

PAIA MANUAL

COBBLE ROAD LABS (PTY) LTD
Registration No: 2025/870024/07

**Prepared in terms of Section 51 of the
Promotion of Access to Information Act, No. 2 of 2000 (as amended by POPIA)**

INFORMATION OFFICER
Marais Roos (Director)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Description
CIPC	Companies and Intellectual Property Commission
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
POPIA	Protection of Personal Information Act No.4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa
SARS	South African Revenue Service

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is to assist the public to:

1. Understand the categories of records held by COBBLE ROAD LABS (PTY) LTD.
2. Understand the procedure for making a formal request for access to a record.
3. Access contact details for the Information Officer.
4. Understand the body's compliance with POPIA, specifically regarding the processing of personal information.

3. KEY CONTACT DETAILS

Detail	COBBLE ROAD LABS (PTY) LTD Information
Name of Private Body	COBBLE ROAD LABS (PTY) LTD
Registration Number	2025/870024/07
Information Officer Name	Marais Roos
Information Officer Title	Director and Information Officer

IO Tel	+27 60 837 5505
IO Email	marais@cobbleroadlabs.com
Deputy Information Officer	No Deputy Information Officer has been appointed. In the absence of the Information Officer, requests may be directed to info@cobbleroadlabs.com.
Access to Information General Contact Email	info@cobbleroadlabs.com
Physical Address	41 AMATOLE STREET, VAALPARK, FREE STATE, 1947
Postal Address	41 AMATOLE STREET, VAALPARK, FREE STATE, 1947
Website	https://cobbleroadlabs.com

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

The Regulator has, in terms of section 10(1) of PAIA, made available a revised Guide on how to use PAIA. The Guide contains:

- The objects of PAIA and POPIA.
- The manner and form of a request for access to a record.
- All remedies available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA.

How to Obtain the Guide: The Guide is available on the Regulator's website: <https://info regulator.org.za/> or can be requested from the Information Officer.

5. RECORDS AVAILABLE WITHOUT REQUEST (VOLUNTARY DISCLOSURE)

COBBLE ROAD LABS (PTY) LTD has no records that are automatically available in terms of a Section 52(2) notice. However, the following information is available without a formal PAIA request:

Category of records	Types of the Record
Company Details	Name, Registration Number, Registered Address (as listed in this Manual)
Publicly Available Information	Marketing brochures, service descriptions, the company's Privacy Notice, and Terms of Use (available on the company website: https://cobbleroadlabs.com).

6. RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

The body holds records in accordance with, but not limited to, the following South African legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI)	Companies Act 71 of 2008
Minutes of Meetings / Resolutions	Companies Act 71 of 2008
Annual Financial Statements (AFS)	Companies Act 71 of 2008
Records relating to Director/Public Officer appointments	Companies Act 71 of 2008
Accounting Records (Ledgers, Source Documents)	Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991
Tax Returns (ITR14, VAT201, etc.)	Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991
Records held for FICA verification	Financial Intelligence Centre Act 38 of 2001

7. DESCRIPTION OF THE SUBJECTS AND CATEGORIES OF RECORDS HELD

Subjects on which the body holds records	Categories of Records
Corporate and Compliance	CIPC Documents (COR14.3), Company Resolutions, Share Register, PAIA/POPIA Compliance Records.
Financial and Tax	Bank Statements, Electronic Banking Records, Invoices (Issued and Received), General Ledger, Trial Balance, Director's Loan Account (DLA) Records, Budgeting Documents, Tax Documentation.
Commercial and Operations	Client Service Agreements/Contracts, Quotes and Proposals, Supplier/Vendor Contracts, Marketing Materials, General Business Correspondence.
Intellectual Property	Trade Marks, Domain Name Registration Records, Copyright Records, Software Source Code, Website Content Files.

Insurance	General Liability, Professional Indemnity, Cyber Insurance Policies and Claim Records.
Personnel (Director/Owner)	Employment Contract (if applicable), Personnel Records, Training Records, Security Access Records.
Information Technology	Software Licenses (e.g., Xero), IT Security Policy, Disaster Recovery Plan.

8. PROCESSING OF PERSONAL INFORMATION (POPIA Requirements)

8.1. Purpose of Processing Personal Information

The body processes personal information primarily to fulfil its legal, financial, and operational obligations, including:

- To comply with the Companies Act, SARS requirements (Income Tax, VAT, PAYE), and FICA.
- To record all transactions accurately and maintain the financial integrity of the company via the accounting system (Xero).
- To fulfil contractual obligations to clients and suppliers (e.g., invoicing, payment, service delivery).
- To manage the statutory records and internal governance of the company.

8.2. Description of the Categories of Data Subjects and Information

Categories of Data Subjects	Personal Information that may be processed
Director / Public Officer	Name, ID number, residential address, contact details (email/phone), bank details, employment history, tax records.
Employees and Contractors	Name, ID number, bank account details, salary/payroll records, UIF/PAYE records, medical aid details, next-of-kin contact details.
Customers / Clients	Name (if natural person), physical/postal address, registration number (if juristic person), contact details, banking details for payment, service history.
Service Providers / Suppliers	Name (if natural person), registration number (if juristic person), VAT number, contact details, bank details.

8.3. Recipients or Categories of Recipients to Whom the Personal Information May Be Supplied

Category of Personal Information	Recipients or Categories of Recipients
Statutory/Tax Information	South African Revenue Service (SARS)
Registration Details	Companies and Intellectual Property Commission (CIPC)
Transactional & Banking Data	Capitec Bank, Licensed South African Payment Gateways/Service Providers.
Accounting Data	Xero (Cloud Accounting Platform/Operator)
Statutory Compliance	Registered Auditors or Independent Reviewers (if applicable)

8.4. Planned Transborder Flows of Personal Information

Yes. COBBLE ROAD LABS (PTY) LTD utilizes cloud-based accounting services. This involves the systematic transfer and storage of personal information (including Director, Customer, and Supplier details) to servers located outside the Republic of South Africa (specifically, New Zealand, where Xero is headquartered).

New Zealand is recognised by the Information Regulator as providing an adequate level of protection (Proclamation No. R. 85 of 2021).

The company relies on Section 72 of POPIA, ensuring that:

1. The transfer is **necessary for the performance of the contract** between the Responsible Party (COBBLE ROAD LABS) and the Data Subject (e.g., the Director or supplier/client who consents to being paid via the system).
2. The Operator (Xero) is subject to a contract that provides an **adequate level of protection** that aligns with POPIA's conditions, as confirmed by Xero's published security compliance (e.g., ISO 27001 certification).

8.5. General Description of Information Security Measures

The Responsible Party implements the following security measures to ensure confidentiality, integrity, and availability of personal information:

- **Technical Controls:** Mandatory Multi-Factor Authentication (MFA) on Xero, bank accounts, and corporate email systems. Use of secure, reputable cloud services (Xero) which provide data encryption both in transit and at rest.
- **Organisational Controls:** The Information Officer restricts access to data based on a need-to-know basis. Policies are in place for secure data disposal and password management.

9. AVAILABILITY OF THE MANUAL

A copy of this Manual is available:

1. On the company's website: <https://cobbleroadlabs.com>
2. At the head office of COBBLE ROAD LABS (PTY) LTD (**41 AMATOLE STREET, VAALPARK, FREE STATE, 1947**) for public inspection during normal business hours.
3. To any person upon request and upon the payment of the prescribed fee.
4. To the Information Regulator upon request.

The fee for a copy of the Manual (or for a record) is determined by the Minister's Regulations (Annexure B of the PAIA Regulations). The fee for the Manual is generally **R1.40** per A4-size page photocopy made (or printed from electronic form).

10. REQUEST PROCEDURE (SECTION 51(1)(B)(IV) OF PAIA)

This section outlines the prescribed procedure for a requester (other than a personal requester) to obtain access to records of COBBLE ROAD LABS (PTY) LTD.

1. **Request Form:** Requests must be made on the prescribed Form 2 (known as Form C in older guidance). This form is available on the Regulator's website (<https://inforegulator.org.za/forms/>) or can be obtained from the Information Officer.
2. **Submission:** The completed form, along with proof of identity and explanation of the right being exercised, must be submitted to the Information Officer (Marais Roos) at the postal or email address provided in Section 3.
3. **Request Fee:** A prescribed request fee of **R140.00** must accompany the request. Personal Requesters seeking their own information are exempt from this fee.
4. **Response:** The company will respond to the request within 30 calendar days, as required by PAIA.

Note: If the preparation time is anticipated to exceed six hours, a deposit equal to one-third of the total access fee may be required before processing continues.

11. UPDATING OF THE MANUAL

The Information Officer of COBBLE ROAD LABS (PTY) LTD will on a regular basis update this manual, particularly when there are changes to the company's structure, the type of information processed, or the relevant South African legislation.

Issued by

Marais Roos

Director and Information Officer