

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL (PAIA MANUAL)

of



NGUZO SABA SCHOOLS NPC
Registration Number: 2024/413304/08

Created: 10 June 2025

1. PURPOSE OF THIS MANUAL

This PAIA Manual is useful for the public to-

- 1.1. 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
- 1.2. check the categories of records held by the body which are available
- 1.3. know if the body process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.4. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.5. know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.6. know the description of the records of the body which are available in accordance with any other legislation;
- 1.7. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 1.8. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.
- 1.9. 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; and

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- 1.10. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.

2. COMPANY INFORMATION

- 2.1. The Company is a Non-Profit Company that offers an alternative to mainstream education.

Name: NHUZO SABA SCHOOLS

Registration Number 2024/413304/08

Location **Registered & Postal Address**

2 Monza Street
Village 1 North
Khayelitsha
Western Cape
7784

Contact number: 021 213 6442

Email: learning@nguzosabainstitute.com

3. INFORMATION OFFICER DETAILS

Name: Siposethu Goniwe

Address: same as the Company

Direct Email: sipho@nguzosabainstitute.com

4. ACCESSING OF RECORDS

- 4.1. Please note that a requester is not automatically allowed access to the company records and the Information Officer has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

4.2. Process

- 4.2.1. The Requester must complete the relevant Form 02, which is available on the Information Regulator's Website or you can download it from this link: [InfoRegSA-PAIA-Form02-Reg7.pdf](#).

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- 4.2.2. The requester shall submit the Form to the Information officer via electronic mail using the Company address and/or email address indicated.
- 4.2.3. The Information Officer may require the requester to pay the prescribed fee (if any) before further processing the request.
- 4.2.4. After the Information Officer has made a decision on the request, the requester shall be notified in the required form.
- 4.2.5. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.
- 4.3. Appeal
- 4.3.1. Please note that the Company is not a public Company and as such does not have an internal appeal process.
- 4.3.2. If the Company therefore refuses your request and you are unhappy with the reason for the refusal to the access, you may either
- 4.3.2.1. lay a complaint at the Information Regulator; or
- 4.3.2.2. Apply to the relevant court within 30 days of such refusal.

5. COLLECTION OF PERSONAL INFORMATION

- 5.1. We collect and process your Personal Information mainly to provide you with access to our services, to help us improve our offerings to you, to support our contractual relationship with you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

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- 5.2. We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information **you are required to provide to us and what information is optional**.

6. HOW WE USE YOUR INFORMATION

- 6.1. We will use your Personal and Non-Personal Information only for the purposes for which it was collected.
- 6.2. We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law;
- 6.3. Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems;
- 6.4. You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.

7. DISCLOSURE OF PERSONAL INFORMATION

- 7.1. We may disclose your Personal Information to our business partners who are involved in the delivery services to you. We have agreements in place to ensure that they comply with these privacy terms.
- 7.2. We will not disclose personal information to anyone without the client's permission unless:
- 7.2.1. we are compelled to do so by law or in terms of a court order;

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- 7.2.2. it is in the public interest to do so;
- 7.2.3. it is necessary to protect our rights
- 7.3. Provided that you have agreed to this, we may use your personal or other information to send you information on industry related news that may be of interest to you and from time to time will mail, email or SMS information to you about us, our products and services. If you do not wish to continue receiving this information you may contact us and we will remove you from our mailing list.
- 7.4. We may distribute your information to our third parties with your consent. When we contract third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.
- 7.5. We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

8. ACCESS TO YOUR PERSONAL INFORMATION

- 8.1. You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 8.2. Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down by PAIA.

9. CORRECTION OF YOUR PERSONAL INFORMATION

- 9.1. You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you.

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- 9.2. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

10. RETENTION OF PERSONAL DATA

- 10.1. We will retain your data in compliance with the POPIA and in compliance with other applicable legislation.
- 10.2. We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held.

11. CATEGORIES OF DATA SUBJECTS

- 11.1. The Company processes various data subjects personal information.
- 11.2. Examples of Information the Company collects from you are the following: (please note this is not a closed list, and the collection of personal information is not limited hereby):

Category	Subject of record / information	Availability ¹ & Legal Basis
Human Resources	Personnel records of each employee, which includes tax reference nr, banking details, address, id number	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Records provided by a third party	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Conditions of employment and other personnel-related records	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Disciplinary records	Based on agreement (consent) and acting in legitimate interest of the data subject.

¹ Copies of certain documents mentioned herein can be requested by any interested party in terms of PAIA and the applicable tariff.

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	Correspondence relating to Personnel	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Employee tax information	By law / ITO legislation
	Payroll records	Based on agreement (consent) and acting in legitimate interest of the data subject.
Clients / Clientele / Donors	Records provided by a third party	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Clients' / Donors documentation in terms of Financial Intelligence Centre Act 38 of 2001	By law / ITO legislation
	Correspondence with clients / donors	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Records relating to domain names	
	Other information relating to, or held on behalf of clients / donors	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Donor's payment card number and associated details (including CVC and expiration data)	Based on agreement (consent) and acting in legitimate interest of the data subject.
Financial Record	Annual financial statements	By law / ITO legislation
	Tax returns	By law / ITO legislation
	Audit reports	By law / ITO legislation
	Bank facilities and account details	By law / ITO legislation
Company Record	Incorporation documents	By law / ITO legislation
	Share register and other statutory registries	Based on agreement (consent) and acting in legitimate interest of the data

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		subject.
	List of Employees	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Contracts of employment with employees of KMF	Based on agreement (consent) and acting in legitimate interest of the data subject.
Immovable and movable property	Agreement for the lease of immovable property	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Records regarding computer systems and programmes	Based on agreement (consent) and acting in legitimate interest of the data subject.
Sponsors / Donors /	Sponsor's registered company name; address; registration number; tax reference number; email address; and contact number.	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Sponsor's financial information, including but not limited to banking details and account numbers.	Based on agreement (consent) and acting in legitimate interest of the data subject.
	Any participant's personal information (including but not limited to contact details, email address and title).	Based on agreement (consent) and acting in legitimate interest of the data subject.
Volunteers / Parents/Guardians / Learners/Students	Name, Id, Address, Email, contact number, medical information	Based on agreement and acting in interest of data subject

12. RECORDS HELD BY THE COMPANY ITO LEGISLATION

12.1. The Company holds various records in terms of various legislation, which legislation includes:

12.1.1. Basic Conditions of Employment Act, No 75 of 1997;

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- 12.1.2. Companies Act, No 71 of 2008;
- 12.1.3. Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
- 12.1.4. Electronic Communications and Transactions Act, No 25 of 2002;
- 12.1.5. Employment Equity Act, No 55 of 1998;
- 12.1.6. Income Tax Act, No 58 of 1962;
- 12.1.7. Labour Relations Act, No 66 of 1995;
- 12.1.8. Occupational Health & Safety Act, No 85 of 1993;
- 12.1.9. Prescription Act, No 68 of 1969;
- 12.1.10. Promotion of Access to Information Act, No 2 of 2000;
- 12.1.11. Protection of Personal Information Act, No. 4 of 2013;
- 12.1.12. Unemployment Insurance Contributions Act 4 of 2002;
- 12.1.13. Unemployment Insurance Act No. 30 of 1966.

13. PLANNED TRANSBORDER FLOWS

- 13.1. The Company makes use of cloud storage facilities which servers are located outside of South Africa, therefore the transborder flow of personal information is possible as information will be stored outside of South Africa.
- 13.2. The cloud storage facilities are well credited and have the proper data protection measures in place.
- 13.3. The cloud storage facilities are:
 - 13.3.1. Google Workspace
 - 13.3.2. Payspace
 - 13.3.3. Xero
 - 13.3.4. D6
- 13.4. We may collect and accept donations outside from the Republic of South Africa. While we do not process any of the personal information received outside of the scope for which it has been provided to us.

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- 13.5. We aim to ensure that all personal information collected from donors outside South Africa, is processed strictly in terms of POPIA, this internal manual and any applicable legislation/provision.
- 13.6. We may, from time to time, host initiatives or similar seminar-like exhibitions with our partners, likeminded NPC's and/or corporates (collectively referred to as "our Partners"). Any personal information shared with and/or processed by our Partners will be in line with the consent we have received from the data subject; will be processed with a legal basis which is in the best interest of the data subject; or will have the further consent received prior to further processing, sharing or similar.

14. SECURITY MEASURES TO PROTECT INFORMATION

- 14.1. The Company has implemented various technical and organizational measures to secure the data subjects personal information.
- 14.2. Should you require information on our security measures, you may request such information from the Information Officer.

15. GUIDE ON HOW TO USE THE ACT

- 15.1. 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 ("Guide"), 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.
- 15.2. The aforesaid Guide contains the description of-
- 15.2.1. the objects of PAIA and POPIA;
- 15.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
- 15.2.2.1. the Information Officer of every public body, and
- 15.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
- 15.2.3. the manner and form of a request for-

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- 15.2.3.1. access to a record of a public body contemplated in section 11 ; and
 - 15.2.3.2. access to a record of a private body contemplated in section 50 ;
 - 15.2.3.3. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
 - 15.2.3.4. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 15.2.3.5. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging
 - 15.2.3.6. an internal appeal;
 - 15.2.3.7. a complaint to the Regulator; and
 - 15.2.3.8. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 15.2.3.9. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 15.2.3.10. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 15.2.3.11. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 15.2.3.12. the regulations made in terms of section 92.
- 15.3. The Guide can be obtained from the Information Regulator Website, or upon request from the Information Regulator in Afrikaans and English.

16. UPDATING OF THE MANUAL

- 16.1. This Manual will be revised annually and updated, if necessary.