

PAIA MANUAL

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

Legal entity	Blackridge Finance (Pty) Ltd
Registration number	2026/303198/07
Trading name	Blackridge Finance / Blackridge
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Approved by Dominic Martins — Director, Head of the Private Body and Information Officer

Information Officer registration: 2026-064715

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1. ACRONYMS AND ABBREVIATIONS

Term	Meaning
Blackridge	Blackridge Finance (Pty) Ltd, trading as Blackridge Finance or Blackridge.
DIO	Deputy Information Officer.
IO	Information Officer.
PAIA	Promotion of Access to Information Act 2 of 2000, as amended.
POPIA	Protection of Personal Information Act 4 of 2013.
Regulator	Information Regulator (South Africa).
Republic	Republic of South Africa.

2. PURPOSE OF THIS MANUAL

This Manual is intended to help members of the public:

- understand the categories of records held by Blackridge and which records are available without a formal PAIA request;
- understand how to request access to a record of Blackridge;
- obtain the contact details of the Head of the private body and Information Officer;
- understand the categories of records available under other legislation;
- understand how Blackridge processes personal information, including recipients, planned transborder flows and general security safeguards; and
- understand the remedies available where a request is refused or not answered.

For access to a record of a private body, a requester must identify the right to be exercised or protected, explain why the requested record is required for that purpose, comply with PAIA's procedural requirements and ensure that no lawful ground of refusal applies.

3. BLACKRIDGE AND KEY CONTACT DETAILS

3.1 Private body details

Item	Details
Legal name	Blackridge Finance (Pty) Ltd
Registration number	2026/303198/07
Trading name	Blackridge Finance / Blackridge
Physical address	6 Windlass Way, Blouberg Sands, Cape Town, Western Cape, 7441, South Africa
Postal address	6 Windlass Way, Blouberg Sands, Cape Town, Western Cape, 7441, South Africa

Item	Details
Telephone / WhatsApp	068 022 1921
General email	info@blackridgefinance.co.za
Privacy / PAIA email	privacy@blackridgefinance.co.za
Website	https://blackridgefinance.co.za

3.2 Head of the private body and Information Officer

Item	Details
Name	Dominic Martins
Capacity	Director, Head of the Private Body and Information Officer
Telephone	068 022 1921
Email	privacy@blackridgefinance.co.za
Information Officer registration	2026-064715
Registration date	19 August 2026
Appointment date	13 April 2026

3.3 Deputy Information Officer

Blackridge has not designated a Deputy Information Officer at the date of this Manual.

3.4 General access-to-information contact

PAIA requests and related enquiries should be sent to privacy@blackridgefinance.co.za. The address is monitored by authorised Blackridge personnel.

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has published a Guide explaining how to use PAIA and POPIA. The Guide covers, among other matters, the objects of PAIA and POPIA, request procedures, available assistance, remedies, forms and prescribed fees.

The Guide is available from the Information Regulator in all official languages and in Braille. Blackridge will provide the current Guide or a link to it on request.

Languages available through Blackridge: English and Afrikaans versions of the Regulator's PAIA Guide are maintained as the practical launch set for inspection or electronic provision by prior arrangement.

Information Regulator contact	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Toll-free	0800 017 160
Email	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za

5. HOW TO REQUEST ACCESS TO A RECORD

5.1 Submission of a request

A requester should:

1. complete the prescribed Form 2: Request for Access to Record;
2. submit it to privacy@blackridgefinance.co.za or deliver it to the physical address in section 3;
3. attach reasonable proof of identity;
4. attach proof of authority where acting for another person;
5. describe the requested record sufficiently for Blackridge to locate it;
6. identify the right to be exercised or protected; and
7. explain why the requested record is required for the exercise or protection of that right.

The current official Form 2 is available from the Information Regulator's PAIA webpage. Blackridge will provide a copy or link on request.

5.2 Assistance

A requester who reasonably needs assistance to complete or submit a request may contact Blackridge. Blackridge may require sufficient information to verify identity, authority and the record requested.

5.3 Fees

Prescribed request, search, preparation, reproduction, delivery and access fees may apply. Blackridge will communicate any amount payable using the prescribed process and Form 3 where applicable. The current private-body fee summary is in Annexure A.

5.4 Decision period

Blackridge will ordinarily notify the requester of its decision within 30 days after receiving a valid request. PAIA permits extensions in specified circumstances, in which case the requester will be notified.

5.5 Possible outcomes and refusals

Blackridge may grant access in full or in part, provide access in another reasonably available form, require prescribed fees, refuse access on a ground permitted by PAIA, or confirm after a reasonable search that the requested record cannot be found or does not exist.

Grounds of refusal may include protection of third-party privacy, confidential commercial information, information supplied in confidence, safety or security, legal privilege, commercial interests, research information and other interests protected by PAIA. Any mandatory public-interest override will be considered where applicable.

5.6 Complaints and remedies

A private body does not have a compulsory internal PAIA appeal process. A requester dissatisfied with a decision or deemed refusal may lodge a complaint with the Information Regulator using Form 5, generally within 180 days of the refusal or failure to respond, or seek appropriate relief from a competent court, subject to PAIA.

6. RECORDS AUTOMATICALLY AVAILABLE

Record	How to access
Website Privacy Policy	Available on the Blackridge website.
POPIA / Section 18 website notices	Displayed at relevant collection points and available on the Blackridge website.
PAIA Manual	Available on the Blackridge website in English and Afrikaans and electronically on request.
General service, pricing and contact information	Available on the Blackridge website.

These records may be inspected or downloaded without a formal PAIA request where published electronically. This does not make client records, internal records, working papers, confidential business information or third-party information automatically available.

7. RECORDS AVAILABLE UNDER OTHER LEGISLATION

Blackridge may create, receive or retain records under the following legislation, where applicable to its own operations or to services it is engaged to perform. The list is not intended to imply that every category applies to every client or engagement.

Legislation	Typical records
Companies Act 71 of 2008	Incorporation records, Memorandum of Incorporation, director/shareholder and beneficial-ownership records, annual returns and company registers.
Income Tax Act 58 of 1962	Income-tax, provisional-tax and employee-tax records relevant to Blackridge or client engagements.
Tax Administration Act 28 of 2011	Returns, assessments, supporting documents, SARS correspondence, authorisations, objections and other tax-administration records.
Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002	UIF records where payroll or employer-compliance work applies.
Skills Development Levies Act 9 of 1999	SDL records where payroll or employer-compliance work applies.
Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995	Employment, leave, remuneration and related employment records where Blackridge employs personnel or processes relevant client payroll records.

Legislation	Typical records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	COIDA and compensation-fund records where applicable.
Consumer Protection Act 68 of 2008	Service, complaint and consumer-communication records where applicable.
Electronic Communications and Transactions Act 25 of 2002	Electronic communications, electronic signatures and electronic transaction records.
Financial Intelligence Centre Act 38 of 2001	Records only where a service or activity undertaken by Blackridge falls within the Act's applicable scope.
Protection of Personal Information Act 4 of 2013	Privacy notices, processing records, consent/objection records, security records, requests and incident records.
Promotion of Access to Information Act 2 of 2000	This Manual, PAIA requests, decisions, fee notices, request registers and related correspondence.
Launch boundary: Blackridge does not offer VAT registration, VAT201 submission, VAT reconciliation or VAT correction services at launch. The Value-Added Tax Act is therefore not listed as a current launch-service record category in this Manual.	

8. SUBJECTS AND CATEGORIES OF RECORDS HELD

Subject	Categories of records
Corporate and governance	CIPC incorporation and disclosure records; Memorandum of Incorporation; director/shareholder and beneficial-ownership records; resolutions; policies; statutory correspondence.
Client acceptance and engagements	Enquiries, consultation notes, quotations, onboarding records, identity/authority/mandate records, engagement letters, scopes, approvals and correspondence.
Accounting and bookkeeping	Ledgers, trial balances, journals, reconciliations, cashbooks, bank records, debtor/creditor records, invoices, bills, schedules, workpapers and management reports.
Financial statements and compilation	Annual financial statements, trial balances, lead schedules, working papers, supporting documents, review notes, adjustments and approvals.
Tax	Income-tax, provisional-tax and employee-tax returns; computations; assessments; SARS correspondence; supporting documents; mandates and eFiling records.
Payroll and employer compliance	Employee identity/contact information, remuneration, deductions, leave, benefits, payslips, PAYE/UIF/SDL records and approvals.

Subject	Categories of records
CIPC / company compliance	Annual returns, beneficial-ownership submissions, director/address/shareholding records, mandates, confirmations and company registers where in scope.
Billing and finance administration	Invoices, statements, payment records, suppliers, subscriptions, expenses, collections and Blackridge's own finance/tax records.
Personnel and contractors	Recruitment, qualifications, professional registrations, agreements, training, access, payroll, performance and confidentiality records.
Suppliers and systems	Contracts, subscriptions, vendor privacy/security reviews, data-processing terms, support/incident records and invoices.
POPIA / PAIA / security	Privacy notices, PAIA manual/forms, processing/vendor/retention/request/incident registers, assessments, access reviews, training and breach records.
Marketing and website	Website content and logs, Netlify Form submissions, enquiry/quotation/consultation records, consent/opt-out/suppression records, campaigns and referral information.
Legal, complaints and disputes	Complaints, claims, disputes, legal advice, insurance records, regulatory correspondence and litigation/enforcement records.

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purposes of processing

- responding to enquiries, consultations and quotation requests;
- verifying identity, authority and client-acceptance requirements;
- entering into and administering engagements;
- providing accounting, bookkeeping, income-tax, payroll, CIPC, compilation, reporting and advisory services within agreed scope;
- preparing and submitting information to SARS, CIPC and other authorised bodies;
- communicating about documents, deadlines, approvals, invoices and services;
- complying with legal, regulatory, professional and contractual obligations;
- managing billing, payments, suppliers, personnel and contractors;
- protecting systems, preventing fraud and responding to incidents;
- managing complaints, disputes and legal claims; and
- conducting lawful direct marketing subject to appropriate opt-out controls.

9.2 Categories of data subjects and personal information

Data-subject category	Personal information that may be processed
Prospective clients and enquirers	Names, contact details, business details, service requirements, consultation information, form responses and communications.

Data-subject category	Personal information that may be processed
Individual clients and taxpayers	Identity, contact, address, tax, income, financial, bank, investment, rental, medical/disability/dependant and supporting information where relevant.
Client entities and representatives	Company, director, shareholder, beneficial-owner, representative, registration, tax, accounting, banking and contact information.
Client employees / payroll beneficiaries	Identity, contact, employment, remuneration, leave, benefits, bank, tax, UIF, SDL, retirement and medical-scheme information where relevant.
Client customers, suppliers and other persons	Names, contact details, invoices, transactions, bank details, contractual information and communications contained in client records.
Blackridge personnel, trainees and applicants	Identity, contact, qualification, registration, employment, payroll, performance, access and training information.
Suppliers, contractors and advisers	Identity, business, registration, tax, banking, contractual, invoice and contact information.
Website users and marketing contacts	Contact details, enquiry/form information, marketing preferences, suppression records and limited technical/security data where generated.
Requesters, complainants and persons in disputes	Identity, authority, contact details, requests, evidence, correspondence and outcomes.

9.3 Recipients or categories of recipients

- SARS, CIPC, the Information Regulator and other government or regulatory bodies where authorised or required;
- accounting, payroll, tax, financial-statement and professional software providers;
- email, cloud-storage, website-hosting, cybersecurity, backup, electronic-signature, communication and approved AI-service providers;
- banks and bank-feed providers where relevant;
- authorised Blackridge directors, personnel, trainees, contractors and specialists subject to confidentiality and access controls;
- clients and client-authorised representatives;
- lawyers, insurers, auditors, reviewers, debt collectors and other professional advisers where relevant; and
- courts, law-enforcement bodies and other recipients where disclosure is legally required.

Blackridge does not sell or rent personal information.

9.4 Planned transborder flows

Blackridge uses cloud and professional-service providers whose infrastructure or subprocessors may process or store personal information outside South Africa. The current launch model therefore includes planned international processing.

Provider / function	Information categories	Planned location / transfer position
Website hosting and forms (Netlify)	Website enquiry, quote, consultation and technical/security data	United States and other jurisdictions used by Netlify or its subprocessors.
Email and cloud collaboration (Google Workspace)	Contact, communications, documents and administrative records	United States, European Union and other jurisdictions within Google's international infrastructure, depending on service and configuration.
Accounting / professional cloud systems	Accounting, tax, payroll, reporting and support information relevant to the service	May include international cloud regions and subprocessors outside South Africa. Provider-specific terms are reviewed before material use.
Electronic signatures (DocuSeal EU, when activated)	Engagement and signature information	European Union configuration, subject to the approved provider setup.
ChatGPT Business	Approved administrative, research, drafting and quality-support inputs; identifiable client/employee information is not used unless separately assessed and approved	International processing may occur under the provider's business data-processing terms and approved controls.

The precise location of cloud processing can change as provider infrastructure and subprocessors change. Blackridge maintains internal vendor records and reviews appropriate contractual or other safeguards intended to address section 72 of POPIA before material use.

9.5 General information-security measures

- Blackridge-owned Google Workspace and access-restricted client folders;
- unique named accounts, least-privilege access and periodic access reviews;
- multi-factor authentication on critical systems;
- device encryption, automatic screen locks, firewalls, endpoint protection and automatic updates on approved work devices;
- confidentiality and POPIA undertakings for authorised users;
- secure deletion and access-removal procedures;
- backup and recovery controls, including restoration testing;
- privacy and information-security awareness training;
- incident-response and security-compromise procedures;
- vendor and subprocessor review; and
- AI-use controls requiring anonymisation or de-identification unless identifiable processing has been separately assessed and approved.

No security measure can eliminate all risk. Blackridge reviews and improves its safeguards as systems, services and risks change.

10. AVAILABILITY OF THIS MANUAL

This Manual is available:

- on the Blackridge website at https://blackridgefinance.co.za/paia.html;
- in English and Afrikaans as downloadable PDF versions on that page;
- at Blackridge's head office at 6 Windlass Way, Blouberg Sands, Cape Town, Western Cape, 7441, for public inspection during normal business hours by prior arrangement;

- electronically on request to privacy@blackridgefinance.co.za; and
- to the Information Regulator upon request and through its eServices portal where uploaded.

A prescribed fee may apply to a physical copy or other reproduction. Electronic copies will ordinarily be provided without charge unless a lawful cost applies.

11. UPDATING AND APPROVAL

Blackridge will review this Manual at least annually and sooner when there is a material change to its services, systems, records, contact details or legal obligations.

Approval item	Details
Approved by	Dominic Martins
Capacity	Director, Head of the Private Body and Information Officer
Approval date	19 August 2026
Version	1.0
Next scheduled review	19 August 2027, or earlier after a material change

ANNEXURE A: CURRENT PAIA FEE SUMMARY

The following private-body fees were rechecked against the Information Regulator's PAIA Fee Structure and Exemptions publication dated March 2026. The prescribed fee schedule should still be rechecked at the time a request is processed in case it has changed.

Description	Amount
Request fee	R140.00
A4 photocopy / printed black-and-white copy	R2.00 per page or part thereof
Printed copy of an A4-size page	R2.00 per page or part thereof
Computer-readable copy on requester-provided flash drive	R40.00
Computer-readable copy on requester-provided CD	R40.00
Computer-readable copy on CD supplied by Blackridge	R60.00
Transcription of visual images	Outsourced cost based on the service-provider quotation
Copy of visual images	Outsourced cost based on the service-provider quotation
Transcription of an audio record	R24.00 per A4 page
Audio copy on requester-provided flash drive	R40.00
Audio copy on requester-provided CD	R40.00
Audio copy on CD supplied by Blackridge	R60.00

Description	Amount
Search and preparation after the first hour	R145.00 per hour or part thereof; maximum R435.00
Deposit where the search exceeds six hours	One-third of the applicable amount calculated under the prescribed items
Postage, email or other electronic transfer	Actual expense, if any

Personal inspection at the head office is free. Reproduction, preparation or delivery fees may apply as permitted by PAIA and the Regulations.

OFFICIAL RESOURCES

- Information Regulator PAIA page: https://inforegulator.org.za/paia/
- PAIA fee structure and exemptions: https://inforegulator.org.za/wp-content/uploads/2026/03/PAIA-Fees-structure.pdf
- Information Regulator eServices: https://eservices.inforegulator.org.za/
- Blackridge Privacy Policy: https://blackridgefinance.co.za/privacy.html
- Blackridge POPIA notice: https://blackridgefinance.co.za/popia.html

END OF MANUAL