Access to Information Manual

Of Paragon Finance (Pty) Ltd

We respect your right of access to information. This manual will help you (the requester of information) to exercise that right and help you know how you may get access to our records. The Promotion of Access to Information Act 2 of 2000 as amended from time to time (known as PAIA[1]) requires us to draft and make this manual available to you.

- Know what types of information we have.
- Know how to request access to it.

Callouts like this are a summary of our manual and contain the most important and relevant points for you. They are here to help you understand it, but please read the full manual.

[1] To read PAIA go to https://accesstoinformation.co.za/. For a plain language summary go to https://www.michalsons.com/focus-areas/information-technology-law/access-to-information-paia/promotion-of-access-to-information-act

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Date we compiled this manual: June 2026

Date we last revised it: June 2026

1. Introduction

PAIA[2] requires the information officer of a private body to compile a manual that contains information on the records it holds. A 'private body' means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. We are a private body.

This manual exists to tell you what information we have and help you get access to it.

2. Scope

This manual applies to Paragon Finance (Pty) Ltd and covers all records held by us, whether in electronic or physical form. It is intended to assist any person who wishes to exercise their right of access to information under PAIA. This manual does not limit or exclude access to information provided by any other law.

3. Our details

Our organisation's and information officer's details are as follows:

Organisation name	Paragon Finance (Pty) Ltd
Website	https://paragonfinance.co.za/
Registration number	2020/189492/07
Postal address	2nd Floor, 50 Harrington Street, District Six, Cape Town, 7925
Physical address	2nd Floor, 50 Harrington Street, District Six, Cape Town, 7925
Default information officer[3]	Gary Palmer
Deputy information officer	Andrew MacPherson
Information officer email	andrewmp@paragonfinance.co.za

[2] Section 51(1) of PAIA
[3] For more about the information officer see https://www.michalsons.com/focus-areas/privacy-and-data-protection/information-officer-popi-paia

Information officer phone number	0798922010

These are all our details, but please rather contact us by email whenever possible.

4. Further guidance from the Information Regulator

For further guidance, contact the Information Regulator. They have compiled a PAIA guide[4] in each official language of South Africa on how to exercise your rights under PAIA.

Visit their website	www.inforegulator.org.za
Physical address	Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
Phone number	069 003 6604
Ask a general enquiry by email	enquiries@inforegulator.org.za
Lodge a complaint on the portal	https://eservices.inforegulator.org.za/default.aspx

For further guidance on how you can get access to information, please visit the Information Regulator website[5].

5. Records which we make automatically available

We make some records automatically available[6] to you without you needing to request access to them.

Type of record	How you can access it
Memorandum of incorporation (MOI)	BizPortal[7]
Directors' names	BizPortal
Documents of incorporation	BizPortal

[4] https://inforegulator.org.za/paia-guidelines/
[5] https://inforegulator.org.za/
[6] Section 52
[7] https://www.bizportal.gov.za/

Banking details	Request by email
Brochures	Request by email
External newsletters and circulars	Subscribing or on our website
Information on our website	Visit our website

6. Records we hold to function

We may hold the following subjects and categories of records in electronic or physical format, which we do not make automatically available. You may request access to them.

Type of record	Description	Examples
Establishment records	Our records related to the establishment, registration, incorporation, or administration of our organisation. Some of them may be available from BizPortal[8], via BizProfile, a search tool for all companies registered on the Companies and Intellectual Property Commission (CIPC).	• Policies and procedures • Codes of conduct • Share certificate • Statutory returns to the relevant authorities • Minutes of board or director meetings • Written resolutions
Business records	Documents that have economic value to the business.	• Annual reports • Applicable statutory documents • Compliance certification • Fraud alerts and whistleblowing • Legal compliance records • Operational records
Financial records	Our records related to our finances.	• Business plan and budget • Capital expenditure • Debtors and creditors statement and invoices • General ledger and sub-ledgers • Management records • Monthly expenses

[8] https://www.bizportal.gov.za/

		• Payment terms • Risk management and insurance
Personnel records	Our records about anyone who works for us, provides services to us, or provides services on our behalf and who we remunerate. This includes our employees, contractors, and other personnel.	• CV's application records • List of employees • Employment records of employees, education and training records. • Training records • Leave records • Medical aid records • Health and safety records
Insurance records	Our records related to our insurable assets.	• Insurance declarations • Insurance policies • Register of all immovable property owned by the company
Income tax records	Our records related to our income tax obligations.	• Employee tax records (such as PAYE) • VAT records • Skills development levies • UIF • Workmen's Compensation
Policies and directives	Both internal and external documents	• Records of internal policies relating to employees and the organisation • Records of external policies relating to customers and other third parties • Information technology systems and documents records • Financial policies and procedures • Employment policies and procedures
Agreements or contracts	Both the documents themselves and all related documents.	• Records of standard agreements

		• Records of contracts concluded with customers • Records of NDAs • Letters of intent and MOUs records • Records of third-party contracts (such as JV agreements, VAR agreements, etc.)
Customer information	Any information about anyone that we provide the Platform to, including our Practitioners, leads, or prospects.	• Customer details records • Records of contact details of individuals within customers • Records of communications with customers • Sales records • Transactional information records • Marketing records
Regulatory documents	Any document we need to comply with any laws.	• Records of exemptions • Records of submissions • Records of registrations • Permits records • Licences records
Information technology and infrastructure	Records describing the technology we have and how we use it.	• Disaster recovery policy and plan • Records of acceptable use procedures • Records of device, browser, IP address, and other technical information collected through the Platform and our website • Records of encryption, de-identification, and pseudonymisation measures applied to

		personal and health information • Records relating to cookies and analytics tools used on our website and Platform
Intellectual property	Our records relating to our intellectual property.	• Licences records • Patents records • Trademark applications records • Copyright agreements records
Legal	Internal and external legal documents and records.	• Agreement records • Records pertaining to commercial disputes, litigation, arbitration or regulatory investigations • Health and safety records

7. Records we hold to comply with the law

We hold records that all organisations are required by law to hold[9]. We also hold records that the law specifically requires organisations like ours to retain. The following legislation (among others) requires us to hold certain records:

- Auditing Professions Act 26 of 2005
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Prevention of Organised Crime Act 121 of 1998
- Protection of Personal Information Act 4 of 2013

[9] https://www.michalsons.com/focus-areas/information-technology-law/access-to-information-paia/paia-manual-your-organisation/laws-that-require-bodies-to-hold-records

- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Skills Development Levies Act 9 of 1999
- Trust Property Control Act 57 of 1988
- Unemployment Insurance Act 30 of 1966
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

This list may not be exhaustive. If new legislation requires us to hold additional records, we will update this manual accordingly. If you believe a right of access exists under legislation not listed here, please indicate the legislative basis in your request.

8. How you can request access

We have appointed our information officer to deal with all matters relating to PAIA so we can comply with our PAIA obligations. To request access to a record, please complete Form 2[10].

Please submit the completed form (together with the relevant request fee we explain below) to our information officer's email address, our physical address, or by fax using the details we provide. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and the form of access you require,
- specifies your email address, postal address, or fax number,
- describes the right that you seek to exercise or protect,
- explains why you need the requested record to exercise or protect that right,
- provides any other way you would like to be informed of our decision other than in writing, and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form, we may:

- reject the request due to lack of procedural compliance,
- refuse it if you do not provide sufficient information, or
- delay it.

You may request information by completing a request for access form and submitting it to our information officer together with a request fee.

[10] https://inforegulator.org.za/paia-forms/

9. How we will give you access

We will evaluate and consider all requests we receive. If we approve your request, we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

10. How much it will cost you

Request fees

When submitting your request, you must pay us a request fee[11] as the law prescribes. You must pay us the prescribed fees before we give you access. You will receive a notice from our information officer upon your request[12], setting out the application procedure[13].

Access fees

If we grant the request, you will have to pay us a further access fee[14] the law prescribes that includes a fee for the time it takes us to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure. Our information officer will notify you if you need to pay a deposit for the access fee. The deposit may be up to one third of the prescribed access fee[15]. The access fee will provide for:

- the costs of making the record, or transcribing the record,
- a postal fee (if applicable), and
- the reasonable time we need to search for the record and prepare the record for you[16].

If you paid the deposit and we refused your request, we will refund you the deposit amount. Until you have paid the fees, we may withhold the record you requested.

11. Grounds for us to refuse access

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy[17],
- another company's commercial information[18],
- someone else's confidential information[19],

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[11] https://www.michalsons.com/focus-areas/information-technology-law/access-to-information-paia/paia-manual-your-organisation/access-to-information-fees-for-private-bodies
[12] Section 54(1)
[13] Section 54(3)(c)
[14] https://www.michalsons.com/focus-areas/information-technology-law/access-to-information-paia/paia-manual-your-organisation/access-to-information-fees-for-private-bodies
[15] Section 54(2)
[16] Section 54(7)
[17] Section 63
[18] Section 64
[19] Section 65

- research information[20],
- the safety of individuals and property[21], or
- records privileged from production in legal proceedings[22].

Some of these grounds are explained in further detail below.

Protection of someone else's privacy (a natural person)

We may refuse to give you access to a record if access would unreasonably disclose a natural person's personal information, including a deceased person.

We will not refuse access in certain circumstances.

- The person who the information pertains to, has given consent.
- The information is publicly available.
- The information belongs to a class of information, and the private body notified the individual upfront that the specific class of information might be made public.
- The record is physical or mental health information or information about someone's well-being who is:
  - under the requester's (your) care and below 18 years, or
  - incapable of understanding the nature of the request and giving access would be in the individual's best interests.
- The information is about a deceased person and:
  - you are the next of kin, or
  - the request is made with the written consent of the individual's next of kin.
- The information is about a person who is, or was an executive at your organisation, and the information relates to their position or functions, for example:
  - that the person was an official at our organisation,
  - the title, work address, work phone number and other similar details,
  - the classification, salary scale or remuneration and responsibilities of the position or services, and
  - the name of the person on a record prepared by them while employed.

Protection of another organisation's commercial information

We may refuse to give you access to a record if the record contains another organisation's:

- trade secrets,
- financial, commercial, scientific, or technical information and the disclosure could cause harm to the financial or commercial interests of that company,
- information and the disclosure could put that company at a disadvantage in negotiations or commercial competition, or

[20] Section 68
[21] Section 66
[22] Section 67

- information on a computer programme owned by us, protected by copyright.

Our decision on giving you access

We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record.

We may have to refuse you access to a record to protect others.

12. Remedies available if we refuse to give you access

We do not have an internal appeal procedure. The decision of our information officer is final. If we deny your request for access, you may:

- apply to a court[23] with appropriate jurisdiction, or
- complain to the Information Regulator,

for the necessary relief within 180 calendar days of us notifying you of our decision.

13. How we process and protect personal information

Please refer to our Privacy Policy, available on our website at https://paragonfinance.co.za/privacy-policy, for full details of how we process and protect personal information.

14. Availability of this Manual

This manual is available in English in electronic format on our website and in physical format at the reception of our company offices.

15. Updates to this Manual

We will update this manual whenever we make material changes to it.

[23] Section 78