

# NATIVECHILD: PAIA MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (“PAIA”)

## 1. Introduction

NativeChild Africa (Pty) Ltd (“NativeChild”, “the Company”, “we”, “us”, or “our”) is committed to promoting transparency, accountability, and lawful access to information in accordance with the Promotion of Access to Information Act, 2000 (“PAIA”).

This Manual has been prepared in terms of Section 51 of PAIA and serves as a guide to the records held by the Company and the process to be followed by any person seeking access to such records.

This Manual must be read together with the Company’s Privacy Policy, Terms of Use, Cookie Policy, and any related policies governing the collection, processing, and protection of personal information.

## 2. Company Information

NativeChild Africa (Pty) Ltd is a South African hair and skincare company involved in the manufacture, distribution, retail, online sale, and salon-based sale of haircare, skincare, and related beauty products.

Company Name: NativeChild Africa (Pty) Ltd

Website: <https://www.nativechild.co/>

Email: nadmin[at]nativechild.co

## 3. Information Officer

In accordance with PAIA and the Protection of Personal Information Act, 2013 (“POPIA”), the Company has appointed an Information Officer responsible for overseeing requests for access to information and matters relating to privacy and data protection compliance.

Information Officer: Dr. A Poee

Email: nadmin[at]nativechild.co

Any requests for access to records, enquiries relating to this Manual, or concerns relating to personal information may be directed to the Information Officer using the contact details above.

#### 4. Purpose of This Manual

The purpose of this Manual is to provide transparency regarding the categories of information held by the Company and to explain how requests for access to records may be submitted and processed under PAIA.

This Manual is intended to assist members of the public, customers, suppliers, regulators, service providers, employees, and any person seeking access to records held by the Company in accordance with applicable law.

Nothing in this Manual shall be interpreted as granting automatic access to records. Access requests will be assessed in accordance with PAIA and any other applicable legislation.

#### 5. Applicable Legislation

NativeChild Africa conducts its operations in accordance with applicable South African legislation. Depending on the nature of the request, records may be maintained in terms of various laws, including:

- i. the Promotion of Access to Information Act, 2000;
- ii. the Protection of Personal Information Act, 2013;
- iii. the Consumer Protection Act, 2008;
- iv. the Electronic Communications and Transactions Act, 2002;
- v. the Companies Act, 2008;
- vi. the Labour Relations Act, 1995;
- vii. the Basic Conditions of Employment Act, 1997; and
- viii. taxation, employment, health, retail, cosmetic, and commercial legislation applicable to the Company's operations.

#### 6. Categories of Records Held by the Company

The Company maintains records necessary for the administration and operation of its business, retail activities, salon operations, e-commerce platform, customer relationships, supplier management, and legal obligations.

These records may include corporate and administrative records such as company registration documents, governance records, internal policies, contracts, compliance documentation, accounting records, and financial statements.

Operational records may include product information, inventory records, retail and online sales records, customer service records, salon booking records, supplier agreements, marketing records, website analytics, and operational procedures.

The Company may also maintain customer-related records including customer account information, online order records, communications, loyalty programme information, delivery information, and records relating to customer support or enquiries.

Human resources records may include employment contracts, payroll records, training information, disciplinary records, recruitment records, and employee administration information.

The Company may process personal information relating to customers, suppliers, employees, website users, and service providers in the ordinary course of business and in accordance with POPIA.

Certain records may contain confidential, proprietary, commercially sensitive, legally privileged, or personal information protected under applicable law.

## 7. Processing of Personal Information

NativeChild Africa processes personal information in accordance with POPIA and applicable data protection principles, including lawfulness, minimality, purpose limitation, transparency, and security.

Personal information may be collected through retail transactions, website interactions, online purchases, customer support engagements, marketing activities, salon services, and other lawful business activities.

The Company implements reasonable technical and organisational safeguards to protect information against unauthorised access, loss, misuse, disclosure, or destruction. These safeguards may include access controls, secure payment processing, authentication mechanisms, monitoring systems, and reasonable cybersecurity measures.

Further information regarding the Company's processing of personal information is contained in the Company's Privacy Policy.

## 8. Requests for Access to Records

Any person requesting access to records held by the Company must submit a written request to the Information Officer.

Requests should contain sufficient detail to enable the Company to identify the record being requested, the identity of the requester, the form of access requested, and any applicable rights or interests supporting the request.

The Company may require proof of identity before processing any request and reserves the right to request additional information reasonably necessary to evaluate the request.

Access to records is not automatic and may be subject to payment of prescribed fees where permitted under PAIA.

Requests for access to records must be submitted using the prescribed PAIA request form published by the Information Regulator of South Africa.

FORM 2: Request for Access to Record

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

## 9. Grounds for Refusal of Access

The Company reserves the right to refuse access to records where permitted under PAIA or any other applicable law.

Access may be refused where disclosure would involve an unreasonable disclosure of personal information, reveal confidential commercial information or trade secrets, prejudice legal proceedings, compromise security measures, breach confidentiality obligations, or infringe the rights of third parties.

The Company may also refuse requests that are manifestly frivolous, vexatious, or operationally unreasonable.

## 10. Third-Party Information

Where records requested under PAIA contain information relating to third parties, the Company may notify affected third parties where required by law before determining whether access may be granted.

The Company shall not be liable for delays arising from mandatory third-party notification procedures contemplated under PAIA.

## 11. Availability of This Manual

This Manual is available on the Company website and may also be requested directly from the Information Officer.

The Company reserves the right to amend this Manual from time to time to reflect changes in legislation, operational practices, or regulatory guidance.

## 12. Information Regulator

Any person who believes that their rights under PAIA or POPIA have been infringed may lodge a complaint with the Information Regulator of South Africa.

Information Regulator South Africa

Website: <https://www.justice.gov.za/inforeg/>

Telephone: 010 023 5200

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)