

Urban Poetry (PTY) LTD

PAIA & POPIA MANUAL – 2025

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 4 of 2013 (POPIA), as amended up to April 2025

1. DEFINITIONS

Client: Any natural or juristic person receiving services from Urban Poetry (PTY) LTD.

Conditions for Lawful Processing: As set out in Chapter 3 of POPIA and detailed in Section 13 of this Manual.

Data Subject: Any person (natural or juristic) to whom personal information relates.

Information Officer (IO): The appointed individual listed under Section 3.

Personnel: Includes directors, staff (permanent, part-time, temporary), and contractors.

POPIA: Protection of Personal Information Act 4 of 2013.

PAIA: Promotion of Access to Information Act 2 of 2000.

Processing: Any activity (manual or automatic) that involves personal information, from collection to deletion.

Private Body: Any juristic or natural person conducting trade or profession in a personal/business capacity.

2. INTRODUCTION

This manual was prepared by Urban Poetry (PTY) LTD, a private body, in compliance with its obligations under PAIA and POPIA. It outlines:

- *Records held by Urban Poetry (PTY) LTD*
- *Procedures for requesting access*
- *Information processing practices*

- *Rights and remedies of data subjects*

3. COMPANY CONTACT INFORMATION

Field	Details
Company Name	Urban Poetry (PTY) LTD
Registration Number	2019/477226/07
Physical Address	Unit A1 Columbus Building, Central Park Business Suites, 15 Orchard Ave, Randburg, Johannesburg, 2169
Postal Address	Unit A1 Columbus Building, Central Park Business Suites, 15 Orchard Ave, Randburg, Johannesburg, 2169
Telephone Number	0696001885
Email Address	info@urbanpoetry.co.za
Website	www.urbanpoetry.co.za
Head of Business	James Bradnick - CEO/Director
Information Officer	James Bradnick (CEO/Director)
Deputy Information Officer(s)	None

4. GUIDE FROM INFORMATION REGULATOR

The official PAIA guide is available in all South African languages. Request a copy from the IO or access it at [PAIA Guides](#)

5. SECTION 52(2) NOTICES

As of the manual issue date, no voluntary notices have been published by Urban Poetry (PTY) LTD. Future notices will be made available at www.urbanpoetry.co.za.

Section 6: Automatically Available Records

In accordance with Section 52 of the Promotion of Access to Information Act (PAIA), the following records are automatically available to the public and may be accessed without a formal request for access under PAIA. These records are available from the Company's website, on request from the Information Officer, or at the Company's place of business.

The following categories of records are made automatically available:

6.1 Company Information

- *Company registration certificate*
- *Memorandum of Incorporation (MOI)*
- *Director names and official contact information*
- *Company profile and business overview*

6.2 Policies and Compliance

- *PAIA Manual*
- *POPIA (Privacy) Policy*
- *Cookie Policy (where applicable)*
- *Code of Conduct or Ethics Policy*
- *Environmental or Health and Safety Policy (if applicable)*

6.3 Financial and Certification Records

- *Broad-Based Black Economic Empowerment (B-BBEE) Certificate*

- *Tax Clearance Certificate (if available to the public)*
- *Proof of Business Banking Details (for invoicing purposes, on request)*

6.4 Marketing and Public Communications

- *Product and service brochures*
- *Press releases*
- *Promotional material*
- *Company newsletters*
- *Social media content (public-facing)*

6.5 Website and Legal Disclosures

- *Terms and Conditions of Use*
- *Privacy Policy*
- *Returns and Refunds Policy (if applicable)*
- *Website disclaimers*

6.6 Employment-Related Information

- *Current vacancies and job advertisements*
- *Standard job application forms*
- *Employment Equity Report (if voluntarily disclosed)*

6.7 Client Engagement and Forms

- *Standard service agreements or templates (if not confidential)*
- *Consent forms for marketing communications*

- Contact forms or service request templates

7. RECORDS AVAILABLE UPON REQUEST

Human Resources:

Detailed employee personal details, employment contracts, working hours records, remuneration records, leave records, attendance registers and timesheets, termination records, payslip copies, overtime agreements, written agreements on averaging hours, disciplinary records, UIF and SDL records, employment equity records where applicable, and training records in compliance with employment and labour legislation.

Legal:

Employment contracts, supplier and client agreements, lease agreements, service level agreements (SLAs), POPIA operator agreements, annual financial statements, tax returns, SARS correspondence, VAT, PAYE, UIF and SDL registration and filing records, invoices and receipts, bank statements, B-BBEE certificates if applicable, letter of good standing under COIDA, PAIA manual, POPIA compliance documentation including policies and consent records, UIF, SDL and COIDA submissions, insurance policies and claims correspondence, legal disputes, summons, settlement agreements, intellectual property registrations (trademark, patent, copyright), licensing and assignment agreements.

Secretarial:

Certificate of incorporation (CK/CM/CoR14.3), memorandum of incorporation (MOI), share register and share certificates, register of directors and officers, minutes of board and shareholder meetings, CIPC annual returns and supporting documentation.

Financial:

Annual financial statements, general ledger and trial balances, journals and cash books, sales and purchase invoices, bank statements, receipts and deposit slips, credit and debit notes, VAT returns and supporting documentation, PAYE, UIF and SDL records, tax returns including IT14s and provisional tax, fixed asset register, stock/inventory records, payroll records (salary slips, overtime, bonuses), internal and external audit reports, SARS correspondence including assessments and objections, budget and forecast documents, management accounts.

Client:

Client agreements and contracts, client contact information, invoices and billing statements, proof of delivery or service completion, client consent forms for marketing or data use, client databases including CRM and email lists, service level agreements, correspondence such as emails and letters, dispute and complaint records, client feedback and surveys, marketing campaign records per client.

Marketing:

Marketing campaign reports, ad spend and return on investment reports, audience analytics from platforms such as Google Analytics and Meta Insights, social media performance reports, email marketing reports including open and click rates, direct marketing consent records, marketing strategy documents, branding and messaging guidelines, promotional material archives, client marketing briefs, content calendars and planning documents.

IT:

System access logs documenting user login activity, system usage reports and audit trails, third-party integration logs including APIs and webhooks, data sharing agreements with third parties (e.g. Make, Monday.com), POPIA-compliant operator agreements, cloud storage and hosting agreements, backups and disaster recovery logs, security incident and breach reports, IT policies covering access control, passwords, data handling, software licensing and subscription records, data protection impact assessments for high-risk systems.

Website:

Records of page visits, click tracking, form submissions, search terms, referral sources, device and browser information, geolocation via IP address, visitor type classification, cookies, web logs, Wix member data if applicable, custom IP logging via Velo, and third-party integrations with appropriate data processing agreements.

Miscellaneous:

Other records relevant to operational, compliance, or business activities not classified above.

8. RECORDS HELD UNDER OTHER LEGISLATION

Companies Act, 71 of 2008; Basic Conditions of Employment Act, 75 of 1997; Employment Equity Act, 55 of 1998; Income Tax Act, 58 of 1962; Protection of Personal Information Act, 4 of 2013 (POPIA); Labour Relations Act, 66 of 1995; Occupational Health and Safety Act, 85 of 1993; Electronic Communications and Transactions Act, 25 of 2002; Skills Development Act, 97 of 1998; Unemployment Insurance Act, 63 of 2001; Attorneys Act, 53 of 1979; Legal Practice Act, 28 of 2014

9. REQUEST PROCEDURE

- *Requests must be submitted using the prescribed process.*
- *The preferred submission method is: Data subject requests should preferably be submitted via email to ensure traceability and timely processing, with alternative accessible channels made available as required by POPIA regulations.*

- *Prescribed Request Fee: Form 03: Outcome of request and of fees payable [Regulation 8]*
- *Email Address: info@urbanpoetry.co.za*
- *Support for disabled or illiterate persons: 0696001885*

10. GROUNDS FOR REFUSAL

Requests may be refused under PAIA in the following cases:

- *Protection of personal privacy*
- *Third-party commercial/confidential information*
- *Legal privilege*
- *Intellectual property*
- *Safety or physical security of persons or property*
- *Trade secrets or commercial disadvantage*
- *Research information*
- *Frivolous or burdensome requests*

Additional business-specific grounds: *Requests for access to records may be refused on grounds provided for in PAIA, including but not limited to protection of privacy of third parties, commercial confidentiality, and where the request is manifestly frivolous or vexatious. The organisation reserves the right to refuse access where disclosure would result in a breach of other applicable laws or contractual obligations.*

11. REMEDIES

In the case of a refusal:

- *Form 04: Internal Appeal Form [Regulation 9]*

12. FEES

Request Fee: Request Fee Form

Deposit may be required if preparation exceeds 6 hours.

Accepted methods: EFT, Online Portal, or other specified.

13. POPIA COMPLIANCE

13.1 Conditions for Lawful Processing:

- *Accountability*
- *Processing Limitation*
- *Purpose Specification*
- *Further Processing Limitation*
- *Information Quality*
- *Openness*
- *Security Safeguards*
- *Data Subject Participation*

13.2 Types of Personal Information Processed:

Personal information processed comprises full names, contact details, identity and passport numbers, employment history, educational qualifications, demographic information, financial details, online identifiers such as IP addresses and cookies, device and browser information, location data, criminal history, social media profiles, customer purchase behaviour, and client communication records.

13.3 Data Subjects:

Data subjects include staff members, clients, suppliers, third parties involved in business operations, and the general public as applicable to the records processed.

13.4 Purpose of Processing:

Personal information is processed for client onboarding and relationship management, marketing campaign development and execution, content creation and publishing, employee and contractor administration, data analytics and reporting, invoicing and financial administration, legal and regulatory compliance, direct marketing and communication, security and system monitoring, as well as training, quality control, and internal improvement initiatives.

13.5 Types of Processing:

The processing activities include collection, recording, organisation and structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, and erasure or destruction of personal information.

13.6 Data Recipients:

Data recipients include internal staff authorised to access information, third-party processors engaged under data processing agreements, clients as relevant to service delivery, and contractors involved in operational activities requiring personal information.

13.7 Cross-Border Transfers:

Personal information is stored and processed in cloud environments including OneDrive, Google Drive, ClickUp, and Hootsuite, and automations are managed via Make.com. These services are hosted by reputable international cloud providers.

13.8 Security Safeguards:

- **Physical:** *Physical security measures include a documented data processing policy, 24/7 security monitoring, secure storage rooms for physical documents with locked and authorised access only, and controlled entry to data storage areas to prevent unauthorised access.*
- **Digital:** *Digital security measures consist of Microsoft Azure cloud security infrastructure, authorised access restricted file structures, use of systems including ClickUp, Make, and Hootsuite with data processing agreements in place, implementation of access control policies, regular backups, disaster recovery protocols, security incident monitoring, and POPIA-compliant operator agreements.*

13.9 Data Subject Rights:

Data subjects have the right to object to the processing of their personal information, request correction or deletion of their personal information, access copies of their personal information, withdraw consent for processing, lodge complaints regarding data handling, exercise data portability by requesting transfer to another service provider, be informed about data collection practices, and restrict further processing of their personal information, all in accordance with POPIA provisions.

14. REVIEW AND MAINTENANCE

- *Review Officer: James Bradnick*
- *Next Review Date: 2026-06-21T20:22:46.219Z*

15. ANNEXURES

Forms available at: [Information Regulator - PAIA](#)

- *[Form 01: Request for a Guide from the Regulator \[Regulation 2\]](#)*
- *[Form 01: Request for a Copy of the Guide from an Information Officer \[Regulations 3\]](#)*
- *[Form 02: Request for Access to Record \[Regulation 7\]](#)*
- *[Form 03: Outcome of request and of fees payable \[Regulation 8\]](#)*
- *[Form 04: Internal Appeal Form \[Regulation 9\]](#)*
- *[Form 05: Complaint Form \[Regulation 10\]](#)*
- *[Form 13: PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)*

Signed by: *James Bradnick*

Date: 2025-06-21T20:22:46.218Z