

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Giovanni Liebenberg t/a Let's Crea8

**Prepared in terms of Section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended) and read together with the
Protection of Personal Information Act 4 of 2013 (POPIA)**

Last Updated: 16 April 2026

1. Introduction

This Manual has been compiled to inform members of the public about the records held by **Giovanni Liebenberg t/a Let's Crea8** and the process for requesting access to such records under PAIA.

PAIA gives effect to the constitutional right of access to information held by private bodies where such access is required for the exercise or protection of any rights. This Manual must be read together with our **Privacy Policy**, **Cookie Policy**, and other legal policies available on our website (crea8.co.za).

2. Contact Details of the Private Body

Name of Private Body: Giovanni Liebenberg t/a Let's Crea8
Physical Address: 16 Park Street, Perlamoenbaai, Gansbaai, 7220
Postal Address: 16 Park Street, Perlamoenbaai, Gansbaai, 7220
Telephone: +27 83 300 0158
Email: gio@crea8.co.za
Website: <https://crea8.co.za>

3. Information Officer

Name: Giovanni Liebenberg
Position: Owner & Information Officer
Email: gio@crea8.co.za
Telephone: +27 83 300 0158

Deputy Information Officer: None at present.

4. Guide on How to Use PAIA

The Information Regulator has compiled a Guide on how to use PAIA (and POPIA). The Guide is available in all official languages and can be obtained from the Information Regulator:

- Website: <https://infoeregulator.org.za>
- Email: infoereg@justice.gov.za

The Guide explains the objects of PAIA and POPIA, how to make requests, available remedies, and more.

5. Records Automatically Available (Section 52)

The following records are voluntarily disclosed and available without a formal PAIA request:

- All website policies and legal documents (Privacy Policy, Cookie Policy, Terms and Conditions, Acceptable Use Policy, Marketing Email Communications Policy, Refund and Cancellation Policy, Legal Disclaimer, Accessibility Statement).
- Portfolio examples and case studies on the website.

- Blog articles and marketing content.

These are accessible at <https://crea8.co.za>.

6. Records Available in Terms of Other Legislation

Records required to be kept in terms of other South African legislation (where applicable) include basic statutory records under the Companies Act (if any), Tax Administration Act, Basic Conditions of Employment Act, and others. No specific records are automatically publicly available under these laws beyond what is already voluntarily disclosed.

7. Subjects and Categories of Records Held

We hold the following categories of records (this list is not exhaustive):

- **Operations / Client Service Records** — Client contracts and service agreements, project briefs, correspondence, work-in-progress files, completed project files, invoices and payment records.
- **Financial Records** — Banking records, budgets, financial transactions, accounting records, tax records.
- **Marketing Records** — Marketing materials, client enquiries, lead forms.
- **Supplier / Contractor Records** — Supplier agreements, invoices, correspondence with vendors and contractors.
- **Recruitment / HR Records** — Job applications and CVs (if any).
- **Website & Technical Records** — Website analytics data, server logs (limited), backup files.

8. Processing of Personal Information (POPIA)

Categories of Data Subjects: Clients & prospective clients, Suppliers & vendors, Service providers & contractors (including occasional subcontractors), Job applicants, and any other individuals whose personal information we process.

Purposes of Processing: Service delivery, project coordination, invoicing and payments, marketing communications, recruitment (if applicable), supplier relationship management.

Recipients / Categories of Recipients: Personal information is primarily stored and processed within our business systems (e.g., Google Workspace, Zoho Invoice, Mac Mail, iCloud, OneDrive). We do not actively share personal information with third parties except where necessary for legitimate business purposes and under appropriate agreements. External service providers (such as cloud hosting providers) have their own security measures in place.

Cross-Border Transfers: Certain data may be stored on third-party cloud services (Google, Zoho, Apple iCloud, Microsoft OneDrive) which may involve transfers outside South Africa. We rely on the security and data protection measures implemented by these reputable providers.

Security Measures: We use Avast Premium Security on our devices, along with standard access controls, encryption where available, and regular backups. Our cloud service providers maintain their own robust security protocols.

Note: We do not process special personal information (e.g., health, biometric, religious) or personal information of children.

This section should be read in conjunction with our full **Privacy Policy** at <https://crea8.co.za/privacy-policy/>.

9. Request Procedure

Requests for access to records must be made using the prescribed **Form 2** (available from the Information Regulator website or upon request from us).

Submit the completed form together with the prescribed request fee (where applicable) to the Information Officer:

- Email: gio@crea8.co.za
- Physical / Postal: 16 Park Street, Perlamoenbaai, Gansbaai, 7220

The request must provide sufficient detail to identify the record(s) required and explain why the record is needed for the exercise or protection of a right.

We will respond within 30 days. Access is not automatic and may be refused on grounds permitted by PAIA (e.g., protection of privacy, commercial confidentiality, etc.).

10. Fees

Prescribed fees for private bodies (as at 2026):

- **Request fee:** R140.00 (non-refundable, unless the request is for your own personal information).
- **Access / reproduction fees:** As prescribed (e.g., R2.00 per A4 photocopy/page, search/preparation fees, etc.). Full details are available in the PAIA regulations or from the Information Regulator.

A deposit may be required for large requests. Fees are subject to change per Government Gazette.

11. Availability of the Manual

This Manual is available:

- On our website: <https://crea8.co.za> (<https://crea8.co.za/wp-content/uploads/2026/04/PAIA-Manual-Lets-Crea8.pdf>)
- Upon request from the Information Officer.

We will review and update this Manual as necessary (recommended annually, preferably in April).

Issued by: Giovanni Liebenberg

Information Officer Giovanni Liebenberg t/a Let's Crea8

Date: 16 April 2026