CAITLYN BOOKKEEPING (PTY) LTD

Numbers with Grace.

PAIA and POPIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, and the Protection of Personal Information Act 4 of 2013

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Information Officer	Caitlyn Crous
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Contents

1. Purpose of this Manual 2
2. Definitions 2
3. Company Details 3
4. Information Officer 3
5. Guide by the Information Regulator 4
6. Records Available Without a Request 4
7. Records Kept in Terms of Other Legislation 4
8. Categories of Records Held 5
9. Procedure to Request Access to a Record 5
10. Grounds for Refusal of Access 6
11. Remedies 6
12. Processing of Personal Information 7
13. Availability and Updating of this Manual 7
14. Approval 7

1. Purpose of this Manual

The Promotion of Access to Information Act 2 of 2000 gives effect to the constitutional right of access to information held by private bodies, where that information is required for the exercise or protection of a right. This manual sets out the records held by Caitlyn Bookkeeping (Pty) Ltd, the procedure to request access to them, and how the Company processes personal information in terms of the Protection of Personal Information Act 4 of 2013.

2. Definitions

“the Company”	Caitlyn Bookkeeping (Pty) Ltd (2026/748005/07)
“PAIA”	Promotion of Access to Information Act 2 of 2000
“POPIA”	Protection of Personal Information Act 4 of 2013
“Information Officer”	The Company’s head, responsible for PAIA and POPIA compliance
“Regulator”	The Information Regulator established under section 39 of POPIA
“Record”	Any recorded information, regardless of form or medium, in the possession or under the control of the Company.
“Requester”	Any person, including a person acting on behalf of another, who requests access to a record of the Company.

Other terms, such as “personal information” and “operator”, have the meanings given in section 1 of POPIA.

3. Company Details

Name	Caitlyn Bookkeeping (Pty) Ltd
Registration number	2026/748005/07
Date of registration	17 September 2026
Nature of business	Virtual bookkeeping and financial reporting services
Head of the private body	Caitlyn Crous, Director
Street address (registered office)	105 Bruarfoss Avenue, Valhalla, Centurion, Gauteng, 0815
Postal address	105 Bruarfoss Avenue, Valhalla, Centurion, Gauteng, 0815
Telephone / WhatsApp	+27 81 212 5249
Email	info@caitlynbookkeeping.co.za
Website	caitlynbookkeeping.co.za

4. Information Officer

The Director of the Company is its Information Officer in terms of PAIA and POPIA, and is registered with the Regulator. No Deputy Information Officer has been designated. All requests for access to records, and all enquiries about this manual or the processing of personal information, must be addressed to the Information Officer.

Information Officer	Caitlyn Crous
Registration number	2026-068241
Email	info@caitlynbookkeeping.co.za
Telephone / WhatsApp	+27 81 212 5249
Address	As set out in section 3

5. Guide by the Information Regulator

In terms of section 10 of PAIA, the Regulator has compiled a guide, in each official language, on how to use PAIA and POPIA. The guide explains the rights of requesters and the procedure to request access to records. It is available from the Regulator, and a copy may be inspected by arrangement with the Information Officer.

Website	inforegulator.org.za
Email	enquiries@inforegulator.org.za
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

6. Records Available Without a Request

The following records are freely available on the Company's website, and may be obtained without a formal request in terms of PAIA: information about the Company's services and packages, the Client Privacy Notice, this manual, and the Company's published guides and articles.

7. Records Kept in Terms of Other Legislation

The Company keeps records in terms of the following legislation, to the extent that it applies to the Company. Access to these records remains subject to the provisions of PAIA.

- Companies Act 71 of 2008
- Tax Administration Act 28 of 2011
- Income Tax Act 58 of 1962
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008
- Basic Conditions of Employment Act 75 of 1997, Unemployment Insurance Act 63 of 2001 and Labour Relations Act 66 of 1995, if and when the Company employs staff

8. Categories of Records Held

Category	Records
Company records	Registration certificate and Memorandum of Incorporation, securities register, directors' resolutions, CIPC filings and beneficial ownership records
Financial and tax records	Accounting records, bank statements, invoices, receipts, annual financial statements, tax registrations, returns and correspondence with SARS
Client records	Engagement letters, Clarity Check questionnaires and agreements, onboarding forms, source documents supplied by clients, working papers, reports and correspondence
Supplier records	Agreements, invoices and correspondence with service providers, including Sage, AutoEntry and email and hosting providers
Marketing and communication	Website enquiries, newsletter subscriber lists and general correspondence
Professional and compliance	CIBA membership and CPD records, and POPIA and PAIA compliance records

9. Procedure to Request Access to a Record

9.1 **Form.** A request must be made on Form 2 (Request for Access to Record) prescribed by the PAIA Regulations, 2021, available from the Regulator's website or from the Information Officer.

9.2 **Particulars.** The requester must identify the record requested, state the preferred form of access, and identify the right to be exercised or protected, with an explanation of why the record is required for that purpose.

9.3 **Submission.** The request must be sent to the Information Officer by email, by post or by hand, at the details in section 4. A person requesting on behalf of another must provide proof of the capacity in which the request is made.

9.4 **Fees.** A request fee and an access fee, as prescribed by the PAIA Regulations, may be payable. The requester will be notified of any fee before access is given. A personal requester seeking their own personal information is not required to pay the request fee.

9.5 **Decision.** The Company will notify the requester of its decision within 30 days of receiving a complete request. This period may be extended once, by not more than 30 days, in the circumstances permitted by PAIA, in which case the requester will be informed of the reasons.

10. Grounds for Refusal of Access

Access to a record may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including where access would:

Ground for refusal	PAIA section
Involve the unreasonable disclosure of personal information about a third party	Section 63
Disclose trade secrets or confidential commercial, financial, scientific or technical information of a third party	Section 64
Constitute a breach of a duty of confidence owed to a third party	Section 65
Endanger the life or physical safety of a person, or the security of property	Section 66
Disclose a record that is privileged from production in legal proceedings	Section 67
Disclose the Company's own trade secrets or confidential commercial, financial or technical information	Section 68
Disclose research information of the Company or a third party	Section 69

Where a request is refused, the requester will be given adequate reasons for the refusal, with reference to the relevant provisions of PAIA.

11. Remedies

The Company does not have an internal appeal procedure. A requester who is dissatisfied with a decision of the Information Officer may, within 180 days of the decision:

- lodge a complaint with the Regulator, in the manner prescribed in the PAIA Regulations; or
- apply to a court with appropriate jurisdiction for relief.

12. Processing of Personal Information

Purpose of processing	To provide bookkeeping and reporting services; to prepare quotes following a Grace Clarity Check; to respond to enquiries; to send the Grace Newsletter to subscribers; to manage relationships with service providers; and to comply with legal, tax and regulatory obligations.
Data subjects and information	**Clients and prospective clients:** names, contact details, registration and tax numbers, financial records and correspondence. **Clients' employees, customers and suppliers**, processed as an operator on the client's behalf: names, identity and tax numbers, remuneration and deductions, and contact and banking details in records supplied by the client. **Subscribers and website visitors:** names, email addresses, telephone numbers and messages. **Service providers:** names, contact details and banking details.
Recipients	SARS and other authorities where required by law; a client's tax practitioner, auditor, accountant or payroll provider at the client's request; and service providers that process information on the Company's behalf, including Sage, AutoEntry, MailerLite, WhatsApp, AI assistant tools and email and hosting providers.
Transborder flows	Certain cloud-based service providers may store information on servers outside South Africa. Such transfers take place only as permitted by section 72 of POPIA.
Security measures	Password-protected accounts with two-step verification where available, access limited to the Information Officer, reputable cloud-based systems, protected devices, documents received through AutoEntry, email or a direct WhatsApp chat on the business number (slips and invoices only, removed from the chat once filed), and secure deletion at the end of retention periods.

Further detail is set out in the Company's Client Privacy Notice, available on its website.

13. Availability and Updating of this Manual

This manual is available on the Company's website at caitlynbookkeeping.co.za/paia-manual.pdf and, free of charge, on request from the Information Officer. It will be reviewed at least annually and updated whenever the Company's records or practices change.

14. Approval

Approved by the head of the private body

Caitlyn Crous

Director and Information Officer, Caitlyn Bookkeeping (Pty) Ltd · 13 October 2026