

# PAIA MANUAL

The Bloc Studio (Pty) Ltd

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

Date of compilation: 13 May 2026

Date of first revision: 26 June 2026

**Date of second revision: 30 June 2026**

*Reason for second revision: Addition of Brevo SAS as a third-party  
data processor for email marketing purposes*

Registration No: 2025/631931/07  
[www.thebloc.studio](http://www.thebloc.studio)

## **1. List of Acronyms and Abbreviations**

- 1.1 "CEO" means Chief Executive Officer;
- 1.2 "DIO" means Deputy Information Officer;
- 1.3 "IO" means Information Officer;
- 1.4 "Minister" means the Minister of Justice and Correctional Services;
- 1.5 "PAIA" means the Promotion of Access to Information Act No. 2 of 2000, as amended;
- 1.6 "POPIA" means the Protection of Personal Information Act No. 4 of 2013;
- 1.7 "Regulator" means the Information Regulator (South Africa);
- 1.8 "Republic" means the Republic of South Africa; and
- 1.9 "TBS" or "the Company" means The Bloc Studio (Pty) Ltd.

## **2. Purpose of PAIA Manual**

This PAIA Manual is useful for the public to—

- 2.1 check the categories of records held by the Company 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 Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the Company which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy 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 Company 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 recipients or categories of recipients to whom the personal information may be supplied;
- 2.8 know if the Company has planned to transfer or process personal information outside the Republic, and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.9 know whether the Company 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 The Bloc Studio (Pty) Ltd**

### **3.1 Information Officer**

Name: Diandra Kim Holden, Director

Tel: +27 61 527 3835

Email: [diandra@thebloc.studio](mailto:diandra@thebloc.studio)

The Information Officer is registered with the Information Regulator of South Africa as required under PAIA and POPIA.

### **3.2 Deputy Information Officer**

No Deputy Information Officer is currently designated. All requests should be directed to the Information Officer above.

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

Email: [hey@thebloc.studio](mailto:hey@thebloc.studio)

### **3.4 Head Office**

- Physical Address: 54 Cross Street, President Ridge, Randburg, 2194, South Africa
- Postal Address: 54 Cross Street, President Ridge, Randburg, 2194, South Africa
- Telephone: +27 61 527 3835
- Email: [hey@thebloc.studio](mailto:hey@thebloc.studio)
- Website: [www.thebloc.studio](http://www.thebloc.studio)
- Registration number: 2025/631931/07
- VAT registration: Not VAT registered

## **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 Guide contains the description of—

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone number and, if available, electronic mail address of the Information Officer and every Deputy Information Officer of public and private bodies designated in terms of section 17(1) of PAIA and section 56 of POPIA;

4.3.3 the manner and form of a request for access to a record of a public body (section 11) and a private body (section 50);

4.3.4 the assistance available from the Information Officer 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 an internal appeal, a complaint to the Regulator, and an application with a court;

4.3.7 the provisions of sections 14 and 51 requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 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 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the Company and the Regulator during normal working hours.

4.5 The Guide can also be obtained upon request to the Information Officer, or from the website of the Regulator ([www.inforegulator.org.za](http://www.inforegulator.org.za)), using Form 01: Request for a Copy of the Guide from an Information Officer.

### **4.6 How to Request Access to a Record of the Company**

#### **4.6.1 Prescribed form**

All requests for access to records held by TBS must be submitted on Form 02: Request for Access to Record, prescribed under Regulation 7 of the PAIA Regulations. Form 02 is available from the Information Regulator's website at [www.inforegulator.org.za](http://www.inforegulator.org.za), or on request from the

Information Officer. A request will not be processed unless it is submitted using the prescribed form.

#### **4.6.2 Completing the request**

The requester must provide:

- Full name and contact details
- Proof of identity
- Proof of authority, if requesting on behalf of another person
- A description of the record being requested, in sufficient detail to enable the Information Officer to locate it
- The form of access requested (copy, inspection, electronic format, or other)
- The right being exercised or protected, and why the record is required for that purpose
- Any application for a fee waiver, with supporting grounds

#### **4.6.3 Submitting the request**

Completed Form 02 requests must be submitted to the Information Officer using the contact details in section 3.1 of this manual.

#### **4.6.4 Request fee**

A request fee of R140 is payable to TBS before the request will be processed, in accordance with the prescribed tariff under Annexure B of the PAIA Regulations. This fee is not refundable, regardless of the outcome of the request. Requesters seeking access to their own personal information are exempt from the request fee.

#### **4.6.5 Response timeframe**

TBS will respond to a valid request within 30 days of receipt of the request fee. This period may be extended by a further 30 days in complex cases, in which case the requester will be notified in writing before the original period expires. If no response is provided within the applicable timeframe, the request is deemed to have been refused.

#### **4.6.6 Access fees**

If access is granted, an access fee will be payable before the records are provided, calculated in accordance with the prescribed tariff under the PAIA Regulations, including:

- R1.10 per photocopied page (A4)
- R7.50 per 24 minutes of search and preparation time
- The actual cost of reproduction in any other requested format

Where the estimated access fee exceeds R600, a deposit of one third of that amount may be required before the request is processed further. Requesters seeking access to their own personal information are exempt from access fees.

#### **4.6.7 Grounds for refusal**

A request may be refused on the grounds set out in Part 4 of PAIA, which include but are not limited to: protection of the privacy or personal information of a third party; protection of commercially sensitive or confidential information; legal privilege; and records that would prejudice the Company's commercial or financial interests if disclosed. Where a request is refused, in whole or in part, the Information Officer will provide written reasons identifying the specific ground of refusal relied upon.

#### **4.6.8 Internal appeal**

A requester who is dissatisfied with a decision of the Information Officer may lodge an internal appeal using Form 04: Internal Appeal Form, prescribed under Regulation 9 of the PAIA Regulations. The internal appeal must be submitted to the Information Officer using the contact details in section 3.1 of this manual.

#### 4.6.9 Further remedies

If a requester remains dissatisfied following an internal appeal, the requester may lodge a complaint with the Information Regulator using Form 05: Complaint Form, available from [www.inforegulator.org.za](http://www.inforegulator.org.za), or apply to the High Court of South Africa for appropriate relief.

### 5. Categories of Records Available Without a Formal Request

In accordance with section 52(1) of PAIA, the following categories of records are made available by TBS without the need for a formal PAIA request:

Category of Records	Type of Record	Available on Website	Available on Request
Privacy Policy	Legal / compliance document	Yes	Yes
Terms and Conditions	Legal / compliance document	Yes	Yes
This PAIA Manual	Legal / compliance document	Yes	Yes
Portfolio, case studies and partnership / accreditation documentation	Commercial document	Yes	Yes

Requesters seeking any of the above records do not need to submit a formal Form 02 request and may approach the Information Officer directly.

### 6. Records Available in Accordance with Any Other Legislation

Category of Records	Applicable Legislation
Memorandum of Incorporation and statutory company records	Companies Act 71 of 2008
Annual financial statements	Companies Act 71 of 2008
Tax and statutory financial records	Tax Administration Act 28 of 2011; Income Tax Act 58 of 1962
Privacy Policy and related personal information processing records	Protection of Personal Information Act 4 of 2013
This PAIA Manual	Promotion of Access to Information Act 2 of 2000

### 7. Description of the Subjects on Which the Company Holds Records

Subjects on Which the Company Holds Records	Categories of Records
Finance	Annual financial statements (prepared by Openbooks Accounting); day-to-day accounting records maintained on Zoho Books; invoices and payment records. Financial year end: end of February.
Human Resources	Personnel records relating to the Company's sole director and employee, Diandra Holden. The Company does not currently employ additional staff.
Operational & Client Records	Client and project records managed via Zoho Projects; client contracts, quotations and correspondence (stored digitally only); freelancer and subcontractor agreements.
IT & Security Records	Access control system records at the Company's premises; IT infrastructure and website hosting managed by Verpex (external IT service provider).
Legal & Compliance Records	POPIA compliance documentation, including the Privacy Policy and Terms of Use for the website; this PAIA Manual.
Email Marketing Records	Newsletter subscriber lists and campaign records managed via Brevo SAS (formerly Sendinblue), Paris, France. Records include subscriber email addresses, names where provided, subscription status, and campaign analytics (open rates, click rates).

*UPDATED: Email Marketing Records row added in revision of 30 June 2026 to reflect the adoption of Brevo SAS as the Company's email marketing platform.*

## 7.1 Records Held by Third Parties on the Company's Behalf

In accordance with the Act, a requester may be entitled to access records held by a third party on behalf of TBS. The following third parties hold or have access to Company records:

Third Party	Location	Category of Records Held
Openbooks Accounting (Daniel Abrams)	uMdloti, South Africa	Annual financial statements and related accounting records
Google LLC (Google Drive)	United States (servers may be global)	Cloud storage of company, client and project records
Verpex	European Union	IT infrastructure and website hosting
Brevo SAS (formerly Sendinblue)	Paris, France (European Union)	Newsletter subscriber lists, subscription status, and email campaign records

*UPDATED: Brevo SAS row added in revision of 30 June 2026.*

TBS is not currently registered with any industry body, SETA, or regulatory authority beyond the Companies and Intellectual Property Commission (CIPC). TBS does not use an external legal firm to hold records on its behalf.

## 8. Processing of Personal Information

### 8.1 Purpose of Processing Personal Information

The Company processes personal information for the purposes of: responding to enquiries from clients and prospective clients; performing and managing website design and digital agency service contracts; managing relationships with freelancers and subcontractors; sending email newsletters and marketing communications to opted-in subscribers via Brevo SAS; maintaining accounting and statutory records; and complying with applicable legal obligations.

**UPDATED:** Email newsletter processing via Brevo SAS added in revision of 30 June 2026.

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

Categories of Data Subjects	Personal Information That May Be Processed
Clients / prospective clients	Names, contact details, business address, registration numbers, billing and payment details
Freelancers / subcontractors / service providers	Names, contact details, banking details, contractual terms
Website visitors	Name, email address and message submitted via the website contact form; technical usage and browsing behaviour data collected via Google Analytics, Google Tag Manager, Google Search Console and Microsoft Clarity
Newsletter subscribers	Email address and name (where provided), subscription status, and email engagement data (open rates, click rates), processed via Brevo SAS

**UPDATED:** Newsletter subscribers row added in revision of 30 June 2026.

## 8.3 Recipients or Categories of Recipients to Whom the Personal Information May Be Supplied

Category of Personal Information	Recipients or Categories of Recipients
Financial and accounting records	Openbooks Accounting (Daniel Abrams)
Company, client and project records held in cloud storage	Google LLC (Google Drive)
Website and IT infrastructure data	Verpex (IT service provider)
Website analytics and search performance data	Google LLC (Google Analytics, Google Tag Manager, Google Search Console)
Website session and user behaviour data	Microsoft Corporation (Microsoft Clarity)
Newsletter subscriber data and email campaign records	Brevo SAS (formerly Sendinblue), Paris, France

**UPDATED:** Newsletter subscriber data row added in revision of 30 June 2026.

## 8.4 Planned Transborder Flows of Personal Information

The Company's website is hosted by Verpex on servers situated in the European Union. Website analytics and search performance data may be processed by Google LLC (Google Analytics, Google Tag Manager, Google Search Console) and by Microsoft Corporation (Microsoft Clarity) on servers situated outside the Republic. Company, client and project records stored on Google Drive may also be processed by Google LLC on servers situated outside the Republic, including in the United States.

Newsletter subscriber data is processed by Brevo SAS on servers situated in the European Union. Brevo SAS is a company registered in France and is subject to the EU General Data Protection Regulation (GDPR). The transfer of personal information to Brevo SAS is conducted under appropriate contractual safeguards, including Brevo's Data Processing Agreement, which provides adequate protection for the transfer of personal information outside the Republic in accordance with POPIA.

*UPDATED: Brevo SAS transborder flow paragraph added in revision of 30 June 2026.*

## 8.5 General Description of Information Security Measures

The Company has implemented two-factor authentication (2FA) across its business systems and accounts, together with malware and antivirus protection on its devices and infrastructure, to safeguard the confidentiality, integrity and availability of the personal information under its care. Third-party service providers, including Brevo SAS, maintain independent security certifications and technical and organisational measures appropriate to the data they process on the Company's behalf.

*UPDATED: Reference to Brevo SAS security measures added in revision of 30 June 2026.*

## 9. Availability of the Manual

9.1 A copy of this Manual is available—

9.1.1 on the Company's website at [www.thebloc.studio](http://www.thebloc.studio);

9.1.2 at the head office of TBS for public inspection during normal business hours;

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

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, is payable per A4-size photocopy made.

## 10. Updating of the Manual

The head of TBS will, on a regular basis, review and update this Manual to reflect changes in the Company's structure, record-keeping practices, or applicable legislation.

Revision Date	Reason for Revision
13 May 2026	Initial compilation
26 June 2026	First revision — general updates
30 June 2026	Second revision — addition of Brevo SAS as third-party data processor for email marketing; corresponding updates to sections 7, 7.1, 8.1, 8.2, 8.3, 8.4, and 8.5

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Issued by:

Diandra Kim Holden

Director, The Bloc Studio (Pty) Ltd

*30 June 2026*