PAIA Manual – Trade Route Coffees (Pty) Ltd

Nov 11, 2026 · @Johnny B Goode

Manual prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) for TRADE ROUTE COFFEES (PTY) LTD, registration number 2026/841713/07.

1. Introduction

TRADE ROUTE COFFEES (PTY) LTD ("the Company") is a private company that roasts and sells coffee and runs a mobile coffee trailer for events in Cape Town. This manual is published under section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA").

It tells you what records the Company holds, how to ask for access to them, what it costs, and how the Company handles personal information.

2. Company details

Registered name	TRADE ROUTE COFFEES (PTY) LTD
Registration number	2026/841713/07
Income tax number	9319053279
Directors	Heather Anne Haydn, John-Philip Haydn
Physical and postal address	10 Stork Road, Cape Town, Western Cape, 7441
Telephone	083 406 4369
Email	info@traderoutecoffees.co.za
Website	www.traderoutecoffees.co.za

3. Information Officer

Requests under PAIA and POPIA must be sent to the Information Officer.

	Information Officer	Deputy Information Officer
Name	Heather Anne Haydn (director)	John-Philip Haydn (director)

	Information Officer	Deputy Information Officer
Address	10 Stork Road, Cape Town, Western Cape, 7441	10 Stork Road, Cape Town, Western Cape, 7441
Telephone	083 406 4369	083 406 4369
Email	heather@traderoutecoffees.co.za	info@traderoutecoffees.co.za

4. The Information Regulator's PAIA guide

The Information Regulator publishes a guide, in each official language, on how to use PAIA and POPIA to get access to information. It explains what records you can ask for, how to make a request, the fees, and what to do if a request is refused.

The guide is available free on the Regulator's website or from its office:

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

A copy of the guide can also be inspected at the Company's address during business hours.

5. Records available without a request

The following are available to anyone without a formal PAIA request:

- product information, prices and terms published on www.traderoutecoffees.co.za and the Company's social media (Instagram and Facebook: traderoutecoffees);
- price lists and trailer hire information, on request by email or WhatsApp;
- this PAIA manual;
- the Company's registered details as filed with the Companies and Intellectual Property Commission (CIPC), which can also be obtained from the CIPC.

6. Records kept under other laws

The Company keeps records as required by the following laws, where they apply to it:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972
- Immigration Act 13 of 2002
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991 (once the Company is VAT registered)

This list is not exhaustive. Where a law gives a right of access to a record, that right applies alongside PAIA.

7. Categories of records held

The records below are held by the Company. Listing a record does not mean access will be granted: every request is assessed under PAIA (section 9 explains the grounds for refusal).

Subject	Categories of records
Company and statutory	Memorandum of Incorporation, CIPC registration documents, securities register, share certificates, directors' and shareholders' resolutions and minutes, shareholders' agreement, beneficial ownership filings, annual returns

Subject	Categories of records
Finance and tax	Financial statements, cashbook and accounting records, bank statements, invoices and receipts, asset register, stock counts, SARS registrations, returns and correspondence, loan agreements
Staff	Employment contracts, staff shift and pay records, payroll, PAYE, UIF and Compensation Fund records, identity and work-permit copies, leave and disciplinary records, injury reports
Customers	Orders, invoices and payment records, coffee subscription records, trailer and event bookings, wholesale accounts and price agreements, customer correspondence
Suppliers	Supplier agreements, purchase orders, invoices and correspondence (green coffee, packaging, courier, hosting and other services)
Operations and food safety	Roasting and stock records, product specifications and labelling, Certificates of Acceptability and other licences, equipment and trailer maintenance records
Marketing	Website content, social media content, promotions and giveaways, marketing material
Insurance and legal	Insurance policies and claims, contracts, legal correspondence
IT	Website and hosting records, domain registration, software subscriptions, access and security records

8. Personal information (POPIA)

8.1 Purposes of processing

The Company processes personal information to:

- take, fulfil, deliver and invoice orders, subscriptions and trailer bookings;
- manage wholesale and supplier relationships;
- employ and pay staff, including casual event staff, and meet labour and tax obligations;

- keep accounting and tax records;
- comply with laws on food safety, employment, immigration, tax and company records;
- market its products to customers who have agreed to it, and run promotions;
- keep its premises, trailer, systems and records secure.

8.2 Data subjects and categories of information

Data subject	Personal information processed
Customers (retail, subscription, event)	Name, phone and WhatsApp number, email, delivery address, order and payment history
Wholesale customers and their contacts	Business and contact details, account and order history
Staff, including casual staff	Name, ID or passport number, nationality and work-permit details, contact and address details, emergency contact, bank details, tax number, hours, pay, injury and safety records
Suppliers and service providers	Business and contact details, bank details, invoices
Directors and shareholders	Name, ID number, address, contact details, shareholding
Website and social media visitors	Messages, comments and contact details they choose to send

8.3 Who it may be shared with

- SARS, CIPC, the Department of Employment and Labour (UIF and Compensation Fund) and other authorities where the law requires;
- the Company's accountant, auditor and legal advisers;
- banks and payment providers (including Yoco) to process payments;
- couriers (including The Courier Guy) to deliver orders;
- website, hosting, email and software providers that store data for the Company;
- insurers, for policies and claims.

The Company does not sell personal information.

8.4 Cross-border transfers

Some service providers, such as social media and messaging platforms (Meta: Instagram, Facebook, WhatsApp), email and cloud software, may store information on servers outside South Africa. The Company uses such providers only where the transfer is allowed under section 72 of POPIA, for example where the recipient is bound by protections substantially similar to POPIA or the transfer is needed to perform a contract with the data subject.

8.5 Security measures

- Paper records containing personal information (staff files, ID copies, signed documents) are kept in a locked cabinet.
- Electronic records are kept on password-protected devices and accounts, with access limited to the directors and those who need it.
- Bank and payment details are processed through the bank's and Yoco's systems, not stored in open files.
- Service providers that handle personal information are required to keep it confidential and secure.
- Records are kept only as long as the law or the purpose requires, then destroyed securely.
- Any security breach involving personal information will be reported to the Information Regulator and the people affected, as POPIA requires.

8.6 Your rights under POPIA

You may ask whether the Company holds your personal information and request a copy, ask for it to be corrected or deleted (POPIA Form 2), or object to its processing (POPIA Form 1). Send these to the Information Officer in section 3.

9. How to request access

1. Complete the prescribed **Form 2 (Request for Access to Record)**, available from the Information Regulator's website or from the Information Officer.
2. Send it to the Information Officer by email or post, or deliver it to the Company's address (section 3).
3. Give enough detail to identify the record, say how you want access (copy, inspection, email), and state which of your rights you are exercising or protecting and why the record is needed for that.
4. If you are requesting on behalf of someone else, include proof of your authority to do so.

5. Pay the request fee, if it applies (section 10).

The Company will decide within **30 days** of receiving a complete request, and may extend this once by up to 30 days where PAIA allows. You will be told the outcome on **Form 3**, with reasons if access is refused.

Grounds for refusal. The Company may or must refuse access where PAIA requires it, including to protect:

- the privacy of a third party who is a natural person;
- a third party's commercial information or confidential information;
- the safety of individuals and the protection of property;
- records privileged from production in legal proceedings;
- the Company's own commercial information, such as trade secrets, pricing and supplier terms;
- research information of the Company or a third party.

Where only part of a record is protected, the rest will be released where possible.

10. Fees

Fees are prescribed by the PAIA regulations, as published by the Information Regulator for private bodies.

Item	Fee
Request fee (not payable by a person requesting their own personal information)	R140.00
Photocopy or printed copy, per A4 page	R2.00
Copy on a flash drive or CD supplied by the requester	R40.00
Copy on a CD supplied by the Company	R60.00
Transcription of an audio record, per A4 page	R24.00
Search and preparation, per hour after the first hour	R145.00, to a maximum of R435.00
Deposit, if search and preparation will take more than 6 hours	One-third of the access fee
Postage or email	Actual cost, if any

Fees are payable by EFT into the Company's bank account. Records are released once fees are paid.

If you are not satisfied. There is no internal appeal for a private body. Within 180 days of the decision you may lodge a complaint with the Information Regulator (Form 5, PAIAComplaints@inforegulator.org.za) or apply to court.

11. Availability and updating

This manual is available:

- on www.traderoutecoffees.co.za;
- for inspection at 10 Stork Road, Cape Town, during business hours;
- free by email from the Information Officer, or as a printed copy at R2.00 per page;
- to the Information Regulator on request.

The Company will review this manual at least once a year and update it whenever its contact details, records, processing purposes or service providers change.

Approval

Approved by the directors of TRADE ROUTE COFFEES (PTY) LTD, Heather Anne Haydn (Information Officer) and John-Philip Haydn (Deputy Information Officer), on 11 November 2026. The signed original is kept at the Company's address.

Sources

- Information Regulator – PAIA fees for private bodies (published March 2026)
- ClearComply – PAIA manual requirements in South Africa
- IRBA PAIA Manual 2025 (Information Regulator contact details)
- Acts Online – Information Regulator template PAIA manual for private bodies