



SpinOut Advisory

Keeping Early Ventures Moving

PAIA MANUAL

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

TWO OCEANS HOLDINGS
trading as SPINOUT ADVISORY

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www.spinoutadvisory.co.za

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Table of contents

1. List of acronyms and abbreviations
2. Purpose of this PAIA Manual
3. Key contact details for access to information
4. Guide on how to use PAIA and how to request access
5. Records available without a formal PAIA request
6. Records available in accordance with other legislation
7. Subjects on which records are held and categories of records
8. Processing of personal information
9. Availability of this Manual
10. Updating of this Manual

Approval and issue

Important

This Manual is intended to facilitate access to records under PAIA. It does not make confidential, privileged, commercially sensitive or third-party information automatically available. Any request will be considered in accordance with PAIA and applicable law.

1. List of acronyms and abbreviations

Acronym	Meaning
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
SpinOut Advisory	Two Oceans Holdings trading as SpinOut Advisory

2. Purpose of this PAIA Manual

This Manual has been prepared in terms of section 51 of PAIA. It is intended to help members of the public understand what records SpinOut Advisory holds, which records may be available without a formal request, how to submit a request for access, and how SpinOut Advisory processes personal information.

- identify categories of records that are available without a formal PAIA request;
- understand the subjects on which SpinOut Advisory holds records and the categories of records held on each subject;
- obtain the contact details of the Information Officer who can assist with an access request;
- understand how to obtain and use the Information Regulator's Guide on PAIA;
- understand the procedure, forms, possible fees and remedies applicable to a request for access;
- understand the purposes for which personal information is processed and the categories of data subjects and information involved;
- understand the categories of recipients to whom personal information may be supplied;
- understand whether personal information may be transferred or processed outside South Africa; and
- understand the general security measures used to protect personal information.

3. Key contact details for access to information

3.1 Information Officer and Head of Private Body

Field	Details
Name	Belinda Shaw
Capacity	Information Officer and Head of Private Body
Telephone	+27 83 456 2760
Email	spinoutadvisory@icloud.com
Website	www.spinoutadvisory.co.za

3.2 Deputy Information Officer

No Deputy Information Officer has been designated at the date of compilation of this Manual. All requests and enquiries should be directed to the Information Officer.

3.3 General access-to-information contact

Email: spinoutadvisory@icloud.com

3.4 Head office and physical address

Field	Details
Physical address	31 Beach Road, Mouille Point, Cape Town, 8005, South Africa
Postal address	Same as physical address
Telephone	+27 83 456 2760
Email	spinoutadvisory@icloud.com
Website	www.spinoutadvisory.co.za

4. Guide on how to use PAIA and how to request access

The Information Regulator has prepared and updated a Guide on how to use PAIA. The Guide is intended to assist any person who wishes to exercise a right contemplated in PAIA or POPIA.

4.1 What the Guide covers

- the objects of PAIA and POPIA;
- the contact details of Information Officers and Deputy Information Officers;
- the manner and form of requests for access to records of public and private bodies;
- the assistance available from Information Officers and from the Regulator;
- available remedies, including complaints to the Regulator and court proceedings;
- the preparation and availability of PAIA manuals;
- voluntary disclosure of records;
- fees that may be payable; and
- the applicable PAIA regulations and prescribed forms.

4.2 Where to obtain the Guide

The Guide can be obtained from the Information Officer on request or from the Information Regulator's website: [Information Regulator - PAIA Guidelines](#)

The Guide is available in all official South African languages and in accessible formats made available by the Regulator. Electronic copies in English and Afrikaans can be made available through the Information Officer on request.

4.3 How to request access to a record of SpinOut Advisory

- Complete the prescribed Form 2: Request for Access to Record.
- Send the completed form to the Information Officer using the contact details in section 3.
- Describe the record clearly enough for SpinOut Advisory to identify it.
- State the right that you seek to exercise or protect and explain why the requested record is required for that purpose.
- Identify the preferred form of access and provide sufficient contact details.
- Provide proof of identity and, where acting for another person, proof of authority.

Prescribed PAIA forms are available at: [Information Regulator - PAIA Forms](#)

4.4 Fees, time periods and decisions

A prescribed request fee may be payable by a requester other than a personal requester. If access is granted, prescribed access, reproduction, search or preparation fees may also be payable. SpinOut Advisory will provide written notice of fees where applicable.

SpinOut Advisory will ordinarily decide a request within 30 days after receipt of a properly completed request, subject to any extension permitted by PAIA. The decision and any applicable fees will be communicated using the prescribed outcome notice.

4.5 Grounds for refusal and remedies

Access may be refused where a ground for refusal in PAIA applies, including the protection of third-party privacy, confidential information, commercial information, safety, legally privileged records, research information or other protected interests.

There is no internal appeal against a decision of a private body. A requester may lodge a complaint with the Information Regulator using the prescribed complaint procedure or approach a competent court, subject to PAIA and applicable time limits.

5. Records available without a formal PAIA request

The following records are generally available without submitting a formal PAIA request, subject to website availability and reasonable administrative arrangements. Availability does not extend to underlying confidential, proprietary or third-party material.

Category of records	Types of record	Available on website	Available on request
Corporate and contact information	Trading name, registration number, website address and public contact details	Yes	Yes
Website information	Public descriptions of services, engagement options, background and contact information	Yes	Yes
Legal and privacy information	Privacy Notice, PAIA Manual, Website Terms and Disclaimer, cookie information	Yes	Yes
Public resources	Published articles, checklists, brochures, presentations or guidance made public by SpinOut Advisory	Where published	Yes, where available
Public announcements	Public notices, updates and professional social-media content	Where published	Yes, where available

6. Records available in accordance with other legislation

SpinOut Advisory may create, receive or retain records in accordance with the legislation listed below, to the extent that the legislation applies to its activities. Inclusion in this table does not mean that every record is automatically accessible under PAIA.

Category of records	Applicable legislation
Company incorporation, governance and statutory records	Companies Act 71 of 2008 and Companies Regulations, 2011
Tax, accounting and financial records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991, where applicable
Access-to-information records and this Manual	Promotion of Access to Information Act 2 of 2000 and PAIA Regulations
Personal-information and privacy records	Protection of Personal Information Act 4 of 2013 and regulations
Electronic communications and website records	Electronic Communications and Transactions Act 25 of 2002
Intellectual-property records	Copyright Act 98 of 1978 and other applicable intellectual-property legislation
Client and consumer records	Consumer Protection Act 68 of 2008, where applicable
Employment and contractor records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Occupational Health and Safety Act 85 of 1993, where applicable

7. Subjects on which records are held and categories of records

The following table describes the main subjects on which SpinOut Advisory may hold records. Access remains subject to PAIA, legal privilege, confidentiality, contractual restrictions, third-party rights and applicable grounds for refusal.

Subject	Categories of records
Corporate and governance	Incorporation records; memorandum of incorporation; director and shareholder records; statutory registers; resolutions; policies; insurance; governance and compliance records
Finance and tax	Budgets; invoices; receipts; payment records; bank and accounting records; tax returns; supporting schedules; expense records; financial statements and working papers
Clients and prospective clients	Enquiries; proposals; quotations; engagement letters; contracts; client contact information; correspondence; meeting records; deliverables and client-administration records
Advisory engagements	Governance diagnostics; board and meeting records received or created; milestone trackers; risk registers; reporting templates; portfolio reports; action logs; due-diligence readiness material; founder and management-support records
Sponsoring institutions and portfolios	Institutional contact records; portfolio mandates; reporting arrangements; venture information; escalation records; agreed portfolio reports and related correspondence
Suppliers and professional advisers	Supplier details; contracts; confidentiality agreements; invoices; service records; bank and tax information; professional-adviser correspondence
Website, marketing and communications	Website content; analytics; enquiry-form submissions; marketing materials; mailing lists; consent and opt-out records; public resources; brand and social-media content
Information technology and security	User access records; system and device information; security settings; backup information; incident logs; software and cloud-service records
Intellectual property	Website copy; trade marks; designs; copyright material; methodologies; templates; know-how; licences and permissions
Human resources, contractors and applicants	Applications; identity and contact information; contracts; qualifications; performance and payment records; leave and statutory records, where applicable
PAIA and POPIA compliance	PAIA requests and responses; privacy requests; consent records; data-subject requests; security-incident records; operator arrangements; policies and compliance evidence

8. Processing of personal information

8.1 Purposes of processing personal information

- responding to website, email and telephone enquiries;
- assessing prospective engagements and preparing proposals, quotations and contracts;
- providing governance, commercialisation, founder-support and portfolio-support services;
- communicating with clients, founders, directors, investors, technology transfer offices and professional advisers;
- preparing agreed reports, meeting records, action logs and deliverables;
- administering invoicing, payments, accounting, tax and business records;
- managing suppliers, contractors and professional advisers;
- operating, securing and improving the website and business systems;
- maintaining professional and regulatory records;
- complying with legal obligations and protecting legal rights;
- preventing fraud, misuse and security incidents; and
- sending service information or marketing communications where permitted by law.

8.2 Categories of data subjects and personal information

Categories of data subjects	Personal information that may be processed
Website visitors	IP address; device and browser data; approximate location; cookies; pages visited; referral and interaction information
Prospective clients and clients	Name; contact details; organisation; role; enquiry information; correspondence; meeting notes; proposal, contract, billing and engagement information
Founders, directors, officers, shareholders and venture personnel	Name; contact details; role and responsibilities; professional background; meeting participation; actions and decisions; governance and management information relevant to an engagement
Sponsoring institutions, investors, funds and technology transfer offices	Contact and role information; institutional details; correspondence; mandate and reporting arrangements; meeting and engagement records
Suppliers, contractors and professional advisers	Name; contact details; organisation and registration information; tax and banking details; contracts; invoices; professional and service records
Employees, applicants and independent contractors, where applicable	Identity and contact details; qualifications; employment history; contracts; payroll, tax, leave, performance and statutory information
Professional contacts, referrers and event participants	Name; organisation; role; contact details; correspondence; event or networking information
Regulators, public officials and legal representatives	Name; title; official contact details; correspondence; requests, notices and regulatory records

8.3 Recipients or categories of recipients

Category of personal information	Recipients or categories of recipients
Client, venture and engagement information	Contracting client or sponsoring institution, within the agreed reporting scope and subject to confidentiality obligations
Contact, website and enquiry information	Wix and other website, hosting, analytics, security and communication providers
Email, correspondence and cloud documents	Email, cloud-storage, collaboration and backup service providers, including Apple iCloud and other approved providers
Financial and transaction information	Banks, payment service providers, accountants, auditors and tax advisers
Legal and compliance information	Attorneys, insurers, regulators, courts, law-enforcement agencies and public authorities where required or permitted by law
Supplier and contractor information	Relevant internal users, accountants, banks and service providers involved in administration and payment
Any category	Other recipients authorised by the data subject or required by law

8.4 Planned transborder flows of personal information

SpinOut Advisory uses website, email and cloud-service providers that may process or store personal information outside South Africa. Website and enquiry data processed through Wix may be stored in data centres located in the United States of America, Ireland, South Korea, Taiwan, Israel and other jurisdictions used by Wix for service delivery. Email, cloud documents and backups may also be processed by Apple iCloud and other service providers in jurisdictions outside South Africa, depending on provider infrastructure and service configuration.

The categories of information transferred may include contact details, website and device data, enquiry-form information, correspondence, business records and documents created or received during engagements. SpinOut Advisory will take reasonable steps to ensure that transborder transfers are permitted under POPIA and are subject to appropriate contractual, legal or other safeguards.

8.5 General information-security measures

SpinOut Advisory applies or intends to maintain reasonable technical and organisational safeguards appropriate to the scale of the business, the nature of the information and the risks involved. These may include:

- password-protected accounts and role-appropriate access controls;
- multi-factor authentication where supported by the relevant service;
- device encryption, screen locks and secure device configuration;
- anti-malware, operating-system and software updates;
- HTTPS and security controls provided by the website and cloud-service platforms;
- restricted sharing of client and engagement records;
- confidentiality obligations in contracts and engagement arrangements;
- secure backup, recovery and document-retention practices;
- reasonable verification before disclosing records or personal information;
- secure deletion or destruction when information is no longer required; and
- incident-response and notification procedures where a security compromise occurs.

Security qualification

No electronic system can be guaranteed to be completely secure. SpinOut Advisory is required to implement appropriate, reasonable safeguards and to respond to suspected security compromises in accordance with POPIA.

9. Availability of this Manual

A copy of this Manual is available:

- on the SpinOut Advisory website at www.spinoutadvisory.co.za;
- from the Information Officer by email request;
- for public inspection at the physical address in section 3, during normal business hours and by prior appointment;
- to any person upon request, subject to any reasonable prescribed reproduction fee; and
- to the Information Regulator upon request.

Any fee for a copy of the Manual or for access to records will be determined in accordance with PAIA and the applicable regulations.

10. Updating of this Manual

The Information Officer will review this Manual regularly and update it when necessary to reflect material changes in legislation, the business, the categories of records held, processing activities, service providers or contact details.

The current version will be published on the SpinOut Advisory website. The version and last-revised date should be updated whenever the Manual is materially amended.

Approval and issue

This Manual is issued by the Information Officer and Head of the Private Body on behalf of Two Oceans Holdings trading as SpinOut Advisory.

Name Belinda Shaw
Capacity Information Officer and Head of Private Body
Signature _____
Date 19 June 2026



Review note
This Manual is a practical compliance document based on the Information Regulator’s private-body template and the information available as at 19 June 2026. It should be reviewed if the legal entity name, address, services, staffing, technology providers or information-processing practices change.