



SAKELIGA
SELFSTANDIGE SAKEGEMEENSAP

PAIA MANUAL

SAKELIGA NPC

REG: 2012/043725/08

Manual in Terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (as amended)

Prepared as a Private Body

Date of compilation/revision	Information officer
2025/09/30	PJ le Roux

Table of Contents

1. Acronyms.....	2
2. Introduction to this Manual.....	2
3. Purpose of PAIA Manual.....	3
4. Contact details for access to information requests.....	4
5. Guide PAIA and how to obtain access to the Guide.....	5
6. Requests for access to information held by a private body.....	8
7. Categories of records which are available without a person having to request access.	10
8. Description of the subjects and categories of records held on each subject.....	10
9. Purpose of processing Personal Information.....	13
10. Information categories held by the private body.....	14

11.	Availability of the Manual.....	19
12.	Updating of the Manual.....	20

1. Acronyms

- 1.1. DIO means the Deputy Information Officer;
- 1.2. IO means the Information Officer;
- 1.3. Minister means the Minister of Justice and Correctional Services;
- 1.4. PAIA means the Promotion of Access to Information Act 2 of 2000 (as Amended);
- 1.5. POPIA means the protection of Personal Information Act 4 of 2013;
- 1.6. Private body means Sakeliga NPC.
- 1.7. Regulator means the Information Regulator of South Africa; and
- 1.8. Republic means the Republic of South Africa.

2. Introduction to this Manual

- 2.1. This PAIA Manual is prepared in accordance with Section 51 of PAIA, as amended. It applies to Sakeliga NPC, a registered non-profit company operating as a private body within the meaning of PAIA (hereinafter referred to as **“Sakeliga”** or **“the private body”**).
- 2.2. Sakeliga is a non-profit business interest organisation that operates in the public interest and in the interest of its members, supporters, and broader society. It maintains a network of members, supporters, and donors, and is associated with various chambers of commerce and other organisations that promote and protect the rights and interests of business in South Africa.
- 2.3. The purpose of this Manual is to facilitate requests for access to information held by Sakeliga, in a manner that gives effect to the constitutional right of access to information, while balancing this right with Sakeliga’s rights and obligations to

protect personal and confidential information, preserve its legitimate business interests, and to protect the rights and privacy of third parties.

- 2.4. This Manual provides an outline of the information structure of Sakeliga, the categories of records available without a request, the process to be followed when requesting access to records, the applicable forms and contact details, as well as information required in terms of POPIA.
- 2.5. Requesters are advised to read this Manual together with the PAIA Guide issued by the Information Regulator, and the provisions of PAIA and POPIA, before submitting any request for access to records.

3. Purpose of PAIA Manual

- 3.1. This PAIA Manual is useful for the public to-
 - 3.1.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
 - 3.1.2. 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;
 - 3.1.3. know the description of the records of the body which are available in accordance with any other legislation;
 - 3.1.4. 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;
 - 3.1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 3.1.6. know if the body 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;

- 3.1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.1.9. 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
- 3.1.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. Contact details for access to information requests

- 4.1. This section outlines how a requester may contact the private body for the purposes of exercising rights or fulfilling obligations under PAIA and/or POPIA.
- 4.2. All such contacts must be made through the designated Information Officer (IO) or Deputy Information Officer (DIO), whose contact details are provided in this Manual.
- 4.3. All requests for access to information must be directed to the IO, and where so indicated, also the DIO.

4.4. Chief Information Officer

Name: PJ le Roux (Head of Institution)

Email: paia@sakeliga.org.za

4.5. Deputy Information Officers

Name: TV Alberts

Tel: 012 880 1951

Email: paia@sakeliga.org.za

Name: HP van der Merwe

Tel: 012 880 1951

Email: paia@sakeliga.org.za

4.6. Access to information general contacts:

Email: paia@sakeliga.org.za

4.7 National or Head Office:

Postal Address: Loftus Park Block A, Floor 5, 416 Kirkness Street, Pretoria

Physical Address: Loftus Park Block A, Floor 5, 416 Kirkness Street, Pretoria

Telephone: 012 880 1951

Email: paia@sakeliga.org.za

Website: www.sakeliga.org.za

5. Guide 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 from the Regulator 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, 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 and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 5.3.4. the assistance available from the IO 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;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-
 a) that record is required for the exercise or protection of any rights; b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 5.3.7. the provisions of sections 14⁵ and 51⁶ 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 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 5.3.10. the regulations made in terms of section 92¹¹.
- 5.4. Copies of the Guide can be made available on request.
- 5.5. The Guide can also be obtained-
 - 5.5.1. upon request to the Information Officer;
 - 5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>)
- 5.6. A copy of the Guide is also available in the following official languages on the website of the Regulator-
 - 5.6.1. [Afrikaans](#);
 - 5.6.2. [isiZulu](#)

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ 11 Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding- (a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.

5.6.3. [Sepedi](#)

5.6.4. [Setswana](#)

5.6.5. [isiXhosa](#)

6. Requests for access to information held by a private body

- 6.1. A requester seeking to obtain information from the public body must follow the provisions of the PAIA, read together with the PAIA Regulations, the Guide issued by the Information Regulator, and this PAIA Manual before any access to records held by the private body will be considered.
- 6.2. Access to information is not automatic. The private body respects the constitutional right of access to information but will protect its own rights, including the right to privacy, confidentiality, commercial secrecy, legal privilege, and the protection of personal information in accordance with PAIA and the POPIA.
- 6.3. A request for access must be made on the prescribed [Form 2 \(as per Regulation 7 of the PAIA Regulations\)](#), which must be fully and properly completed and submitted to the Information Officer at the contact details listed in this Manual. Incomplete or non-compliant requests may be rejected or returned.
- 6.4. The requester must provide sufficient detail on the request form to enable the Information Officer to:
 - 6.4.1. Identify the record(s) requested;
 - 6.4.2. Identify the requester and the right the requester seeks to exercise or protect;
 - 6.4.3. Provide an explanation of why the record is required to exercise or protect that right;
 - 6.4.4. Indicate the preferred form of access;
 - 6.4.5. Furnish the postal address, email address or other applicable contact details;

- 6.4.6. State whether they wish to be informed of the outcome in another manner and, if so, the relevant manner and particulars.
- 6.5. The private body will assess the request in accordance with the applicable provisions of PAIA and may refuse access on any ground permitted by law, including where the record is subject to legal privilege, contains personal or commercial information of a third party, or if disclosure would reasonably be expected to prejudice the legitimate interests of the private body.
- 6.6. A request fee and access fee may be payable. No processing will occur until the required fees are paid. The Information Officer will notify the requester of the applicable fee(s), if any.
- 6.7. The private body will respond to the request within 30 calendar days, unless extended in terms of PAIA. The Information Officer may refuse a request that does not comply with the law or the requirements set out herein.
- 6.8. Before granting access to any record that may contain information about a third party, including personal information, confidential information, trade secrets, or other commercially sensitive material, the private body will take steps to notify the affected third party as required by PAIA. The third party will be afforded an opportunity to make representations as to why the request should be refused. In such instances, the time period for responding to the request may be extended in accordance with PAIA. The requester will be informed of any such process and delay. Access to a record will be denied where it would constitute an unreasonable disclosure of personal or commercial information about a third party, unless the third party has consented or the disclosure is otherwise permitted under PAIA.
- 6.9. In the event that a request is refused, the requester may lodge a complaint with the Information Regulator or approach a court for appropriate relief, subject to the procedures and timeframes prescribed in PAIA.
- 6.10. Kindly refer to the Guide and PAIA for more particulars.

7. Categories of records which are available without a person having to request access

Category	Description	Mode of access				
		I	R	W	C	F
PAIA	PAIA Manual	X	X	X	X	X
	Form 01 – Request for a Guide from the Regulator [Regulation 2]		X	X		X
	Form 02 – Request for Access to a Record [Regulation 7] **		X	X		X
POPIA	Form 1: Objection to the Processing of Personal Information	X	X	X	X	X
	Form 2: Request for Correction or Deletion of Personal Information or Destruction or Deletion of Record of Personal Information	X	X	X	X	X
Communications	Media Statements and public facing records on Sakeliga's website			X		X

* I = Inspection, R = Request, W = Website, C = Copying, F = Free

8. Description of the subjects and categories of records held on each subject

8.1. The records listed in the table below are not automatically available to the public and are considered part of the protected records of the private body. Access to these records is subject to the provisions of PAIA and may only be granted following a formal request in terms of the Act, and where such access is not refused on lawful grounds, including but not limited to confidentiality, privacy, legal privilege, the

protection of personal or third-party commercial information, and other relevant exemptions.

Subjects held	Categories of records
Corporate records	Board minutes and resolutions
	Member registers
	Registration documents
Financial records	Annual financial statements
	Audit Records
	Tax records
	Accounting records
	Asset registers
Strategic documents, plans and proposals	Annual Reports
	Strategic plans
	Policy documents
	Business plans
	Projects, project plans and proposals
Human Resources	Employment contracts
	Staff files
	Leave records
	Payroll records
	Training materials
	Staff policy materials
Legal and compliance	Contracts and agreements
	Licences and permits
	Regulatory filings
	Litigation records
	Privileged member / donor records

Administrative records	Standard operating procedures
	Internal memoranda
	Office management records
Information technology	IT policies
	System documentation
	Asset registers
	Access logs
	Member Data
	Databases and digital records
	Data backup records
Supplier records	Supplier agreements
	Procurement documents
	Purchase policies and records
Health and safety	Health and safety records
	Incident reports
	Audits
Intellectual Property	Trademarks
	Patents
	Copyright
	Technology and software
	Licensing agreements
	Proprietary systems
Donor and Support	Donor and supporter personal information
	Donation records
	Communication records

	Anonymity or confidentiality designations and agreements
	Campaign participation records
	Consent records for communications
	Event attendance or involvement
	Affiliation or membership information (where applicable)
	Support history and classification
	Demographic data (where collected for research or engagement purposes)

- 8.2. Donor and supporter records are specifically classified as records relating to third parties and are deemed to require the highest level of protection within the private body. These records are considered highly sensitive due to their direct connection to the constitutional rights of individuals and legal entities to privacy, freedom of association, and political association.
- 8.3. Sakeliga recognises that its donors and supporters exercise their fundamental rights when choosing to support a private body that advances the constitutional order, sustainable business environments, the free market, and public interest objectives. The confidentiality of donor and supporter identities, contributions, and forms of support is essential to protecting these rights and ensuring an environment where civil participation and support of lawful causes can occur without fear of reprisal, victimisation, undue exposure, or interference.
- 8.4. Accordingly, such records will not be disclosed unless expressly required by law, and only after all procedural safeguards under PAIA have been exhausted, including the notification and consultation of affected third parties and legal challenge. Any request for access to such records will be rigorously assessed to ensure full compliance with applicable legal protections and the relevant constitutional values.

9. Purpose of processing Personal Information

- 9.1. Sakeliga processes personal information to fulfil its mandate as a non-profit business interest organisation acting in the interests of its members, supporters, and the broader public. This includes maintaining accurate records of

membership, donors, and affiliates; facilitating communication; managing events and initiatives; and engaging in strategic advocacy and litigation to advance lawful commercial and public interest objectives.

- 9.2. Sakeliga also processes personal information to support and administer various programmes, campaigns, and projects aligned with its mission, such as promoting constitutional order, market freedom, legal reform, economic resilience, alternatives to state collapse, and business-friendly policy environments. These efforts may involve partnerships or collaboration with affiliated entities, chambers of commerce, policy think tanks, and other civil society organisations.
- 9.3. Personal information is also processed in connection with research and analysis, policy development, public interest litigation, stakeholder engagement, education and training, donor and supporter communications, and digital platform operation and security.
- 9.4. Where applicable, processing is necessary for administrative, legal, operational, archival, or statistical purposes. Sakeliga ensures that such processing is proportionate, secure, and consistent with its obligations under POPIA, and other applicable laws.

10. Information categories held by the private body

- 10.1. Description of the categories of data subjects held by the private body:

Categories of Data Subjects	Personal information that may be processed
Members and Affiliates	Full name, ID number, contact details, business or organisational affiliation, membership or participation history, payment records, communication preferences
Donors / Supporters	Name, contact details, donation records, payment methods, anonymity designations, campaign involvement, consent records, communication history
Employees	Employment contracts, qualifications, contact details, ID numbers, payroll and tax information, performance records, disciplinary records

Volunteers and contributors	Name, contact details, availability, qualifications, relevant skills, background verification (if applicable)
Strategic partners and affiliates	Organisation details, representative contact information, partnership agreements, project involvement
Beneficiaries of projects and campaigns	Name, contact details, demographic data, nature of support received, participation records
Project and event participants	Registration details, contact information, participation records, feedback and evaluation data
Stakeholders and strategic partners	Organisation and/or personal details, representative contact information, partnership documentation, project involvement, advisories, communication and collaboration
Service providers	Company information, contact persons, contract terms, payment details
Website and platform users	Login data, contact details, user preferences, usage data, IP address, location data
Advocacy and litigation	Name, contact details, correspondence or submissions related to litigation, consultation, information gathering, advocacy initiatives or support.

10.2. The recipients or categories of recipients to whom the personal information may be supplied¹²:

10.2.1. Sakeliga foresees the following categories of personal information and potential recipients of such information:

¹² *Disclaimer - Personal information is processed and shared strictly in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), and in line with the applicable legal bases, consents, and rights afforded to each data subject. This may include the sharing or transfer of personal information internally within the structures, departments, and affiliated entities of the private body, including but not limited to operational teams, administrative functions, project units, and affiliated organisations, where such transfer is necessary to achieve lawful and legitimate purposes. The listing of recipients or categories of recipients in this section is for transparency and does not imply that personal information will necessarily be shared with all such recipients, nor that all categories of personal information will be disclosed. Any sharing of information, whether internal or external, will take place only where appropriate, relevant, and legally justified, and subject to appropriate safeguards.*

Categories of Personal Information	Categories of potential recipients
Identity number, names, and contact details (general)	Staff, associates, consultants, affiliated chambers or partner organisations, service providers, and legal and/or other advisors
Membership information, donor and supporter information and contact details	Internal administrative teams, trusted third-party service providers (e.g. CRM, communication platforms), payment processors, and legal representatives (where necessary and lawful)
Financial and banking details	Auditors, banks, payment processors, accounting service providers
Legal, policy and advocacy	Legal representatives, courts or tribunals, regulators, public interest partners, parties to litigation
Digital platform usage and interaction data	Cloud service providers, IT administrators, platform analytics providers, cybersecurity partners
Personal information of employees	SARS, UIF, payroll service providers, pension and benefit administrators, medical aid providers, training institutions
Survey, advisory, opinion and research outputs	Research teams, governmental bodies, non-governmental organisations, academic institutions, policy organisations, or civil society partners

- 10.2.2. Sakeliga takes reasonable steps to ensure that personal information is only disclosed to authorised recipients, and only where such disclosure is justified in terms of PAIA, POPIA, or other applicable laws.
- 10.2.3. Disclosure may occur where necessary to fulfil Sakeliga's operational, legal, advocacy, or strategic objectives, including engagement with third parties that support its mission and public interest initiatives.
- 10.2.4. In certain cases, personal information may be shared with trusted national or international partners, including research institutions, academic bodies, non-governmental organisations, and governmental entities, where such cooperation advances legitimate policy, research, advisory, or public interest outcomes. Any such disclosure is subject to

appropriate safeguards, legal permissions, and confidentiality undertakings.

10.3. Transborder flows of Personal Information:

10.3.1. Sakeliga may, where operationally necessary, transfer or store certain categories of personal information outside the borders of the Republic of South Africa. This occurs in the context of Sakeliga's international engagements, digital infrastructure requirements, and collaborative research and advisory projects.

10.3.2. Such transborder flows are undertaken in accordance with Section 72 of POPIA and only occur where one or more of the following conditions are met:

10.3.2.1. The recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection substantially similar to POPIA;

10.3.2.2. The data subject consents to the transfer;

10.3.2.3. The transfer is necessary for the performance of a contract or for the implementation of pre-contractual measures;

10.3.2.4. The transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain consent;

10.3.2.5. Adequate safeguards (such as standard contractual clauses or data processing agreements) are in place.

10.3.3. Transborder flows typically occur in the following circumstances:

Categories of Personal Information	Country or Region	Purpose of transfer / storage
Contact details, supporter and donor data, and communication records	Africa, European Union, Ireland, United States, United Kingdom	Cloud-based CRM, donor management platforms, secure storage, newsletter and campaign services

Advocacy, research and policy engagement	Africa, European Union, Ireland, United States, United Kingdom	Collaborative research projects, joint publications, policy advisory, international submissions, litigation
Website and platform user data	Africa, European Union, Ireland, United States, United Kingdom	Web hosting, analytics, and user management systems
Employee records and internal communications	Africa, European Union, Ireland, United States, United Kingdom	Human resource platforms, payroll processing, and internal cloud services
Legal submissions and correspondence	As required by specific cross-border or international legal forums	International litigation, advocacy, regulatory or public interest work

10.3.4. Sakeliga ensures that appropriate contractual, technical, and organisational measures are in place to protect personal information during cross-border transfers. These measures include encryption, access controls, and data protection clauses in agreements with foreign service providers and collaborators.

10.4. General description of Information Security Measures:

10.4.1. Sakeliga implements a range of technical and organisational safeguards to ensure the confidentiality, integrity, and availability of the personal information in its possession, as required by POPIA.

10.4.2. The following categories of information security measures are in place or under implementation:

10.4.2.1. Access Controls: Role-based and password-protected access to information systems to ensure that only authorised personnel have access to specific categories of personal information.

- 10.4.2.2. Data Encryption: Use of encryption technologies for data at rest and in transit to protect sensitive personal information from unauthorised access or interception.
- 10.4.2.3. Network and Infrastructure Security: Firewalls, intrusion detection systems, and secure VPNs to protect against external threats and unauthorised access.
- 10.4.2.4. Anti-virus and Anti-malware Solutions: Regularly updated software to detect and mitigate malicious threats across all devices and systems.
- 10.4.2.5. Secure Cloud Services: Use of reputable third-party cloud service providers that comply with international security standards and data protection laws.
- 10.4.2.6. Physical Security: Restricted physical access to offices and server rooms, alarm systems, and surveillance where appropriate.
- 10.4.2.7. Backup and Disaster Recovery: Regular data backups and tested disaster recovery plans to ensure data availability and business continuity.
- 10.4.2.8. Security Awareness and Training: Ongoing training and awareness programmes for employees and volunteers regarding data protection responsibilities and good security practices.
- 10.4.2.9. Audit and Monitoring Controls: Regular auditing, monitoring, and reviewing of systems and processes to identify vulnerabilities and ensure compliance.

- 10.4.3. These safeguards are designed to mitigate the risks of data breaches, unauthorised disclosures, and loss or damage to personal information.

11. Availability of the Manual

- 11.1. A copy of the Manual is available-

- 11.1.1. on www.sakeliga.org.za, if any;
 - 11.1.2. head office for public inspection during normal business hours;
 - 11.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 11.1.4. to the Information Regulator upon request.
- 11.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

12. Updating of the Manual

- 12.1. The board will on a regular basis update this manual.

Issued by
PJ le Roux
Information Officer