PAIA Manual

Manual of Pillinger and Digital (Pty) Ltd, prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Last updated: 16 September 2026

1. Purpose of this manual

The Promotion of Access to Information Act 2 of 2000 ("PAIA") gives effect to the right of access to information held by the State and to information held by another person that is required for the exercise or protection of any right.

Section 51 of PAIA requires every private body to compile a manual setting out what records it holds and how a person may request access to them. This manual is that document. It applies to **Pillinger and Digital (Pty) Ltd** and to all trading names under which the company operates, including **SudoHost**.

This manual is available free of charge as set out in section 10 below, and is updated whenever the information in it changes materially.

2. Particulars of the private body

Item	Detail
Registered name	Pillinger and Digital (Pty) Ltd
Registration number	2018/240515/07
Trading names	SudoHost, and other trading names of the company
Head of the private body	Andrew Pillinger
Information Officer	Andrew Pillinger
Physical address	Workshop17, Ballito Junction Regional Mall, Leonora Drive, Ballito, KwaZulu-Natal
Postal address	As above
Telephone	075 262 9331
Email	privacy@sudohost.co.za
Website	sudohost.co.za

All requests for access to records held by the company, and all enquiries about this manual, must be directed to the Information Officer at the address above.

3. The Information Regulator's Guide on how to use PAIA

In terms of section 10 of PAIA, the Information Regulator has compiled a guide in each official language containing the information a person reasonably requires in order to exercise their rights under the Act.

The Guide is available free of charge from the Information Regulator:

The Information Regulator (South Africa)
Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Telephone: 010 023 5200 · Toll free: 0800 017 160
General enquiries: enquiries@inforegulator.org.za
PAIA complaints: PAIAComplaints@inforegulator.org.za
POPIA complaints: POPIAComplaints@inforegulator.org.za
Website: inforegulator.org.za

4. Records available without a request

Section 52(2) of PAIA allows a private body to publish a notice in the Government Gazette describing categories of records that are automatically available without a formal request.

Pillinger and Digital (Pty) Ltd has not published such a notice. All requests for access to records must therefore follow the procedure in section 7 below.

Certain information is nonetheless published voluntarily and may be obtained at no cost from our websites, including service descriptions and pricing, our Terms of Service, and our Privacy and Cookie Policy.

5. Records held by the company

The following categories of records are held. Listing a category in this manual does not mean that access to records in that category will be granted: every request is assessed against the grounds for refusal in Chapter 4 of Part 3 of PAIA, summarised in section 8 below.

Category	Records held
Company and statutory	Memorandum of Incorporation, CIPC registration and returns, records of directors, share register, minutes and resolutions, statutory registers
Financial	Accounting records, annual financial statements, management accounts, banking records, invoices and statements, tax records and SARS correspondence, asset register
Client	Client account and contact details, service agreements and orders, hosting and service specifications, billing and payment records, support tickets and correspondence, domain registration records
Technical and operational	Infrastructure and platform configuration, system and security logs, backup records, monitoring and availability records, change records, incident records, supplier licence records
Employee and contractor	Employment and contractor agreements, personnel records, payroll and benefits records, statutory deductions, training records, disciplinary records
Supplier and service provider	Supplier agreements and terms, licensing agreements, correspondence, purchase and payment records
Marketing and business development	Website and campaign content, marketing material, proposals and quotations, tender submissions and supporting documents

Legal, compliance and policy	Published policies and terms, internal policies and procedures, operator agreements, insurance records, legal correspondence

6. Records held under other legislation

Records are held in accordance with, among others, the following legislation. This list is not exhaustive, and inclusion of an Act does not mean that records held under it are automatically accessible.

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Tax Administration Act 28 of 2011
- Value-Added Tax Act 89 of 1991, where applicable
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Electronic Communications and Transactions Act 25 of 2002
- Consumer Protection Act 68 of 2008
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000

7. How to request access to a record

Step 1: Complete the prescribed form

A request must be made on **Form 2, Request for Access to Record of Private Body**, prescribed by Regulation 7 of the PAIA Regulations, 2021. The form is available from the Information Regulator's website at inforegulator.org.za, and a copy will be supplied by the Information Officer on request.

The form must be completed in full and must:

1. provide sufficient detail to enable the record to be identified;
2. identify the requester and, where the request is made on behalf of another person, provide proof of the capacity in which the requester is acting;
3. specify the form of access required and the postal address, email address or other contact details of the requester;
4. **identify the right that the requester is seeking to exercise or protect, and explain why the requested record is required for the exercise or protection of that right.** This is a requirement of section 50(1)(a) of PAIA and a request that does not address it cannot be granted; and
5. state whether the requester wishes to be informed of the decision in any manner in addition to written notice, and specify how.

Step 2: Submit the form and pay the request fee

The completed form must be submitted to the Information Officer at the address in section 2, together with proof of payment of the prescribed request fee set out in section 9.

Step 3: Decision

The Information Officer will decide on the request and notify the requester in writing within **30 days** of receipt. That period may be extended by a further 30 days in the circumstances set out in section 57 of PAIA, in which case the requester will be notified in writing of the extension and the reasons for it.

If the request is granted, the notice will state the access fee payable, the form in which access will be given, and that the requester may lodge an application with a court against the fee or the form of access.

If the request is refused, the notice will state adequate reasons for the refusal, the provisions of PAIA relied on, and that the requester may lodge an application with a court against the refusal.

Records containing another person's information

Where a record contains information about a third party, that third party will be notified and given the opportunity to make representations or give consent, as required by sections 71 to 73 of PAIA, before a decision is taken.

8. Grounds for refusing access

Access to a record must or may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA. In summary, these include records whose disclosure would involve:

- the unreasonable disclosure of personal information about a third party, including a deceased individual (section 63);
- a breach of a duty of confidence owed to a third party under an agreement (section 65);
- prejudice to the commercial or financial interests of a third party, or the disclosure of trade secrets or confidential commercial, financial, scientific or technical information (sections 64 and 68);
- prejudice to the safety of an individual or to the protection of property (section 66);
- prejudice to the protection of records privileged from production in legal proceedings (section 67);
- prejudice to research being carried out by or on behalf of a third party or the company (section 69); or
- a request that is manifestly frivolous or vexatious, or would involve a substantial and unreasonable diversion of resources (section 45).

Access may nonetheless be granted where the public interest override in section 70 applies.

9. Fees

Two fees apply under PAIA. A **request fee**, payable by every requester on submission, and an **access fee**, payable only if the request is granted, calculated to reimburse the reproduction, search and preparation costs actually incurred.

The following are the fees prescribed for private bodies by the PAIA Regulations, 2021.

Item	Amount
Request fee, payable by every requester	R140.00
Photocopy or printed black and white copy, per A4 page or part thereof	R2.00
Printed copy of an A4-size page or part thereof	R2.00
Copy in computer-readable form on a flash drive provided by the requester	R40.00

Copy in computer-readable form on a compact disc provided by the requester	R40.00
Copy in computer-readable form on a compact disc provided by us	R60.00
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on a flash drive or compact disc provided by the requester	R40.00
Copy of an audio record on a compact disc provided by us	R60.00
Transcription or copy of visual images	Outsourced, charged at the service provider's quoted rate
Search and preparation, per hour or part thereof, excluding the first hour	R145.00
Maximum total search and preparation fee	R435.00
Deposit, where the search is estimated to exceed six hours	One third of the access fee
Postage, email or other electronic transfer	Actual expense, if any

Where a deposit is payable and the request is subsequently refused, or access is given to only part of the record, the deposit is refunded in whole or in proportion, as required by section 54(6) of PAIA.

The prescribed fees are set by regulation and are subject to change. The Information Regulator publishes the current fee structure at inforegulator.org.za.

10. Availability of this manual

This manual is available:

- on our website at sudohost.co.za, free of charge;
- for inspection at our principal place of business during normal business hours, free of charge;
- from the Information Officer on request, by email at no charge, or in printed form at the reproduction fee in section 9; and
- from the Information Regulator.

11. Remedies available to a requester

A private body has no internal appeal procedure under PAIA. A requester who is dissatisfied with a decision of the Information Officer may:

- **Lodge a complaint with the Information Regulator** in terms of section 77A of PAIA, on the prescribed form, within 180 days of the decision. Complaints are sent to PAIAComplaints@inforegulator.org.za.
- **Apply to a court** in terms of section 78 of PAIA for appropriate relief, within 180 days of the decision.

12. Updating of this manual

This manual is reviewed and updated whenever the particulars in it change materially, and in any event at intervals of not more than one year. The version date appears on the first page.

Contact for all PAIA requests

Andrew Pillinger, Information Officer
Pillinger and Digital (Pty) Ltd
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privacy@sudohost.co.za · 075 262 9331