

PAIA MANUAL

MANUAL IN TERMS OF 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")

OF
Purple Box Trading 8 (Pty) Ltd

t/a

MANGWENI PRIVATE GAME RESERVE

2005/036220/07

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Revision 0

AN INTRODUCTION TO PAIA

The Promotion of Access to Information Act, 2000 ("PAIA") originally came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. PAIA sets out the requisite procedural issues attached to information requests, including the obligation to compile a PAIA Manual.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual has to comply with.

Where a person is desirous of obtaining information from a private body, in terms of PAIA such request must be made in the format as prescribed and described under the private body's PAIA Manual, and following receipt of the request, such private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable.

For a long period, most private bodies were exempt from having to publish this manual. We are however now obliged to do so.

OUR PAIA MANUAL

This Manual constitutes Mangweni Private Game Reserve's PAIA manual.

This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy and largely commenced on 1 July 2020. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

For purposes of this Manual, we refer to ourselves as "Mangweni", "we", "us" or "our".

We have compiled this Manual to inform you of, and guide you through, the procedural and other requirements with which a PAIA request must comply.

This manual enables you to:

- See what categories of records we hold and which may be available without having to submit a formal PAIA request'
- Know what records are available in terms of other legislation;
- Have sufficient information to be able to request access to a record;
- Access the contact details of our Information Officer;
- Understand how to access the Information regulator's guide on the PAIA;
- Know how we hold and process personal information.

ABOUT US

We are a privately owned game reserve located within the Limpopo province of South Africa. You can visit www.mangweni.co.za to learn more about us.

OUR CONTACT DETAILS

Our general contact details are as follows:

Mangweni Private Game Reserve

R101

Marken Rd

Limpopo

Telephone +27 64 836 4889

Email: info@mangweni.co.za

INFORMATION OFFICER CONTACT DETAILS

The details of our Information and Deputy Information Officer/s are as follows:

Information Officer:

Name: Andrew Tucker

Address: 69 Vasco Boulevard, Goodwood, 7460

Telephone number: 0215908500

Email legaldept@ct-international.co.za

Correspondence:

For the attention of the Information Officer to PO Box 13515, N1 City, 7463

Phone number for PAIA / POPIA requests: +27 21 590 8500

Email address for PAIA / POPIA requests: legaldept@ct-international.co.za

THE PAIA GUIDE

In order to assist those who are not familiar with PAIA or POPIA, a Guide that contains information to assist you in understanding how to exercise your rights under PAIA ("the Guide") is available in all the South African official languages.

The Guide includes:

- The objects of the PAIA and the POPIA;
- The contact details of the Information Regulator;
- How to request access to a record of a public or private body;
- The assistance available from the Information Regulator;
- Remedies available in law regarding the infringement of the PAIA or the POPIA including how to lodge an internal appeal or a complaint to the Regulator.

You can obtain a copy of the Guide online at <https://www.inforegulator.org.za> or you can request a copy from the Information Officer

If you have any queries, please contact the Information Regulator directly at:

The Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Sandton, 2191

Complaints email: PAIAComplaints@inforegulator.org.za for PAIA related complaints of POPIAComplaints@inforegulator.org.za for POPIA related complaints.

General enquiries email: enquiries@inforegulator.org.za

AUTOMATICALLY AVAILABLE INFORMATION

Some general information such as product and service offerings, company profiles and contact details is available without having to request access. This information is generally available on our website and may be automatically accessed by you without having to go through the formal PAIA request process.

RECORDS KEPT UNDER OTHER LAWS

We are subject to many laws and regulations, some of which require us to keep certain records.

These laws are detailed below:

- Animal Diseases Act 35 of 1984 (Animal Health)
- Basic Conditions of Employment Act 75 of 1997 (Labour)
- Broad Based Black Economic Empowerment Act 53 of 2003 (Constitutional law)
- Business Names Act 27 of 1960 (Commercial Law)
- Close Corporations Act 69 of 1984 (Corporate law)
- Companies Act 71 of 2008 (Corporate law)
- Compensation for Occupational Injuries & Diseases Act 130 of 1993 (Labour)
- Competition Act 89 of 1998

- Constitution of the Republic of South Africa Act 108 of 1996 (Constitutional law)
- Consumer Protection Act 68 of 2008 (Commercial law)
- Copyright Act 98 of 1978 (Commercial law)
- Electronic Communications Act 36 of 2005 (Communications)
- Electronic Communications & Transactions Act 25 of 2002 (Communications)
- Employment Equity Act 55 of 1998 (Labour)
- Foodstuffs, Cosmetics and Disinfectants Act 54 of 1972 (Food safety)
- Hazardous Substances Act 15 of 1973 (Health)
- Identification Act 68 of 1997 (Citizenship)
- Immigration Act 13 of 2002 (Citizenship)
- Income Tax Act 58 of 1962 (Tax)
- Labour Relations Act 66 of 1995 (Labour)
- National Environmental Management Act 107 of 1998 (Environment)
- National Environmental Management: Biodiversity Act 10 of 2004 (Environment)
- Occupational Health and Safety Act 85 of 1993 (Labour)
- Promotion of Access to Information Act 2 of 2002 (Constitutional law)
- Skills Development Act 97 of 1998 (Labour)
- Standards Act 8 of 2008 (Science)
- Subdivision of Agricultural Land Act 70 of 1970
- Trade Metrology Act 77 of 1973 (Science)
- Unemployment Insurance Act 63 of 2001 (Labour)
- Unemployment Insurance Contributions Act 4 of 2002 (Labour)
- Value Added Tax Act 89 of 1991 (Tax)

Please note that this list is not exhaustive.

RECORDS HELD BY US

Described below are the type of records we may hold, divided into categories for ease of reference:

Companies Act Records

- Documents of Incorporation;
- Memorandum of Incorporation;
- Minutes of meetings and resolutions
- Records relating to the appointment of directors / auditors / company secretary / public officer and other officers;
- Share Register and other Statutory Registers; and
- Other Statutory Records.

Financial Records

- Annual Financial Statements;
- Tax Returns;
- Accounting Records;
- Banking Records;
- Bank Statements;
- Electronic Banking Records;
- Asset Register;
- Rental Agreements; and
- Invoices.

Income Tax Records

- PAYE Records;
- Documents issued to employees for income tax purposes;
- Records of payments made to SARS on behalf of employees;
- All other statutory compliances;

- VAT;
- Skills Development Levies;
- UIF and Workmen's Compensation.

Personnel Documents and Records

- Employment contracts;
- Employment policies and procedures;
- Employment Equity Plan;
- Internal evaluations and disciplinary records;
- Salary records;
- Disciplinary codes;
- Leave records;
- Training records and manuals;
- Operating manuals;
- Personal records provided by personnel;
- Other statutory records; and
- Related correspondence.

Farming and Agricultural Records

- Game counts
- Treatment and vaccination records
- Rainfall records

POPIA RELATED INFORMATION

Introduction

POPIA requires us to provide you with certain information relating to how personal information that we process is, amongst others, used, disclosed and destroyed.

We have set out the required information below.

Information on how you can request your personal information under POPIA

Requests for personal information under POPIA must be made in accordance with the provisions of PAIA. This process is outlined in paragraph 11 below.

If we provide you with your personal information, you have the right to request the correction, deletion or destruction of your personal information, in the prescribed form. You may also object to the processing of your personal information in the prescribed form.

We have attached the prescribed forms to this Manual for your convenience.

We will give you a written estimate of the fee for providing you with your personal information, before providing you with the services. We may also require you to provide us with a deposit for all or part of the fee prior to giving you the requested personal information.

Purpose of processing

POPIA provides that personal information may only be processed lawfully and in a reasonable manner that does not infringe your (the data subject's) privacy.

The type of personal information that we process will depend on the purpose for which it is collected. We will disclose to you why the personal information is being collected and will process the personal information for that purpose only.

Personal information that is processed; category of data subject; and category of personal information

The information provided under this section refers to broad categories of information.

This list is not exhaustive.

Clients - Natural persons: names; contact details; physical and postal addresses; date of birth; ID or passport number; nationality; gender; vehicle registration number; payment details; confidential correspondence.

Contracted Service Providers: Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories.

Employees / Directors / Potential Personnel / Shareholders / Volunteers / Employees' family members / Temporary Staff: gender, pregnancy; marital status; race, age, language, education information; financial information; employment history; ID number; next of kin; children's name, gender, age, school, grades; physical and postal address; contact details; opinions, criminal behaviour and/or criminal records; well-being; trade union membership; external commercial interests; medical information.

Website end-users / Application end-users: names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data.

Categories of recipients for purposes of processing personal information

We may supply personal Information to these potential recipients:

- Management;
- Employees;
- Temporary Staff;
- Regulators;
- Sub-contracted Operators and other recipients

We may disclose personal information we collected to any of our subsidiaries, associate entities or third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where we have a legal duty or a legal right to do so.

Actual or planned trans-border flows of personal information

We may transfer personal information across South African borders if we deem it necessary, for example to third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions. We will always take reasonable steps to ensure the protection of such information.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where we have a legal duty or a legal right to do so.

General description of information security measures

Mangweni employs appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. These measures include:

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control;
- Secure setup of hardware and software making up our information technology infrastructure; and
- Outsourced service providers who are contracted to implement security controls.

We take steps to ensure that operators who process personal information on our behalf apply adequate safeguards as outlined above. In addition we continuously implement and monitor processes to protect the personal information we hold.

HOW TO REQUEST A RECORD

Prescribed forms (Form 2) and the applicable fees are contained in the annexures to this Manual and can also be requested from the Information Officer.

OBJECTIONS

POPIA provides that a data subject may object, at any time, to the processing of personal information by us, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

CORRECTIONS

A data subject may also request us to correct or delete personal information about the data subject in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that we are no longer authorised to retain records of in terms of POPIA's retention and restriction of records provisions.

A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the prescribed form.

PROOF OF IDENTITY

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

TIMELINES

Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

GROUNDINGS FOR REFUSING ACCESS

There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put us at a disadvantage in negotiations or prejudice us in commercial competition; and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by us.

Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

REMEDIES IN A CASE OF REFUSAL TO ACCESS

If the Information Officer decides to grant a requester access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

In the event that a request to access information has been refused, you are entitled to apply to the Information Regulator or a court of competent jurisdiction to take the matter further.

Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

AVAILABILITY OF PAIA MANUAL

Copies of this Manual are available:

- for inspection, free of charge, at our offices during normal business hours;
- to any person upon request to the Information Officer and on payment of a reasonable prescribed fee;
- from the Information Regulator upon request.

UPDATES

This manual will be updated from time to time.

Purple Box Trading 8 (Pty) Ltd
t/a Mangweni Private Game Reserve

Annexures:

Form 2

Form 3

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

_____ (Address)

E-mail address:

Fax number:

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made <i>(when made on behalf of another person)</i>				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			

Full names of person on whose behalf request is made (<i>if applicable</i>):	
Identity Number	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8] *Note:*

1. *If your request is granted the—*
 - (a) *amount of the deposit, (if any), is payable before your request is processed; and*
 - (b) *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	

E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

Kindly note that your request has been:

☐ Approved

☐

Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60. 00		

Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐

Yes

☐

No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer
