

**Nik Software (Pty) Ltd**  
**trading as LekkerDuelist**

# **PAIA MANUAL**

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

**DATE OF COMPILATION: 14/03/2026**

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## **1. LIST OF ACRONYMS AND ABBREVIATIONS**

- 1.1 **“CPA”** — Consumer Protection Act No. 68 of 2008;
- 1.2 **“ECTA”** — Electronic Communications and Transactions Act No. 25 of 2002;
- 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 (South Africa);
- 1.8 **“Republic”** — Republic of South Africa;
- 1.9 **“SARS”** — South African Revenue Service;
- 1.10 **“TCG”** — Trading Card Game.

## **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 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. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NIK SOFTWARE (PTY) LTD t/a LEKKERDUELIST**

#### **3.1 Information Officer**

Name: Nikolaos Spyratos  
Designation: Sole Director  
Email: [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software)

#### **3.2 Deputy Information Officer**

No Deputy Information Officer has been designated at this time.

#### **3.3 Access to Information — General Contact**

Email: [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software)

All PAIA requests and related correspondence should be directed to the above email address.

#### **3.4 Head Office**

Postal Address: Available on request via email

Physical Address: Available on request via email

Email: [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software)

Website: <https://lekkerduelist.co.za>

## **4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

4.1 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.

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

4.3 The aforesaid Guide contains the description of—

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of—

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

4.3.3 the manner and form of a request for—

4.3.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and

4.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;

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

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

4.3.6 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—

4.3.6.1 an internal appeal;

4.3.6.2 a complaint to the Regulator; and

4.3.6.3 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;

4.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92<sup>11</sup>.

4.4 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.

4.5 The Guide can also be obtained—

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

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

4.6.1 English

4.6.2 Afrikaans

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and (c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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.

<sup>8</sup> 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.

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

## **5. DESCRIPTION OF THE PRIVATE BODY**

Nik Software (Pty) Ltd is a private company registered in the Republic of South Africa, trading as **LekkerDuelist**.

LekkerDuelist is a community platform for Yu-Gi-Oh! Trading Card Game (TCG) enthusiasts in South Africa. The platform focuses on the EU distribution region (of which South Africa is part) and is designed for mobile-first use. The platform provides the following services:

- **Leagues and Tournaments:** Swiss-paired tournaments with tiebreaking systems, solo leagues for non-platform participants, and player registries.
- **Group Buys:** A coordinator tool for organising shared import orders of TCG products, with fee calculations, Excel exports, and participant management.
- **Claim Sale Trackers:** Coordinator-only tracking for claim sales involving non-platform participants, with payment and shipping status management.
- **Auctions:** A full auction system with bidding, buy-it-now, snipe protection, real-time updates, and an administrative moderation workflow.
- **Card Data and Price Aggregation:** Integration with the YGOProDeck card database and scraping of South African retailer websites to aggregate card prices and availability.
- **Trading Tools:** “Looking For” post builders, card price list services, and trade post text formatters for community use.
- **Blog Posts and News:** Original editorial content and syndicated news articles from external Yu-Gi-Oh! news sources.
- **Feedback and Contact:** A feedback and contact system allowing users to submit enquiries, general messages, and Trusted User applications.
- **Utility Links:** A curated directory of links to external Yu-Gi-Oh! resources.
- **Marketplace (in development):** A retailer-first marketplace for purchasing TCG cards from South African stores.

The platform does not employ staff. All operations are managed by the sole director.

## **6. CATEGORIES OF RECORDS OF NIK SOFTWARE (PTY) LTD t/a LEKKERDUELIST WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

In terms of section 52(2) of PAIA, the following categories of records are voluntarily made available without a person having to submit a formal PAIA request:

<b>Category of Records</b>	<b>Types of the Record</b>	<b>On Website</b>	<b>On Request</b>
Legal and Compliance	Privacy Policy	X	X
Legal and Compliance	Terms of Service	X	X
Legal and Compliance	Seller Terms and Conditions	X	X
Legal and Compliance	PAIA Manual (this document)	X	X
Card Data	Yu-Gi-Oh! card database (names, attributes, images, official data sourced from YGOProDeck)	X	
Card Data	Aggregated card prices from South African retailers	X	
Card Data	Individual retailer card listings (price, availability, condition)	X	
Editorial Content	Published blog posts	X	
Editorial Content	Syndicated news articles (from YGOrganization RSS feed)	X	
Editorial Content	Help and guidance articles	X	
Community Resources	Utility links directory (curated external links)	X	

<b>Category of Records</b>	<b>Types of the Record</b>	<b>On Website</b>	<b>On Request</b>
Community Resources	Public event listings	X	
Community Resources	Public league standings and tournament results	X	
Community Resources	Active auction listings (publicly visible)	X	
Community Resources	Site-wide banner announcements	X	

## **7. DESCRIPTION OF THE RECORDS OF NIK SOFTWARE (PTY) LTD t/a LEKKERDUELIST WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

The following records are held in accordance with applicable South African legislation and may be subject to access requests under the relevant Act:

<b>Category of Records</b>	<b>Applicable Legislation</b>
PAIA Manual	Promotion of Access to Information Act No. 2 of 2000 (section 51)
Privacy Policy and personal information processing records	Protection of Personal Information Act No. 4 of 2013
Terms of Service and electronic transaction records	Electronic Communications and Transactions Act No. 25 of 2002
Company registration documents and corporate records	Companies Act No. 71 of 2008
Tax records and returns	Income Tax Act No. 58 of 1962
VAT records	Value-Added Tax Act No. 89 of 1991
Consumer protection compliance records	Consumer Protection Act No. 68 of 2008
Records of electronic communications	Regulation of Interception of Communications and Provision of Communication-related Information Act No. 70 of 2002 (RICA)

**Note:** Records held in accordance with legislation listed above are subject to the provisions and limitations of the relevant legislation, and access thereto may be restricted in terms of such legislation or in terms of the grounds for refusal set out in Chapter 4 of Part 3 of PAIA (see section 12 below).

## **8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT**

The following is a comprehensive description of the subjects on which Nik Software (Pty) Ltd t/a LekkerDuelist holds records, and the categories of records held under each subject. **Note:** The inclusion of a category of records below does not mean that such records will necessarily be disclosed; a request for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

### **8.1 Company Administration**

- Company registration documents (CIPC filings)
- Tax records and returns (income tax, VAT)
- Financial records, bank statements, and accounting records
- Insurance records
- Correspondence with regulators and authorities
- Contracts and agreements with service providers

### **8.2 Platform User Records**

- User account information (name, email address, profile details)
- Authentication records (encrypted passwords, two-factor authentication configuration, login history)
- Gaming identifiers (Konami ID, DuelingBook username, DuelingNexus username, Master Duel friend code, Duel Links friend code)
- User role and permission records
- User preference settings (e.g., sharing of gaming usernames)
- Terms acceptance records and timestamps
- Email verification records
- Feedback and contact form submissions
- User karma and reputation ratings
- Card alert preferences and notification records
- Trade post collections and generated collage images

- Account deletion records (soft-deleted accounts)

### **8.3 Financial and Transactional Records**

- Shopping cart records (including anonymous session-based carts)
- Order records (order numbers, items, pricing, status history)
- Payment transaction references (Paystack payment references, access codes; credit card details are not stored on our systems)
- Refund records and dispute history
- Commission invoices
- Settlement statements for retailers
- Subscription records (plan details, billing cycles, cancellation records)
- Exchange rate records

### **8.4 Community and Event Records**

- League records (league names, descriptions, standings, settings)
- Tournament records (pairings, round data, match results, scores, participant registrations)
- Player registry records
- Auction records (listing details, descriptions, pricing, bid history, moderation decisions including approval, rejection, or takedown reasons)
- Auction images uploaded by users
- Group buy records (coordinator details, participant lists, card orders, fee structures, payment status, sites/sources)
- Claim sale tracker records (participant details, payment and shipping status, tracking numbers)
- Event records (event names, descriptions, dates, locations, associated stores)

### **8.5 Content and Editorial Records**

- Blog posts (titles, content, publication status, author, tags, categories, meta descriptions)

- Syndicated news articles (titles, descriptions, content, source URLs, publication dates; sourced via RSS from YGOrganization)
- Help and guidance articles
- Utility link records (titles, URLs, categories)
- Banner and announcement records

## **8.6 Card Data and Market Information**

- Yu-Gi-Oh! card database records (card names, types, attributes, descriptions, images, prices, banlist status, format support; sourced from the YGOProDeck API)
- Scraped card listings from South African retailers (prices, stock levels, conditions, SKUs, URLs)
- Aggregated marketplace card records (low/mid/high prices, listing counts, price history)
- Individual card listings for the marketplace (price, condition, quantity, retailer association)
- Card price history records (historical price changes for tracked products)
- Sitemap URL records used for web scraping (retailer sitemaps, processing status)

## **8.7 Technical and Operational Records**

- Web server access logs and application logs
- Session records (session identifiers, IP addresses, user agents, last activity timestamps; applicable to both authenticated and unauthenticated visitors)
- Error and exception logs
- Queued job execution records and failed job logs
- Application performance monitoring data (Laravel Pulse metrics)
- Debug and development logs (Laravel Telescope, when active)
- Feature flag configuration records (Laravel Pennant)
- Cookie and session data

## **8.8 Third-Party Data Entered by Users**

Certain platform features allow registered users to enter information about individuals who are not registered on the platform. These records include:

- Group buy solo participant records (name, preferred contact method, contact value, payment status)

- Claim sale tracker participant records (name, contact method, contact value, payment and shipping status, tracking numbers)
- Solo league participant records (name, Konami ID)
- Player registry solo player records (name, Konami ID)

The registered user who enters this data acts as data controller for the purposes of POPIA. The platform stores this data as data processor on their behalf. Third parties whose information has been stored may submit data access, correction, or deletion requests to [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software).

### **8.9 Retailer and Seller Records**

- Retailer profiles (names, base URLs, scraping configurations)
- Store records (store names, descriptions, types, contact details, addresses, website URLs)
- Seller application records (applicant details, store information, company registration numbers, application status, admin review notes)
- Retailer API integration credentials (encrypted; Shopify/WooCommerce keys)
- Payment processing configuration (Paystack subaccount codes, settlement bank identifiers)
- VAT registration details
- Retailer shipping method configurations
- Webhook configuration records

## **9. PROCESSING OF PERSONAL INFORMATION**

### **9.1 Purpose of Processing Personal Information**

Nik Software (Pty) Ltd, trading as LekkerDuelist, processes personal information for the following purposes:

- To create, manage, and authenticate user accounts on the LekkerDuelist platform;
- To facilitate community features such as leagues, tournaments, auctions, group buys, claim sales, and trading tools;
- To process transactions and manage payment flows between buyers, sellers, and the platform;
- To communicate with users regarding their accounts, transactions, and platform updates;
- To enable users to coordinate group purchases and track claim sales involving non-platform participants;
- To aggregate and display card pricing information from South African retailers;
- To moderate user-generated content (e.g., auction listings) and enforce platform rules;
- To maintain the security and integrity of the platform, including prevention of automated abuse;
- To monitor application performance and diagnose technical issues;
- To comply with legal obligations under South African law, including tax reporting;
- To improve the platform and user experience through analytics; and
- To respond to feedback, support requests, and enquiries.

### **9.2 Description of the Categories of Data Subjects and of the Information or Categories of Information Relating Thereto**

<b>Categories of Data Subjects</b>	<b>Personal Information That May Be Processed</b>
Registered Users	Name, email address, phone number (optional), profile information, encrypted password, login history, IP address, two-factor authentication details, gaming identifiers (Konami ID, DuelingBook username, DuelingNexus username, Master Duel friend code, Duel Links friend code), user roles, preference settings, terms acceptance timestamps, user-generated content (tournament results, trade posts, auction listings, bids, feedback submissions, card alert preferences, uploaded images)
Sellers and Retailers	Store names, contact details (address, phone, email, website), company registration numbers, VAT registration details, settlement bank identifiers (last 4 digits of account number, bank name), Paystack subaccount codes, seller application details, admin review notes
Non-Platform Participants (third-party data entered by users)	Name, preferred contact method, contact value (as entered by a coordinating user for claim sales, group buys, or solo leagues); Konami ID (for solo league and registry participants)
Website Visitors (including non-authenticated)	IP address, browser type and version, operating system, pages visited, session identifiers, cookies, session data, last activity timestamps
Correspondents (feedback and contact)	Name, email address, message content, purpose of enquiry, consent to follow-up contact
Buyers (marketplace)	Contact information (as provided during checkout), order history, payment transaction references (Paystack), shipping details, refund records

### **9.3 The Recipients or Categories of Recipients to Whom the Personal Information May Be Supplied**

<b>Category of Personal Information</b>	<b>Recipients or Categories of Recipients</b>
User account and transaction data, where compelled by law	South African law enforcement authorities (pursuant to a valid warrant, subpoena, or court

Category of Personal Information	Recipients or Categories of Recipients
	order)
Payment and billing information	Paystack (payment processor); credit card information is submitted directly to Paystack and does not pass through our servers
Tax and financial records	South African Revenue Service (SARS), as required by law
Order and shipping details	Relevant retailer/seller fulfilling the order (limited to information necessary for order fulfilment)
Tournament participation and results	Other tournament participants and the public (limited to player names and match results as part of public league/tournament standings)
Analytics data (aggregated and de-identified)	Analytics service providers
Auction listing content and bids	The public (auction listings are publicly visible); bid amounts visible to auction participants

Nik Software (Pty) Ltd **does not sell personal information** to third parties and will never do so.

#### 9.4 Planned Transborder Flows of Personal Information

The LekkerDuelist platform is hosted on a virtual private server (VPS) located in the **European Union**. Accordingly, all personal information of users (including those located in South Africa) is stored and processed in the EU.

The following categories of personal information may be transferred outside the Republic:

- User account details and authentication records;
- User-generated content (auction listings, trade posts, tournament data);
- Transaction and order records;
- Session and analytics data; and

- Application logs.

These transfers are conducted in compliance with the requirements of Chapter 9 of POPIA. The European Union has been recognised as providing an adequate level of protection for personal information.

In addition, payment transaction data is shared with **Paystack** (a payment processor with operations in Nigeria and South Africa) for the purposes of processing payments. Paystack is PCI-DSS compliant and processes credit card information directly; card details do not pass through LekkerDuelist's systems.

## 9.5 General Description of Information Security Measures

Nik Software (Pty) Ltd implements the following security measures to ensure the confidentiality, integrity and availability of personal information:

- **Encryption in transit:** All data transmitted between users and the platform is encrypted via SSL/TLS (HTTPS);
- **Password security:** User passwords are stored using industry-standard one-way hashing (bcrypt); passwords are never stored or transmitted in plain text;
- **Two-factor authentication (2FA):** Available to all users for additional account security;
- **Access control:** Administrative access to the platform and its data is restricted to authorised personnel only, with role-based permissions enforced at the application level;
- **API credential protection:** Third-party API credentials (e.g., Shopify, WooCommerce) are stored encrypted in the database;
- **Payment card data handling:** Credit card information is not stored on or transmitted through our servers; all payment processing is handled by PCI-DSS compliant Paystack;
- **Regular software updates:** The platform software, its dependencies, and the server infrastructure are kept up to date with security patches;
- **Anti-bot protections:** CAPTCHA and other measures are employed to prevent automated abuse and brute-force attacks;
- **Data minimisation:** Only personal information necessary for the functioning of the platform is collected and retained;

- **Soft deletion:** When user accounts are deleted, data is retained in a soft-deleted state for a limited period before permanent purging, ensuring recoverability while respecting erasure requests; and
- **Session management:** Sessions are managed server-side with automatic expiry.

## 10. HOW TO REQUEST ACCESS TO RECORDS

10.1 A requester must use the prescribed form (**Form C**) to make a request for access to a record. Form C is available from the website of the Information Regulator at <https://www.justice.gov.za/inforeg/> or may be requested from the Information Officer.

10.2 The requester must provide sufficient detail on the request form to enable the Information Officer to identify—

- (a) the record or records requested;
- (b) the requester (and if an agent is acting on behalf of another person, proof of the capacity in which the requester is making the request); and
- (c) the form of access required.

10.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

10.4 The requester must indicate which form of access is required, including—

- (a) if the request is for a copy of a record, whether the copy should be posted to the requester; or
- (b) if the request is for a record in electronic format, in what format the record should be provided.

10.5 The request form, together with the request fee (see section 11 below), must be submitted to the Information Officer at:

**Email:** [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software)

**Post:** Available on request

10.6 The Information Officer will respond to the request within **30 days** of receipt thereof. If the request is granted, the requester will be advised of the access fee (if any) to be paid before access is given. If the request is refused, the requester will be advised of the reasons for refusal, the provisions of PAIA relied upon, and the remedies available (including the right to lodge a complaint with the Information Regulator or to apply to a court).

10.7 The 30-day period may be extended by a further period of not more than 30 days if—

- (a) the request is for a large number of records or requires a search through a large number of records and compliance within 30 days would unreasonably interfere with the activities of the private body;
- (b) the request requires a search for records in, or collection thereof from, an office of the private body not situated in the same town or city as the office of the Information Officer that cannot reasonably be completed within the original period; or
- (c) consultation with another private body or a third party is necessary or desirable.

## **11. PRESCRIBED FEES**

11.1 A **request fee** is payable upon submission of a request for access, as prescribed in the Regulations to PAIA. This fee is non-refundable and is required before the request will be processed.

11.2 An **access fee** may also be payable where a request for access is granted, depending on the form of access and the volume of records involved. The access fee is calculated in accordance with the prescribed tariffs set out in Annexure B of the PAIA Regulations.

11.3 The current prescribed fees, as published by the Minister, include (but are not limited to) the following:

- (a) Photocopy of A4-size page (or part thereof): R1.10 per page;
- (b) Printed copy of A4-size page (or part thereof): R0.75 per page;
- (c) Copy in computer-readable form (e.g., CD/flash drive): R70.00;
- (d) Transcription of visual images (per A4-size page): R40.00;
- (e) Copy of visual images: R60.00;
- (f) Transcription of an audio record (per A4-size page): R20.00;
- (g) Copy of an audio record: R30.00;
- (h) Request fee: R50.00.

11.4 Fees are subject to change from time to time as prescribed by the Minister. The current fee schedule can be confirmed with the Information Officer.

11.5 The Information Officer may require a deposit of not more than one-third of the access fee before access is given, where the access fee is likely to exceed R100.00.

## **12. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS**

The Information Officer may refuse a request for access to a record in accordance with Chapter 4 of Part 3 of PAIA. The main grounds for refusal, as applicable to a private body, include (but are not limited to):

**12.1 Unreasonable disclosure of personal information of a third party** (section 63): Access will be refused if it would involve the unreasonable disclosure of personal information about a third party (including a deceased individual), unless that party has consented in writing or the information is already publicly available.

**12.2 Trade secrets and confidential commercial or financial information of a third party** (section 64): Access will be refused if the record contains trade secrets, or financial, commercial, scientific, or technical information of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party.

**12.3 Confidential information of the private body** (section 65): Access may be refused if disclosure would be likely to cause harm to the commercial or financial interests of the private body, including trade secrets, financial information, or information supplied in confidence by a third party.

**12.4 Safety of individuals and property** (section 66): Access may be refused if disclosure could reasonably be expected to endanger the life or physical safety of an individual.

**12.5 Privileged records** (section 67): Access will be refused to records that are privileged from production in legal proceedings, unless the person entitled to the privilege has waived it.

**12.6 Research information of a third party** (section 68): Access may be refused if the record contains information about research being or to be carried out by or on behalf of a third party, and disclosure would be likely to expose the third party or the researcher to serious disadvantage.

**12.7 Records that cannot be found or do not exist** (section 69): If after a reasonable search, a record cannot be found or does not exist, the Information Officer will notify the requester by way of an affidavit or affirmation.

**Mandatory disclosure in the public interest (section 70):** Despite the grounds for refusal listed above, the Information Officer must grant access to a record if the disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law; or an imminent and serious public safety or environmental risk; and the public interest in the disclosure clearly outweighs the harm contemplated.

**Remedies:** If a request for access is refused, the requester may—

- Lodge a complaint with the Information Regulator within 180 days of the refusal;
- Apply to a court for appropriate relief; or
- Request the Information Officer to reconsider the decision.

The contact details of the Information Regulator are:

Address: JD House, 27 Stiemens Street, Braamfontein,  
Johannesburg, 2001

Email: [infoleg@justice.gov.za](mailto:infoleg@justice.gov.za)

Website: <https://www.justice.gov.za/infoleg/>

## **13. AVAILABILITY OF THE MANUAL**

13.1 A copy of this Manual is available—

13.1.1 on the LekkerDuelist website at <https://lekkerduelist.co.za>;

13.1.2 by emailing [lekkerduelist@nik.software](mailto:lekkerduelist@nik.software) to request a copy;

13.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

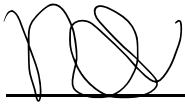
13.1.4 to the Information Regulator upon request.

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 Nik Software (Pty) Ltd, trading as LekkerDuelist, will on a regular basis update this manual as and when required by law or by changes to the operations of the private body.

*Issued by*



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**Nikolaos Spyratos**

Sole Director and Information Officer

Nik Software (Pty) Ltd t/a LekkerDuelist