

LEGAL NINJAS (PTY) LTD

Precision | Strategy | Compliance

PROMOTION OF ACCESS TO INFORMATION ACT

PAIA MANUAL

*Section 51 — Promotion of Access to Information Act 2 of 2000
as read with the Protection of Personal Information Act 4 of 2013*

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Review Frequency

Annually



LEGAL NINJAS
NOT YOUR AVERAGE SUITS

ABOUT THIS MANUAL

This manual is published by **Legal Ninjas (Pty) Ltd** in compliance with **Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA")**, read with the **Protection of Personal Information Act 4 of 2013 ("POPIA")**. The **Section 32 of the Constitution of the Republic of South Africa, 1996** grants everyone the right of access to information required for the exercise or protection of any right. PAIA gives practical effect to that right.

This manual tells you:

- Who to contact to request records held by Legal Ninjas
- What categories of records Legal Ninjas holds
- How to submit a formal request for access to those records
- What fees apply
- The grounds on which access may be refused
- What remedies are available if your request is refused

Note: This document does not constitute legal advice. Legal Ninjas reserves the right to amend this manual as required by applicable law.

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1. CONTACT DETAILS

In terms of **Section 51(1)(a) of PAIA**, every Section 51 manual must include the postal and street address, telephone number, and electronic mail address of the head of the private body.

Name of Private Body	Legal Ninjas (Pty) Ltd
Registration Number	2024/265967/07
Physical / Street Address	151 Humewood Drive, Sunningdale, Cape Town, 7441
Postal Address	151 Humewood Drive, Sunningdale, Cape Town, 7441
Telephone	082 420 0887
Email (General)	hello@legalninjas.co.za
Website	www.legalninjas.co.za

2. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER(S)

The Information Officer is the head of the private body designated in terms of **Section 1 of PAIA** and **Section 55 of POPIA** to receive and process requests for access to records, liaise with the Information Regulator, and ensure compliance with PAIA.

Information Officer

Full Name	Taryn Janet Blignaut
Designation / Title	Director
Telephone	0824200887
Email Address	taryn@legalninjas.co.za
Physical Address	151 Humewood Drive, Sunningdale, Cape Town, 7441

3. GUIDE ON HOW TO USE PAIA

In terms of **Section 51(1)(b)(i) of PAIA**, this manual must describe the guide compiled by the Information Regulator under Section 10 of PAIA. The guide is available in all official languages and assists persons in exercising their access to information rights.

Responsible Body	Information Regulator of South Africa
Website	https://www.inforegulator.org.za
eServices Portal	https://eservices.inforegulator.org.za
Telephone	010 023 5200
Toll-Free	0800 017 160
PAIA Complaints	PAIAComplaints@inforegulator.org.za
General Email	inforeg@justice.gov.za
Physical Address	Woodmead North Office Park, 54 Maxwell Dr, Woodmead, Johannesburg, 2191

Legal Ninjas maintains copies of the guide in at least two official languages at its offices for public inspection during business hours, free of charge (Regulation 2, GN R.757, 27 August 2021).

4. RECORDS AUTOMATICALLY AVAILABLE

In terms of **Section 52(1) of PAIA**, Legal Ninjas makes the following records publicly available without a formal request:

- This PAIA Manual (website and offices)
- Privacy Policy / POPIA Notice (website)
- General marketing material and firm brochures
- Information publicly available on the Legal Ninjas website
- Free educational content published on social media

5. CATEGORIES OF RECORDS HELD

In terms of **Section 51(1)(b)(ii) of PAIA**, the following describes the subjects on which Legal Ninjas holds records. Inclusion of a category does not guarantee access — each request is evaluated on its merits against the grounds for refusal in Chapter 4, Part 3 of PAIA.

Category	Description of Records	Privilege / Restriction
Client Matter & Legal Files	Mandates, instructions, correspondence, contracts, opinions, due diligence reports, client contact information	Attorney-client privilege (s 65 PAIA)
Employment Records	Employment contracts, payroll, leave, performance and disciplinary records	Third-party privacy (s 63 PAIA)

Financial & Accounting Records	Audit reports, management accounts, bank statements, invoices, tax returns	Commercial info (s 67 PAIA)
Operational Records	Internal policies, IT/data security protocols, service provider contracts	Commercial info (s 67 PAIA)
Regulatory & Compliance Records	PAIA manual, request register, POPIA records, FICA compliance, LPC correspondence	s 68 PAIA (mandatory refusal)
Corporate / Statutory Records	Founding documents, resolutions, share register, annual returns, B-BBEE certificates	Generally available

Records Held in Terms of Other Legislation

In terms of **Section 51(1)(b)(iii) of PAIA**, the following legislation requires or regulates the retention of records by Legal Ninjas:

- Protection of Personal Information Act 4 of 2013 (POPIA) — data subject records
- Financial Intelligence Centre Act 38 of 2001 (FICA) — KYC / client due diligence records
- Companies Act 71 of 2008 — company registration, resolutions, annual returns
- Income Tax Act 58 of 1962 and VAT Act 89 of 1991 — tax records
- Basic Conditions of Employment Act 75 of 1997 — employment records
- Labour Relations Act 66 of 1995 — disciplinary and collective agreement records

6. PROCESSING OF PERSONAL INFORMATION (POPIA)

Section 51(1)(c) of PAIA (as amended by POPIA Schedule 3) requires the following information where the private body processes personal information:

Element	Details	Legislative Basis
Purpose of processing	Providing legal services; FICA compliance; HR administration; billing; regulatory compliance; securing services; marketing (where consent has been sought)	POPIA s 13
Categories of data subjects	Clients; employees; counterparties; service providers	POPIA s 18
Categories of personal information	Names, ID numbers, company names, company registration numbers, contact details, financial data, legal history, banking information	POPIA s 18
Recipients	Courts, regulators, opposing attorneys, FIC, SARS, professional indemnity insurers, third-party processors	POPIA ss 19, 21
Transborder flows	United States and United Kingdom; Contractual provisions require compliance with regulation similar to the POPIA including GDPR	POPIA s 72
Security measures	Access controls, encryption, secure storage, staff training, processor agreements, password protection	POPIA s 19

7. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

In terms of **Section 50(1) of PAIA**, a requestor must be given access to any record of a private body if the procedural requirements of PAIA are met, the record is required for the exercise or protection of a right, and access is not refused on any ground in Chapter 4 of PAIA.

7.1 How to Submit a Request

1. Complete Form C (prescribed in Annexure B to the PAIA Regulations, GN R.757, GG No. 45057, 27 August 2021). Available from the Information Officer or from www.inforegulator.org.za.
2. Include: full name and ID number; description of record(s) requested; form of access required; the right to be exercised or protected and why the records are required; certified proof of identity.
3. Pay the prescribed request fee of R140.00 (non-refundable) before the request will be processed.
4. Submit to the Information Officer by hand, registered post, or email (contact details in Section 2).

7.2 Timeframe for Response

The Information Officer will respond within **30 calendar days** of a complete, valid request (*PAIA s 56*), extendable by a further 30 days where permitted (*PAIA s 57*).

7.3 Fees

Fee Type	Amount	Notes
Request fee (on submission)	R140.00	Non-refundable
Search & preparation (per hour after the first)	R30.00	Deposit may apply for requests > 6 hrs
Photocopy — A4 b/w	R2.00 / page	
Photocopy — A4 colour	R7.00 / page	
Reproduction on compact disc	R40.00	
Electronic copy (per MB)	R40.00	
Postage / electronic transmission	Actual cost	

Fee exemption: applies where the requestor earns below the prescribed threshold or where the request relates to the requestor's own personal information (PAIA s 54(8)).

8. GROUNDS FOR REFUSAL OF ACCESS

Chapter 4 of Part 3 of PAIA sets out the grounds on which access may be refused. Each request is evaluated individually on its merits.

PAIA Section	Ground for Refusal	Description
s 63	Privacy of third parties	Unreasonable disclosure of personal information of a third party (client, employee or opposing party). Read with POPIA Schedule 3.

s 64	Confidential third-party information	Trade secrets or financial/commercial information the disclosure of which would harm third-party commercial interests.
s 65	Safety of individuals and property	Disclosure would endanger any person's life or physical safety or prejudice the security of a building or system.
s 66	Legal professional privilege	Record subject to attorney-client privilege or work product doctrine — of particular relevance to Legal Ninjas.
s 67	Commercial information of Legal Ninjas	Disclosure would unreasonably prejudice Legal Ninjas' trade secrets or legitimate commercial activities.
s 68	Mandatory refusal — prohibited by law	Disclosure prohibited by other legislation, would constitute contempt of court, or expose a person to criminal or civil liability.
s 69	Research information	Would reveal the identity of a confidential research source.
s 70	Frivolous or vexatious request	Request is clearly frivolous or vexatious or would unreasonably divert Legal Ninjas' resources.

Mandatory disclosure (s 46): Access must be granted, notwithstanding any ground for refusal, where the record reveals evidence of a substantial contravention of the law or a serious public safety risk, and the public interest in disclosure clearly outweighs the harm.

9. REMEDIES AVAILABLE TO A REQUESTOR

Remedy	How to Invoke	Timeframe
Internal appeal (s 74 PAIA)	Lodge written appeal with the relevant authority of Legal Ninjas, setting out grounds of appeal	Within 60 days of refusal
Complaint to the Information Regulator (s 77A PAIA)	Submit complaint to PAIAComplaints@info regulator.org.za or via eservices.info regulator.org.za after exhausting internal remedies	No fixed deadline
Court application (s 78 PAIA)	Apply to a court of competent jurisdiction for appropriate relief (ss 78–82 PAIA)	As directed by the court

10. DECLARATION AND SIGNATURE

This PAIA Manual has been compiled and approved in terms of **Section 51 of the Promotion of Access to Information Act 2 of 2000**. It is hereby published by Legal Ninjas (Pty) Ltd and is available on its website and at its offices for public inspection during normal business hours.



Signature of Information Officer / Head of Private Body

Full Name	Taryn Janet Blignaut (née Grant)
Designation	Director
Date of Signature	21 April 2026

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