



PROMOTION OF ACCESS TO INFORMATION

PAIA Manual

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

PRIVATE BODY	DOCUMENT CONTROL
K2026530858 (South Africa) (Pty) Ltd Trading as Rawh Foods	Version 1.0 Compiled: 10 September 2026 Revision date: 10 September 2026

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STATUS	MANAGEMENT NOTE
Approved for publication as version 1.0, subject to routine updates when business particulars or processing activities change.	The Information Officer registration is stated as in progress. No Deputy Information Officer is designated. The principal place of business is recorded as Paarl, Western Cape; inspection is by prior appointment.

1. Acronyms and abbreviations

Acronym	Meaning
CEO	Chief Executive Officer
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
Responsible Party	A public or private body or other person which determines the purpose and means of processing personal information

2. Purpose of this manual

This manual helps members of the public understand the records held by Rawh Foods and the process for requesting access. In particular, it enables a person to:

- identify records that are available without a formal PAIA request;
- understand how to request access to a record and which contact person can assist;
- identify records created or retained under other applicable legislation;
- understand the subjects on which records are held and the categories within each subject;
- understand why and how personal information is processed, including recipients and possible processing outside South Africa; and
- understand the general safeguards used to protect the confidentiality, integrity and availability of information.

The inclusion of a record category does not mean that a particular record exists, is retained indefinitely, or must be disclosed. Every request is considered under PAIA, POPIA and other applicable law.

3. Key contact details for access to information

Role / detail	Information
Private body	K2026530858 (South Africa) (Pty) Ltd
Trading name	Rawh Foods
Registration number	2026/530858/07
Head of private body / Information Officer	Kalan Cloete - Director and Head of the Private Body
Deputy Information Officer	None designated
Telephone	076 598 1206
PAIA / POPIA email	hello@rawhfoods.co.za
General email	hello@rawhfoods.co.za
Principal place of business	Paarl, Western Cape, South Africa (inspection by prior appointment)
Postal contact	Electronic correspondence is preferred; postal delivery must be arranged in advance with the Information Officer
Website	https://rawhfoods.co.za
Fax	Not applicable

Registration of the Information Officer with the Information Regulator is recorded as in progress. Requests may nevertheless be submitted at any time using the contact details above.

4. Guide on how to use PAIA

The Information Regulator has published a Guide explaining how to use PAIA and POPIA, how to make a request, the assistance available, applicable remedies, fees and prescribed forms. The Guide is available in the official languages and in Braille.

Resource	Current access details
PAIA Guide and language versions	https://infoeregulator.org.za/paia-guidelines/
Prescribed request form	Form 2 - Request for Access to Record, available from the Information Regulator's PAIA pages
Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
General enquiries	0800 017 160 (toll-free) / 010 023 5200 / enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za

A copy of the Guide in English or Afrikaans may also be requested from the Rawh Foods Information Officer for public inspection during normal business hours, by prior arrangement.

5. Records available without a formal request

The following public-facing records may generally be accessed without submitting a formal PAIA request. Access remains subject to reasonable identity, confidentiality, intellectual-property, security and legal restrictions.

Category	Types of records	Website	On request
Corporate and contact information	Trading name, company identity, contact channels and public business profile	Yes	Yes

Category	Types of records	Website	On request
Policies	PAIA manual, privacy notice, website terms, delivery and returns policies	Yes	Yes
Products and services	Published product descriptions, prices, promotions, ordering information and food information made public	Yes	Yes
Marketing	Public advertising, social media posts, catalogues and campaign material	Yes	Yes
Customer-specific records	A requester's own order correspondence or personal information, subject to identity verification	No	Yes

6. Records available under other legislation

Rawh Foods may create, receive or retain records under the following legislation, to the extent applicable to its size, activities, registrations and workforce.

Applicable legislation	Examples of relevant records
Companies Act 71 of 2008	Memorandum of incorporation, securities and director records, statutory company records
Income Tax Act 58 of 1962	Tax returns, assessments, supporting documents and accounting records
Value-Added Tax Act 89 of 1991	VAT records and tax invoices, if and when applicable
Tax Administration Act 28 of 2011	Returns, notices, correspondence and supporting tax records
Consumer Protection Act 68 of 2008	Product, pricing, sales, complaint, return and refund records
Electronic Communications and Transactions Act 25 of 2002	Website supplier disclosures, electronic communications and transaction records
Protection of Personal Information Act 4 of 2013	Privacy notices, data-subject requests, processing and security records
Promotion of Access to Information Act 2 of 2000	PAIA manual, requests, decisions, correspondence and annual reporting records
Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972 and applicable regulations	Labels, ingredients, allergens, batch, supplier, traceability, storage and food-safety records
Basic Conditions of Employment Act 75 of 1997	Employment particulars, leave, remuneration and working-time records, where applicable
Labour Relations Act 66 of 1995	Employment, policy, grievance and disciplinary records, where applicable
Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002	UIF registration, contribution and employee records, where applicable
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Registration, incident and compensation records, where applicable
Occupational Health and Safety Act 85 of 1993	Risk, incident, training and workplace-safety records, where applicable

7. Subjects and categories of records held

Subject	Categories of records
Corporate governance	Formation and registration records; director and ownership records; resolutions; policies; licences and registrations
KOS strategy and management	Operating plans; budgets; performance trackers; management decisions; project plans; internal procedures and business-development records
Finance and tax	Cashbooks; invoices; receipts; bank records; accounting ledgers; budgets; tax records; asset, insurance and financial reporting records
Customers and sales	Enquiries; order requests; quotations; sales; payments; delivery details; returns; refunds; complaints and correspondence
Suppliers and procurement	Supplier details; quotations; orders; agreements; invoices; banking details; product, quality and delivery records
Products, stock and food safety	Product specifications; ingredients; allergens; labels; weights; batches; inventory; packing; storage; traceability; quality issues and recalls
People	Director, employee, contractor and reseller records; agreements; payroll and tax records; training; performance and disciplinary records, where applicable
Marketing and intellectual property	Brands; logos; designs; photographs; website content; campaigns; social media; customer communications and licence records
Technology and security	Website and hosting records; access logs; device and account records; backups; incidents; vendor and cybersecurity records
Legal and compliance	Contracts; legal advice; disputes; PAIA/POPIA requests; regulatory correspondence; permits; policies and compliance registers

8. Processing of personal information

8.1 Purpose of processing

Rawh Foods processes personal information only for legitimate business and legal purposes, including to:

- receive and manage enquiries, order requests, quotations, sales, payments, deliveries, returns, refunds and complaints;
- communicate with customers, prospective customers, suppliers, resellers, couriers, contractors and advisers;
- verify identity, prevent fraud, manage safety and protect the business, customers and systems;
- manage suppliers, stock, food information, traceability, quality issues and product recalls;
- operate, secure and improve the website, business systems and customer service;
- administer personnel, contractors, payroll, training and workplace obligations, where applicable;
- keep accounting, tax, company and statutory records and respond to lawful requests; and
- send direct marketing where permitted, subject to consent or another lawful basis and an opt-out mechanism.

8.2 Categories of data subjects and information

Data subjects	Personal information that may be processed
Customers and prospective customers	Names; contact details; delivery address; order, payment-status, return and complaint records; correspondence; preferences; marketing consent
Website visitors	IP address; date and time; requested pages; browser/device and security event information; functional cart identifiers stored in the browser
Suppliers, couriers, resellers and service providers	Names; identity or registration details; contact information; tax/VAT details; banking and payment information; contracts; performance and correspondence
Directors, shareholders and beneficial owners	Identity and contact details; ownership and statutory information; signatures; tax, financial and banking information
Employees, applicants and contractors	Identity and contact details; qualifications; work history; demographic and tax information; banking and payroll data; leave, performance, disciplinary, health and safety records, where applicable
Complainants, requesters and representatives	Identity, authority, contact information, request/complaint contents and supporting documents

8.3 Recipients or categories of recipients

Information category	Possible recipients
Order, contact and delivery information	Rawh Foods personnel and authorised representatives; couriers and delivery partners; communication platforms
Payment and financial information	Banks, payment-service providers, accountants, auditors, tax practitioners and SARS
Website and technical information	Website hosting, cloud, security, email and technology service providers
Company, personnel and compliance information	Professional advisers, insurers, regulators, government bodies and law-enforcement agencies where lawfully required
Product and traceability information	Suppliers, couriers, customers, food-safety advisers and competent authorities where required for quality, safety or recall purposes

8.4 Planned transborder flows

Rawh Foods uses internet, hosting, email, cloud, social-media and messaging services. Depending on the service provider's infrastructure, ordinary technical, account, communication or order information may be processed or stored outside South Africa. WhatsApp/Meta receives order information only when a customer chooses to open and send the prepared message. Rawh Foods seeks to use providers and safeguards that provide an adequate level of protection, contractual protection, consent where appropriate, or another lawful basis under POPIA. Provider locations and processing arrangements may change and should be reviewed periodically.

8.5 General information security measures

- access control based on business need, strong passwords and multi-factor authentication where available;
- reasonable encryption in transit, secure hosting, endpoint protection, software updates and malware protection;
- secure backups, recovery procedures and retention or deletion controls appropriate to the record;
- confidentiality obligations, staff awareness and careful handling of payment and identity information;
- supplier and service-provider assessment, contractual safeguards and restricted sharing;
- physical safeguards for paper records, stock and devices; and
- incident identification, containment, investigation and notification procedures where required.

9. Availability of the manual

A copy of this manual is available:

- on the Rawh Foods website at <https://rawhfoods.co.za>;
- from the Information Officer by email at hello@rawhfoods.co.za;
- for inspection at the principal place of business in Paarl during normal business hours, by prior appointment; and
- to the Information Regulator on lawful request.

An electronic copy of this manual is provided free of charge. A fee for physical copies may be charged only as permitted by the applicable PAIA regulations.

10. How to request access

A requester should use the current prescribed Form 2 published by the Information Regulator and:

1. identify the requested record clearly and state the preferred form of access;
2. provide contact details and sufficient proof of identity or authority;
3. identify the right the requester seeks to exercise or protect and explain why the record is required for that purpose;
4. send the completed form to hello@rawhfoods.co.za with the subject 'PAIA request'; and
5. pay any prescribed fee after receiving a lawful fee notice, if applicable.

A request may be granted, partly granted, transferred or refused only on grounds permitted by law. The prescribed response periods, notices and extension provisions apply. If a request is denied or no response is received, a complaint may be lodged with the Information Regulator using Form 5 and the current complaint channels.

11. Updating and approval of the manual

The head of the private body will review this manual regularly and update it when business particulars, applicable law, record practices, processing activities or security arrangements materially change.

ISSUED BY	
Kalan Cloete Director and Head of the Private Body Information Officer	Signature: <u>K Cloete</u> Date: 10 September 2026

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