit the request to the Information Officer
- 7.1.3. Pay the prescribed request fee (if applicable)

7.2. Requests must provide sufficient detail to enable TCS to identify:

- 7.2.1. The record requested
- 7.2.2. The requester's identity
- 7.2.3. The form of access required

8. Grounds for Refusal of Access

8.1. Access to records may be refused on grounds including:

- 8.1.1. Protection of personal information of third parties
- 8.1.2. Confidential commercial information
- 8.1.3. Legal privilege
- 8.1.4. Safety and security considerations

9. Remedies Available to Requesters

9.1. If a request is refused, the requester may:

- 9.1.1. Lodge a complaint with the Information Regulator
- 9.1.2. Apply to a court for appropriate relief

10. Data Breach Notification

10.1. TCS takes data security seriously and implements appropriate, reasonable technical and organisational measures to protect personal information.

10.2. In the event of a security compromise involving personal information, TCS will act in accordance with section 22 of the Protection of Personal Information Act 4 of 2013 ("POPIA").

10.3. Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, TCS will:

- 10.3.1. Notify the Information Regulator as soon as reasonably possible

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10.3.2. Notify affected data subjects as soon as reasonably possible, unless otherwise directed by the Information Regulator or where notification would impede a criminal investigation

10.4. Such notification will include, where possible:

10.4.1. A description of the possible consequences of the breach

10.4.2. The measures taken or proposed to address the breach

10.4.3. Recommendations for data subjects to mitigate potential adverse effects

10.4.4. The contact details of the Information Officer

10.5. TCS will take immediate steps to:

10.5.1. Identify and contain the breach

10.5.2. Assess the risks associated with the breach

10.5.3. Prevent any recurrence

11. Availability of the Manual

11.1. This PAIA Manual is available:

11.1.1. On our website

11.1.2. Upon request from the Information Officer