
PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Last Updated - 21 July 2025

1. Introduction

- 1.1. This manual is published in compliance with section 51 of the Promotion of Access to Information Act (**PAIA**). It is intended to assist individuals in requesting access to records held by Di Palma Attorneys Inc ("the Firm") and to provide an overview of the types of records in our possession, the grounds on which access may be granted or refused, and the process to be followed in lodging a request.
- 1.2. This manual also takes into account relevant provisions of the Protection of Personal Information Act 4 of 2013 (**POPIA**).

2. Contact Details of Firm

Detail	Information
Name of Firm	Di Palma Attorneys Inc.
Information Officer	Fausto Di Palma
Physical Address	51 Troupant Avenue, Magaliessig, Johannesburg
Email Address	enquiries@dipalmas.co.za
Website	www.dipalmas.co.za

3. Purpose of this Manual

This manual serves to:

- 3.1. Outline the categories of records held by the Firm.
- 3.2. Provide guidance on how to request access to some of the records.
- 3.3. Identify the applicable legislative frameworks.
- 3.4. Explain the grounds on which access may be refused by the Firm.
- 3.5. Describe the nature and purpose of personal information processed by the Firm.
- 3.6. Generally, promote transparency, accountability, and compliance with the law.

4. Guide on How to Use PAIA

4.1. A guide on how to exercise rights under PAIA is available from the Information Regulator (South Africa):

Website: <https://inforegulator.org.za/>; and

Email: PAIAComplaints@inforegulator.org.za / POPIAComplaints@inforegulator.org.za

4.2. The guide explains:

4.2.1. How to access records;

4.2.2. The rights of data subjects;

4.2.3. The remedies available when access is denied; and

4.2.4. How to object to or request correction of personal information.

5. Records Held by Di Palma Attorneys Inc.

5.1. Some records are available without the need to lodge a PAIA request (e.g. website material).

5.2. Other records may only be accessed in accordance with formal PAIA procedures, or may not be accessible at all, depending on the circumstances and the nature of the information that you might be requesting.

5.3. Records which are automatically available without a request for them:

5.3.1. Firm profile and contact details on our website;

5.3.2. General marketing material; and

5.3.3. Privacy Policy.

5.4. Records that are held subject to a formal request:

Category	Description
Statutory Records	Company incorporation documents and director appointments
Financial Records	Invoices, budgets, tax filings, asset registers
Employment Records	Employment contracts, payroll, leave, performance files
Client Files	Mandates, correspondence, opinions, pleadings and notices

Compliance Records	FICA records, Ricks Management Compliance Programme, risk assessments, internal policies
IT and Operations	Equipment registers, software licences, internal systems, domain registrations, website code
Contracts	Service provider contracts, non-disclosure agreements, client agreements, and other transactional documentation

6. Processing of Personal Information

Di Palma Attorneys Inc. processes personal information in accordance with POPIA. The Firm is committed to protecting data subjects' privacy and only processes personal information where there is a lawful basis to do so.

6.1. The purpose for which the Firm will process personal information includes:

- 6.1.1. To provide legal services;
- 6.1.2. For billing, invoicing, and debt recovery;
- 6.1.3. For recruitment and human resource administration;
- 6.1.4. FICA and regulatory compliance;
- 6.1.5. Client relationship management; and
- 6.1.6. Ensuring data and facility security.

6.2. The data subjects of the Firm include:

- 6.2.1. Clients;
- 6.2.2. Employees, directors and shareholders;
- 6.2.3. Service providers; and
- 6.2.4. Users of the website users and newsletter subscribers.

6.3. The Firm may disclose personal information to regulators, courts, and service providers when lawfully required or contractually permitted. There are no group companies of the Firm. There may be cross-border transfers of personal information where international web applications are used to assist in the provision of our services.

6.4. We employ appropriate technical and organisational safeguards to protect personal data against loss, misuse, or unauthorised access

7. Procedure for Requesting Access

7.1. Requests for access to records must be made in writing on the prescribed form (Form 2 attached as **Annexure A**), addressed to the Information Officer and submitted via email only.

7.2. The requester must:

7.2.1. Provide sufficient detail to identify the record(s) which are being requested;

7.2.2. Specify the preferred method of access to the records;

7.2.3. Identify the legal right the requester seeks to exercise or protect; and

7.2.4. Submit proof of identity.

7.3. Where acting on behalf of another person, acceptable written authority must be provided to the Information Officer together with the request for records.

8. Fees

A schedule of applicable fees is attached as **Annexure B**. Fees may be charged for:

8.1. Lodging a request (request fee);

8.2. Accessing documents (access fees);

8.3. Reproduction or postal services.

9. Timeframes

We will respond to requests within 30 days of receipt. In certain circumstances (e.g., voluminous records), this period may be extended by a further 30 days. The requester will be notified in writing of any such extension.

10. Grounds for Refusal

We may refuse access to records if the request:

10.1. Infringes the privacy of a third party;

10.2. Contains confidential or privileged information;

10.3. Would jeopardise safety, property, or legal proceedings;

10.4. Includes commercial information of a third party;

10.5. Is manifestly unreasonable, frivolous, or vexatious.

11. Remedies for Refusal

A requester dissatisfied with a refusal may lodge a complaint with the Information Regulator or bring an application to court for appropriate relief.

12. Availability and Updates

This manual is available in digital format on our website, www.dipalmas.co.za. It will be reviewed and updated periodically as required. It is also available at our place of business during normal business hours and upon request.

| **LINKS TO ANNEXURES A AND B, OVERLEAF** |

ANNEXURE A

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

ANNEXURE B

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

| END OF PAIA MANUAL |