PAIA MANUAL

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

Inyanga Trading 304 (Pty) Ltd t/a Vic Legacy Auto
CK 2005/028265/07

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CONTROLLED DOCUMENT – MANAGEMENT APPROVAL REQUIRED BEFORE PUBLICATION

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- PAIA – Promotion of Access to Information Act 2 of 2000, as amended.
- POPIA – Protection of Personal Information Act 4 of 2013.
- IO – Information Officer.
- DIO – Deputy Information Officer.
- Regulator – Information Regulator of South Africa.
- Republic – Republic of South Africa.
- CK – Company registration number.
- NCA – National Credit Act 34 of 2005.
- CPA – Consumer Protection Act 68 of 2008.

2. PURPOSE OF THE PAIA MANUAL

This manual provides information about Inyanga Trading 304 (Pty) Ltd t/a Vic Legacy Auto ("Vic Legacy Auto" or "the Company"), the records it holds, the manner in which access to those records may be requested, and the contact details of the persons responsible for assisting requesters. It is prepared with reference to the Information Regulator's current private-body PAIA manual template and section 51 of PAIA.

- It enables a requester to identify categories of records that may be available without a formal PAIA request.
- It explains how to make a request for access to a record held by the Company.
- It identifies categories of records held by the Company and the subjects to which those records relate.
- It provides contact details for the Information Officer and PAIA/POPIA compliance contact.
- It describes, at a high level, the Company's processing of personal information in accordance with POPIA.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Private body	Inyanga Trading 304 (Pty) Ltd t/a Vic Legacy Auto
Company registration number	2005/028265/07
Information Officer / Head	Victor Manual Moutinho Correia
Telephone	016 018 0224
Email	victor@vla1.co.za
Deputy Information Officer / Compliance Officer*	Melissa Visagie
Compliance / PAIA email	melissa@vla1.co.za
Physical address	40 General Smuts Road, Duncanville, Vereeniging, 1939
Postal address	40 General Smuts Road, Duncanville, Vereeniging, 1939
Website	www.viclegacyauto.co.za
PAIA request submission	Requests should be directed to the Information Officer / PAIA contact at melissa@vla1.co.za, with copies to victor@vla1.co.za where appropriate.

* The formal designation and registration of the Information Officer/Deputy Information Officer with the Information Regulator should be confirmed by management before publication of this manual.

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

The Information Regulator has published a Guide on how to use PAIA, as amended. The Guide explains the rights available under PAIA and POPIA, how to make requests, the assistance available from the Regulator, applicable remedies, fees and relevant regulations.

- The Guide is available from the Information Regulator and is published in South African official languages, with accessibility options provided by the Regulator.
- The Company will assist a requester, where reasonably possible, to identify the prescribed process and the appropriate contact person.
- A request for access to a record of a private body is made using the prescribed Form 2 and must identify the record sought, the requester, the form of access required, the right to be exercised or protected and why the record is required for that right.

Information Regulator: www.inforegulator.org.za | Tel: 010 023 5200 | Email: enquiries@inforegulator.org.za

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

The following categories may be made available without a formal PAIA request, subject to applicable confidentiality, privacy and legal restrictions:

Category	Examples	How access may be obtained
Company / public information	Company name, contact details, services, trading information, website content, published notices.	Website or by contacting the Company.
Marketing information	Vehicle advertisements, brochures, published offers and general dealership information.	Website, social media or dealership.
PAIA / privacy information	This PAIA Manual and any publicly available privacy notice/policy.	Company website or by contacting the PAIA contact.
Employment opportunities	Vacancies or recruitment information that the Company has chosen to publish.	Website or other published recruitment channel.

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Company may hold and maintain records in terms of applicable South African legislation. Access to such records remains subject to the requirements and restrictions of the relevant legislation and PAIA.

Applicable legislation	Examples of records
Companies Act 71 of 2008	Company registration and corporate records, including records required to be maintained by law.

Income Tax Act 58 of 1962 / Tax Administration Act 28 of 2011	Tax and accounting records required by law.
Value-Added Tax Act 89 of 1991	VAT-related records, where applicable.
Basic Conditions of Employment Act 75 of 1997	Employment and prescribed workplace records.
Labour Relations Act 66 of 1995	Employment relations and related records.
Employment Equity Act 55 of 1998	Employment-equity records, where applicable.
Skills Development Act 97 of 1998	Training and skills-development records, where applicable.
Unemployment Insurance Act 63 of 2001	UIF-related employment records, where applicable.
Compensation for Occupational Injuries and Diseases Act 130 of 1993	COIDA-related records, where applicable.
Consumer Protection Act 68 of 2008	Customer and consumer-related records, where applicable.
National Credit Act 34 of 2005	Credit/finance-related records, where applicable to the Company's activities.
Electronic Communications and Transactions Act 25 of 2002	Electronic communications and transaction records, where applicable.
Protection of Personal Information Act 4 of 2013	Personal-information processing and compliance records.
Promotion of Access to Information Act 2 of 2000	This manual, PAIA requests, responses and related records.

7. SUBJECTS ON WHICH VIC LEGACY AUTO HOLDS RECORDS AND CATEGORIES OF RECORDS

Subject	Categories of records
Corporate / Governance	Memorandum and Articles/constitutional records as applicable, company registration records, resolutions, statutory registers, policies and governance documents.
Finance / Accounting	Invoices, receipts, payments, bank-related records, budgets, accounting records, tax records and financial reports.
Sales / Customers	Customer details, quotations, sales records, vehicle purchase/sale documentation, delivery records, customer correspondence and complaints.
Vehicle / Stock	Vehicle stock records, acquisition records, vehicle specifications, inspection/service-related documents, licensing/registration documentation and related correspondence.
Finance / Credit	Applications, supporting documents, correspondence and records relating to finance or credit arrangements, where applicable.
Suppliers / Service Providers	Supplier details, quotations, invoices, contracts, service agreements, correspondence and payment records.
Human Resources	Employment contracts, employee records, leave, payroll, training, disciplinary and other employment-related records.
Legal / Compliance	Contracts, legal correspondence, complaints, regulatory correspondence, PAIA/POPIA records and compliance documentation.
Marketing / Communications	Advertising material, website content, customer communications, marketing campaigns and social-media business records.
Information Technology / Security	Access-control information, systems administration records, backups, security logs and IT service records, where held.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing personal information

Vic Legacy Auto processes personal information where reasonably necessary for its dealership, administrative, contractual, legal, customer-service, employment, finance/credit-intermediary, security and compliance activities. Processing is carried out subject to POPIA and other applicable law.

8.2 Categories of data subjects and personal information

Data subject	Personal information that may be processed
Customers / prospective customers	Names, contact details, identity or company information, vehicle and transaction details, identification/supporting documents, financial or credit-related information where applicable, correspondence and preferences.
Employees / applicants	Identity and contact details, employment information, payroll and banking information, qualifications, leave, performance, disciplinary and training information, where applicable.

Suppliers / service providers	Names/contact details, company and registration information, tax/VAT details, banking/payment information, contracts and correspondence.
Business partners / finance or service intermediaries	Contact and business details, transaction records, correspondence and compliance information.
Website / communication users	Information submitted through contact channels, technical information and communication records, where collected.

8.3 Recipients or categories of recipients

Depending on the transaction and legal basis, personal information may be supplied to:

- Government departments, licensing and registration authorities and regulators where required or permitted by law.
- Vehicle finance providers, banks, credit providers and credit bureaus where relevant to a customer's application or transaction.
- Insurers, auditors, accountants, attorneys, professional advisers and service providers acting on behalf of the Company.
- Vehicle manufacturers, wholesalers, suppliers, logistics providers and other business partners where necessary for a transaction.
- Courts, law-enforcement agencies or other authorities where disclosure is legally required or permitted.
- IT, hosting, communications, document-management and other service providers, subject to appropriate confidentiality and security measures.

8.4 Planned transborder flows of personal information

No specific planned transborder transfer is identified for declaration in this manual at the date of compilation. Where cloud, hosting, software, communications or other service providers process personal information outside the Republic, the Company will assess and manage such transfers in accordance with POPIA and applicable contractual safeguards.

8.5 General description of information security measures

The Company's information-security controls are intended to protect the confidentiality, integrity and availability of information. Controls may include role-based access, passwords and authentication, physical protection of files, confidentiality obligations, secure disposal, backups, malware protection, system updates and access restrictions. The specific controls in operation should be reviewed periodically by management and updated where necessary.

9. AVAILABILITY OF THE PAIA MANUAL

A copy of this Manual is intended to be available:

- On the Company website: www.viclegacyauto.co.za
- At the Company's head office: 40 General Smuts Road, Duncanville, Vereeniging, 1939, during normal business hours.
- To any person upon request, subject to any prescribed or reasonable reproduction fee permitted by law.
- To the Information Regulator upon request.

10. UPDATING OF THE PAIA MANUAL

The Company will review and update this manual regularly and when there are material changes to its business, information holdings, responsible persons, contact details, processing of personal information or applicable legal requirements.

11. REQUEST PROCEDURE AND FEES

A requester seeking access to a record of this private body should submit the prescribed PAIA Form 2 to the Company's Information Officer / PAIA contact. The request must provide sufficient detail to identify the record and requester, state the form of access required, identify the right the requester seeks to exercise or protect, and explain why the record is required for that right. If the requester acts on behalf of another person, proof of authority must be provided.

- Email the completed Form 2 to melissa@vla1.co.za.
- Alternatively, deliver or post the request to the Company's physical address.
- The Company will process the request in accordance with PAIA and the applicable regulations.
- A personal requester is not required to pay the request fee applicable to other requesters.
- The current prescribed request and access fees applicable to private bodies must be applied as published under the PAIA Regulations. At the date of this manual, the 2021 regulations provide a R140 request fee for a requester other than a personal requester, with reproduction, search/preparation and other applicable fees prescribed separately.
- Where a deposit or access fee is lawfully required, the requester will be notified in the prescribed manner.

12. GROUNDS FOR REFUSAL AND REMEDIES

Access to a record is not automatic. PAIA contains mandatory and discretionary grounds on which access may be refused, including protections relating to personal information/privacy, commercial confidentiality, confidential information, legal privilege, safety and other protected interests. Where access is refused, the Company will provide the reasons required by law and information about the requester's available remedies.

- For a private body, the requester generally has no internal appeal under PAIA. A requester may lodge a complaint with the Information Regulator where the statutory requirements are met.
- The Information Regulator's current guidance states that a complaint against a private body should generally be lodged within 180 days from the refusal/non-response, subject to the applicable rules and any condonation process.
- A requester may also have rights to approach a court where permitted by PAIA and applicable law.

Information Regulator: www.inforegulator.org.za | enquiries@inforegulator.org.za | 010 023 5200

13. APPROVAL AND SIGN-OFF

This Manual is issued for and on behalf of the Company and should be approved by the appropriate responsible person before publication.

Name	Victor Manual Moutinho Correia
Designation	Owner / Head / Information Officer
Signature	
Date	17 September 2026

ANNEXURE A – USEFUL PAIA RESOURCES

Official resources used as the legal drafting basis for this manual:

- Information Regulator – PAIA page: https://inforegulator.org.za/paia/
- Information Regulator – Private Body PAIA Manual Template: https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Manual-Template-Private-Body.pdf
- Department of Justice – PAIA legislation and regulations: https://www.justice.gov.za/paia/paia.htm

This manual is a practical compliance draft based on the official Information Regulator private-body template and current publicly available PAIA materials. It should be reviewed against the Company's actual records, contracts, IT systems, Information Officer registration/designations and current legal requirements before being adopted as the final controlled document.