

TWO BIRDS INTERIORS (PTY) LTD

PAIA MANUAL

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

DATE OF COMPILATION: 08/04/2026

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 “DIRECTOR”	Directors of the company
1.2 “DIO”	Deputy Information Officer
1.3 “IO”	Information Officer
1.4 “Minister”	Minister of Justice and Correctional Services;
1.5 “PAIA”	Promotion of Access to Information Act No.2 of 2000 (as amended)
1.6 “POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7 “REGULATOR”	Information Regulator; and
1.8 “REPUBLIC”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. COMPANY INFORMATION

3.1 Two Birds Interiors (Pty) Ltd is a company registered in accordance with the laws of South Africa with the Companies and Intellectual Property Commission (CIPC), registration number: 2016/346731/07

3.2 This PAIA manual of Two Birds Interiors (Pty) Ltd is available in English and can be viewed at its premises: 6 Gavenwood,55 Alma Road, Rosebank, Cape Town, 8005.

Company Name	Two Birds Interiors (Pty) Ltd
Registration Number	2016/346731/07
Physical Address	6 Gavenwood,55 Alma Road, Rosebank, Cape Town, 8005
Postal Address	Same as above
Telephone	+27 63 336 0922
Email Address	hello@twobirdsinteriors.co.za
Website	https://twobirdsinteriors.co.za/

The purpose of this manual is to provide guidance to any person who wishes to request access to information held by Two Birds Interiors (Pty) Ltd in terms of PAIA. This manual is prepared in accordance with Section 51 of PAIA.

4. CONTACT DETAILS OF THE DIRECTORS (SECTION 51(1)(A))

Director	Amanda Kelly Stone
Email Address	hello@twobirdsinteriors.co.za

5. THE INFORMATION OFFICER (SECTION 51(1)(B))

5.1 The Act prescribes the appointment of an Information Officer for Private Bodies where such Information Officer is responsible to, inter alia, assess requests for access to information. The Head of a Private Body fulfils such a function in terms of section 51. Two Birds Interiors (Pty) Ltd has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.

5.2 The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities required for both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.

5.3 The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Two Birds Interiors (Pty) Ltd as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All requests for information in terms of the Act must be addressed to the Information Officer.

5.4 Contact details of the Information Officer

Information Officer	Amanda Kelly Stone
Telephone	+27 63 336 0922
Email Address	hello@twobirdsinteriors.co.za

5.5 Contact details of the Deputy Information Officer

No Deputy Information Officer has been appointed

5.6 Access to information general contacts

Email address	hello@twobirdsinteriors.co.za
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6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

6.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

6.2. The Guide is available in each of the official languages and in braille.

6.3. The aforesaid Guide contains the description of-

6.3.1. the objects of PAIA and POPIA;

6.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

6.3.2.1. the Information Officer of every public body, and

6.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA(2);

6.3.3 the manner and form of a request for-

6.3.3.1. access to a record of a public body contemplated in section 11(3); and

6.3.3.2. access to a record of a private body contemplated in section 50(4);

6.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

6.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

6.3.6.1. an internal appeal;

6.3.6.2. a complaint to the Regulator; and

6.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if- a) that record is required for the exercise or protection of any rights; b) c) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

6.3.7. the provisions of sections 14(5) and 51(6) requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

6.3.8. the provisions of sections 15(7) and 52(8) providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

6.3.9. the notices issued in terms of sections 22(9) and 54(10) regarding fees to be paid in relation to requests for access; and

6.3.10. the regulations made in terms of section 92(11).

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11 Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

6.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

6.5. The Guide can also be obtained-

6.5.1. upon request to the Information Officer;

6.5.2. from the website of the Regulator (<https://www.inforegulator.org.za/>).

6.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

6.6.1 English and Afrikaans

**7. CATEGORIES OF RECORDS OF TWO BIRDS INTERIORS (PTY) LTD
WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST
ACCESS**

These are records that are **publicly accessible** or routinely available without a formal PAIA request:

CATEGORY OF RECORDS	TYPE OF RECORD	AVAILABLE ON WEBSITE	AVAILABLE WITHOUT FORMAL REQUEST
7.1 Company Registration Documents	Incorporation documents, MOI	NO	YES
7.2 Director Details	Names of directors and official contact details	NO	YES
7.3 Governance & Policies	Operational policies, company procedures	NO	YES
7.4 Contact Information	Company physical and postal address, email, telephone numbers	YES	YES
7.5 General Service Information	Information relating to services offered by the company	YES	YES

8. DESCRIPTION OF THE RECORDS OF TWO BIRDS INTERIORS (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Access to these records is governed by the specific legislation cited.

CATEGORY OF RECORDS	APPLICABLE LEGISLATION	ACCESS METHOD
8.1 Tax Filings & SARS Correspondence	Income Tax Act	Upon request, subject to SARS rules
8.2 CIPC Filings	Companies Act, 71 of 2008	Access via CIPC
8.3 Regulatory Compliance Records	Applicable regulatory legislation	Upon request, subject to legal requirements
8.4 Legal Documents & Contracts	Applicable contract and legal obligations	Upon request from Information Officer

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY TWO BIRDS INTERIORS (PTY) LTD

Note: Some of these records contain personal or sensitive information and access is governed by PAIA, POPIA, or other relevant legislation.

SUBJECT	CATEGORIES OF RECORDS HELD
9.1 Company Administration	MOI, resolutions, board minutes
9.2 Financial Management	Annual financial statements, accounting records, budgets, bank statements, tax returns
9.3 Clients / Customers	Client records, contracts, correspondence
9.4 Legal & Compliance	Contracts, agreements, regulatory filings, legal advice correspondence
9.5 Operational Policies	Company policies, procedures, internal communications
9.6 External Correspondence	Communication with service providers, auditors, legal advisors

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing Personal Information

The company processes personal information of directors/members, shareholders, employees, service providers, and other relevant persons for the following purposes:

10.1.1 Company Administration

10.1.1.1 To properly administer the company in accordance with applicable legislation

10.1.1.2 To maintain accurate records of directors/members and stakeholders

10.1.2 Financial Management and Reporting

10.1.2.1 To prepare financial statements, accounting records, and tax returns

10.1.2.2 To manage payments, billing, and financial operations

10.1.3 Compliance with Legal and Regulatory Obligations

10.1.3.1 To comply with the Companies Act, Income Tax Act, and other applicable legislation

10.1.3.2 To respond to regulatory authorities, auditors, and legal requirements

10.1.4 Communication and Correspondence

10.1.4.1 To communicate with clients, employees, directors/members, and service providers

10.1.4.2 To respond to queries, requests for information, or legal notices

10.1.5 Risk Management and Security

10.1.5.1 To ensure proper governance, risk management, and protection of company assets and information

10.1.6 Lawful Basis for Processing

Personal information is processed in accordance with POPIA, based on one or more of the following lawful grounds:

10.1.6.1 Consent of the data subject

10.1.6.2 Performance of a contract

10.1.6.3 Compliance with a legal obligation

10.1.6.4 Legitimate interests of the company

10.1.7 Property Investment and Development Activities

To facilitate property acquisition, renovation, and resale activities, including managing investor participation, project reporting, and financial tracking related to property development projects.

Note: The company only processes personal information that is necessary for these purposes. All personal information is processed lawfully, reasonably, and in accordance with the principles of the Protection of Personal Information Act (POPIA).

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

This section specifies the categories of data subjects in respect of whom the Company processes personal information, and the nature or categories of personal information being processed. The types of information are aligned with the purposes described in 10.1.

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
10.2.1 Clients / Customers	Names, identity numbers, addresses, contact details, banking details, project records, service records, invoicing records, etc
10.2.2 Directors / Members	Names, identity numbers, addresses, contact details, qualifications, appointments, resolutions signed, and compliance-related information

10.2.3 Employees / Staff	Names, identity numbers, contact details, addresses, qualifications, gender, race, employment records, payroll and banking details
10.2.4 Service Providers / Contractors	Names, company registration numbers, VAT numbers, addresses, contact details, trade secrets, contracts, and banking details
10.2.5 Shareholders	Names, identity numbers, addresses, contact details, payment or banking information, shareholding records, dividend/payment records, etc
10.2.6 Other Relevant Third Parties	Legal representatives, auditors, regulators, and professional advisors – names, contact details, professional qualifications, correspondence relevant to Company matters

Note: Two Birds Interiors (Pty) Ltd ensures that personal information is collected and processed **only to the extent necessary** to carry out its functions, comply with legal obligations, and administer the Company effectively.

10.3 The recipients or categories of recipients to whom the personal information may be supplied

This section specifies the categories of recipients to whom the company may supply personal information, in line with its operational, compliance, and legal obligations.

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS
10.3.1 Identity numbers, names, and personal details for verification or background checks	South African Police Service, Master of the High Court (Company Filings), regulatory authorities
10.3.2 Qualifications, certifications, and professional history	South African Qualifications Authority, professional verification bodies
10.3.3 Banking and payment details, credit and financial information	Credit Bureaus, banks, payment service providers
10.3.4 Tax and financial information	South African Revenue Service (SARS), auditors, accountants
10.3.5 Legal and contractual information	Legal advisors, attorneys, auditors, regulators
10.3.6 Employee personal records (e.g., payroll, benefits)	Payroll service providers, insurance companies, government agencies (e.g., UIF, SARS)

Note: Personal information is only shared **for legitimate purposes**, in line with the company's obligations under POPIA and other applicable laws. Recipients are required to handle the information responsibly and in accordance with confidentiality requirements.

10.4 Planned transborder flows of personal information

Due to the nature of the Company's business operations, personal information may be transferred outside the Republic of South Africa.

The Company engages in property investment and development activities, which include foreign investment into the Company and specific property projects. As a result, personal and financial information relating to investors, directors, and projects may be shared with foreign investors and stakeholders located outside South Africa.

Information is typically shared electronically via secure means, including:

- Password-protected email communication; and
- Secure document-sharing platforms such as Google Drive (accessed via controlled links).

The Company ensures that any cross-border transfer of personal information is conducted in accordance with Section 72 of the Protection of Personal Information Act (POPIA), and that appropriate safeguards are in place to protect the confidentiality and integrity of the information.

10.5 General description of Information Security Measures

The Company implements appropriate, reasonable technical and organisational measures to safeguard personal information, in accordance with POPIA.

Given the nature of the Company's operations, including cross-border investor reporting and project-based information sharing, the following security measures are in place:

- **Access Control:** Access to personal information is restricted to authorised individuals based on their role and responsibilities.
- **Secure Electronic Sharing:** Documents are shared via secure platforms such as Google Drive, using controlled access links with restricted permissions.
- **Password Protection:** Sensitive documents transmitted via email are password-protected to prevent unauthorised access.
- **Data Encryption:** Where applicable, electronic data is encrypted during transmission and storage.
- **Device Security:** Company devices are protected with secure passwords, antivirus software, and firewalls.
- **Confidentiality Agreements:** Employees, contractors, and relevant third parties are bound by confidentiality obligations.
- **Secure Storage:** Physical documents are stored in secure locations with controlled access.
- **Backup Procedures:** Regular data backups are performed to ensure data availability and recovery.
- **Ongoing Monitoring:** Security measures are periodically reviewed and updated to address evolving risks.

The Company takes all reasonable steps to ensure that personal information remains protected against unauthorised access, loss, or disclosure.

11. REQUEST PROCEDURE

11.1 A requester must complete the prescribed Form 2 (Request for Access to Record of a Private Body) in accordance with the PAIA Regulations, 2021.

Form 2 is available from the Information Regulator website at <https://www.inforegulator.org.za>

11.2 The request must be submitted to the Information Officer:
Email: hello@twobirdsinteriors.co.za

11.3 The requester must:

- 11.3.1 Provide sufficient detail of the record requested
- 11.3.2 Identify the right being exercised or protected
- 11.3.3 Provide contact details
- 11.3.4 The requester must demonstrate that the requested record is required for the exercise or protection of any rights, as contemplated in section 50 of PAIA.

11.4 A request fee may be payable before processing.

11.5 The Information Officer will respond within 30 days of receipt of the request.

11.5.1 The Information Officer may grant, partially grant, or refuse access to the requested record, and will provide written reasons where access is refused.

11.6 Grounds for Refusal of Access

Requests for access to records may be refused in accordance with Chapter 4 of PAIA. Grounds for refusal include, but are not limited to:

- 11.6.1 Protection of personal information of third parties
- 11.6.2 Confidential information of third parties
- 11.6.3 Commercial information
- 11.6.4 Safety of individuals
- 11.6.5 Privileged records

11.7 Remedies Available to Requesters

If a requester is dissatisfied with the response received, they may lodge a complaint with the Information Regulator.

Contact details of the Information Regulator:

Website: <https://www.inforegulator.org.za>

Email: enquiries@inforegulator.org.za

12. FEES

The applicable fees are prescribed in Annexure B of the PAIA Regulations, 2021 and may include:

- A request fee
- An access fee
- Reproduction and search fees

12.1 A request fee may be required before processing a request.

12.2 Access fees may be charged for:

- 12.2.1 Photocopies
- 12.2.2 Searching and preparation time

The requester will be informed of any applicable fees.

13. AVAILABILITY OF THE MANUAL

13.1 A copy of the Manual is available-

- 13.1.1 on the Company's website, if applicable;
- 13.1.2 head office of the Two Birds Interiors (Pty) Ltd for public inspection during normal business hours;
- 13.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

13.1.4 to the Information Regulator upon request.

13.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

14. UPDATING OF THE MANUAL

The head of Two Birds Interiors (Pty) Ltd will review and update this manual on a regular basis.

Issued by



AK STONE

(Information Officer & Director of Two Birds Interiors (Pty) Ltd)