



Cedar Lakes

Lifestyle Estate

**Cedar Lakes Homeowners Association NPC
(Registration Number: 2000/002883/08)**

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1. Definitions

Capitalised words throughout this policy will bear the following meanings:

- 1.1. **“the Association”** – means The Cedar Lakes Homeowners Association NPC, registration number 2000/002883/08, a non-profit company with Members to which the Memorandum of Incorporation is applicable, duly registered and incorporated according to the company laws of the Republic of South Africa;
- 1.2. **“the Association Area”** – means the development area known as Cedar Lakes Residential Estate comprising extensions of the townships known as Maroeladal Extension 8 duly demarcated on S.G. No A10399/1993, Maroeladal Extension 11 duly demarcated on S.G. No 5217/2000, Maroeladal Extension 13 duly demarcated on S.G. No 1030/1996, Needwood duly demarcated on S.G. No 2542/1996 and Needwood Extension 4 or such other townships as may be approved from time to time, situated on former portion 32 of the Farm Zevenfontein No. 407 JR, portion 258 of the Farm Zevenfontein No 407 JR, the Farm Cedar Lakes 718 JR, portion 319 of the Farm Witkoppen No 194 IQ, portion 348 of the Farm Witkoppen 194 IQ and portion 317 of the Farm Witkoppen No. 194 IQ respectively
- 1.3. **“Data Subject”** – means the person to whom Personal Information relates;
- 1.4. **“Information Officer”** – means the head of the Association;
- 1.5. **“Manual”** – means this Manual that was prepared in accordance with section 51 of PAIA and regulation 4(1) (c) of the POPIA Regulations;
- 1.6. **“PAIA”** – means the Promotion of Access to Information Act 2 of 2000;
- 1.7. **“Personal Information”** – means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—
 - 1.7.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 1.7.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 1.7.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 1.7.4. the biometric information of the person;
 - 1.7.5. the personal opinions, views or preferences of the person;
 - 1.7.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 1.7.7. the views or opinions of another individual about the person; and
 - 1.7.8. the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person;
- 1.8. **“POPIA”** – means the Protection of Personal Information Act 4 of 2013;
- 1.9. **“POPIA Regulations”** – means the regulations promulgated in terms of section 112(2) of POPIA;

- 1.10. **“Private Body”** – means:
- 1.10.1. A natural person who carries or has carried on any trade, business or profession, but only in such capacity;
 - 1.10.2. a partnership which carries or has carried on any trade, business or profession; or
 - 1.10.3. any former or existing juristic person, but excludes a public body;
- 1.11. **“Processing”** – means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including—
- 1.11.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.11.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.11.3. merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 1.12. **“Requestor”** – in relation to a Private Body means:
- 1.12.1. any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that Private Body; or
 - 1.12.2. a person acting on behalf of the person contemplated in subparagraph 1.12.1.
- 1.13. **“Request for Access”** – in relation to a Private Body means a request for access to a record of a Private Body in terms of section 50 of PAIA.
- 1.14. Any other terms not described herein will have the meaning as ascribed to them in terms of PAIA or POPIA.

2. Purpose of this PAIA Manual

- 2.1. This PAIA Manual is useful for the public to:
- 2.1.1. check the categories of records held by the Association which are available without a person having to submit a formal PAIA request;
 - 2.1.2. have a sufficient understanding of how to make a request for access to a record of the Association, by providing a description of the subjects on which the Association holds records and the categories of records held on each subject;
 - 2.1.3. know the description of the records of the Association which are available in accordance with any other legislation;
 - 2.1.4. 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;
 - 2.1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 2.1.6. know if the Association will 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;
 - 2.1.7. know the recipients or categories of recipients to whom the Personal Information may be supplied;
 - 2.1.8. know if the Association 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

2.1.9. know whether the Association has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

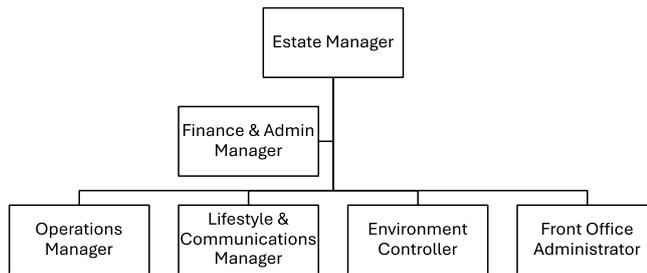
2.2. This Manual sets out all information required by both PAIA and POPIA;

3. Structure of the Association and functions

3.1. Structure:

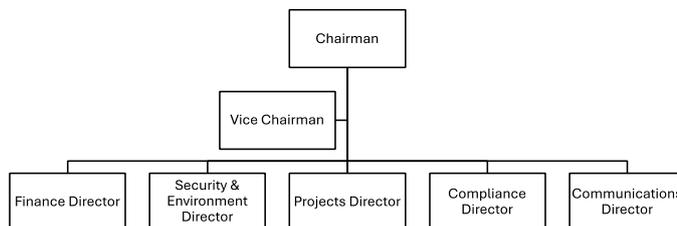
Cedar Lakes Homeowners Association

Staff Organogram



Cedar Lakes Homeowners Association

Board Organogram



3.2. Functions:

3.2.1. The Association is a non-profit company incorporated in terms of the Companies Act 61 of 1973 and is governed by the Companies Act 71 of 2008. Its activity is limited to that of management of the common areas of the Association Area, inter alia, the collecting of levies and other ancillary charges, and protecting and promoting the communal rights and interests of all property owners. Its Board of Directors attends to the functioning and governing of the Association;

3.2.2. For the purposes of POPIA and PAIA, the Association is defined as a Private Body. In accordance with the Association's obligations in terms of POPIA and PAIA, the Association has produced this Manual.

4. Contact details

Business Name:	Cedar Lakes Homeowners Association NPC
Registration Number:	2000/002883/08
Physical Address:	Cedar Lakes Estate Cedar Road Fourways 2191
Postal Address:	Postnet Suite 124

Private Bag x153
Bryanston
2091
Contact Number: 011 469 1693
Website: www.cedarlakes.co.za
Information Officer: Kevin Nicholson
Email address: privacy@cedarlakes.co.za
Deputy Information Officer: Sarah Calf
Email address: financemgr@cedarlakes.co.za

5. Guide on how to use PAIA and how to obtain access to the guide

- 5.1. 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.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of:
 - 5.3.1. the objects of PAIA and POPIA;
 - 5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 5.3.2.1. the Information Officer of every public body, and
 - 5.3.2.2. every Deputy Information Officer of every public body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 5.3.3. the manner and form of a request for-
 - 5.3.3.1. access to a record of a public body contemplated in section 11; and
 - 5.3.3.2. access to a record of a Private Body contemplated in section 50;
 - 5.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
 - 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6. 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-
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. 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;
 - 5.3.7. 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;
 - 5.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and Private Body, respectively;
 - 5.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 5.3.10. the regulations made in terms of section 92.

- 5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.5. The Guide can also be obtained from the Regulator at:
- | | |
|-----------------------------|--|
| Physical Address: | Woodmead Office Park
54 Maxwell Drive
Woodmead
Johannesburg |
| Postal Address: | P.O. Box 31533
Braamfontein
Johannesburg
2017 |
| Telephone: | (010) 023 5200 |
| Information Officer: | Mr Mosalanyane Mosala
+27 (0) 10 023 525 |
| Email: | MMosala@infoeregulator.org.za |
| Deputy Information Officer: | Mr Jaco Jansen
+27 (0) 10 023 5237 |
| Email: | JJansen@infoeregulator.org.za |
| Website: | https://infoeregulator.org.za/ |
- 5.6. A copy of the Guide can be requested from the Association's Information Officer using Appendix A: Form 1 Request for a Copy of the Guide.
- 5.7. A copy of the Guide is also available at the Association's offices in the following two official languages, for public inspection during normal office hours-
- 5.7.1. English
 - 5.7.2. Zulu

6. Availability and publication of certain records in terms of PAIA

- 6.1. The Association holds and/or processes the records listed below for PAIA and POPIA.
- 6.2. Categories of records of the Association which are available on the Association's website:
- 6.2.1. Estate Rules
 - 6.2.2. Architecture Rules
 - 6.2.3. Memorandum of Incorporation
 - 6.2.4. Fishing Rules
 - 6.2.5. Bird List
 - 6.2.6. Dog Run Rules
 - 6.2.7. Estate Agents
 - 6.2.8. Water Quality Report
 - 6.2.9. Penalty Appeal Application
 - 6.2.10. PAIA Manual
 - 6.2.11. Website Privacy Notice
- 6.3. The following listed below may be requested. However, it should be noted that there is no guarantee that the request will be approved. Each request will be evaluated in terms of PAIA, the Association's MOI, the Companies Act and any other applicable legislation.

6.4. Statutory records:

- 6.4.1. Statutory documents of incorporation of the Association;
- 6.4.2. Contractors' Code of Conduct;
- 6.4.3. Director's Confidentiality Agreements;
- 6.4.4. Committee Members' Code of Conducts;
- 6.4.5. Records relating to the appointment of:
 - 6.4.5.1. Directors;
 - 6.4.5.2. Auditors;
 - 6.4.5.3. Public Officer;
 - 6.4.5.4. Company Secretary.
- 6.4.6. Register of Members;
- 6.4.7. Register of Directors;
- 6.4.8. Register of Directors other Directorships;
- 6.4.9. Minute books of Members' General Meetings;
- 6.4.10. Minute books of Board Meetings and Committee Meetings;
- 6.4.11. Details of proxies;
- 6.4.12. Ordinary resolutions passed at General Meetings;
- 6.4.13. Special resolutions passed at General Meetings;
- 6.4.14. Resolutions passed at Board Meetings;
- 6.4.15. Statutory records and returns;
- 6.4.16. Memorandum of Incorporation;
- 6.4.17. Association Rules and Appendices;
- 6.4.18. POPIA Consent forms.

6.5. Financial records:

- 6.5.1. Annual financial statements;
- 6.5.2. Accounting records;
- 6.5.3. General ledger;
- 6.5.4. Subsidiary ledgers;
- 6.5.5. Banking records;
- 6.5.6. Banking details and bank accounts;
- 6.5.7. Member levy account statements;
- 6.5.8. Supplier statements and invoices;
- 6.5.9. Cash books and petty cash books;
- 6.5.10. Fixed asset register;
- 6.5.11. Schedules to calculate accrued interest, interest on debtors in arrears, and interest held for deposits;
- 6.5.12. Disposal of asset records;
- 6.5.13. Budget schedules, calculations and quotes;
- 6.5.14. Reserve plan;
- 6.5.15. Tender process records;

6.5.16. Property transfer records;

6.5.17. CSOS records.

6.6. Tax records:

6.6.1. Income tax returns calculations;

6.6.2. Tax assessments PAYE returns;

6.6.3. UIF returns;

6.6.4. Workmen's Compensation records;

6.6.5. ETI Claims;

6.6.6. Tax Directives;

6.6.7. TERS claim records.

6.7. Human resources records:

6.7.1. Policies and procedures;

6.7.2. Organogram with name and occupation of each employee;

6.7.3. Job specifications for each employee;

6.7.4. Employment contracts;

6.7.5. Disciplinary records;

6.7.6. Performance appraisal records;

6.7.7. Training and development records;

6.7.8. Leave records;

6.7.9. IRP5 and IT3 records;

6.7.10. Maternity leave procedure;

6.7.11. Employment Equity reports and returns;

6.7.12. Insourced vs outsourced workforce comparisons;

6.7.13. Time and attendance records;

6.7.14. Provident fund and employee benefit records;

6.7.15. Recruitment records;

6.7.16. Resignation letters;

6.7.17. Identity documentation;

6.7.18. Background search reports.

6.8. Payroll Records:

6.8.1. Overtime claim forms;

6.8.2. Expense claim forms;

6.8.3. Deduction approval forms;

6.8.4. Salary increases letters;

6.8.5. Performance bonus letters;

6.8.6. Monthly payroll reports.

6.9. Property records:

6.9.1. Title deeds of properties within the Association Area;

6.9.2. Building plans of CLHOA properties;

- 6.9.3. Copies of Members' building plans (not all);
- 6.9.4. Maintenance letters and audits;
- 6.9.5. Show day records;
- 6.9.6. Powers of attorney;
- 6.9.7. Letters of authority;
- 6.9.8. Sales agreements.

6.10. Health and safety records:

- 6.10.1. Appointment letters;
- 6.10.2. Reports by health and safety consultants;
- 6.10.3. Contractor Health and Safety agreements and appointments;
- 6.10.4. Contractor Health and Safety files;
- 6.10.5. Certificates of compliance;
- 6.10.6. Permits and licenses;
- 6.10.7. Risk assessments;
- 6.10.8. Annual audits;
- 6.10.9. Claims documents.

6.11. Information Technology records:

- 6.11.1. Software licenses;
- 6.11.2. Software packages;
- 6.11.3. Backup of accounting and payroll files;
- 6.11.4. Biometric access data records;
- 6.11.5. Surveillance camera footage and data (time-limited);
- 6.11.6. Record of IT issues and resolutions;
- 6.11.7. Register of IT infrastructure;

6.12. Insurance records:

- 6.12.1. Insurance policy documents;
- 6.12.2. Insurance audits;
- 6.12.3. Insurance valuations of immovable property;
- 6.12.4. Claims records.

6.13. Legal records:

- 6.13.1. Agreements with contractors/suppliers/agents/operators;
- 6.13.2. Litigation records.

6.14. Security records:

- 6.14.1. Incident reports;
- 6.14.2. Monthly audit report from the security service provider;
- 6.14.3. Infrastructure records and audits;
- 6.14.4. South African Police Services reports;
- 6.14.5. Access reports at the entrance gates.

6.15. Admin records:

- 6.15.1. Committee meeting presentations and action sheets;
- 6.15.2. General meeting presentations, registers of attendees, and publications to members;
- 6.15.3. Schedules for tracking all income activities;
- 6.15.4. Schedules for tracking contractual expenses;
- 6.15.5. Monthly audit report from the security service provider;
- 6.15.6. Standard Operating Policies and Procedures;
- 6.15.7. All records relating to projects;
- 6.15.8. Record of animals on the Association Area (resident's pets);
- 6.15.9. Gift registry;
- 6.15.10. Complaints and compliments register;
- 6.15.11. Schedule of licenses;
- 6.15.12. Schedule of destroyed documentation;
- 6.15.13. Schedule of documentation stored off-site;
- 6.15.14. Demographic study records;
- 6.15.15. Association application forms;
- 6.15.16. Association Area history records;
- 6.15.17. Annual Christmas gift collection records;
- 6.15.18. Association Area maps;
- 6.15.19. Monthly reports to Board;
- 6.15.20. Risk register.

6.16. Operational records:

- 6.16.1. Stocktake registers and recons;
- 6.16.2. GIS data with records of Association Area infrastructure;
- 6.16.3. Research and records for each portfolio's projects and purchases;
- 6.16.4. Records and photographs of events and functions hosted by CLHOA;
- 6.16.5. Maintenance and landscape job cards and records of work completed
- 6.16.6. Master plan research and reports;
- 6.16.7. Member survey records;
- 6.16.8. Schedules to track all elements of vehicle usage (logbooks, fuel control, maintenance records, KM tracking, inspections);
- 6.16.9. Compliance records;
- 6.16.10. Penalties issued and schedules to record information.

6.17. General records:

- 6.17.1. Correspondence with Members;
- 6.17.2. Correspondence with Suppliers;
- 6.17.3. Correspondence with donation beneficiaries;
- 6.17.4. Identity documentation of members, residents and contractors;
- 6.17.5. Newsletters.

6.18. Information available in terms of legislation:

- 6.18.1. Information is available in terms of the following legislation, to the extent that the relevant Act makes disclosure of records compulsory:
 - 6.18.1.1. Basic Conditions of Employment Act, No. 75 of 1997;
 - 6.18.1.2. Community Schemes Ombud Service Act, No. 9 of 2011
 - 6.18.1.3. Companies Act, Act 61 of 1973;
 - 6.18.1.4. Companies Act, No. 71 of 2008;
 - 6.18.1.5. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
 - 6.18.1.6. Constitution of the Republic of South Africa Act, No. 108 of 1996;
 - 6.18.1.7. Construction Industry Development Board Act 38 of 2000
 - 6.18.1.8. Electronic Communication and Transactions Act, No. 25 of 2002;
 - 6.18.1.9. Employment Equity Act, No. 55 of 1998;
 - 6.18.1.10. Income Tax Act, No. 58 of 1962;
 - 6.18.1.11. Occupational Health and Safety Act No. 85 of 1993;
 - 6.18.1.12. Pension Funds Act, No. 24 of 1956;
 - 6.18.1.13. Promotion of Access to Information Act 2 of 2000;
 - 6.18.1.14. Protection of Personal Information Act 4 of 2013;
 - 6.18.1.15. Skills Development Act, Act 97 of 1998;
 - 6.18.1.16. Skills Development Levies Act, No. 9 of 1999;
 - 6.18.1.17. Tax Administration Act, Act 28 of 2011;
 - 6.18.1.18. The Community Schemes Ombud Service Act, 2011.
 - 6.18.1.19. The Labour Relations Act, No. 66 of 1995;
 - 6.18.1.20. Unemployment Insurance Act, No. 63 of 2001;
 - 6.18.1.21. Unemployment Insurance Contributions Act, Act 4 of 2002;
 - 6.18.1.22. Value Added Tax Act, No. 89 of 1991;
- 6.18.2. The aforementioned are not an exhaustive list of statutes that may require the Association to keep records and are not automatically available without a request in terms of the Act.

7. Purposes of Processing

- 7.1. The Association processes information for the following purposes:
 - 7.1.1. For purposes of day-to-day management of the Estate;
 - 7.1.2. To provide services to its members in terms of the contractual relationship;
 - 7.1.3. To ensure the safety and security of the Estate;
 - 7.1.4. To fulfil domestic legal, regulatory and compliance requirements;
 - 7.1.5. To verify the identity of individuals engaging the Association;
 - 7.1.6. For risk assessment, information security management, statistical, trend analysis and planning purposes;
 - 7.1.7. To monitor and record calls and electronic communications for quality, training, investigation and fraud prevention purposes;
 - 7.1.8. To enforce or defend the Association or the its affiliates' rights;

- 7.1.9. To procure goods and services for the benefit of its members and/or residents and/or the Association and to prevent fraud in such procurement;
- 7.1.10. To facilitate the sale of properties within the Estate;
- 7.1.11. To support law enforcement in the prevention, detection and prosecution of criminal activities;
- 7.1.12. To manage the employment relationship;
- 7.1.13. Any additional purposes authorised by the Association's members.

8. Categories of Data Subjects

- 8.1. **Employees and Directors (including prospective employees and directors):** Name, maiden name, identification number, driver's license number, nationality, date of birth, likeness (photograph, video) medical aid, medical aid number, work permit, address, contact numbers, personal email address, banking information, income tax number, emergency contact information, gender, race, educational history, qualifications, conviction history, photograph, performance ratings, disciplinary history, opinion information, signature, vehicle registration number, medical information, criminal behaviour information, salary information, clothing and shoe size, voice, other directorships, biometric information (fingerprints), access logs, camera surveillance footage.
- 8.2. **Homeowners and tenants:** Name, identification number, driver's license number, nationality, stand number, physical address, postal address, contact numbers, passport number, likeness (photograph, video) vehicle make, model, registration number, marital status, matrimonial regime, medical information, misconduct, biometric data (fingerprints), access logs, camera surveillance footage.
- 8.3. **Children:** Name, date of birth, age, address, likeness (photograph, video), criminal behaviour information, access logs, camera surveillance footage.
- 8.4. **Residents' employees:** Name, identification number / date of birth, cell phone number, likeness (photograph), referrers' names, cell phone numbers, stand numbers, conviction history, access logs, camera surveillance footage.
- 8.5. **Estate agents:** Name, identification number, Fidelity Fund Certificate number, contact numbers, address, email address, registration number, vehicle registration number, access logs, camera surveillance footage.
- 8.6. **Suppliers and their employees:** Name, registration number, email address, identification number; contact numbers, facsimile number, bank details, income tax number, VAT number, B-BBEE information, vehicle registration number, photograph, access logs, camera surveillance footage.
- 8.7. **Referrers:** Name, contact numbers, email address, opinion information, signature.
- 8.8. **Donation beneficiaries:** Name, contact numbers, address, email address, bank details, income tax number, VAT number, B-BBEE information, photograph.
- 8.9. **Visitors to the Estate:** Name, identification number, driver's license number, motor vehicle registration number, access logs, camera surveillance footage.
- 8.10. **Witnesses:** Name, identification number, address, contact numbers, opinion.

9. The recipients or categories of recipients

- 9.1. Personal information may be provided to the following categories of recipients:
 - 9.1.1. Visitors to show houses (estate agents' Personal Information);
 - 9.1.2. The Association's security services provider;

- 9.1.3. Homeowners;
- 9.1.4. Residents;
- 9.1.5. The Association's access control management supplier;
- 9.1.6. South African Police Services;
- 9.1.7. South African Revenue Services;
- 9.1.8. External attorneys;
- 9.1.9. External auditors and accountants;
- 9.1.10. IT service provider;
- 9.1.11. Insurance broker and/or insurance company;
- 9.1.12. Pension fund administrator;
- 9.1.13. Credit and/or criminal background search agencies;
- 9.1.14. Courts and other administrative, judicial, arbitration organisations or ombudsman;
- 9.1.15. Other Association affiliates and their representatives.

10. Planned transborder flows of Personal Information

- 10.1. In storing personal data within third-party databases, the Association transfers Personal Information outside South Africa to data centres in the following countries / regions:
 - 10.1.1. United Kingdom;
 - 10.1.2. European Economic Area;
 - 10.1.3. United States of America.
- 10.2. The legal basis for such transfers:
 - 10.2.1. The recipient country effectively upholds principles for reasonable Processing of the information that are substantially similar to POPIA and includes substantially similar provisions regarding onward transfers.

11. General description of security measures

- 11.1. The Association implements numerous security measures to protect Personal Information that is stored electronically and physically.
- 11.2. The Personal Information that is held physically is stored in locked cupboards with keys stored securely in a safe or in responsible parties' possession;
- 11.3. The following security measures have been implemented by the responsible party to ensure the confidentiality, integrity and availability of electronic Personal Information:
 - 11.3.1. The implementation of least privilege access to Personal Information: access to Personal Information is granted only to those individuals requiring access to perform their duties;
 - 11.3.2. Personal data is stored within Microsoft 365 and leverages the security controls implemented by Microsoft within that environment. For further information on how Microsoft protects data within Microsoft 365, see Microsoft's independent audit reports in the Microsoft Service Trust Portal (<https://servicetrust.microsoft.com/>);
 - 11.3.3. All personnel are required to authenticate using Microsoft's Multi-factor Authentication which means that they must log in with their usernames and passwords as well as another authentication factor such as a one-time-pin or a temporary code generated by the Microsoft Authenticator App.

- 11.3.4. Endpoint devices are password and/or biometrically controlled;
- 11.3.5. Sensitive documents are password controlled and/or encrypted;
- 11.3.6. CLHOA uses Microsoft Defender which incorporates tools for protection against malware, phishing and other malicious activity;
- 11.3.7. Employee behaviour is governed by a variety of policies such as the CLHOA's Information Security Policy and all employees are required to sign Confidentiality and Non-Disclosure Agreements as a condition of their employment;
- 11.3.8. CLHOA has adopted a classification taxonomy to classify and protect high risk and sensitive information.
- 11.3.9. Security and privacy awareness training rolled out to employees and directors.

12. Request process

- 12.1. An individual who wishes to submit a request must comply with all the procedures laid down in PAIA. The Requestor must complete Appendix B: Form 2 Request for Access to a Record. The prescribed form must be submitted as well as payment of a request fee and a deposit, if applicable, to the Association's Information Officer at the postal or physical address, fax number or electronic mail as is stated herein.
- 12.2. The prescribed form must be completed with enough information to enable the Information Officer to determine:
 - 12.2.1. The record(s) requested;
 - 12.2.2. The identity of the Requestor;
 - 12.2.3. What form of access is required; and
 - 12.2.4. The physical address and email address of the Requestor.
- 12.3. The Requestor must state what records are required for the Requestor to exercise or protect a right and clearly state the nature of the right to be exercised or protected.
- 12.4. The request for access will be dealt with within 30 days from the date of receipt unless the Requestor has set out special grounds that satisfy the Information Officer that the request should be dealt with sooner.
- 12.5. The period of 30 days may be extended by not more than 30 additional days if the request is for a large quantity of information, or the request requires a search for information held at another location and the information cannot be reasonably obtained within 30 days. The Information Officer will notify the Requestor in writing should an extension be necessary.
- 12.6. The Requestor will be informed in writing whether access to the records has been granted or denied. If the request has been denied reasons for the decision will be provided.
- 12.7. If a Requestor has requested the records on another individual's behalf, the Requestor must submit proof of the capacity the Requestor submits the request in, to the satisfaction of the Information Officer.
- 12.8. If the Requestor is unable to complete the prescribed form due to illiteracy or disability, the Requestor may request it orally from the Information Officer.

13. Grounds for refusal

- 13.1. The following are grounds upon which the Association may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access following Chapter 4 of PAIA:

- 13.1.1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- 13.1.2. Mandatory protection of the commercial information of a third party if the records contain:
 - 13.1.2.1. Trade secrets of that third party;
 - 13.1.2.2. Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 13.1.2.3. Information disclosed in confidence by a third party to the Association, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 13.1.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 13.1.4. Mandatory protection of the safety of individuals and the protection of property;
- 13.1.5. Mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 13.1.6. Protection of the commercial information of the Association, which may include:
 - 13.1.6.1. Trade secrets;
 - 13.1.6.2. Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Association;
 - 13.1.6.3. Any information which, if disclosed, could put the Association at a disadvantage in contractual or other negotiations or prejudice the Association in commercial competition; and/or
 - 13.1.6.4. Computer programs which are owned by the Association and which are protected by copyright and intellectual property laws;
- 13.2. Any research information of the Association or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- 13.3. Requests for Records that are clearly frivolous or vexatious or which involve an unreasonable diversion of resources.

14. Remedies should a request be refused

- 14.1. The Association does not have an internal appeal procedure in the event of a denial of a request. Decisions made by the Information Officer are final.
- 14.2. The Requestor may, in accordance with sections 56(3) (c) and 78 of PAIA, lodge a complaint to the Information Regulator, or an application with a court, against the refusal of the request (within 180 days of notification of the decision) for appropriate relief.

15. Fees

- 15.1. The following fees shall be payable upon request by a Requestor. Any information available to Members under the provisions of the Association’s MOI and the Companies Act will be supplied at no cost:

Description	Amount
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Request Fee (payable on every request)	R140.00
Photocopy of an A4 page or part thereof	R2.00
Printed copy of an A4 page or part thereof	R2.00
Hard copy on a flash drive (flash drive to be provided by the Requestor)	R40.00
Hard copy on a compact disc (compact disc to be provided by the Requestor)	R40.00
Hard copy on a compact disc (compact disc to be provided by the Association)	R60.00
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record per A4 page	R24.00
Copy of an audio record on flash drive (flash drive to be provided by the Requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by the Requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by the Association)	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation (maximum charge)	R435.00
Postage, email or any other electronic transfer	Actual expense, if any

16. Updating of this Manual

16.1. The Information Officer will review this Manual on an annual basis and update where necessary.

Issued by

Kevin Nicholson
Estate Manager