



**PAIA Manual of Dodo's
Shoes (Pty) Ltd
(hereinafter Dodo's)
Reg no 1989/002523/07**

This document is prepared in Accordance with
Section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended).

Document use

This document is a public document and is authorised for perusal by any person interested party or stakeholder interested in the Dodo's PAIA process.



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Abbreviations/ Acronyms/ Definitions

Abbreviation	Expansion
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000
POPIA	Protection of Personal Information Act No.4 of 2013
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa



Introduction

The Promotion of Access to Information Act (Act) requires Dodo's to draft this PAIA manual for the purposes of,

- Informing the public of their right to request access to information, which is a Constitutional right,
- further to inform the public of the type of information Dodo's holds in its' business operations, that may be requested for access,
- and to inform the public how to request such access.

About Dodo's

Dodo's (Pty) Ltd is a private company operating within the footwear wholesale and retail industry.

The Dodo's brand has been synonymous with high quality fashion and contemporary footwear since it opened its first store.

Its ambition is to attract emerging, middle market consumers, with a range of beautifully crafted and well-priced footwear.

The company has grown into a fashion forward shoe retailer that operates in the retail and online space as the parent company of a growing portfolio of allied businesses.

About this PAIA Manual

The PAIA Manual is useful for the public to:

- Observe the categories of available records held by a body, without having to submit a formal PAIA request.
- Obtain sufficient understanding of how to make a request to access a record of the body, by describing the subjects on which the body holds records and the categories of records held on each subject.
- View the list of other legislation which requires the body to hold records.
- Access all the relevant contact details of the Information Officer (IO) and Deputy Information Officer (DIO), responsible for assisting the public with access to records requests.
- Recognize the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- Understand if the body will process personal information, the purpose of processing of Personal information.



- Recognize the description of the categories of data subjects and of the information or categories of information relating thereto.
- Recognize the recipients or categories of recipients to whom personal information may be supplied.
- Check 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.
- Recognize whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of personal information to be processed.



Key Details on Information and PAIA for Dodo's

i. Guide on How to Use PAIA and How to Obtain Access to the Guide

The regulator has, in terms of section 10(1) of PAIA, amended, updated, and made available the revised guide on how to use PAIA, in an easily comprehensible form and manner. This can reasonably be used by a person to exercise any right contemplated in PAIA and POPIA. The guide is available in each of the 11 official languages.

The guide contains the description of:

- The objects of PAIA and POPIA.
- The postal and street address, phone, and fax number and, if available, electronic mail address of:
 - The Information Officer (IO) of every public body.
 - The Deputy Information Officer (DIO) of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA².

The guide also contains the manner and form of a request for:

- Access to a record of a public body contemplated in section 11³.
- Access to a record of a private body contemplated in section 50⁴.
- Assistance available from the IO of a public body in terms of PAIA and POPIA.
- Assistance available from the Regulator in terms of PAIA and POPIA.

The guide includes 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:

- An internal appeal (available for public bodies).
- A complaint to the Regulator.
- An application with a court against a decision by the information officer of a public body.

A decision on an internal appeal or a decision by the Regulator or a decision of the head of a private body.

¹ 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.*

² 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.*

³ 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.*

⁴ 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.



- The provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and the process to obtain access to a manual.
- The provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- The notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access.
- The regulations made in terms of section 92¹¹.

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.

The guide can also be obtained by:

- Request to the Information Officer.
- The website of the Regulator (www.inforegulator.org.za).

A copy of the guide is also available for public inspection during normal office hours in the two official languages at any Government building, in English and translations available for other languages upon request.

ii. Availability of this PAIA Manual

A copy of the manual is available:

- To any person upon request and upon the payment of a reasonable prescribed fee.
- To the Information Regulator upon request.
- The Physical Offices of Dodo's Shoes:
57 Smits Road
C/O Oxford and Dunkeld
Rosebank

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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.”



A fee for a copy of the manual, as contemplated in annexure B of the regulations, is payable for each A4-size photocopy made.

iii. Dodo's Records in Accordance with Other Legislation

The following table describes the legislation that requires Dodo's to hold records.

Table 1: Legislation requiring Dodo's to maintain records

Legislation requiring Dodo's to maintain records – reference to law include sub-regulation	
1.	Basic Conditions of Employment Act No. 75 Of 1997
2.	Companies Act 71 of 2008
3.	Compensation for Occupational Injuries and Diseases Act, No. 130 Of 1993
4.	Electronic Communications and Transactions Act No 25 of 2002
5.	Employment Equity Act No. 55 Of 1998
6.	Employment Services Act, No. 4 Of 2014
7.	Employment Tax Incentives Act 26 of 2013
8.	Income Tax Act 58 of 1962
9.	Patents Act No 57 of 1978
10.	Trademarks Act No 194 of 1993
11.	Labour Relations Act No. 66 of 1995
12.	National Minimum Wage Act, No. 9 of 2018
13.	Occupational Health and Safety Act 85 Of 1993
14.	Promotion of Access to information Act 2 of 2000
15.	Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
16.	Protection of Personal information Act 4 of 2013
17.	Skills Development Act (SDA), No. 97 of 1998
18.	Skills Development Levies Act, No. 9 Of 1999
19.	Tax Administration Act, No. 28 Of 2011
20.	Unemployment Insurance Act, No. 63 Of 2001



Legislation requiring Dodo's to maintain records – reference to law include sub-regulation	
21.	Unemployment Insurance Contributions Act, No. 4 Of 2002
22.	Value Added Tax Act 89 of 1991

iv. Subjects and Categories of Records per Subject Held by Dodo's

This table describes the Subjects on which the Body Holds Records and Categories of Records Held on each Subject by Style Eyes.

Table 2: Records of Dodo's available Per category of record

Record Grouping	Record	Length of Time	Accessibility
General Business Records	Registration and Incorporation Documents	Permanently	Not accessible
	Patents, trademark registrations, copyright registrations	Permanently	Not accessible
	Property Records	Permanently	Accessible via PAIA process with justifiable reason.
	Company Documents	Permanently	Accessible via PAIA process with justifiable reason
	Tax Documents	Permanently	Accessible via PAIA process with justifiable reason
Staff Documents	Staff Files – Employment contract, employee personal details, banking details, income tax numbers, etc.	For length of employment and 5 years post termination/retirement/death	Accessible through PAIA process
Financial Business Records	Financial Statements	5 years	Accessible via PAIA process with justifiable reason
	Tax Returns and Filings	5 years	Accessible via PAIA process with justifiable reasons
	Audit Reports	5 years	Accessible via PAIA process with justifiable reason
	Cash books	5 years	Accessible via PAIA process with justifiable reason
	Charts of Accounts	5 years	Accessible via PAIA process with justifiable reason
	Salaries/PAYE/UIF/SDL	5 years	Accessible via PAIA process with justifiable reason



	Bank Reconciliations	5 years	Accessible via PAIA process with justifiable reason
	Client Account Details – invoices, credit notes etc.	5 years	Accessible via PAIA process with justifiable reason
	Bank records and statements	5 years	Accessible via PAIA process with justifiable reason
Insurance Records	Company Insurance Details	Permanently or for length of insurance cover	Accessible via PAIA process with justifiable reason
	Vehicle Insurance Details	Lifetime of vehicle plus 3 years	Accessible via PAIA process with justifiable reason
Policies	Policy Documents	Permanently	Accessible via PAIA process with justifiable reasons
Client Case information	Medical Records, Statements, financial information, case specific documents etc	5 years	Accessible via PAIA process with justifiable reasons
General company information	Website	Permanently	In the public domain: N/A



How Dodo's Processes Personal Information

i. The Purpose of Processing Personal Information

Dodo's processes Personal Information for the following purposes:

- To manage general queries, compliments, and complaints
- In fulfilling contractual obligations
- In compliance with legal obligation and compliance standards
- Maintaining employees, contractors, third- parties and suppliers services
- Recruitment activities
- Campaigning and marketing activities
- Client Services management
- Business management and planning
- Providing information and communications to media
- Monitor use of resources in compliance with policies
- All other operational functions in the legitimate interests of Dodo's and the Data subject

ii. Categories of Data Subjects and the Categories of Information Relating Thereto

The following table describes the description of the categories of data subjects and the categories of information relating thereto.



Table 3: Categories of Data Subjects and of the Information or Categories of Information Relating Thereto

Data Subject Category	Information Processed
Directors	Identity numbers, Names, FICA documentation.
Employees, Potential Employees, New Recruits	Name, Surname, South African identity number or other identifying number, contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information, health information, details related to employee performance, disciplinary procedure information
Shareholders	Identity numbers, Names, Employer, Occupation, Business address, Residential address, Copies of identity documentation, Proof of residence, Contact numbers, Email addresses.
Consultants/ Contractors	This will be dependent on the nature of the services provided to Dodo's Shoes (Pty) Ltd. but may include any of the details in the categories for Employees and/or Service providers.
Service Providers; including Outsourced/Hosted Services, Auditors, etc.	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details.
Clients – Natural Persons (Current, Prospective, and Historic)	Name, Surname, South African identity number or other identifying number (e.g., passport), date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, May also include the personal information of children /minors, if they are listed as beneficiaries or dependants.
Clients – Juristic Persons (Current, Prospective, and Historic)	Entity name, registration number, tax-related information, contact details for representatives, FICA documentation, trustee personal information (as for Natural Persons).



iii. The Categories of Recipients to Whom the Personal Information May be Supplied

The following table describes the recipients or categories of recipients to whom the personal information may be supplied.

Table 4: Categories of Recipients to Whom the Personal Information May be Supplied

Category of Recipients
• Employees, • Suppliers, • Governmental organisations, • Courts, or Statutory Institutions, • Emergency services, • PAIA applicants, • valid and vetted 3rd parties • Banks • Audit firm • SARS • Medical Aid Companies and/or Medical Aid Administrators • Insurers • Recruitment agencies may collect personal information on behalf of Dodo's Shoes • Training providers and relevant SETAs • Payroll firms

iv. Planned Transborder Flows of Personal Information

Dodo's may transfer the personal information collected about data subjects to countries outside South Africa, through external storages servers hosted outside of South Africa, partnerships with internal companies.

Information can be shared cross border to Dodo's third-party vendors and sub-contractors operating cross border.

Dodo's ensures that personal information transferred out of South Africa is secure and binds recipients through contractual and legal obligations to protect the confidentiality and integrity of personal information.

v. General Description of Information Security Measures implemented by Dodo's

Dodo's processes personal information under its control with adequate security and privacy technical and organisational measures appropriate to the operational risks and requirements of the company to ensure the safeguarding of personal information to prevent to unauthorised and/or unlawful loss, disclosure, destruction or use of personal information.



Our privacy policy, along with restricted internal policies and procedures further detailed our approach to privacy and security matters. Our privacy policy can be requested

How to Request Information under PAIA from Dodo's

This section contains details on how to request information, the key contact details for access to information requests, the applicable fees and exemptions applicable for PAIA requests made to Dodo's.

i. Access to Information General Contacts

The prescribed form is to be filled and shared to the Information officer through the contact details specified below. The form must be filled in full, any incomplete form may be rejected immediately or sent back.

Where a requester provides a request verbally, due illiteracy or a disability, the information officer can be contacted detailing this scenario and requested to assistance.

Table 5: Contact Details for PAIA requests

Contact details to request Access to information and submit queries or complaints
Information Officer name: Ralph Peter Dodo Email: popia@dodos.co.za / paia@dodos.co.za Contact Number: 011 029 0400 Deputy information Officer: Jos Rabie Email: jos@dodos.co.za Contact number: 011 029 0400

i. Related Records/Information Held and Applicable Legislation (PAIA)

PAIA grants any requester access to records held or controlled by a private body, on condition that the record of information is required for the exercise or protection of any rights, referencing in particular, personal information rights as described in PoPIA.

This section serves as guidance to the records that are held by and includes records related to Dodo's Shoes (Pty) Ltd. business operations.

Requestors must take into consideration applicable prescribed fees for reproduction where access is granted



i.i Records relating to Dodo's Shoes (Pty) Ltd. are provided:
(Please see Reason Key below)

Records Held/Controlled	May Be Disclosed	May Not Be Disclosed	Limited Disclosure	May Not Be Refused
Public and Investor Relations				
Investor Corporate Releases	1			
Media Releases	1			
Company Secretarial and Legal				
Statutory Records		12		
Incorporation Documents				
Evidence of Executive, Board and Shareholder Decisions Taken		12		
Share Register		12		
General Contract Information				
Financial Records				
Audited Financial Statements		12		
Tax, VAT, and PAYE Records		12		
Management Accounts		12		
Human Resources				
Employee/Staff Records		5 & 9	4	
Employment Contracts		5	4	
Policies and Procedures		12		
Health and Safety Records		5, 8, & 9	4	
Employment Equity Plan		12		
Training and Development Records		12		
Medical Aid Records		8/9	4	
Payroll Records		5	4	



Records Held/Controlled	May Be Disclosed	May Not Be Disclosed	Limited Disclosure	May Not Be Refused
Company Investment				
Investment Policy Documents		12		
Economic Reports and Forecasts		12		
Research Reports		12		
Board Committee Submissions		12		
Property Investments		9 & 12		
Sales and Marketing				
Market Information		12 & 13		
Research Information		13		
Public Customer Information	1			
Performance and Sales Records		12 & 2		
Customer Databases		12		
Marketing and Product Strategies		12		
Information Risk Management				
Business Continuity Plan		9 & 12		
Disaster Recovery Plan		9 & 12		
Incident Response Plan		9 & 12		
Documented Information Security Controls		12		

Reason Key:

Reason Code	Explanation
1	Publicly accessible
2	Request received after the commencement of legal proceedings (criminal or civil) – <i>PAIA Section 7</i>
3	Subject to copyright
4	Personal information that belongs to the requester of the information – <i>PAIA Section 61</i>



5	Unreasonable disclosure
6	Likely to harm the commercial or financial interests of third party – <i>PAIA Section 64(a)(b)</i>
7	Likely to harm the company or third party in contract or other negotiations – <i>PAIA Section 64(c)</i>
8	Would breach a duty of confidence owed to a third party in terms of an agreement – <i>PAIA Section 65</i>
9	Likely to compromise the safety of individuals or protection of property – <i>PAIA Section 66</i>
10	Legally privileged document – <i>PAIA Section 67</i>
11	Environmental testing: investigation which reveals public safety; environmental risks – <i>PAIA Section 64(2) and Section 68(2)</i>
12	Commercial information of private body – <i>PAIA Section 68</i>
13	Likely to prejudice research and development information of the company or a third party – <i>PAIA Section 69</i>
14	Disclosure in public interest – <i>PAIA Section 70</i>

ii. Fees and fee exemptions

PAIA allows for certain prescribed fee to be charged for the provision of a record under the Act.

Cost estimates for granting access to records will be provide to the requestor before fulfilling a PAIA request, where payment or deposit may be required upfront.

Any exceptions to PAIA fees may require additional information that may be validated against the applicable legislation or regulation stipulating the threshold requirements at that point in time, before exempting the requester.

iii. Rights, obligations and decisions on access to information from Dodo's

Dodo's has obligations under PAIA, PoPIA amongst other legislation, that will limit the sharing of information. The right to request for access to information is limited in certain regards, and must be balanced against the right being protected or exercised under a PAIA request. Dodo's will endeavour to fully evaluate all requests for access to information and determine the lawful and balanced consideration for access, based on the conflicting rights, on a case by case basis.

Note, when requests for records involves personal information of another party (someone who is different to the requestor), extra steps will be required by us to provide the party who's information is being requested an opportunity to reject the provision of access of records to the requestor. Dodo's is obliged to assess any requestors, authorisation materials of third parties to



request records on behalf of another person and the person's authorising a third-party requesting records itself, before access to information may be granted.

Where records requested from Dodo's may be granted, however cannot be found, are incomplete or have been either destroyed or de-identified beyond recognition and where the identification is required, Dodo's will not be able to provide these records, and under PAIA this access request may be deemed a rejection to provide access to records.

All access to information requests will be closed with written response and reason to the requestor to understand the basis of Style Eyes' decision on providing access to records.

In the event that the format in which a requestor has requested a record to be accessed in is not possible for us to deliver, Dodo's will contact the requestor to arrange alternative provisions, or explain and charge the requestor additional fees to have a third party deliver it in the requested format.

Annexure A: PAIA Request Form 2:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

Annexure B: Internal Appeal Form 4:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form04-Reg9.pdf>



Updating the Manual

Dodo's will update this manual on a regular basis as authorized by the appropriate teams.

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