



JOHAN STEMMET ENTERTAINMENT ENTERPRISES cc

PAIA MANUAL

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

**DATE OF COMPILATION: 21/08/2026
DATE OF REVISION: 21/08/2026**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
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; and
1.8	“Republic”	Republic of South Africa

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 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 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 JOHAN STEMMET ENTERTAINMENT ENTERPRISES cc

3.1. Chief Information Officer

Name:	Carl Stemmet
Tel:	+27 (60) 815-0772
Email:	info@pieceocakeseries.com
Fax number:	N/A

3.2. Deputy Information Officer

Name: N/A
Tel: N/A
Email: N/A
Fax Number: N/A

3.3 Access to information general contacts

Email: info@pieceocakeseries.com

3.4 National or Head Office

Postal Address: 714 Martilda Drive, LCE, Langebaan, Western Cape 7357
Physical Address: 714 Martilda Drive, LCE, Langebaan, Western Cape 7357
Telephone: +27 (60) 815-0772
Email: info@pieceocakeseries.com
Website: www.pieceocakeseries.com

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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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-

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.*

- 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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.”

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/infoereg/>).

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 & Afrikaans

5. CATEGORIES OF RECORDS OF JOHAN STEMMET ENTERTAINMENT ENTERPRISES cc WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Website & Legal Policies	• Terms of Service / User Agreement • Privacy Policy • This PAIA Manual	X	
Platform Content & Marketing	• Video/Audio Content Catalogues • Content Previews and Teasers	X	
User Account Records	• Profile Information (Name & Email) • Active Subscription Status & Plan • Past Invoices & Customer ID	X	Accessible by logging into the user's personal, password-protected account portal.
Corporate Information	• Close Corporation Registration Details • Public Contact Channels & Support Email • Frequently Asked Questions (FAQs)	X	

6. DESCRIPTION OF THE RECORDS OF JOHAN STEMMET ENTERTAINMENT ENTERPRISES cc WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Founding Statement / Registration Documents (CK1 / CK2)	Close Corporations Act 69 of 1984
PAIA Manual	Promotion of Access to Information Act 2 of 2000
User Data, Privacy Policies & Consent Logs	Protection of Personal Information Act 4 of 2013 (POPIA)
Website Disclosures, Terms & Conditions, and Electronic Communications	Electronic Communications and Transactions Act 25 of 2002 (ECTA)
Original Content Videos, Audio, Media Production Files and Licensing Agreements	Copyright Act 98 of 1978
Subscription Terms, Refund Policies, and Pricing Disclosures	Consumer Protection Act 68 of 2008
Income Tax Records & Financial Statements	Income Tax Act 58 of 1962

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY JOHAN STEMMET ENTERTAINMENT ENTERPRISES cc

Subjects on which the body holds records	Categories of records
Corporate Governance & CC Admin	• Founding Statement / Registration Documents (CK1 / CK2) • Association Agreements between CC members • Signed member resolutions

Finance & Tax	• Annual Financial Statements • Accounting books and ledger entries • Tax returns and assessments • Paddle transaction summaries and payout receipts
Intellectual Property & Content Production	• Original video and audio master files • Scripts and production assets • Media release forms / participant agreements
Platform Infrastructure & Information Technology	• WordPress source code, configuration files & Elementor layout data • Database backups and Hostinger web server logs • Bunny.net CDN traffic and distribution records
Customer Management	• Secure user database logs (Names and Emails) • Subscription statuses, plan types and invoice history

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The body processes personal information for the following purposes:

- **Account Provisioning:** To create, manage and verify secure user accounts on the WordPress streaming platform.
- **Service Delivery:** To facilitate high-quality video streaming and media distribution via our content delivery network.
- **Subscription Management:** To track active billing plans, manage customer account statuses and issue transactional invoices through our merchant of record.
- **Platform Security:** To protect user accounts and forms against malicious threats, fraud, cross-site request forgery and unauthorized platform access.
- **Communication:** To deliver system transactional emails, password reset notifications and critical platform updates.

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
Platform Users (Parents, Teachers & Subscribers)	• Account & Contact Data: First and last name, email address. • Access Credentials: Encrypted, non-reversible hashed passwords. • Technical Identifiers: IP addresses, browser user-agent strings, system timestamps and video playback interaction logs. • Billing & Status Metadata: Active plan type, subscription status, system invoice history and Paddle customer ID. <i>(Note: Full credit card or banking details are never stored on our servers; they are processed securely by Paddle).</i>
Service Providers & Operators	• Entity & Operational Data: Names, company registration numbers, tax/VAT details, operational business addresses and banking details of foundational tech infrastructure or business vendors (e.g., Hostinger, Paddle, Bunny.net).

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Names, Email Addresses and Encrypted Passwords	Hostinger: Used for secure web server and user database hosting.
Names, Emails, Billing Country and Subscription Status	Paddle: Act as Merchant of Record for global checkout processing, tax compliance and subscription management.
IP addresses, Device/Browser Metadata and Video Interaction Data	Bunny.net: Content Delivery Network (CDN) used to securely stream video data and process necessary technical network traffic.
Technical Network Data (IP addresses and Browser User-Agents)	Google Fonts: Utilized strictly to load website typography and platform layouts correctly.
Any account information requested under legal warrant	South African Police Services (SAPS) or statutory regulatory bodies, strictly when legally compelled.

8.4 Planned transborder flows of personal information

The body transmits personal information outside the borders of South Africa under the following conditions:

- **Subscription & Payment Processing:** User names, emails and billing locations are transferred to **Paddle** (operating globally out of the UK, Europe and the USA) to securely handle payment transactions and local sales taxes.
- **Web Server & Hosting Services:** Platform databases, encrypted passwords and user details are securely hosted via **Hostinger's** international server infrastructure.
- **Video Delivery & Infrastructure Traffic:** Technical stream logs (IP addresses and browser metadata) connect directly to **Bunny.net's** global CDN network to optimize video delivery.
- **Essential Typography:** Browsers establish basic network requests to **Google Fonts** to safely load platform text layouts.
- **Data Protection Safeguards:** The body ensures that all foreign operators are subject to international data laws or binding contracts that maintain data security protection equivalent to or exceeding POPIA standards.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The body implements the following technical measures to protect the integrity and confidentiality of personal information:

- **Data Encryption:** All data transmitted between user browsers and the website is encrypted using industry-standard SSL/TLS (HTTPS) certificates.
- **Password Security:** All user credentials and passwords are encrypted using strong, non-reversible cryptographic hashing algorithms before being stored on our servers.
- **Financial Data Security:** Full credit card or banking details are never stored on our servers. All sensitive financial records are managed exclusively by Paddle via secure payment infrastructure.
- **Strictly Essential Cookies:** The platform relies solely on necessary functional cookies for system health:
 - `wordpress_logged_in_[hash]` (Maintains parent/teacher active login sessions)
 - `wordpress_test_cookie` (Verifies browser cookie support)
 - `wordpress_sec_[hash]` (CSRF nonces to prevent Cross-Site Request Forgery)

- elementor (Local storage used to render UI design settings)
- **System Log Management:** Standard server health logs (IP addresses, timestamps) are only kept briefly to ensure platform maintenance and identify security threats.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.pieceocakeseries.com;

9.1.2 head office of Johan Stemmet Entertainment Enterprises cc for public inspection during normal business hours;

9.1.3 to any person upon request and upon the 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, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Johan Stemmet Entertainment Enterprises cc will on a regular basis update this manual.

Issued by



Carl Stemmet
Director / CC Member