



## **Wilde Colours (Pty) Ltd – PAIA MANUAL**

### **Wilde Colours (Pty) Ltd trades as Wilde Watercolour**

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

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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
  - 1.8 "Republic" – Republic of South Africa
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## **2. PURPOSE OF PAIA MANUAL**

### **This PAIA Manual is useful for the public to:**

- 2.1 Check the categories of records held by Wilde Colours (Pty) Ltd 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 that the body processes personal information, the purpose of such processing, and the categories of data subjects and information relating thereto.
  - 2.7 Know the recipients or categories of recipients to whom personal information may be supplied.
  - 2.8 Know whether the body has planned to transfer or process personal information outside the Republic of South Africa.
  - 2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of personal information.
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### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF WILDE COLOURS (PTY) LTD**

#### **3.1 Information Officer**

Name: Anneri Chudleigh (de Wilde)  
Title: Chief Executive Officer  
Tel: 060 716 3503  
Email: [adewilde@wildecLOURS.com](mailto:adewilde@wildecLOURS.com)  
Fax: N/A

#### **3.2 Deputy Information Officer**

Name: Gwen Chudleigh  
Title: Head of Operations  
Tel: 060 716 3503  
Email: [g.w.chudleigh@wildecLOURS.com](mailto:g.w.chudleigh@wildecLOURS.com)  
Fax: N/A

#### **3.3 Access to Information General Contact**

Email: [admin@wildecLOURS.com](mailto:admin@wildecLOURS.com)

#### **3.4 Head Office**

Physical Address: 174 McKenzie Street, St Lucia Estuary, KwaZulu-Natal, 3936, South Africa  
Postal Address: 174 McKenzie Street, St Lucia Estuary, KwaZulu-Natal, 3936, South Africa  
Telephone: 060 716 3503  
Email: [admin@wildecLOURS.com](mailto:admin@wildecLOURS.com)  
Website: <https://www.wildecLOURS.com/>

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### **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, 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 Guide contains descriptions of the objects of PAIA and POPIA, contact details of Information Officers, the manner and form of requests for access to records,

available assistance, and all remedies in law available regarding acts or failures to act in respect of rights or duties conferred or imposed by PAIA and POPIA.

4.4 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained:

- Upon request to the Information Officer at [adewilde@wildecouleurs.com](mailto:adewilde@wildecouleurs.com)
- From the website of the Regulator at <https://infoeregulator.org.za/>

4.6 A copy of the Guide is available in the following official languages for public inspection during normal office hours:

- **English**
- **Afrikaans**

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## **5. CATEGORIES OF RECORDS OF THE WILDE COLOURS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

| <b>Category of Records</b> | <b>Type of Record</b>                                      | <b>Available on Website</b> | <b>Available on Request</b> |
|----------------------------|------------------------------------------------------------|-----------------------------|-----------------------------|
| Compliance Documentation   | POPIA Privacy Policy                                       | ✓                           | ✓                           |
| Compliance Documentation   | PAIA Manual                                                | ✓                           | ✓                           |
| Product Information        | Kit descriptions and product information                   | ✓                           | ✓                           |
| Pricing Information        | Current wholesale pricing                                  | ✓                           | ✓                           |
| Marketing Material         | Wholesale brochure and café setup information              |                             | ✓                           |
| Conservation Information   | SANACOB partnership and Endangered Species kit information | ✓                           | ✓                           |
| General Enquiries          | Website contact forms                                      | ✓                           |                             |
| Customer Policies          | Shipping Policy                                            | ✓                           | ✓                           |

|                   |                          |   |   |
|-------------------|--------------------------|---|---|
| Customer Policies | Wholesale Returns Policy | ✓ | ✓ |
|-------------------|--------------------------|---|---|

## 6. DESCRIPTION OF THE RECORDS OF WILDE COLOURS (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

| Category of Records              | Applicable Legislation                           |
|----------------------------------|--------------------------------------------------|
| Memorandum of Incorporation      | Companies Act 71 of 2008                         |
| Company Registration Documents   | Companies Act 71 of 2008                         |
| Financial Records and Statements | Income Tax Act 58 of 1962                        |
| POPIA Privacy Policy             | Protection of Personal Information Act 4 of 2013 |
| PAIA Manual                      | Promotion of Access to Information Act 2 of 2000 |

## 7. DESCRIPTION OF SUBJECTS AND CATEGORIES OF RECORDS HELD BY WILDE COLOURS (PTY) LTD

| Subject                      | Categories of Records                                                                                                                                                                                                 |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sales and Customer Relations | Prospective wholesale partner contact details; wholesale partner account information; order and transaction history; territorial exclusivity agreements; wholesale partner onboarding and invoicing details (JotForm) |
| Finance and Accounting       | Invoices and billing records; financial statements; bookkeeping records; payment processing records                                                                                                                   |
| Operations and Logistics     | Inventory records; delivery and shipping records; supplier and vendor contact information                                                                                                                             |
| Marketing and Communications | Mailchimp newsletter subscriber list; social media content (Instagram, Facebook, LinkedIn); wholesale brochure; café setup information                                                                                |

|                                    |                                                                                                                                                          |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Compliance and Legal               | Memorandum of Incorporation; company registration documents; PAIA Manual; POPIA Privacy Policy; Shipping Policy; Wholesale Returns Policy                |
| Conservation and Partnerships      | Records relating to conservation initiatives and informal partnership communications                                                                     |
| Creative and Intellectual Property | Watercolour reference photography and original image files (stored on Zoho WorkDrive, Canva, and local devices); image credits and licensing information |

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## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

Wilde Colours (Pty) Ltd processes personal information for the following purposes:

- Identifying and onboarding suitable wholesale partners
- Registering and managing wholesale customer accounts
- Processing orders and payments
- Arranging shipping, delivery, and returns
- Communicating order-related and operational information
- Sending monthly marketing newsletters to opted-in wholesale partners
- Maintaining accounting and legal records
- Complying with applicable laws and regulations
- Pursuing formal conservation and community partnerships

Personal information will not be processed for purposes incompatible with those listed above.

### 8.2 Categories of Data Subjects and Personal Information Processed

| Categories of Data Subjects    | Personal Information Processed                                                                                                                                                                   |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prospective wholesale partners | Business name; owner or manager name; email address; contact telephone number; town or suburb; website; job function or title                                                                    |
| Existing wholesale customers   | Business name and registration details; contact person name and surname; email address; contact telephone number; physical delivery address; billing information; order and transaction history; |

|                                                         |                                                                                 |
|---------------------------------------------------------|---------------------------------------------------------------------------------|
| Suppliers and vendors                                   | Business name; contact person name; email address; telephone number; website    |
| Conservation and community organisation representatives | Organisation name; representative name; email address; contact telephone number |
| Website visitors                                        | IP address; browser type; browsing behaviour (via cookies)                      |

### 8.3 Recipients of Personal Information

| Category of Personal                | Information Recipients                         |
|-------------------------------------|------------------------------------------------|
| Recipient name and delivery address | RAM (for order fulfilment)                     |
| Recipient name and delivery address | The Courier Guy (for order fulfilment)         |
| Billing and payment information     | Paystack (for payment processing)              |
| Email address and contact details   | Mailchimp (for newsletter distribution)        |
| Onboarding and invoicing details    | JotForm (for wholesale partner onboarding)     |
| Customer and prospect data          | Odoo CRM (for relationship management)         |
| Financial and invoicing records     | Zoho Commerce, Zoho Books, and Zoho Inventory  |
| Order information                   | Zoho Commerce, Zoho Books, and Zoho Inventory  |
| Operational correspondence          | Zoho Mail                                      |
| Bookkeeping records                 | Zoho WorkDrive, Zoho Books, and Zoho Inventory |
| Website contact form submissions    | Wix and Zoho Commerce                          |

Personal information is not sold, rented, or traded to any third party.

#### 8.4 Planned Transborder Flows of Personal Information

Wilde Colours (Pty) Ltd uses third-party platforms based outside of South Africa that may process or store personal information on servers located in other countries. These include:

| Platform  | Country of Operation       | Categories of Personal Information                 |
|-----------|----------------------------|----------------------------------------------------|
| Mailchimp | United States of America   | Email addresses; newsletter engagement data        |
| JotForm   | United States of America   | Wholesale partner onboarding and invoicing details |
| Odoo CRM  | Belgium (servers may vary) | Prospecting and customer relationship data         |

All transborder transfers are conducted in accordance with Section 72 of POPIA. These platforms maintain compliance with recognised international data protection standards, including the General Data Protection Regulation (GDPR).

#### 8.5 Information Security Measures

Wilde Colours (Pty) Ltd implements the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- Device encryption is enabled on all local devices used to access business records
  - Access to personal information is restricted to authorised personnel only
  - Business records are stored centrally on Zoho WorkDrive, which operates on secure cloud infrastructure with built-in redundancy
  - All third-party platforms used to process personal information maintain their own security frameworks and comply with applicable data protection standards
  - Physical access to business premises is controlled
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## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of this Manual is available:

- On the Wilde Colours website at <https://www.wildecolours.com/>
- At the head office of Wilde Colours (Pty) Ltd for public inspection during normal business hours
- To any person upon request to the Information Officer
- To the Information Regulator upon request

9.2 A fee for a copy of this Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

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## **10. UPDATING OF THE MANUAL**

The Information Officer of Wilde Colours (Pty) Ltd will on a regular basis update this Manual to ensure it remains accurate and current.

Issued by:

**Anneri Chudleigh (de Wilde)**  
**Chief Executive Officer**  
**Wilde Colours (Pty) Ltd**

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