

PAIA Manual

Coutts Media (Pty) Ltd

Version 1.0 | Approved by the sole director | Effective 15 October 2026 | Review by 15 October 2027

Prepared under 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). This manual explains which records Coutts Media holds, how to request access, and how personal information is processed. Listing a record does not make it public or guarantee that it exists in every case.

Company and contact details

Legal name: Coutts Media (Pty) Ltd

Registration number: 2025/495226/07

Business: media and AI consulting, editorial services and training.

Lloyd Coutts, Managing Director and head of the company

Email: lloyd@couttsmedia.co.za

Telephone: 072 729 6480

Physical and postal address: 2A Fourth Avenue, Walmer, Gqeberha, Eastern Cape, 6065

Website: <https://www.couttsmedia.co.za/>

Information Officer: Lloyd Coutts, Managing Director. IO registration with the Information Regulator is pending at preparation; requests may be addressed to him as company head while registration is completed. No Deputy Information Officer is designated. The same email, telephone and address apply to privacy and access requests. No fax contact is provided.

How to obtain this manual

This manual is approved for availability from 15 October 2026 on <https://www.couttsmedia.co.za/>, by email on request and for inspection at the address above during normal business hours. Contact the company to arrange a convenient visit. Inspection and the electronic copy are free; prescribed reproduction charges may apply to a printed copy. A copy will be supplied to the Regulator on request.

The Information Regulator Guide

The Regulator's section 10 Guide explains PAIA and POPIA access rights, completion of requests, fees, assistance and remedies. It is available in South Africa's official languages at <https://inforegulator.org.za/paia/>. Ask the company head for assistance obtaining the Guide or a copy in English or isiXhosa. It explains internal appeals for relevant public bodies; Coutts Media has no statutory internal PAIA appeal.

Records available without a formal request

Published service descriptions, course information and announcements are available on the website. This manual and the public website privacy notice are available electronically without a PAIA Form 2. Other already published company material may be requested by email. Confidential client work, contact lists and banking records are not automatically available.

Subjects and categories of records

Subject	Records and present status
Company governance	Registration certificate and memorandum of incorporation; ownership and director records; company decisions, policies and statutory submissions where held.
Clients and enquiries	Client and prospective client contacts, project correspondence and work records. Proposals, contracts, deliverables and related records where created or received.
Finance	Banking details currently held. Invoices, payments, bank records, accounting and tax supporting documents where created or received.
Suppliers and contractors	Contacts and work correspondence; service agreements, credentials and provider terms where held.
Training administration	Training materials and provider administration where held. No learner records at preparation. Future enrolment, attendance, assessment, moderation, appeals and certification records arise only when training is delivered.
People and personnel	Director and service provider records where held. Staff contracts and employment records only if employment arrangements exist; this manual does not assert a current payroll.
Website and systems	Website content and administration; technical and security records generated by active services; access, backup and incident records as created.
Privacy and access	Notices and policies; permission records, information requests, complaints and breach records where created.

Records under other legislation

Companies Act 71 of 2008: company, ownership, governance and accounting records. Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011: tax and supporting financial records. Electronic Communications and Transactions Act 25 of 2002: relevant electronic transactions. Skills Development Act 97 of 1998 and National Qualifications Framework Act 67 of 2008: applicable training and quality assurance records as activities begin. Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995 apply to

employment records when applicable. POPIA and PAIA govern privacy and access records. Statutory access conditions apply; this list does not make all records public.

Making a request for records

Use PAIA Form 2 from <https://infoeregulator.org.za/paia/> or ask the company head for a copy. Send the completed form to lloyd@couttsmedia.co.za or post or deliver it to the address in this manual. Contact us for assistance if disability or literacy prevents completion.

- Identify yourself and any person on whose behalf you act, with evidence of authority where relevant. Provide sufficient detail to locate the record.
- State the right you seek to exercise or protect and why the record is required for that purpose, where section 50 requires it. Requests concerning your own personal information also have a POPIA access route.
- Specify the form of access and how you wish to receive the decision. Provide suitable contact details.
- We may request proportionate identity verification to protect the records. Do not send unnecessary identity documents or third-party information.

Response and access

The company head must decide as soon as reasonably possible and within 30 days after receipt, subject to the Act. A permitted extension may add no more than 30 days, with written reasons and information about review rights. Failure to decide within the applicable period is a deemed refusal. We will give a written decision, reasons and relevant review route; if access is granted, we will explain its form and any lawful charges.

If a record cannot be found or does not exist after reasonable searching, the company head will provide the sworn statement or affirmation required by section 55, describing the steps taken. If the record is later found, the request will be dealt with under the Act. PAIA concerns records held; it does not generally require creation of a new report or answers to questions.

Fees

Fees are governed by section 54 and the current PAIA Regulations, including Annexure B. The company will notify a requester of any applicable request or access fee, how it was calculated and how to challenge it. Charges may cover reproduction, permitted search and preparation, delivery or outsourced transcription. A prescribed deposit may apply where search and preparation exceed the regulatory threshold. Access may be withheld pending lawful payment; statutory exemptions and refunds apply. Ask for the current fee schedule before incurring a charge. The company will not substitute its own commercial rates for prescribed fees. The Regulations and Annexure B are available at <https://www.justice.gov.za/legislation/notices/2021/20210827-gg45057gon757-PAIAregulations.pdf>.

Under POPIA section 23, confirmation of whether we hold your personal information is free following adequate identity verification. Providing the information itself may attract a lawful fee; we will give an estimate before charging.

Protection of other information and remedies

PAIA permits or requires refusal on specified grounds, including another person's privacy, confidential or commercial information, safety and security, legally privileged material, and protected research information. The company must consider partial access through removal of protected portions and any applicable public-

interest override. We will follow required third-party notice and representation procedures. A confidentiality label alone is not a sufficient reason to refuse a request.

There is no statutory internal appeal for this private company. A requester or affected third party may complain to the Information Regulator in the prescribed manner, normally within 180 days of the relevant decision, or pursue relief in a court with jurisdiction under PAIA. Court routes and time limits depend on the decision and procedural history; act promptly and seek advice where needed. The written decision will identify the applicable route. A voluntary discussion with the company does not suspend statutory deadlines.

Why we process personal information

We process information to answer enquiries, agree and deliver consulting or media work, administer suppliers and payments, meet corporate and tax duties, and protect our systems. As training begins, processing will also support adult enrolment, attendance, assessment, moderation, accommodations, appeals, certification and applicable quality assurance or funder reporting.

The lawful ground depends on the activity and may be contractual necessity, legal duty, justified legitimate interests or valid consent. We give an activity-specific notice where needed. We do not rely on website visits as blanket consent. When acting on client instructions as an operator, we use information only for that assignment under the agreed conditions.

People and information categories

People or organisations	Information categories
Clients and prospective clients	Names, work roles, contacts, correspondence, project information and payment details where necessary.
Facilitators assessors and moderators	Contacts, credentials, work allocation, agreements and banking details where needed.
Suppliers	Contacts, service and payment records.
Adult learners in future	Required enrolment and identity fields, contacts, attendance, evidence, results and certification details. Accommodation information only when necessary and lawfully authorised.
Website visitors	Enquiry information voluntarily supplied; technical, analytics and security information generated by active services.
Director and future employees	Necessary corporate, contact, work and employment information as applicable.

No learner records are currently held and children are outside the present scope. Personal information also includes information about identifiable juristic persons where POPIA applies.

Recipients and overseas processing

Necessary information may be shared with assigned staff or contractors, professional advisers, banking or payment services, hosting and cloud providers, and authorities where law requires it. Future learner disclosures may go to assigned assessors and moderators, QCTO or relevant quality assurance bodies, and authorised funders or employers for a stated lawful purpose. We do not treat funding as automatic authority to disclose every learner record.

Known services are Afrihost for hosting and email, Microsoft OneDrive for work storage, WhatsApp for communication and ChatGPT subject to the company's redaction restriction. Moodle is not in use. Provider services may process information outside South Africa. The company must check relevant processing locations and apply section 72 safeguards, such as adequate protection through law or binding agreements, before transferring personal information. New services require review before use.

ChatGPT is restricted to material with identifying and confidential information removed. Raw client records, learner evidence, identity and banking information must not be uploaded. Indirect identification and document metadata must also be addressed. This is a company rule; it does not assert that a software setting alone guarantees anonymity.

Security retention and individual rights

The policy requires role-limited access, protected personal or company devices, restricted work folders, secure paper storage, an independent encrypted backup, recovery tests and prompt incident reporting. Copies currently exist on external drives and OneDrive; the existence of copies does not itself verify recovery testing. Only the director currently has website login access. Safeguards must be implemented and reviewed rather than assumed from this manual.

Keep records for their service purpose and applicable legal or contractual requirements, then review and securely dispose of them. Holds apply to litigation, complaints, audits and requests. Future training retention periods must be confirmed before enrolment against the applicable accreditation and funding requirements.

People may request access to their personal information, correction or deletion where permitted, object to qualifying processing, or withdraw consent where relied on. Use lloyd@couttsmedia.co.za. POPIA objection and correction/deletion forms are available at <https://inforegulator.org.za/popia/>. Verification, lawful retention requirements and protection of other people's records apply. No solely automated decision with substantial effects is authorised under company policy.

Regulator contact and document control

Information Regulator South Africa

Website and current contact details: <https://inforegulator.org.za/>

General enquiries: enquiries@inforegulator.org.za | 010 023 5200

POPIA complaints: POPIAComplaints@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

eServices: <https://eservices.inforegulator.org.za/>

Approved by Lloyd Coutts as sole director, effective 15 October 2026. Review by 15 October 2027 and whenever contacts, systems or record categories change. Prepared with reference to the Regulator's private-body template and guidance, adapted to the company's confirmed records and planned training scope.