



PAIA Manual

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

Date of compilation	26 June 2026
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1. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Definition
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
FICA	Financial Intelligence Centre Act 38 of 2001
FIC	Financial Intelligence Centre
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa
HVGD	High-Value Goods Dealer
CDD	Customer Due Diligence
RMCP	Risk Management and Compliance Programme

2. PURPOSE OF THIS PAIA MANUAL

This manual is prepared in terms of section 51 of PAIA and is intended to assist members of the public to:

- Understand the categories of records held by Elemental Studio and how to access them.
- Make a request for access to a record of Elemental Studio.
- Know the contact details of the Information Officer.
- Understand how personal information is processed by Elemental Studio and for what purpose.
- Know the security measures in place to protect personal information.
- Understand how to obtain a copy of this manual.

3. KEY CONTACT DETAILS

3.1 Information Officer

Name	Leza McLeod
Role	Information Officer and sole proprietor
Email	leza@elementalstudio.co.za

Website	elementalstudio.co.za
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3.2 Deputy Information Officer

No Deputy Information Officer has been designated. All access to information requests should be directed to the Information Officer above.

3.3 Business Contact

Trading name	Elemental Studio
Email	leza@elementalstudio.co.za
Website	elementalstudio.co.za

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available a Guide on how to use PAIA in an easily comprehensible form. The Guide is available in each of the official languages and in braille.

The Guide can be obtained from:

- The Information Officer of Elemental Studio upon request.
- The website of the Information Regulator: www.inforegulator.org.za
- The offices of the Information Regulator during normal business hours.

Information Regulator	www.inforegulator.org.za
General email	inforeg@justice.gov.za
POPIA complaints	POPIAComplaints@inforegulator.org.za

5. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

The following categories of records are available without the need to submit a formal PAIA request:

Category of Record	Type of Record	On Website	On Request
Privacy Policy	POPIA privacy policy	Yes	Yes
FICA / POPIA Notice	Data protection notice for CDD	Yes	Yes
PAIA Manual	This document	Yes	Yes

Category of Record	Type of Record	On Website	On Request
Contact Information	Business contact details	Yes	Yes
Product Information	Jewellery catalogue and pricing	Yes	Yes

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

Category of Record	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA privacy notice and manual	Protection of Personal Information Act 4 of 2013
FICA CDD records and KYC documents	Financial Intelligence Centre Act 38 of 2001
Risk Management and Compliance Programme	Financial Intelligence Centre Act 38 of 2001
Tax records and returns	Income Tax Act 58 of 1962; VAT Act 89 of 1991
Business records	Various commercial legislation

7. SUBJECTS ON WHICH RECORDS ARE HELD

Subject	Categories of Records
Client records	KYC / CDD verification records, identity documents, proof of address, source of funds declarations, PIP/PEP declarations
Financial records	Sales records, invoices, receipts, tax records, bank statements
Compliance records	RMCP, FICA registration, FIC correspondence, suspicious transaction reports, cash threshold reports
Operational records	Supplier invoices, stock records, commission records
Communications	Client correspondence by email and in person
Website / e-commerce	Shopify order records, customer accounts, shipping records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing

Elemental Studio processes personal information for the following purposes:

- To fulfil orders placed through the online store, Leza McLeod Jewellery and in person.
- To communicate with clients regarding their orders, commissions, and enquiries.
- To comply with legal obligations under FICA, including customer due diligence and identity verification for qualifying transactions.
- To comply with tax and other statutory reporting obligations.
- To manage supplier and service provider relationships.
- To maintain records as required by applicable legislation.

8.2 Categories of Data Subjects and Personal Information Processed

Category of Data Subject	Personal Information Processed
Clients (e-commerce)	Name, email address, shipping and billing address, phone number, order history, payment information (processed by Shopify/payment provider)
Clients (CDD / FICA)	Full name, date of birth, identity or passport number, nationality, residential address, occupation, employer, source of funds, PIP/PEP status, copies of identity and proof-of-address documents
Suppliers / providers	Name, business name, contact details, banking details, VAT number

8.3 Recipients of Personal Information

Category of Personal Information	Recipients
Order and shipping information	Courier and logistics providers for fulfilment
Payment information	Shopify and payment gateway providers for transaction processing
CDD / FICA records	Financial Intelligence Centre (FIC) where reporting obligations arise; law enforcement or courts where legally required
Tax records	South African Revenue Service (SARS) as required by law

8.4 Transborder Flows of Personal Information

E-commerce order data is processed and stored by Shopify Inc., which operates servers in various jurisdictions including outside the Republic of South Africa. This transfer is governed by Shopify's data processing agreements and applicable data protection legislation.

FICA / CDD records are stored in a secure, access-controlled cloud environment with data residency in the South Africa North region (Johannesburg). These records do not leave the Republic of South Africa.

8.5 Information Security Measures

Elemental Studio implements the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- All data transmitted through the KYC intake system is encrypted in transit using TLS.
- CDD records and documents are stored in a cloud environment with encryption at rest.
- Access to CDD records is restricted to authorised personnel only, with access logging enabled.
- E-commerce data is processed by Shopify, which maintains its own security certifications and controls.
- No KYC or CDD data is stored on local devices or transmitted via personal email or messaging services.

9. AVAILABILITY OF THIS MANUAL

A copy of this manual is available:

- On the Elemental Studio website at elementalstudio.co.za
- Upon written request to the Information Officer at leza@elementalstudio.co.za
- To the Information Regulator upon request.

A reasonable fee may be charged for a printed copy of this manual, in accordance with the prescribed fees under PAIA.

10. UPDATING OF THIS MANUAL

Leza McLeod, as Information Officer of Elemental Studio, will review and update this manual on a regular basis and whenever there are material changes to applicable legislation or the operations of the business.

Issued by:



Leza McLeod

Information Officer, Elemental Studio

Date: 26 June 2026