



STARK Consulting Services (Pty) Ltd

Company registration no: 2020/031 559/07

PAIA Manual

**Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of
2000 (as amended)**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“DIO”	Deputy Information Officer;
1.2	“IO“	Information Officer;
1.3	“MD”	Managing Director
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF STARK CONSULTING SERVICES (PTY) LTD

3.1. Chief Information Officer

Name: Anusha Teeruth
 Title: Managing Director
 Tel: +27 82 496 5496
 Email: anusha@starkconsultingservices.co.za

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: N/A

Tel: N/A
Email: N/A
Fax Number: N/A

3.3 Access to information general contacts

Email: anusha@starkconsultingservices.co.za

3.4 National or Head Office

Postal Address: POSTNET Suite 420, Private Bag X121, Halfway House
Midrand, 1685

Physical Address: 469 Carlswald North Estate, Tambotie Road, Midrand,
1685

Telephone: +27 82 496 5496

Email: anusha@starkconsultingservices.co.za

Website: www.starkconsultingservices.co.za

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

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours.

4.6.1 English

5. CATEGORIES OF RECORDS OF STARK Consulting Services (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.

Category of records	Types of the Record	Available on Website	Available upon request
Certificate	BBBEE Certificate	X	X
Certificate	Information Officer Certificate		X

6. DESCRIPTION OF THE RECORDS OF STARK Consulting Services (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

NB: Please specify all the records which are created and available in accordance with any of the South African legislation.

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI) and Registration Certificates - Share Register, Debenture Register - Minutes of Board of Directors and Shareholder Meetings - Records related to the appointment of Directors, Public Officer, and Auditor - Statutory returns and filings (e.g., CIPC records)	Companies Act 71 of 2008
PAIA Manual and Information Officer Certificate	Promotion of Access to Information Act 2 of 2000
BBBEE Certificate	Broad-based Black Economic Empowerment Act 53 of 2003
Annual Financial Statements, General Ledgers, and Subsidiary Ledgers - Bank statements, bank account details, and banking records - Asset Registers and Fixed Asset Records - Budgets, Management Accounts, and Financial Forecasts	International Financial Reporting Standards
Income Tax Returns and assessments - Value Added Tax (VAT) records - Records of payments made to and correspondence with SARS	Income Tax Act 58 of 1962 Value-Added Tax Act 89 of 1991

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY STARK Consulting Services (Pty) Ltd

Subjects on which the body holds records	Categories of records
Client and Project Records	Client engagement letters and service agreements/contracts - Project proposals, scopes of work, and project documentation - Consulting

Subjects on which the body holds records	Categories of records
	Reports, Deliverables, and Advice rendered to clients - Client communication records (emails, meeting notes, correspondence) - Billing and invoicing records related to client projects
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Risk Policies and Procedures	Risk strategy, risk policy, risk appetite and tolerance policy, risk registers.
Compliance Policy	Compliance policies, compliance frameworks.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Data Subject Category	Purpose(s) of Processing Personal Information
Clients/Customers	To conclude and perform on a contract for consulting services. To manage the client relationship, invoicing, and account administration. To communicate information about our services and updates (with consent where required).
Service Providers/Vendors	To conclude and perform on a contract for the provision of goods or services. To process payments, manage the contract, and ensure quality control. To comply with financial and tax reporting obligations.
Website Users/Marketing Leads	To respond to enquiries submitted via your website contact form. To provide requested newsletters, industry updates, or marketing material (based on consent). For website security and analytical purposes (e.g., to track usage trends).
General Compliance	To protect the legitimate interests of the company (e.g., legal defence, debt collection). To comply with regulatory and legal obligations imposed by various South African legislation (e.g., Companies Act, Tax Administration Act, PAIA, POPIA).

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Names, address, registration numbers or identity numbers, employment status and bank details
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details

8.3 The recipients or categories of recipients to whom the personal information may be supplied

NB: Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

The organisation does not have planned transborder flows of personal information.

NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Security Aspect	Nature of Safeguards Implemented or Under Implementation
Network & Perimeter Security	Firewalls and Intrusion Prevention Systems (IPS) to monitor and control network traffic. Virtual Private Network (VPN) access required for remote connections to the corporate network.
Endpoint Security	Industry-standard Anti-virus and Anti-malware solutions on all workstations, laptops, and servers.
Data Protection & Storage	Access control measures (Role-Based Access Control - RBAC) limiting file and folder access based on job function.
System Access Control	Strong password policies enforced across all systems. Multi-Factor Authentication (MFA) required for access to critical systems, servers, and cloud environments. Automatic session time-outs to prevent unauthorized access to unattended workstations.
Physical Security	Secure storage of physical records in locked cabinets or filing rooms. Restricted access (e.g., biometric access) to server rooms and company premises where personal information is processed or stored.

NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On the company website at: www.starkconsultingservices.co.za

9.1.2 head office of STARK Consulting Services (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made

10. UPDATING OF THE MANUAL

The head of STARK Consulting Services (Pty) Ltd will on a regular basis update this manual.

Issued by



Anusha Teeruth
Managing Director