

CAMPHER JOUBERT ATTORNEYS

(PAIA MANUAL FOR A PRIVATE BODY)



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1. Introduction and Purpose of the Manual

1. This Manual is prepared in terms of **section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA")** and refers, where applicable, to the **Protection of Personal Information Act 4 of 2013 ("POPIA")** and must be read together with such statutes.
2. This Manual is the manual of **CAMPHER JOUBERT INCOPORATED t/a CAMPHER JOUBERT ATTORNEYS** ("the Firm"), being a private body for purposes of PAIA.
3. The Firm is an incorporated entity which conducts business as a law firm. We provide general legal services which includes litigation, family, company, property, labour and commercial legal service to our clients.
4. The purpose of this Manual is to:
 - a. describe the categories of records held by the Firm;
 - b. explain how a person may request access to records held by the Firm;
 - c. describe the manner in which such requests will be considered and processed;
 - d. identify the contact details of the Firm's Information Officer and any Deputy Information Officer;
 - e. provide an overview of the Firm's processing of personal information, where applicable; and
 - f. assist requesters to exercise rights of access to information in accordance with PAIA.
5. This Manual must be made available to the public in accordance with applicable law.
6. All rights of the Firm are strictly reserved and nothing in this Manual:
 - a. creates any automatic right of access to any record;
 - b. limits any right or obligation arising under PAIA, POPIA, legal professional privilege, confidentiality, or any other law; or
 - c. requires the Firm to disclose any record where disclosure is prohibited or lawfully refused.

2. Definitions and Interpretation

1. In this Manual, unless the context indicates otherwise:
 - a. "**data subject**" means the person to whom personal information relates;

- b. **“Information Officer”** means the person designated or deemed to be the information officer of the Firm for purposes of PAIA and POPIA;
 - c. **“manual”** means this PAIA Manual as amended from time to time;
 - d. **“PAIA”** means the Promotion of Access to Information Act 2 of 2000;
 - e. **“personal information”** has the meaning assigned to it in POPIA;
 - f. **“POPIA”** means the Protection of Personal Information Act 4 of 2013;
 - g. **“private body”** means a private body as contemplated in PAIA;
 - h. **“record”** means any recorded information, regardless of form or medium, in the possession or under the control of the Firm;
 - i. **“requester”** means any person making a request for access to a record of the Firm in terms of PAIA;
 - j. **“the Firm”** means **CAMPHER JOUBERT ATTORNEYS**.
2. Words importing:
- a. the singular include the plural and vice versa;
 - b. one gender include the other genders; and
 - c. natural persons include juristic persons and vice versa, where the context allows.
3. Any reference to legislation includes any amendment, re-enactment or replacement thereof, to the extent applicable.

3. Details of the Private Body

1. The details of the Firm are as follows:
- a. **Name of private body:** CAMPHER JOUBERT INC. t/a CAMPHER JOUBERT ATTORNEYS
 - b. **Type of body:** Private law firm
 - c. **Registration number:** 2022/426126/21
 - d. **Physical address:** 4 Burger Street, Suideroord, Johannesburg
 - e. **Postal address:** 4 Burger Street, Suideroord, Johannesburg
 - f. **Telephone number:** 076 701 0655 / 083 233 5476
 - g. **Email address:** cayleigh@cjatt.com
 - h. **Website:** www.campherjoubert.co.za

4. Information Officer

1. The Firm's Information Officer is:
- a. **Name:** Cayleigh Ann Joubert
 - b. **Position:** Director

- c. **Email address:** cayleigh@cjatt.com
- d. **Telephone number:** 076 701 0655

- 2. All requests for access to records in terms of PAIA must be directed to the Information Officer at the contact details set out in this Manual.

5. Guide on PAIA and POPIA

- 1. A guide on PAIA and access to information, as contemplated by applicable law, may be obtained from the relevant regulator.
- 2. Requesters who require assistance in understanding how to submit a request may consult the applicable guide issued by the **Information Regulator**.
- 3. The contact details of the Information Regulator should be confirmed from the official source at the time of use of this Manual.

6. Purpose and Use of this Manual

- 1. This Manual is intended to assist any requester who wishes to request access to a record held by the Firm.
- 2. The Manual describes:
 - a. the categories of records that may be held by the Firm;
 - b. the categories of personal information that may be processed by the Firm;
 - c. the procedure to be followed in requesting access to records;
 - d. the fees that may be payable;
 - e. the period within which the Firm will respond; and
 - f. the grounds upon which access may be refused.
- 3. This Manual does not replace PAIA, and in the event of any inconsistency, PAIA will prevail.

7. Records Available in Terms of Other Legislation

1. The Firm may hold records in terms of legislation applicable to legal practice and the administration of its business.

2. The legislation that may be relevant to records held by the Firm includes, where applicable:
 - a. **Basic Conditions of Employment No. 75 of 1997**
 - b. **Broad Based Black Economic Empowerment Act No. 53 of 2003**
 - c. **Employment Equity Act No. 55 of 1998**
 - d. **Financial Intelligence Centre Act No. 38 of 2001**
 - e. **Income Tax Act No. 95 of 1967**
 - f. **Labour Relations Act No. 66 of 1995**
 - g. **Legal Practice Act No. 28 of 2014**
 - h. **Prescription Act No. 68 of 1969**
 - i. **Prevention and Combating of Corrupt Activities Act No. 12 of 2004**
 - j. **Promotion of Access to Information Act 2 of 2000**
 - k. **Protection of Personal Information Act 4 of 2013**
 - l. **Companies Act 71 of 2008**
 - m. **Tax Administration Act 28 of 2011**
 - n. **Unemployment Insurance Act No. 30 of 1996**
 - o. **Value-Added Tax Act 89 of 1991**

3. The mere reference to a category of legislation in this Manual does not mean that every record created under that legislation is automatically available without a PAIA request or without consideration of any lawful grounds of refusal.

8. Categories of Records Held by the Firm

1. The Firm may hold records in physical and electronic form.

2. The categories of records held by the Firm may include the following:
 - a. **Client and matter records**

- i. client files;
- ii. mandates and engagement records;
- iii. matter notes;
- iv. legal opinions;
- v. pleadings and court documents;
- vi. contracts and agreements;
- vii. settlement documents;
- viii. attendance notes and consultation records;
- ix. instructions received from clients.

b. Correspondence

- i. email correspondence;
- ii. letters;
- iii. memoranda;
- iv. communications with clients;
- v. communications with opposing parties;
- vi. communications with counsel;
- vii. communications with courts, tribunals and public bodies;
- viii. communications with experts, service providers and third parties.

c. Financial and accounting records

- i. invoices;
- ii. statements;
- iii. receipts;
- iv. trust and business accounting records, where applicable;
- v. banking records;
- vi. taxation records;
- vii. payment records.

d. Operational and administrative records

- i. internal policies and procedures;
- ii. office administration records;
- iii. diary and scheduling records;
- iv. supplier records;
- v. asset registers;
- vi. IT and systems records.

e. Human resources records

- i. employment records;
- ii. remuneration and leave records;
- iii. disciplinary records, if any;
- iv. personnel administration records.

- f. **Compliance and statutory records**
 - i. regulatory compliance records;
 - ii. records required for professional practice and governance;
 - iii. statutory returns and filings;
 - iv. risk management and compliance documentation.
 - g. **Electronic records**
 - i. word processing documents;
 - ii. scanned records;
 - iii. cloud-stored documents;
 - iv. metadata associated with documents;
 - v. backups and archived records, where applicable.
3. The above list:
- a. is not exhaustive;
 - b. is provided for convenience only; and
 - c. does not create a right of access to any record listed.
4. Certain records may be subject to:
- a. legal professional privilege;
 - b. duties of confidentiality owed to clients;
 - c. the protection of personal information;
 - d. third-party rights; and
 - e. other lawful grounds of refusal.

9. Categories of Personal Information Processed

1. In the course of providing legal services and administering its practice, the Firm may process personal information relating to:
- a. clients;
 - b. former clients;
 - c. prospective clients;
 - d. employees or staff members;
 - e. counsel and consultants;
 - f. opposing parties;
 - g. witnesses;
 - h. experts;
 - i. service providers;
 - j. correspondents and other legal representatives;

- k. members of the public who contact the Firm.
2. The categories of personal information processed may include:
 - a. names and surnames;
 - b. identity or registration numbers;
 - c. contact details;
 - d. physical and postal addresses;
 - e. email addresses and telephone numbers;
 - f. financial and billing information;
 - g. correspondence and communications;
 - h. records relevant to legal instructions and disputes;
 - i. employment-related information;
 - j. any other personal information voluntarily provided to the Firm or lawfully obtained for a lawful purpose.
 3. The Firm may also process special or confidential information where strictly necessary and lawful in the context of legal services or administration.

10. Purpose of Processing Personal Information

1. The Firm may process personal information for purposes that include:
 - a. providing legal advice and legal services;
 - b. opening, administering and conducting legal matters;
 - c. communicating with clients and third parties;
 - d. complying with legal and professional obligations;
 - e. billing, collections and financial administration;
 - f. maintaining records and document management systems;
 - g. employment and human resources administration;
 - h. managing suppliers and service providers;
 - i. maintaining office security and IT systems;
 - j. any lawful purpose related to the operation of the Firm.
2. The Firm will process personal information only where there is a lawful basis to do so and where such processing is necessary, relevant and not excessive for the relevant purpose.

11. Recipients or Categories of Recipients of Personal Information

1. Personal information held by the Firm may, where lawful and necessary, be disclosed to or shared with:
 - a. the relevant client or the client's authorised representative;
 - b. courts, tribunals and regulatory bodies;
 - c. opposing attorneys or parties, where required in legal proceedings or correspondence;
 - d. advocates, correspondents, experts, consultants and other legal service providers;
 - e. accountants, auditors, banks or payment service providers;
 - f. IT service providers, cloud or document hosting providers, and administrative service providers;
 - g. public authorities where disclosure is required by law;
 - h. any other person where disclosure is authorised by the data subject, required by law, or necessary for the lawful conduct of the Firm's mandate.

2. The Firm will take reasonable steps to ensure that disclosures of personal information are lawful and appropriately limited.

12. Request Procedure for Access to Records

1. A requester who seeks access to a record of the Firm must submit a written request to the Information Officer.

2. The request must be made using the prescribed PAIA request form for a Private Body, or in a substantially similar form containing sufficient detail to enable the Firm to consider the request. A copy of the Form is annexed to this Manual

3. The request should include:
 - a. the full name and contact details of the requester;
 - b. proof of identity, and where applicable proof of authority to act on behalf of another person;
 - c. sufficient particulars to identify the record requested;
 - d. the form of access required;
 - e. the right that the requester seeks to exercise or protect; and
 - f. an explanation of why the requested record is required for the exercise or protection of that right.

4. If a request is made on behalf of another person, the requester must provide written proof of the capacity in which the request is made.
5. The Firm may require the requester to provide further information reasonably necessary to:
 - a. identify the requester;
 - b. identify the record requested;
 - c. assess whether the record is required for the exercise or protection of a right; and
 - d. determine whether access may lawfully be granted.
6. Requests must be sent to the Information Officer using the contact details set out in this Manual.
7. A request will be considered only once the Firm has received all information reasonably required to process it and any applicable request fee, if payable.

13. Prescribed Fees

1. The Firm may charge the fees permitted under PAIA.
2. Such fees may include:
 - a. a request fee, where applicable;
 - b. a reproduction fee for copies or printouts;
 - c. a fee for transcription, if applicable;
 - d. search and preparation fees, where permitted;
 - e. electronic reproduction fees;
 - f. postage or courier fees.
3. The requester will be notified if any fee is payable before the request is processed further or before access is granted, as the case may be.

4. Where permitted by law, the Firm may require a deposit before proceeding with the search for and preparation of the requested record.
5. The applicable fee schedule is the fee schedule prescribed under PAIA from time to time.

14. Decision on Requests and Time Periods

1. After receiving a request, the Firm will consider whether:
 - a. the request complies with PAIA;
 - b. the requested record exists;
 - c. the requester has provided sufficient information;
 - d. any fee is payable; and
 - e. access may lawfully be granted or refused.
2. The Firm will respond within the period prescribed by PAIA, subject to any lawful extension.
3. The response may:
 - a. grant access to the record;
 - b. grant partial access, subject to lawful redactions;
 - c. refuse access on lawful grounds; or
 - d. request further information or clarification.
4. If access is granted, the Firm will indicate:
 - a. the form in which access will be given, where reasonably possible;
 - b. any fees payable before access is provided; and
 - c. any practical arrangements for collection, inspection or delivery.
5. If access is refused, the Firm will provide written reasons to the extent required by law.

15. Grounds for Refusal of Access

1. Access to records may be refused where refusal is permitted or required by PAIA or any other applicable law.
2. Without limiting the generality of the above, grounds for refusal may include:
 - a. **legal professional privilege**;
 - b. **confidentiality obligations** owed to clients or third parties;
 - c. **protection of personal information** relating to a third party;
 - d. **protection of commercial information** of the Firm or a third party;
 - e. **protection of privileged or confidential communications**;
 - f. **records containing internal deliberations**, where protected by law;
 - g. **records the disclosure of which would amount to a breach of a duty imposed by law**;
 - h. **records that do not exist or cannot be found after a reasonable search**;
 - i. any other ground recognised by PAIA.
3. Where a record contains information that can lawfully be disclosed and information that cannot lawfully be disclosed, the Firm may grant access only to the portion that may lawfully be disclosed, subject to appropriate redaction.

16. Remedies Available to a Requester

1. As the Firm is a private body, there is **no internal appeal procedure** under PAIA against a decision of the Firm.
2. A requester who is dissatisfied with the decision of the Firm may:
 - a. address written representations to the Information Officer requesting reconsideration;
 - b. lodge a complaint with the Information Regulator, where applicable; or
 - c. apply to a court of competent jurisdiction for appropriate relief, as permitted by law.
3. Any person considering further steps should ensure compliance with the applicable procedures and time limits under PAIA and any other applicable law.

17. Availability of this Manual

1. This Manual is available:
 - a. at the Firm's office for inspection during normal business hours;
 - b. on the Firm's website; and
 - c. on request from the Information Officer.
2. A copy of this Manual may be provided in electronic form on request, subject to reasonable practical arrangements.
3. This Manual is made available in English, being one of the official languages of the Republic of South Africa.

18. Security, Retention and Record Management

1. The Firm retains records for such periods as may be required by:
 - a. applicable law;
 - b. professional obligations;
 - c. contractual obligations; or
 - d. legitimate operational requirements.
2. The Firm takes reasonable technical and organisational measures to protect records and personal information against:
 - a. loss;
 - b. unauthorised access;
 - c. misuse;
 - d. unlawful disclosure;
 - e. alteration; and
 - f. destruction.
3. Records may be stored in:
 - a. paper-based filing systems;
 - b. email systems;
 - c. computer systems;
 - d. cloud-based systems; and
 - e. archived storage, where applicable.

4. Access to records is limited to persons who require access for lawful and legitimate purposes.

19. Training and Awareness

1. The Firm will take reasonable steps to ensure that all staff are aware of:
 - a. the existence and purpose of this Manual;
 - b. the basic requirements of PAIA;
 - c. the importance of confidentiality and legal privilege;
 - d. the need to protect personal information; and
 - e. the proper escalation of access requests to the Information Officer.
2. Given the Firm's small size, such awareness may be maintained through internal discussion, periodic review, and documented office procedures rather than formal training programmes.

20. Review and Amendment of this Manual

1. This Manual may be reviewed and updated from time to time.
2. The Firm may amend this Manual to reflect changes in:
 - a. applicable law;
 - b. guidance issued by the Information Regulator;
 - c. the Firm's structure or personnel;
 - d. the categories of records held by the Firm;
 - e. the Firm's record management practices.

21. Approval and Adoption

1. This Manual was approved on behalf of the Firm on the date set out below.
2. Signed at **CENTURION** on this **12TH** day of **JUNE 2026**.



CAYLEIGH ANN JOUBERT

Information Officer for and on behalf of

CAMPHER JOUBERT ATTORNEYS

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer