

CONTROLLED POLICY

PAIA Manual

MW-PAIA-002 | Mediate Works (Pty) Ltd

Document ID	MW-PAIA-002
Version	1.0
Status	Draft for formal adoption
Classification	Public
Policy owner	Ebrahim Patelia — Chief Executive
Primary contact	Ebrahim Patelia — ebrahim@mediateworks.com
General contact	info@mediateworks.com +27 87 150 5283
Legal/professional review date	5 August 2026
Effective date	5 August 2026
Review cycle	At least annually and on material legal, regulatory, service or technology change

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

2. PURPOSE

- 2.1. This Manual helps a requester understand what records MW holds, which records are available without a formal request, how to request access to a record required for the exercise or protection of a right, how MW processes personal information, and how to contact the person responsible for PAIA and POPIA matters.

3. COMPANY AND ACCESS-TO-INFORMATION CONTACTS

- 3.1. Legal name: Mediate Works (Pty) Ltd Registration number: 2015/160919/07 Place of registration: Republic of South Africa Principal with physical and postal address 24, 1st Avenue Houghton Estate, Johannesburg 2198; Website: <https://www.mediateworks.com/>; Telephone: +27 87 150 5283 General email: info@mediateworks.com; Information Officer/Head of private body: Ebrahim Patelia — Chief Executive; Information Officer email: ebrahim@mediateworks.com.
- 3.2. The Information Officer is registered with the Information Regulator before taking up POPIA duties as required by applicable guidance.

4. THE INFORMATION REGULATOR'S PAIA GUIDE

- 4.1. The Information Regulator maintains the Guide contemplated in section 10 of PAIA. It explains the objects of PAIA and POPIA, how to make access requests, available assistance, remedies, fees and relevant forms. The current Guide and forms are available at <https://infoeregulator.org.za/> and may also be requested from MW's Information Officer.

5. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

- 5.1. Subject to the website being operational and any intellectual-property restrictions, the following may ordinarily be accessed without Form 2:

Category	Examples	Access
Corporate/public contact information	Legal/trading name, website, public telephone/email	Website
Service information	Published descriptions of mediation, dispute resolution, training and advisory services	Website
Professional profiles	Public biographies and credentials of associates as published	Website
Publications	Blog posts, public guides, videos and other materials expressly made public	Website/direct link
Governance documents	Privacy Notice, Website Terms, Cookie Policy, Med-AI Terms, Professional Code, this PAIA Manual	Website
Public course information	Published course descriptions, dates and marketing material	Website/booking page

- 5.2. Automatic/public availability does not grant a licence to copy, republish, scrape, train a model on, commercially exploit or remove attribution from MW intellectual property.

6. RECORDS HELD UNDER OR IN CONNECTION WITH LEGISLATION

- 6.1. MW may hold records required under legislation including, where applicable, the Companies Act 71 of 2008; Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991; Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Unemployment Insurance legislation; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Uniform Rule 41A of the High Court, Gauteng High Court Mediation Directives for Mandatory Mediation, Rules 70-79 of the Magistrates Court Rules; POPIA; PAIA; ECTA; CPA; Copyright Act 98 of 1978; and other legislation applicable to a particular engagement.

- 6.2. Listing legislation does not mean every record held under it is automatically available. Access remains subject to PAIA and applicable confidentiality, privilege, privacy and statutory restrictions.

7. SUBJECTS AND CATEGORIES OF RECORDS

7.1. MW may hold records on:

- 7.1.1. corporate governance: incorporation, directors, resolutions, contracts, policies and insurance;
- 7.1.2. finance and tax: accounts, invoices, quotations, payments, banking records, financial statements and tax records;
- 7.1.3. clients and prospective clients: enquiries, proposals, conflict checks, engagement documents, instructions, correspondence, invoices and service records;
- 7.1.4. dispute-resolution matters: appointment records, parties and representatives, procedural correspondence, submitted case material, schedules, mediation/arbitration/facilitation documents and outcomes to the limited extent MW is authorised to retain them;
- 7.1.5. training: proposals, curricula, participant lists, attendance, assessment, evaluation, certificates, client reporting and training materials;
- 7.1.6. human resources: recruitment, employment, payroll, leave, performance, discipline and statutory employment records where applicable;
- 7.1.7. associates, neutrals, trainers and contractors: profiles, credentials, accreditations, contracts, conflict disclosures, invoices, evaluations and conduct records;
- 7.1.8. suppliers/operators: contracts, due diligence, security/privacy terms, invoices and performance records;
- 7.1.9. marketing and website: content, subscriptions, marketing preferences, analytics and campaign records;
- 7.1.10. technology and security: access logs, asset/configuration records, backups, security events, impact/risk assessments and incident records;
- 7.1.11. intellectual property: copyright materials, licences, brand assets, course materials, manuals, templates and permissions;
- 7.1.12. PAIA/POPIA governance: processing inventories, impact assessments, access/correction requests, complaints, Information Officer records and breach records; and
- 7.1.13. legal/compliance: legal advice, claims, court/regulatory correspondence and legal holds.

8. HOW TO REQUEST ACCESS

- 8.1. A requester seeking a record of a private body under section 50 of PAIA should use the current prescribed Form 2 and provide enough information to identify the requested record, identify the right to be exercised or protected and explain why the record is required for that purpose. The requester should specify the preferred form of access and provide proof of identity/authority appropriate to the request.

9. Form 2 should be sent to MW's Information Officer at the contact details above. The current form is available from the Information Regulator's PAIA forms page.
10. MW may require the prescribed request, access, search/preparation, reproduction or other fees in force at the time. Current amounts must be taken from the Information Regulator's then-current fee schedule; MW will not use an obsolete schedule embedded in this Manual.

11. GROUNDS FOR REFUSAL AND THIRD-PARTY INFORMATION

- 11.1. Access is not automatic. MW will apply PAIA's mandatory and discretionary grounds of refusal, including protections applicable to personal information of others, commercial information, confidential information, safety, legally privileged material, research and other protected interests. Where only part of a record is protected and severance is reasonably possible, MW will consider giving access to the remainder as PAIA requires.
- 11.2. Mediation confidentiality is a particularly important consideration. A PAIA request does not automatically override confidentiality, privilege, court rules, settlement protections or statutory grounds of refusal. Each request will be assessed on its facts.

12. REMEDIES

- 12.1. There is no internal appeal procedure within a private body equivalent to the internal appeal procedure applicable to certain public bodies. A requester aggrieved by a refusal, deemed refusal or other PAIA decision may use the remedies provided by PAIA, including a complaint to the Information Regulator in the prescribed form/time and, where applicable, an application to a competent court.
- 12.2. Current PAIA complaint information is available at <https://inforegulator.org.za/complaints/>.

13. INFORMATION REQUIRED IN THIS PAIA MANUAL

13.1. PURPOSES OF PROCESSING

- 13.1.1. MW processes personal information for the purposes described in MW-PRIV-001, including enquiries, conflict checks, professional service delivery, training, booking/payment administration, legal compliance, security, professional quality, marketing where lawful and Med-AI operation.

13.2. CATEGORIES OF DATA SUBJECTS AND INFORMATION

- 13.2.1. Data subjects may include website visitors; enquirers; prospective, current and former clients; mediation/dispute parties; representatives; witnesses or experts where relevant; employees and job applicants; associates, neutrals and trainers; suppliers; course participants; subscribers; authors/speakers and professional contacts. The categories of information are described in MW-PRIV-001 section 4.

13.3. RECIPIENTS

- 13.3.1. Recipients may include authorised MW personnel; appointed practitioners/trainers; parties and representatives within the agreed process; approved operators and service providers; professional advisers; auditors/insurers; and public authorities where lawfully required. Disclosure is limited to the purpose and the recipient's role.

13.4. PLANNED TRANSBORDER FLOWS

13.4.1. MW may use global cloud, website, communications, booking, payment and AI providers. Transfers must comply with POPIA section 72.

13.4.2. The following are the planned transborder flows.

Wix & Wix AI	United States, Ireland, Israel, Taiwan, South Korea	Website hosting, analytics, AI content generation, contact form submissions.
Cal.com (Cal.co)	United States, European Union (EU)	Appointment scheduling, calendar sync data, usernames, and emails.
Microsoft & Teams	South Africa (Local Core Data), United States, European Union	Business emails, chats, video call data, file sharing, and internal documents.
Google (Workspace & Gemini)	United States, European Union	Cloud storage, document collaboration, emails, and AI prompt interactions.
Zoom	United States, European Union, Israel	Video conferencing metadata, cloud recordings, and meeting participant logs.
QuickBooks (Intuit)	United States (AWS Cloud Infrastructure)	Accounting data, financial invoices, business expenses, and client billing info.

13.5. GENERAL SECURITY SAFEGUARDS

13.5.1. MW maintains or will maintain appropriate technical and organisational controls including access control, authentication, secure communications, backups, device and malware protection, patching, incident response, confidentiality obligations, operator contracts and periodic risk assessment. This description is deliberately general and does not disclose security-sensitive configuration.

14. AVAILABILITY AND UPDATE OF THE MANUAL

14.1. This Manual is to be available at <https://www.mediateworks.com/> through a clearly labelled PAIA link and at MW's principal place of business during normal business hours, subject to reasonable access arrangements. A copy will be supplied on request subject to lawful fees.

14.2. The Information Officer must review this Manual regularly and after material changes to MW's processing, services or law.

14.3. Issued by: Ebrahim Patelia Capacity: Chief Executive / Information Officer; Date of adoption: 5 August 2026.

15. CURRENT FEE VERIFICATION

15.1. As at 5 August 2026, the Information Regulator's published fee schedule lists a R140 request fee for a request to a private body, with reproduction, search/preparation, media and transfer charges governed by

the current published schedule and applicable exemptions. The fee will be amended from time to time in accordance with the Information Regulators fee schedule.

16. RELATED MW CONTROLLED DOCUMENTS

16.1. MW-PRIV-001 — Privacy and POPIA Notice

16.2. MW-GOV-012 — POPIA, Information Security and Records Governance Framework

17. VERIFIED AUTHORITIES AND REVIEW BASIS

17.1. Legal/professional source check completed 5 August 2026. Primary legislation, regulator/court materials and IMI's own standards were prioritised. The SALRC mediation paper is treated as reform material, not enacted law; IMI draft-code consultation material is treated as non-binding.

17.2. [Information Regulator — Private Body PAIA Manual template](#)

17.3. [Information Regulator — PAIA Fee Structure and Exemptions \(2026\)](#)

17.4. [Information Regulator — POPIA/PAIA and Information Officer guidance](#)

17.5. [Protection of Personal Information Act 4 of 2013](#)

Document control and approval

Approved by	EBRAHIM PATELIA
Capacity	CEO
Signature	EP
Adoption / effective date	5 AUGUST 2026
Next review	4 AUGUST 2027

