



KOUGA DIGITAL

IT SUPPORT | HOSTING | WEBSITES

ACCESS TO INFORMATION

PAIA Manual

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

PRIVATE BODY

Michael Herbst, a sole proprietor trading as Kouga Digital.

This concise manual describes the records held by Kouga Digital, how to request access to them, and the practice's personal-information arrangements. It should be read with PAIA, POPIA and the Information Regulator's current forms and guidance.

Contact Item	Details
Head and Information Officer	Michael Herbst
Registration number	Not applicable to the sole proprietorship
Deputy Information Officer	None designated
Physical and postal address	63 Da Gama Road, Jeffreys Bay, Eastern Cape, 6330, South Africa
Phone	064 676 5276
Email and PAIA requests	hello@kougadigital.co.za
Website	kougadigital.co.za
Fax	Not applicable

Key terms: PAIA - Promotion of Access to Information Act 2 of 2000; POPIA - Protection of Personal Information Act 4 of 2013; Regulator - Information Regulator (South Africa).



01

PAIA Guide and request procedure

The Information Regulator's section 10 [Guide on how to use PAIA](#) explains the Act, requests, fees and remedies. The Guide is available in South Africa's official languages and in accessible formats from the Regulator's [PAIA resource page](#). Electronic copies in English and Afrikaans are kept for public inspection at the business address during normal business hours.

HOW TO REQUEST A RECORD

- 1 Complete the prescribed [Form 2: Request for Access to Record](#).
- 2 Describe the record, identify the right to be exercised or protected, and explain why the record is required for that right.
- 3 Attach proof of identity and, if acting for someone else, proof of authority.
- 4 Send the signed form to the Information Officer by email, post or delivery using the details on page 1.

FEES, TIME AND OUTCOME

Prescribed request, search, reproduction and access fees may apply. Kouga Digital will use the prescribed outcome notice to explain any amount before access is provided. A decision is ordinarily made within 30 days, subject to PAIA's permitted extensions and third-party procedures.

WHEN ACCESS MAY BE REFUSED

Access is not automatic. PAIA may require or permit refusal to protect another person's privacy, confidential commercial information, safety, legally privileged material, law-enforcement interests, or records connected to litigation already under way. Any decision will be communicated in the prescribed form, with reasons where the law permits.

Before submitting: give enough detail to identify the record and preferred form of access, and include a South African address or email address for notices.



02

Records held by Kouga Digital

AVAILABLE WITHOUT FORM 2

Category	Public records	Access
Business information	Contact details, service areas, opening hours and public profiles	Website
Services and prices	Service descriptions, published prices and promotion terms	Website
Policies and manuals	Privacy policy and this PAIA manual	Website and PDF

Kouga Digital does not rely on a separate section 52(2) notice. These public records are nevertheless available without a formal request; private client, financial and third-party records are not public.

SUBJECTS AND CATEGORIES

Subject	Categories of records
Enquiries and clients	Contact details, messages, quotations, agreed scope, client communications and service records
Jobs and support	Job notes, supplied device or account details, remote-access consent, handover notes, warranties and support history
Projects and deliverables	Client-supplied documents, CV source material, images, logos, website copy, working files and completed deliverables
Finance and tax	Invoices, receipts, payment records, debit-order mandates where applicable, accounting and tax records
Communications	Business email and WhatsApp Business correspondence
Website and administration	Website content and configuration, form submissions, security and business-administration records
PAIA and POPIA	Manuals, policies, requests, decisions, complaints and privacy-enquiry records

Kouga Digital has no employees and keeps no employee or contractor personnel records. A listed record is not necessarily disclosable; PAIA's grounds for refusal and other legal duties still apply.

RECORDS MAINTAINED UNDER OTHER LEGISLATION

Legislation	Relevant records
PAIA 2 of 2000	Manual, requests and decisions
POPIA 4 of 2013	Privacy, data-subject request and information-security records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Invoices, receipts, payment, accounting and tax records
Consumer Protection Act 68 of 2008	Quotes, service terms, invoices and client communications
Electronic Communications and Transactions Act 25 of 2002	Electronic transactions, communications and website information

The list applies only where relevant to this sole-proprietor practice and does not make every record automatically available.



03

Processing of personal information

PURPOSES

Personal information is used to deliver and secure the website; respond to enquiries; prepare quotations; agree, create, perform, document, invoice and support work; arrange authorised providers and payments; maintain accounting and tax records; handle PAIA or privacy requests; and meet legal obligations.

DATA SUBJECTS AND INFORMATION

Data subjects	Information that may be processed
Site visitors	IP address, browser or device information, requested page and timestamp processed by Netlify for delivery, security and troubleshooting
Enquirers and prospective clients	Name, contact details, enquiry content, selected service and form technical details
Clients and authorised contacts	Contact, quotation, agreement, billing or debit-order information where applicable, payment references, client-supplied project content, working files, deliverables, job, device, account, support and consent information, and personal information incidentally encountered during authorised support
PAIA or privacy requesters	Identity, contact details, authority to act, requested record, relevant right and request correspondence

RECIPIENTS

Information is handled by Michael Herbst and may be supplied only as needed to:

- Netlify for website delivery, security and forms; Google Workspace and Google Drive for business email and backups; and WhatsApp/Meta for WhatsApp Business messages.
- Banks or debit-order operators for payments; domain registrars, hosting or email providers, hardware suppliers and another provider authorised for a client's work.
- The Information Regulator, SARS, law-enforcement bodies or courts where authorised or required by law.
- Professional advisers where their services are required.

RETENTION AND ACCESS

Records are kept only for as long as reasonably needed for the stated purpose, an active client relationship, support or warranty history, dispute handling, or a legal retention period. Access is limited to the proprietor and authorised service systems.

For more detail about collection, use, retention and data-subject rights, see the current [Kouga Digital Privacy Policy](#).



04

Cross-border processing, security and availability

CROSS-BORDER PROCESSING

Visitor, client, enquiry and communications data may be processed outside South Africa by Netlify, Google, WhatsApp/Meta and an authorised provider needed for a job. No Google data region is currently selected. Europe is preferred only if a supported Workspace edition and service are confirmed; that setting may not cover a WhatsApp chat backup in Google Drive, whose location must be confirmed separately. Other service data may still be processed where providers or subprocessors operate.

Primary working copies of quotes, invoices and job records are stored locally on protected computers or removable backup drives in South Africa; copies sent by email or included in a cloud backup may also be processed by the providers above. Kouga Digital limits transferred information to what the service needs, uses provider contractual and technical safeguards, and remains responsible under POPIA.

GENERAL SECURITY SAFEGUARDS

- BitLocker or equivalent device encryption and protected local or removable storage.
- Unique passwords managed with Bitwarden and two-factor authentication using Bitwarden or Aegis.
- A separate managed Chrome Enterprise work profile with advanced security controls.
- Antivirus and anti-malware protection, security updates and backups.
- Separate work email, work number and WhatsApp Business account, with access limited to the proprietor.
- Client-device, account and third-party information is accessed only as necessary and authorised, and is not copied or retained unless needed and agreed.
- HTTPS, restricted website permissions, form spam protection and provider security controls.

AVAILABILITY AND REMEDIES

This manual is available free at kougadigital.co.za/paia, as a PDF, and for public inspection during normal business hours at 63 Da Gama Road (please arrange a time). A printed copy may attract prescribed reproduction or postage fees. It will be supplied to the Information Regulator on request.

A private-body request has no internal appeal. If a request is refused or not answered within the applicable period, the requester may lodge a complaint using the Regulator's prescribed Form 5 or apply to a competent court, subject to PAIA's requirements and time limits. Current forms are on the [Information Regulator's PAIA page](#).

REVIEW AND ISSUE

Issued by Michael Herbst Owner and Information Officer	Date of compilation 10 August 2026	Latest revision 10 August 2026
--	---------------------------------------	-----------------------------------

Michael Herbst will review this manual regularly and when material business, legal or processing arrangements change.