

PAIA MANUAL

Promotion of Access to Information Act 2 of 2000

Elite Cupboards

Private Body Manual | Prepared in accordance with Section 51 of PAIA

1. Introduction

This manual is published by Elite Cupboards in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). PAIA gives effect to the constitutional right of access to any information held by a private body where that information is required for the exercise or protection of any right.

Elite Cupboards is a sole proprietorship, owned and operated by Colin Holland, and is classified as a private body for the purposes of PAIA. Elite Cupboards is not a registered company, close corporation, or other juristic entity, and operates as a one-person business without additional employees.

This manual explains what records Elite Cupboards holds, how to request access to those records, and the process that will be followed in dealing with such requests.

2. Contact details of the Information Officer

In terms of PAIA, the following person is the Information Officer of Elite Cupboards and is responsible for dealing with all requests for access to information:

Field	Detail
Name	Colin Holland
Designation	Owner / Information Officer
Business name	Elite Cupboards
Physical address	Blairgowrie, Randburg, 2194, South Africa
Email	info@elitecupboards.co.za
Telephone	+27 61 451 2301
Website	www.elitecupboards.co.za

As Elite Cupboards has no other employees, there is no separate Deputy Information Officer. All PAIA requests should be directed to Colin Holland using the details above.

3. How to use this manual

This manual is intended to assist members of the public in understanding what information Elite Cupboards holds, and how to request access to it. A general Guide on how to use PAIA is also compiled and made available by the South African Human Rights Commission (SAHRC), as required by Section 10 of PAIA. That guide can be obtained from:

- South African Human Rights Commission, Private Bag 2700, Houghton, 2041
- Telephone: 011 877 3600
- Website: www.sahrc.org.za

4. Records available in terms of other legislation

Certain records held by Elite Cupboards may also be available in terms of other legislation, without the need to submit a formal PAIA request. This includes, where applicable:

- Tax invoices and financial records, which may be requested through the South African Revenue Service (SARS) processes where legally applicable
- Consumer-facing records such as quotes and communications, which are ordinarily made available directly to the client as part of the ordinary course of business

Where a record can reasonably be provided informally on request, Elite Cupboards will do so without requiring the requester to follow the formal PAIA process.

5. Records automatically available (no PAIA request required)

The following records are voluntarily made available to the public, free of charge, via the Elite Cupboards website, and do not require a formal PAIA request:

- This PAIA Manual
- The Elite Cupboards Privacy Policy
- The Elite Cupboards Terms and Conditions
- General information about services offered (kitchens, bathrooms, built-ins, vanities, countertops, and tailor-made design)
- Publicly displayed testimonials and project photographs, published with client consent

6. Categories of records held by Elite Cupboards

The table below sets out the categories of records held by Elite Cupboards, in accordance with Section 51(1)(d) of PAIA. Not all records in each category may exist at a given time, and some records may be exempt from disclosure under PAIA.

Category	Description
Client and enquiry records	Names, phone numbers, email addresses, project details, and photographs submitted by prospective or current clients via the website contact form, WhatsApp, or email
Quotes and correspondence	Written quotes, project scope documents, and email or WhatsApp correspondence with clients

Financial records	Invoices, payment records, and accounting records maintained through accounting software
Website and marketing records	Website analytics data (Google Analytics, Google Search Console, Google Tag Manager, Ahrefs, Microsoft Clarity), testimonials, and project photographs used for marketing purposes
Supplier records	Records relating to materials, fittings, and suppliers used in the course of installation and design work
Business administration records	General correspondence, business records, and records required to comply with tax and legal obligations

7. Requesting access to a record

Any person wishing to request access to a record held by Elite Cupboards must complete the prescribed request form (Form 2, in terms of the PAIA Regulations) and submit it to the Information Officer at the contact details listed in Section 2.

7.1 What must be included in a request

- Sufficient detail to identify the record being requested
- The requester's contact details (postal or email address, and telephone number)
- The form in which access is required (e.g. copy, inspection, electronic format)
- Proof of the right being exercised or protected, if access is required for the exercise or protection of a right
- Details of any authorised third party, if the request is made on behalf of another person

7.2 Fees

A request fee may be payable in accordance with the fee structure prescribed under PAIA. Elite Cupboards will notify the requester of any applicable fees before processing the request. Given the size and nature of the business, most reasonable requests are expected to be handled without a formal fee.

7.3 Response time

Elite Cupboards will respond to a valid PAIA request within 30 days of receipt, as required by PAIA. If a request is refused, in full or in part, written reasons for the refusal will be provided, along with information on the requester's right to lodge a complaint with the Information Regulator or apply to court for relief.

8. Grounds for refusal

Access to a record, or part of a record, may be refused where a ground for refusal set out in PAIA applies. This may include records containing:

- Personal information of a third party, protected under POPIA
- Confidential commercial information (e.g. supplier pricing or business strategy)
- Information that would unreasonably prejudice the commercial or financial interests of Elite Cupboards

Where only part of a record is subject to a ground for refusal, the remainder of the record will be provided where reasonably possible.

9. Right to lodge a complaint

If a requester is unhappy with a decision made by Elite Cupboards in relation to a PAIA request, they may lodge a complaint with the Information Regulator of South Africa:

Field	Detail
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Complaints email	complaints.IR@justice.gov.za
General enquiries	inforeg@justice.gov.za
Website	www.justice.gov.za/inforeg

10. Availability of this manual

This manual is available free of charge on the Elite Cupboards website at www.elitecupboards.co.za, and a copy may be requested directly from the Information Officer using the contact details in Section 2.

11. Updates to this manual

This manual will be reviewed and updated as necessary to reflect changes in the business, its record-keeping practices, or applicable legislation.

Last updated: 1 July 2026