

PAIA MANUAL

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

TOPHENEGG (Pty) Ltd

Website: <https://www.tophenegg.site>

Manual Version: 1.0

Effective Date: 18 July 2026

Review Date: Annually or as required by law

1. INTRODUCTION

TOPHENEGG (Pty) Ltd ("TOPHENEGG", "the Company", "we", "our", or "us") is committed to conducting its business transparently, ethically, and in accordance with the laws of the Republic of South Africa.

This Promotion of Access to Information Act ("PAIA") Manual is published in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The purpose of this Manual is to:

- Explain how members of the public may request access to records held by TOPHENEGG (Pty) Ltd.
 - Describe the categories of records held by the Company.
 - Explain how requests are processed.
 - Promote transparency while protecting confidential and personal information.
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2. COMPANY DETAILS

Registered Name

TOPHENEGG (Pty) Ltd

Registration Number: 2022/334322/07

Registered Address

South Africa

Website

<https://www.tophenegg.site>

Email

info@tophenegg.site

Telephone

010 142 6931

3. INFORMATION OFFICER

In terms of POPIA and PAIA, the Information Officer is responsible for ensuring compliance with access to information legislation.

Information Officer

Director: Gavin Dane Olivier

Email: gavin@tophenegg.site

privacy@tophenegg.site

Website:

<https://www.tophenegg.site>

Postal Address: 1 Bentel Avenue, Eastlands Office Park, Boksburg, 1461

4. PURPOSE OF THIS MANUAL

The purpose of this Manual is to:

- Promote the constitutional right of access to information.
 - Explain the procedure for requesting access to records.
 - Describe records held by TOPHENEGG.
 - Explain grounds upon which access may be granted or refused.
 - Promote compliance with PAIA and POPIA.
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5. APPLICABLE LEGISLATION

TOPHENEGG complies with applicable South African legislation, including but not limited to:

- Promotion of Access to Information Act 2 of 2000 (PAIA)
 - Protection of Personal Information Act 4 of 2013 (POPIA)
 - Companies Act 71 of 2008
 - Electronic Communications and Transactions Act 25 of 2002
 - Consumer Protection Act 68 of 2008
 - Basic Conditions of Employment Act
 - Labour Relations Act
 - Employment Equity Act
 - Occupational Health and Safety Act
 - Income Tax Act
 - Value Added Tax Act
 - Competition Act
 - Copyright Act
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6. RECORDS AVAILABLE WITHOUT A FORMAL REQUEST

The following records may be accessed through our website or upon request without a formal PAIA application where applicable:

- Company information
- Product information
- Terms and Conditions

- Privacy Policy
- Cookie Policy
- Refund Policy
- Delivery Policy
- Website Disclaimer
- Contact information
- Promotional material

Availability of these records may change without notice.

7. RECORDS HELD BY TOPHENEGG

Corporate Records

- Certificate of Incorporation
 - Memorandum of Incorporation
 - Shareholder records
 - Director records
 - Governance documents
 - Policies and procedures
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Financial Records

- Accounting records
 - Annual financial statements
 - Tax records
 - VAT records
 - Banking records
 - Invoices
 - Credit notes
 - Supplier payments
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Operational Records

- Sales records

- Delivery records
 - Inventory records
 - Supplier agreements
 - Customer orders
 - Purchase orders
 - Logistics documentation
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Customer Records

- Customer information
 - Billing information
 - Delivery addresses
 - Order history
 - Customer correspondence
 - Customer complaints
 - Payment confirmations
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Human Resources Records

Where applicable:

- Employment contracts
 - Payroll records
 - Leave records
 - Training records
 - Performance records
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Information Technology Records

- Website records
- Security logs
- Backup records
- Email correspondence
- CRM records
- Website analytics
- Zoho system records

- Cybersecurity documentation
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8. PROCESSING OF PERSONAL INFORMATION

TOPHENEGG processes personal information in accordance with POPIA.

Personal information may include:

- Name
- Contact details
- Delivery address
- Email address
- Telephone number
- Billing information
- Payment information
- Website usage information
- Customer communications

Personal information is collected for legitimate business purposes including:

- Processing orders
 - Deliveries
 - Customer support
 - Invoicing
 - Legal compliance
 - Fraud prevention
 - Marketing (with consent where required)
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9. REQUEST PROCEDURE

A requester wishing to obtain access to records must:

1. Submit a written request to the Information Officer.
2. Clearly identify:
 - The record requested;

- The reason for requesting access (where applicable);
 - Contact details.
3. Provide proof of identity if requested.
 4. Pay any prescribed request fee where applicable.
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10. RESPONSE TIMES

TOPHENEKG will acknowledge receipt of a request.

The Company will respond within the period prescribed by PAIA, unless an extension is permitted by law.

11. FEES

Applicable fees shall be charged in accordance with the regulations issued under PAIA.

These may include:

- Request fee
- Search fee
- Preparation fee
- Reproduction fee
- Postage or courier costs

Where no fee is prescribed, no charge will be levied.

12. GROUNDS FOR REFUSAL

Access may lawfully be refused where disclosure would:

- Infringe another person's privacy.
- Reveal confidential commercial information.
- Breach contractual obligations.
- Endanger the safety of individuals.

- Compromise legal privilege.
 - Reveal trade secrets.
 - Prejudice commercial negotiations.
 - Violate POPIA.
 - Be prohibited by law.
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13. THIRD PARTY INFORMATION

Where requested records relate to another person or organization, TOPHENEGG may notify that third party before deciding whether access should be granted, where required by PAIA.

14. WEBSITE INFORMATION

TOPHENEGG's website may collect:

- Cookies
- Device information
- IP addresses
- Browser type
- Usage statistics

Further information is available in the Company's Privacy Policy and Cookie Policy.

15. RECORD RETENTION

Records are retained only for as long as:

- Required by law;
- Required for business purposes;
- Required to fulfill contractual obligations;
- Required to resolve disputes.

Records are securely destroyed when no longer required.

16. SECURITY

TOPHENEKG employs reasonable technical and organizational measures to protect records against:

- Loss
- Theft
- Unauthorized access
- Alteration
- Destruction
- Cyber threats

No online system can guarantee absolute security.

17. REMEDIES AVAILABLE

If a requester believes a request has been improperly refused, the requester may exercise any remedies available under PAIA, POPIA, or applicable South African law.

18. INFORMATION REGULATOR

Questions or complaints relating to PAIA or POPIA may be directed to the Information Regulator of South Africa through its official channels.

19. UPDATES TO THIS MANUAL

TOPHENEKG reserves the right to amend this Manual from time to time to reflect changes in legislation, business practices, or regulatory requirements.

The latest version will be published on:

<https://www.tophenegg.site>

20. CONTACT US

TOPHENEGG (Pty) Ltd

Website:

<https://www.tophenegg.site>

Email:

info@tophenegg.site

For PAIA requests or privacy enquiries, please contact the Information Officer using the details above.

Document Control

Document: PAIA Manual

Company: TOPHENEGG (Pty) Ltd

Version: 1.0

Effective Date: 18 July 2026

Review Cycle: Annual

Applicable Law: Promotion of Access to Information Act 2 of 2000 (as amended), Protection of Personal Information Act 4 of 2013 and all applicable South African legislation.