

Vinolin Naidoo

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1st Floor Block E
The Pivot
1 Monte Casino Boulevard
Fourways, 2191

LEGAL
STRATEGY
CONSULTANTS

PAIA MANUAL

Legal Strategy Consultants

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and incorporating the Protection of Personal Information Act 4 of 2013 (POPIA)

1. Introduction

This Manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”) and incorporates the requirements of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

PAIA gives effect to the constitutional right of access to information held by public or private bodies, where such information is required for the exercise or protection of any rights. POPIA promotes the protection of personal privacy by regulating the manner in which personal information may be processed. This manual outlines the categories of records held by Legal Strategy Consultants and the exact procedure to be followed should a data subject or requester wish to request access to information.

2. Company Details

- Company Name: Legal Strategy Consultants
- Registration Number: 2025/326855/07
- Trading Name: Legal Strategy Consultants
- Physical Address: 1st Floor Block E, The Pivot, 1 Monte Casino Boulevard, Fourways, 2191
- Postal Address: 1st Floor Block E, The Pivot, 1 Monte Casino Boulevard, Fourways, 2191
- Email: vinolin@legalstrategy.co.za
- Telephone: 076 411 9311
- Website: <https://www.legalstrategy.co.za/>

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3. Information Officer

The appointed Information Officer is responsible for assessing and managing all requests for access to records in terms of PAIA, as well as ensuring ongoing compliance with POPIA.

Information Officer: Vinolin Kreeson Naidoo

Email: vinolin@legalstrategy.co.za

Telephone: 076 411 9311

4. Guide on how to use PAIA

The Information Regulator has compiled a Guide in terms of Section 10 of PAIA, which contains information on how to exercise any right contemplated in PAIA. This Guide is available in all official languages and can be accessed or obtained directly from the Information Regulator:

- Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
- Website: <https://infoeregulator.org.za/>
- Email: enquiries@infoeregulator.org.za / paia-compliance@infoeregulator.org.za

5. Records Automatically Available

The following categories of records are automatically available to the public without a person having to request access in terms of PAIA:

- Company profile and public service descriptions
- Marketing materials, brochures, and public publications
- General contact information listed on the company website



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6. Records Held in Terms of Other Legislation

Where applicable, Legal Strategy Consultants maintains records in accordance with the following South African legislation:

- Companies Act No. 71 of 2008
- Tax Administration Act No. 28 of 2011
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Legal Practice Act No. 28 of 2014
- Basic Conditions of Employment Act No. 75 of 1997
- Employment Equity Act No. 55 of 1998
- Electronic Communications and Transactions Act No. 25 of 2002
- Protection of Personal Information Act No. 4 of 2013

7. Subjects and Categories of Records Held

Legal Strategy Consultants holds internal records on the following subjects to run its business operations:

7.1 Client Records

Consultation files and brief documents

Legal advisory opinions and research

Case-related correspondence and statutory documentation

Service level agreements, mandates, and engagement terms

7.2 Business & Operational Records

Commercial contracts, supplier agreements, and vendor partnerships

Financial and management accounting records

Invoices, billing history, and banking details

Operational logs and asset registers

7.3 Human Resources Records

Employment contracts and internal policies

Payroll records, PAYE, and UIF submission records

Performance evaluations and disciplinary tracking

Employee identification and emergency contact detail copies

7.4 Digital Infrastructure Records

Website enquiry submissions and logs Business email correspondence

Internal digital communication logs and user tracking records



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8. Processing of Personal Information (POPIA Disclosures)

In terms of POPIA, Legal Strategy Consultants is required to provide details regarding how personal information is handled within the organization.

8.1 Purpose of Processing

We process personal information solely for the following purposes:

- Providing legal strategy, consulting, and advisory services to our clients.
- Managing client accounts, processing invoices, and performing financial audits.
- Managing employee records, paying salaries, and complying with labor laws.
- Verifying client identities and complying with statutory rules.
- Maintaining and securing our digital communications and website architecture.

8.2 Categories of Data Subjects and Information Processed

- Clients (Natural & Juristic Persons): Names, contact details, physical/postal addresses, registration numbers, identity numbers, financial information, and unique legal/operational documentation linked to active briefs.
- Employees: Full names, identity documents, bank details, tax numbers, qualifications, and medical aid/pension declarations (where applicable).
- Suppliers & Service Providers: Company registration profiles, VAT details, bank account verification documents, and key representative contact names.

8.3 Likely Recipients of Personal Information

We do not sell personal data. Personal information will only be shared with:

- Regulatory bodies, courts of law, or statutory authorities where required by legal processes.
- Auditing professionals, insurers, and authorized banking institutions.
- Direct sub-contractors or third-party service providers acting strictly under data processing mandates from Legal Strategy Consultants (e.g., IT hosts, cloud storage providers).

8.4 Cross-Border Data Flows

Legal Strategy Consultants may store or process personal information on secure cloud storage infrastructure located outside South Africa (e.g., reputable global productivity suites). We ensure that any cross-border data processing transfers comply with Chapter 9 of POPIA, utilizing platforms that adhere to binding corporate data privacy standards.



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8.5 Information Security Measures

We implement comprehensive technical and organizational measures to prevent unauthorized access, loss, or manipulation of personal data:

- Use of secure, enterprise-grade firewalls and access controls.
- Role-based access permissioning for employees handling client records.
- Regular patching, updating, and backup protocols across all networks.
- Confidentiality clauses integrated into all staff and contractor agreements.

9. Request Procedure

To request access to a record held by Legal Strategy Consultants, the requester must follow these guidelines:

- Prescribed Form: The request must be made using Form 2: Request for Access to Record, which is available directly on the Information Regulator's website.
- Submission Venue: The completed Form 2 must be submitted alongside proof of payment of the request fee (if applicable) to the Information Officer via the email address listed in Section 3 of this manual.
- Clarity of Description: The requester must provide sufficient detail on the form to enable the Information Officer to locate the requested records and confirm the identity of the requester.
- Specify the Right Protected: The requester must identify the exact right they seek to exercise or protect, and provide an explicit explanation of why the requested record is required to fulfill that right.

10. Grounds for Refusal

Legal Strategy Consultants may lawfully refuse access to requested records under the following circumstances:

- Protection of the privacy of a third party who is a natural person, protecting them from unreasonable disclosure.
- Protection of commercial, highly confidential, or trade secret information belonging to a third party or Legal Strategy Consultants.
- Protection of information that is strictly subject to legal professional privilege.
- Protection of safety of individuals and the protection of property.
- Records explicitly prohibited from disclosure under any separate legislative mandate.

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11. Fees

The PAIA framework allows private bodies to charge specific administrative fees:

- Request Fee: A standard, non-refundable request fee must be paid before a request can be processed (exemptions apply to individuals seeking their own personal records).
- Access Fee: If the request is granted, access fees will be charged to cover costs related to searching, reproduction, formatting, and delivery.
- Notification: Legal Strategy Consultants will issue Form 3 (Outcome of Request and Fees) to formally notify the requester of the exact fee calculations due before releasing any records.

12. Availability of This Manual

This manual is updated regularly and is available for inspection:

- On our public website: <https://www.legalstrategy.co.za/>
- At our physical business address upon reasonable prior arrangement during operating business hours.

13. Approval

Prepared by: External service provider / consultant

Date: 29 June 2026

Approved by: Legal Strategy Consultants

Designation: Information Officer