

NANOPIXEL CC

Registration No. 2010/038461/23

MANUAL ON THE PROMOTION OF ACCESS TO INFORMATION **ACT 2 OF 2000 (PAIA)**

Compiled in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000

Effective: August 2026

Prepared by: J. Siedentopf (Information Officer)

1. Overview and Purpose of This Manual

The Promotion of Access to Information Act 2 of 2000 (PAIA) gives effect to section 32 of the Constitution of the Republic of South Africa, which provides that everyone has the right to access information held by the State and, where that information is required for the exercise or protection of rights, information held by private bodies.

Section 51 of PAIA requires every private body to compile and maintain a manual that describes the records it holds, the procedure for requesting access to those records, and the grounds on which access may be refused. This Manual has been compiled to meet that obligation and to promote a culture of transparency and accountability within Nanopixel CC.

This Manual is available free of charge at www.nanopixel.co.za/paia-manual.pdf and from the Information Officer on request.

2. Company Profile

Legal name	Nanopixel CC
Registration number	2010/038461/23
Business type	Close Corporation (CC) — Private Body as defined by PAIA
Industry	Brand development, digital design, marketing and communications
Registered address	Unit 12, Barn Lodge, Thrush Avenue, Boskruin, Johannesburg, Gauteng, 2195
Postal address	As above
General email	info@nanopixel.co.za
Privacy email	privacy@nanopixel.co.za
Website	www.nanopixel.co.za

Nanopixel CC is a full-service brand development agency providing services including brand identity, digital experience design, social media strategy, and performance marketing to clients across South Africa and internationally.

3. Information Officer

In accordance with section 51(1) of PAIA, Nanopixel CC has designated an Information Officer responsible for encouraging compliance, handling requests, and acting as the primary point of contact for all PAIA matters.

Name	J. Siedentopf
Capacity	Information Officer (as required by PAIA Section 51)
Telephone	Available on request via email
Email	privacy@nanopixel.co.za
Physical address	Unit 12, Barn Lodge, Thrush Avenue, Boskruin, Johannesburg, Gauteng, 2195
Postal address	As above

All requests for access to records, and all queries relating to this Manual, must be directed to the Information Officer at the contact details above.

4. Guide on PAIA

The South African Human Rights Commission (SAHRC) has compiled a guide explaining how to use PAIA. This guide is available from:

Organisation	South African Human Rights Commission — PAIA Unit
Telephone	+27 11 877 3600
Email	PAIA@sahrc.org.za
Postal address	Private Bag 2700, Houghton, 2041, South Africa
Website	www.sahrc.org.za

5. Records Available Without a Formal PAIA Request

The following records and information are available to the public without requiring a formal PAIA request:

5.1 Records available on the Nanopixel website (www.nanopixel.co.za)

- › This PAIA Manual
- › Privacy Policy
- › Disclaimer
- › General information about Nanopixel's services and capabilities
- › Contact information

5.2 Records available directly from the Information Officer

- › This PAIA Manual (physical copy on request, at no charge)
- › Confirmation of company registration details

6. Records Held by Nanopixel CC

The following categories of records are held by Nanopixel CC. Records in these categories may be requested using the procedure set out in Section 7 of this Manual. Note that access may be refused on the grounds set out in Section 9.

6.1 Corporate and governance records

- › Certificate of Incorporation and founding documents
- › Member agreements and resolutions
- › Statutory registers and records required by the Companies Act / Close Corporations Act
- › Business plans and strategic documents
- › Internal policies and procedures (including HR, IT, and operational policies)

6.2 Financial records

- › Annual financial statements
- › Management accounts
- › Tax records and SARS correspondence
- › Banking records
- › Invoices, receipts, and payment records
- › Contracts and service agreements (supplier and client)
- › Payroll and remuneration records

6.3 Client and project records

- › Client contracts and engagement letters
- › Project briefs, deliverables, and correspondence
- › Intellectual property records relating to client work
- › NDAs and confidentiality agreements

6.4 Human resources records

- › Employment contracts and personnel files
- › Leave and attendance records
- › Training and development records
- › Disciplinary and grievance records

6.5 Information technology records

- › Software licences and subscriptions
- › IT security policies and incident logs
- › Data backup and recovery procedures

6.6 Legal and compliance records

- › PAIA Manual and related correspondence
- › Privacy Policy and data processing records
- › Legal opinions and correspondence with advisers
- › Insurance policies
- › Licences and regulatory correspondence

6.7 Communications records

- › External communications (press releases, published content)
- › Formal correspondence with clients, suppliers, and authorities

7. Request Procedure

7.1 How to submit a request

Any person wishing to request access to records held by Nanopixel CC must submit a written request to the Information Officer using the prescribed Form C (available from the Information Officer on request or downloadable from the SAHRC website). The request must be submitted:

- › By email to: privacy@nanopixel.co.za (Attention: Information Officer — PAIA Request)
- › By post to: Unit 12, Barn Lodge, Thrush Avenue, Boskruin, Johannesburg, Gauteng, 2195

The request must include:

- › The requester's full name, contact details, and identity or registration number
- › A clear description of the record(s) to which access is sought
- › The form in which access is requested (e.g. copy, inspection)
- › If acting on behalf of another person, written authorisation and proof of that authority
- › Proof of payment of the request fee, where applicable

7.2 Request fee

A request fee of R35.00 is payable by any requester other than a personal requester (i.e. a person requesting their own personal information). The request will not be processed until the fee has been received. Proof of payment must accompany the request.

7.3 Response times

The Information Officer will respond to a request within 30 days of receipt. This period may be extended by a further 30 days in exceptional circumstances (e.g. voluminous records, consultation required), with written notice to the requester. Failure to respond within the prescribed period is deemed a refusal.

7.4 Access fee

If access is granted, an access fee may be charged for the reproduction of records and for search and preparation time in excess of one hour. The applicable fees are set out in Section 8 of this Manual.

7.5 Exemptions from fees

A requester who is seeking access to their own personal information is exempt from the request fee. Requesters meeting the income thresholds prescribed by regulation (currently: individual income not exceeding R14,712 per annum; household income not exceeding R27,192 per annum) are exempt from the access fee. Documentary proof of eligibility must be provided.

8. Fees Schedule (Private Bodies)

The following fees apply to requests by private bodies, in terms of applicable regulations:

Description	Amount (R)
Request fee (non-personal requester)	R35.00
Photocopy — A4 page or part thereof	R0.60 per page
Printed copy from computer / electronic form — A4	R0.40 per page
Copy on memory stick / disc	R40.00
Transcription of visual images — A4	R22.00 per page
Copy of visual images	R60.00
Transcription of audio record — A4	R12.00 per page
Copy of audio record	R17.00
Search and preparation — per hour (excl. first hour)	R15.00
Deposit (when search/prep likely to exceed 6 hours)	1/3 of anticipated access fee
Postage (where applicable)	Actual cost

All fees are payable by EFT to the Nanopixel CC business bank account. Account details will be provided on confirmation of a valid request. Copies are printed in black and white unless colour is specifically required and agreed.

9. Grounds for Refusal of Access

Access to a record may be refused on one or more of the grounds set out in Chapter 4 of PAIA, including:

- › Mandatory protection of the privacy of a third party (natural person)
- › Protection of commercial information of a third party (trade secrets, financial information)
- › Protection of confidential information supplied in confidence by a third party
- › Protection of safety of individuals or property
- › Records privileged from production in legal proceedings
- › Records relating to the commercial activities of Nanopixel where disclosure would cause material harm
- › Records the disclosure of which would constitute contempt of court or breach of a court order
- › Records relating to research where disclosure would expose the research or researcher to serious disadvantage
- › Requests that are manifestly frivolous, vexatious, or constitute an unreasonable diversion of resources

The Information Officer will identify which specific ground applies and communicate the reason for refusal in writing.

10. Remedies if a Request is Refused

If a requester is dissatisfied with the outcome of a request, or if no decision is communicated within the prescribed period (deemed refusal), the requester may:

- › Apply to the High Court of South Africa for appropriate relief within 180 days of the decision or deemed refusal
- › Lodge a complaint with the Information Regulator of South Africa

Information Regulator	Information Regulator of South Africa
General enquiries	enquiries@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
Website	www.infoeregulator.org.za

11. Availability and Updates

This Manual will be reviewed periodically and updated as necessary to reflect changes in Nanopixel's operations, records, or applicable law. The current version is available:

- › On the Nanopixel website at www.nanopixel.co.za/paia-manual.pdf
- › From the Information Officer at privacy@nanopixel.co.za on request, free of charge
- › A copy will be made available to the South African Human Rights Commission as required by PAIA Section 51(3)

This Manual was prepared by J. Siedentopf (Information Officer, Nanopixel CC) in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 and is effective from August 2026.

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