



**MANUAL IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (“PAIA”)

OF
NN THOVHAKALE ATTORNEYS
REGISTRATION NUMBER 2020/737658/21
(“NNT INC.”)**

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Table of Contents

1. LIST OF ACRONYMS AND ABBREVIATIONS	3
2. PURPOSE OF PAIA	3
3. THE RELATIONSHIP BETWEEN PAIA AND POPIA.....	3
4. ABOUT OUR BUSINESS	4
5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	5
6. INFORMATION THAT IS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....	5
7. DESCRIPTION OF THE RECORDS OF NNT INC. WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION.	8
8. DESCRIPTION OF THE SUBJECTS NNT INC. HOLDS RECORDS ON AND CATEGORIES OF RECORDS HELD BY THE FIRM.	8
9. HOW TO MAKE A PAIA REQUEST TO US	10
10. PROCESSING OF PERSONAL INFORMATION IN RELATION TO POPIA	10
11. SECURITY OF PERSONAL INFORMATION	13
12. AVAILABILITY OF THE MANUAL	13
13. FEE SCHEDULE IN TERMS OF SECTION 54	13
14. ANNEXURES	14
15. UPDATING OF THE MANUAL.....	14

1. LIST OF ACRONYMS AND ABBREVIATIONS

Nr.	ACRONYMS AND ABBREVIATIONS	FULL NAME
1	NNT INC	NN Thovhakale Attorneys Incorporated
2	IR	Information Regulator
3	DIO	Deputy Information Officer
4	IO	Information Officer
5	AO	Admin Officer
6	LPC	Legal Practice Council
7	PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
8	POPIA	Protection of Personal Information Act No.4 of 2013

2. PURPOSE OF PAIA

The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA") gives effect to the constitutional right of access to information as provided for in section 32 of the Constitution. The Act allows individuals to request access to information held by public and private bodies where such information is necessary for the exercise or protection of any rights. PAIA further seeks to promote transparency, accountability, and good governance, while encouraging public participation and oversight in the decision-making processes of public institutions.

A public or private body is required to release information where a request has been made by an individual unless PAIA or any other relevant law/legislation states that the records containing such information may not be released/accessed.

3. THE RELATIONSHIP BETWEEN PAIA AND POPIA

PAIA and the Protection of Personal Information Act (POPIA) are complementary information laws with distinct but interconnected purposes:

Characteristic	PAIA	POPIA
Primary Focus	Access to information	Protection of privacy and personal information
Constitutional Right	Right to access information	Right to privacy
Scope	All information (personal and non-personal)	Personal information only
Purpose	Framework for requesting information	Conditions for lawful processing of personal data

4. ABOUT OUR BUSINESS

NN Thovhakale Attorneys Inc t/a NNT Incorporated is a modern, client and risk focused boutique law firm. The firm offers a wide range of legal services, specialising in commercial and corporate law, litigation, taxation, administrative and labour law.

4.1 OUR KEY CONTACT DETAILS

As required by PAIA to provide key contact details of NNT INC, below is our contact information.

Physical Address	Brooklyn Bridge Office Park Steven House, 3rd Floor Brooklyn Pretoria, 0181
Telephone Address	012 433 6482 / 072 160 2117
Email Address	info@nntinc.co.za Ndangi@nntinc.co.za
Information Officer	Mr. Ndangi Thovhakale
Admin Officer	Mrs Motswagae Madja

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator has, according to Section 10(1) of PAIA (as amended) updated and made available the revised **Guide** on how to use PAIA (“the Guide”), in an easily understandable form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in all South African official languages and braille.

A copy of the guide is available on the Information Regulator’s details below:

Websites: <https://inforegulator.org.za/paia/>
<https://www.justice.gov.za/inforeg/>

Emails: enquiries@inforegulator.org.za
PAIACompliance@inforegulator.org.za

Address: Woodmead North Office Park
54 Maxwell Dr,
Sandton,
2191,
South Africa

A copy of the Guide is also available in two official languages, namely English and Tshivenda, at our offices for public inspection during normal office hours. No fee is required for requesting a copy of the guide.

Please use the prescribed form marked as **Annexure "A"** to request a copy of the guide from NNT INC.

6. INFORMATION THAT IS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.

PAIA aims to facilitate and simplify access to information for the public. In support of this objective, entities such as our firm are encouraged to voluntarily make certain categories of documents and information available, thereby enabling access to such records without the need to follow the formal PAIA request

procedure. This information is referred to as "automatically available" or "voluntarily disclosed" information.

The following categories and documents/information for NNT INC. are automatically available and does not need to be formally requested as per the PAIA prescripts.

Category	Examples of Documents/Information	Available on our website	Available upon Request
Our Company Information	❖ Details of Incorporation (CIPC documents). ❖ Registered office address. ❖ Director and employees' names. ❖ Service descriptions	X	X
Legal Notices/Policies	❖ NNT INC's PAIA Manual. ❖ Privacy Policy. ❖ BBBEE Certificate/Sworn Affidavit.	X	X
Financial Records	❖ Annual and Interim Financial Records. ❖ Tax Records. ❖ Accounting books, records and documents. ❖ Auditors' details ❖ Creditors and Debtors invoices ❖ Or any other financial records		X
Banking Records	❖ Bank facilities and accounts details ❖ Details of liabilities owed to financial institutions. ❖ Bank account statements and transaction records.		X

Category	Examples of Documents/Information	Available on our website	Available upon Request
	❖ Details of existing financial obligations and commitments. ❖ Additional banking and financial records.		
Information pertaining to our clients and third parties.	❖ Documentation and other information received from clients. ❖ Records pertaining to legal proceedings involving clients. ❖ Agreements with clients. ❖ Documentation and other information received from third parties. ❖ Correspondence with clients and third parties. ❖ Information prepared by the firm for clients, such as reports, pleadings, opinions and memoranda.		X
Income Tax Records	❖ Records relating to Pay-As-You-Earn (PAYE). ❖ Employee tax certificates and other tax-related documents issued to employees. ❖ Records of tax deductions and payments made to the South African Revenue Service (SARS) on behalf of employees. ❖ Records pertaining Value-Added Tax (VAT) requirements. ❖ Records concerning Skills Development Levies and compliance therewith. ❖ UIF Records ❖ Other records maintained in fulfilment of applicable tax		X

Category	Examples of Documents/Information	Available on our website	Available upon Request
	and statutory compliance requirements.		

Any other request of information or documents not indicated above, access of such will be determined by the Act based on certain grounds of refusal as set out in the Act.

7. DESCRIPTION OF THE RECORDS OF NNT INC. WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION.

- 7.1 Legal Practice Act 2 of 2014
- 7.2 Financial Intelligence Centre Act 38 of 2001
- 7.3 Promotion of Access to Information Act 2 of 2000
- 7.4 Value-Added Tax Act 89 of 1991
- 7.5 Basic Conditions of Employment Act 75 of 1997
- 7.6 Employment Equity Act 55 of 1998
- 7.7 Companies Act 71 of 2008
- 7.8 Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 7.9 Income Tax Act 58 of 1962
- 7.10 Labour Relations Act 66 of 1995

While every effort has been made to identify applicable legislation, the list may not be exhaustive and will be updated as necessary. Where access to records is sought under legislation other than PAIA, the requester must specify the relevant legislative basis to enable the Information Officer to properly assess the request.

8. DESCRIPTION OF THE SUBJECTS NNT INC. HOLDS RECORDS ON AND CATEGORIES OF RECORDS HELD BY THE FIRM.

Subjects	Categories of Records Held
Finance	❖ Financial statements and annual reports ❖ Accounts receivable and payable records ❖ Invoices and billing records

Subjects	Categories of Records Held
	❖ Trust account statements and reconciliations ❖ Tax returns (SARS filings) and VAT records ❖ Client billing statements and fee agreements ❖ Bank statements and bank reconciliation statements
Client Matters	❖ Client intake forms and risk assessments. ❖ Client conflict of interest checks ❖ Engagement letters and fee agreements ❖ Court documents (summons, pleadings, affidavits) ❖ Correspondence with clients and courts ❖ Case files and matter files ❖ Time sheets and billing records per matter ❖ Settlement agreements and judgment records
Marketing & Communication	❖ Website Content ❖ Social Media Posts ❖ Client and Supplier Communications
Information Technology (IT)	❖ System access logs and user accounts ❖ Data backup and recovery records ❖ Cybersecurity policies ❖ Software licenses
Human Resources	❖ Agreements relating to employees ❖ Details of employment ❖ Payroll records ❖ Training and development records ❖ UIF Records

9. HOW TO MAKE A PAIA REQUEST TO US

To request access to a record (information/documents) that we hold, the requester must use the **Prescribed Form 2** (attached as **Annexure "B"**) and submit it to the Director/Information Officer of NNT INC. The request must be sent to NNT INC's physical address of business and/or email address of the Information Officer.

The requester must clearly state which right they are seeking to exercise or protect and explain why the requested record is needed for that purpose. If the request is made on behalf of another person, the requester must provide satisfactory proof of their authority to make the request on behalf of that person. The proof of their authority will be subject to the satisfaction of NNT INC's Information Officer.

The requester must provide enough details on the form "**Form 2**" for the Information Officer to identify both the record being requested and the requester themselves. The requester should also specify the preferred method of access (e.g., inspection, copy, or electronic format) and indicate if they wish to receive the information in a different way, providing the necessary contact details for this purpose.

10. PROCESSING OF PERSONAL INFORMATION IN RELATION TO POPIA

NNT Incorporated ("we", "us" or "our") is committed to protecting and respecting your privacy. In terms of the Protection of Personal Information Act 4 of 2013, we are required to provide information regarding how Personal Information that we process is collected, stored, used and disclosed. In this manual, we have set out the requirements, below.

10.1 Purposes of Processing Personal Information

Protecting your information is important to us and we assure you that we will keep your information confidential. POPIA provides that the processing of personal information must be conducted lawfully and for a specified purpose. Therefore, we will only share your Personal Information when legally required to do so.

The purposes for which we process personal information at NNT INC, are for the following reasons, but not limited to:

- ❖ to conduct due diligence and risk assessment on our clients;
- ❖ to provide legal services to our clients;
- ❖ to comply with our legal or regulatory obligations;

- ❖ where the processing is allowed by law;
- ❖ to keep record and update our clients, or potential client's databases;
- ❖ for security, administrative and legal purposes;
- ❖ to fulfil any contractual obligations that we may have to you or any third party;
- ❖ where a data subject has provided their consent details may also be used for marketing, promotions, invitation to webinars and events that we may host;
- ❖ for matters relating to service provider's information, to create supplier profiles on our systems, pay suppliers, and for general supplier administration;
- ❖ For information processing not explicitly indicated, we will obtain your consent before collecting or using your personal information and/or special personal information for any purpose other than those for which it was originally collected.

10.2 Categories of Data Subjects and information

As you interact or consult with us, you will likely provide information directly to us. We may collect information when you request information from us or request our legal services. Use of our website at www.nntinc.com may result in the collection of information regarding the subject data's activities on our website. Likewise, when a person engages with our social media platforms, apply for employment with us, complete online assessments or surveys, we may also collect information about you from personal or trade references that you have identified to us. NNT IINC may further collect information directly from you or from third parties (such as regulators, government authorities and registries, or from other third parties relating to the legal services we are providing you). In some instances, it is necessary for you to provide us with the information, so that we can provide you such legal services and in others it is optional.

Category of Data Subjects	Category of Personal Information
Customers /Clients	❖ name, address, identity numbers or registration numbers, employment status, banking details, financial and tax information.
Directors/Employees/ Volunteers/ Employees'	❖ Name, identity number, age, race, language, educational information, financial information,

Category of Data Subjects	Category of Personal Information
Family Members/Temporary Staff	employment history, marital status, sex, pregnancy, next of kin, children's name, gender, age, school, grades, physical and postal address, contact details, opinions, criminal behaviour and/or criminal records, well-being, trade union membership, external commercial interests, medical information, life insurance and pension etc.
Service Providers	❖ Names of contact persons, name of legal entity, physical and postal address and contact details, financial information, registration number, founding documents, tax information, Vat number, CSD number and authorised signatories, beneficiaries and ultimate beneficial owners.
Foreign Persons/Entities	❖ Names; physical and postal address, passport number, nationality, contact details, financial information, date of birth, passport number, tax related information, sex, confidential correspondence; registration number; founding documents; authorised signatories, beneficiaries, and ultimate beneficial owners.
Website end-users/Application end-users	❖ Electronic identification data, IP address, log-in data, cookies, electronic localization data, name, cell phone details and GPS data.

10.3 Categories of recipients of Personal Information.

We generally do not disclose your information to third parties however, it may be necessary from time to time to make your information available to third parties such as legal and regulatory authorities, advocates, courts, accountants, banks, auditors, professional advisors, sub-contractors or providers of products and services.

We strive to enter into written agreements with other parties to ensure they comply with our confidentiality and privacy requirements. Personal information may also be disclosed when we have a legal obligation or legal right to do so.

11. SECURITY OF PERSONAL INFORMATION

Our firm implements appropriate and reasonable technical and organisational measures to prevent the loss, damage, or unauthorized destruction of personal information, as well as unlawful access to processing of personal information. At all times we exercise physical and logical control over our client's personal records, ensure that virus protection and firewall software are functional with automatic updates to tighten security.

Our IT service provider continuously reviews and tests the security controls to mitigate the risk of cyberattacks and any online criminal activities however, considering that no system is perfect and while we strive for complete protection, we cannot guarantee absolute security despite our best efforts. In the event that there is a privacy breach, we will let all stakeholders know unless we are obligated by law not to do so.

12. AVAILABILITY OF THE MANUAL

A copy of the manual is available on our website at www.nntinc.co.za and at our offices for public inspection upon appointment, during normal business hours. The manual is also available to the Information Regulator upon request.

13. FEE SCHEDULE IN TERMS OF SECTION 54

Please note that fees will apply to some requests for access to information held by NNT INC except in respect of personal requests which will not be subjected to a fee. The list of prescribed fees in respect of requests, and in respect of access to records (if the request is granted) is set out in **Annexure "C"**, of this Manual as well as on the website of the Information Regulator.

14. ANNEXURES

Annexure A – Form 1 (Request for a copy of the Guide)

Annexure B – Form 2 (Request for access to records)

Annexure C – Form 3 (Outcome of request and of fees payable)

15. UPDATING OF THE MANUAL

This Manual may be updated and amended from time to time as necessary and the latest version will be publicised in the manner prescribed by the Act.

Version 1.1

Last updated: June 2026

Issued by

NDANGI THOVHAKALE

DIRECTOR

ANNEXURE "A"

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

OR

TO: INFORMATION OFFICER
(Insert Email)

I,

Full names:				
In my capacity as (mark with "x"):	Information officer		Other	
Name of *public/private body (if applicable)				
Postal Address:				
Street Address:				
E-mail Address:				
Facsimile:				
Contact numbers:	Tel.(B):		Cellular:	

Hereby request the following copy (ies) of the Guide:

Language (mark with "X")		No of copies	Language(mark with "X")		No of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	
	isiZulu				

Manner of collection (*mark with "x"*):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

.....

Signature of requester

*Delete whichever is not applicable.

ANNEXURE "B"

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				

Postal Address	
----------------	--

Street Address	
----------------	--

E-mail Address	
----------------	--

Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>				
--	--	--	--	--

Description of record or relevant part of the record:	

Reference number, if available	
--------------------------------	--

Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
--	--

Record is in written or printed form	
--------------------------------------	--

Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
--	--

Record consists of recorded words or information which can be reproduced in sound	
---	--

Record is held on a computer or in an electronic, or machine-readable form	
--	--

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

--	--

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by:</i> <i>(State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

ANNEXURE “C”

FORM 3 OUTCOME OF REQUEST AND OF FEES PAYABLE [Regulation 8]

Note:

- If your request is granted the—
 - amount of the deposit, (if any), is payable before your request is processed; and
 - requested record/portion of the record will only be released once proof of full payment is received.
- Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive(<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

--

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4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐

Yes

☐

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer