



Heidelberg

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HEIDELBERG GOLF CLUB

PAIA and POPIA Manual



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Section 1: PAIA Manual

1. List of Acronyms and Abbreviations

DIO	Deputy Information Officer
IO	Information Officer
PI	Personal Information and Special Personal Information
PAIA	Promotion of Access to Information Act No 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No 4 of 2013
Regulator	Information Regulator

2. Key Definitions

Personal Information is defined as any piece of information about an individual that can be used to uniquely identify that individual.

Special Personal Information includes information regarding a data subject's medical or mental health, criminal history, and any other information about the data subject that is not categorised as personal information.

The data subject is the individual to whom the information pertains. This category comprises current and previous employees, contractors, and part-time workers.

All references to the Club mean Heidelberg Golf Club.

3. Purpose of the PAIA Manual

The purpose of the PAIA manual is to-

- 3.1. Check the categories of records held by the Club which are available without a person having to submit a formal PAIA request
- 3.2. Have sufficient understanding of how to make a request for access to a record from the Club by providing a description of the subjects on which the Club holds records and the categories of records held on each subject
- 3.3. Know the description of the records of the Club which are available in accordance with any other legislation
- 3.4. Access all the relevant contact details of the IO and DIOs who will assist the public with the records they intend to access
- 3.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it
- 3.6. Know if the Club will process PI and the purpose of processing PI
- 3.7. Know the description of the categories of data subjects and the categories of information relating thereto



- 3.8. Know the recipients or categories of recipients to whom the PI may be supplied
- 3.9. Know if the Club has planned to transfer or process PI outside the Republic of South Africa and the recipients or categories of recipients to whom the PI may be supplied
- 3.10. Know whether the Club has appropriate security measures to ensure the confidentiality, integrity, and availability of the PI which is to be processed.

4. Key Contact Details

4.1. Registered IO

Name: Ben Stimie
Contact number: 082 300 3239
Email address: bstimie1@gmail.com

4.2. Registered DIO

Name: Chantelle Cooper
Contact number: 016 – 349 1061
Email address: hgolfc@absamail.co.za

Name: Ronel le Roux
Contact number: 016 – 349 1061
Email address: hgolfc@absamail.co.za

4.3. Head Office

Postal Address: PO Box 1273, Heidelberg, 1438, South Africa
Physical Address: 2 Stasie Street, Heidelberg - GP, South Africa
Telephone: +27 16 349 1061
Email: hgolfc@absamail.co.za
Website: www.heidelberggolf.co.za

5. Records Available

The Club's PAIA manual is automatically available on the Club's website and need not be formally requested. The other information that is freely available upon request are:

- Confirmation of Employment
- Employment Bulletins
- Product Information



6. Legislation Governing Club Information

Information which may be kept by or on behalf of the Club are in accordance with the following legislation (some of which may not apply to the Club directly but may be necessary for third-party relationships).

Category of Records	Applicable Legislation
Employee Relations	Basic Conditions of Employment Act 75 of 1997
	Compensation for Occupational Injuries and Diseases Act 130 of 1993
	Employment Equity Act 55 of 1998
	Labour Relations Act 66 of 1995
	Pension Funds Act 24 of 1956
	Unemployment Insurance Act 63 of 2001
Finance	Financial Advisory and Intermediary Services Act 37 of 2002
Finance and Employee Relations	Income Tax Act 95 of 1967
General Management	Close Corporations Act 69 of 1984
	Copyright Act 98 of 1978
Health & Safety	Occupational Health and Safety Act 85 of 1993
Information Technology	Electronic Communications and Transactions Act 25 of 2002
Memorandum of Incorporation	Companies Act 71 of 2008
Organisational Development	Broad-based Black Economic Empowerment Act 53 of 2003
	Skills Development Levies Act 9 of 1999
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013
Sales & Marketing and Finance	Value Added Tax Act 89 of 1991



7. Information held by the Club

The Club is obligated by law to retain a variety of information. Whilst some of the information is readily accessible, others require protection in terms of obtaining, preserving, and sharing the information in accordance with the requirements of POPIA and PAIA. Documents and information that are not freely available on the website should be requested by means of the official request process described in [Section 1, Subsection 9](#). The request may be approved or denied in accordance with POPIA and PAIA rules.

The categories of information available upon request are described in the table below.

Subjects on which the Club holds Information	Categories of Information
Strategic Documents	Strategic Plan
Employee Relations	Policies and Procedures
	Employee Personal Information
	Payroll Information
	Disciplinary records pertaining to proceedings
	CCMA records
Organisational Development	Employment Bulletins
	Information relating to recruitment
	Skills Development Information
	BBBEE Information
Finance and Banking	Audited financial statements
	Asset register
	Bank statements
	Club's financial and tax records
	Management Accounts
Sales and Marketing	Product Brochure
	Product sales records
	Members/Customer database
Health & Safety	Statutory and environmental records
Statutory Club's Information	Memorandum of Incorporation
	Certificate of Incorporation
	Shareholder's Agreements
Third Parties	Personnel, client, or club's records held by third parties
	Records pertaining to the relationship with the third party (Contracts, financial records, information shared by third party, etc.)
Other	Media releases
	Intellectual Property records



8. Processing of Personal Information

8.1. Purpose of processing Personal Information

The Club processes PI for business and employment purposes. PI can be processed in the following ways:

- Input into the Club's payroll system for payment and employment purposes
- Input into the Club's time & attendance system for identification and payment purposes
- Capturing on the Club's databases for employment, operational, and management purposes
- Input into statutory systems
- For legal purposes, as determined by law
- Communication purposes (with the data subjects and other third parties)

8.2. Information Processed in terms of POPIA

The Club processes PI of its data subjects as described below.

Categories of Data Subjects	Personal Information that may be processed
Customers/ Members/ Service Providers	Name and Surname, Contact details, Work Address, E-mail Address, Banking Details
Employees/ Students	Name and Surname, National ID and birth certificate, Passport and work permit (if applicable), Home Address, Postal Address, Banking Details, Tax Number, Contact details (cell phone, e-mail, landline details), CV / Qualifications / Driver's licence, Clock number / Employee number, COVID Screening number, Occupational Levels, Job Title, Email address, Gender, Annual leave applications, Religious beliefs, Race or ethnic origin, Trade union membership, Criminal record, Sick leave applications, medical certificates, Family Responsibility leave application, Maternity leave applications and medical certificate, All medical information, Disability status, Biometric information (Facial and/or fingerprint biometrics), Payslips, Personal Insurance forms, SARS Documents, UIF Documents (UI19/COS/Salary Schedule), Compensation Commission Documents, Employment History, Remuneration data (e.g. basic, benefits, earnings, deductions, fringe benefits, etc.), Warnings, Dismissal Notifications



Employee's Beneficiary / Next of Kin	Next of Kin name, Emergency contact details, Pension Fund Beneficiary form, Provident Fund Beneficiary form, Additional fund contributions, Beneficiary - minors birth certificate, Beneficiary - minor details
Job applicants	Name and Surname, CV, Address, Contact Details, Psychometric results, Interview sheets, Qualifications, Copy of ID, References, Work history, criminal record, credit checks
Visitors	Information to gain access, surveillance records (e.g., CCTV footage)

8.3. The recipients to whom the Personal Information may be supplied

The Club may share PI of its data subjects with the following recipients, upon request.

- South African Police Services
- South African Qualifications Authority
- Credit Bureaus
- South African Revenue Services
- Time & Attendance Supplier
- Payroll Platform Supplier
- ERP Supplier
- Medical Aid Third Party
- Pension and Provident Fund Third Party
- All other Third Parties (Insurances, Garnishees, etc.)
- Recognised Unions
- Internal Employees of the Club
- Other (third parties in the ordinary course of business, court and/or another similar authority)

8.4. Planned transborder flows of Personal Information

The Club currently does not share or transfer information outside of South Africa. Should the need arise to transfer a data subject's information to service providers outside South Africa, the Club will fully comply with applicable data privacy and protection legislation. This may happen if the Club's servers or suppliers and service providers are based outside South Africa, or if the Club's services are hosted in systems or servers outside South Africa and/or if a data subject uses the Club's services whilst visiting countries outside this area. These countries may not have data-protection laws which are similar to those of South Africa.

If the Club transfers information outside of South Africa, the Club will make sure that the information is protected in the same way as if it was being used in South Africa. The Club will use one of the following safeguards:



- Transfer the data subject's information to another country whose privacy legislation ensures an adequate level of protection of personal information similar or equivalent to South Africa; or
- Put in place a contract with the third-party that means they must protect PI to the same standards as South Africa.

8.5. Information Security Measures

The Club commits to implementing and maintaining data protection procedures necessary to meet the objectives of POPIA and PAIA. The Club may employ alternative procedures and adapt to technological advancements in security as necessary to ensure that the objectives are met.

9. Request of Information

To request information not freely available on the website, Form 1 (Annexure A) should be completed and submitted to the Club. Requests will be approved or denied based on the discretion of the IO and/or DIOs. Requests will be payable according to the Fees guideline (Annexure B) provided by the Regulator. Further information on remedial processes can be obtained from the IO or DIOs.

10. Availability of the Manual

A copy of the Manual is available:

- 10.1. On the Club's website: www.heidelberggolf.co.za
- 10.2. Employee Relations office at the Club's site for public inspection during normal business hours,
- 10.3. To any person upon request and upon the payment of a reasonable prescribed fee; and
- 10.4. To the Regulator upon request.

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

This manual will be revised and updated as and when the need arises.



Section 2: Heidelberg Golf Club Privacy Statement

The Club's Privacy Statement pertains to its employees, members, clients, and other external parties. This statement is intended to inform how the Club gathers, processes, stores, and destroys PI in accordance with POPIA and PAIA. Note that the Privacy Statement may be modified, as necessary and should be read with the Club's PAIA Manual and any contracts the Club may have with the data subject. This manual is published on the Club's website at www.heidelberggolf.co.za.

1. Privacy Statement

1.1. Purpose of this statement

The Club is committed to handling Third Parties, Service Providers, and Employee information in accordance with Section 18 of POPIA and to ensure the transparent and appropriate use of PI. This statement is intended to inform data subjects about how PI is collected, processed, stored, and destroyed. The Club is committed to:

- Be accountable for all information processed by the Club and will ensure that the conditions for lawful processing are followed.
- Processing PI in a limited manner and only relevant information will be processed with the permission of the data subject.
- Gathering information for a clearly stated and lawful purpose that the data subject understands and strictly adhering to retention periods.
- Ensuring that with the data subject's approval, information may be used for other reasons. No further consent is necessary if the purpose for processing the information is already consistent with the stated purpose.
- Putting security measures in place to safeguard the integrity and confidentiality of information, as well as the protection of information against loss or unauthorised processing.
- Informing the data subject about how their personal information is processed, where it will be shared, and for what purpose. Additionally, the data subject should be able to update inaccuracies if the relevant proof or supporting documentation is provided.



1.2. Gathering and Sharing of Information

Types of PI collected is outlined in [Section 1, Subsection 8](#) of this document.

Information is gathered about the data subject directly from such data subject and/or other third parties including but not limited to committee members, managers, service providers, former employers, and credit reference agencies. For employment, committee members, management, and legislative purposes information must be gathered either mandatorily or voluntarily.

Information is shared both internally and externally. Internally, information is shared between departments for employment purposes. Information shared is kept confidential and is only shared when necessary. Externally, information is shared with third parties as required.

1.3. Processing of Personal Information

The Club processes PI for business and employment purposes. For more information on the processing of PI, you may refer to [Section 1, Subsection 8](#).

1.4. Storage of Personal Data

Personal data is stored in the following ways:

- On password protected Club computers and laptops
- In filing cabinets in offices that are locked when unoccupied
- In the archives which are kept in a dedicated locked storeroom
- On software systems such as the payroll system and time & attendance system which requires a password to gain access.

For more information on the safeguarding of information, please refer to [Section 1, Subsection 8](#).

1.5. Retention periods for processed information

The Club will only retain PI of data subjects for as long as necessary to fulfil the purpose it was collected for, including for the purposes of satisfying legal, accounting, or reporting requirements. Should you require more information on the retention periods of specific information, please reach out to the ER Manager or the IO to provide guidance.



1.6. Rights and responsibilities of the data subject

As a data subject, you have various rights and obligations that enable and support the Club in adhering to POPIA's criteria.

As the data subject,

- You are responsible for notifying the Club of any changes to your PI by providing the necessary source documents or proof of changes. You may update your PI by contacting the Club Manager or by requesting assistance from the standing committee.
- You have the right to request access to your own information, under PAIA. This is referred to as a 'data subject access request'. Access to your PI enables you to verify and correct data, as necessary.
- You have the right to request the destruction of information. This, however, should be accomplished through a written request to the standing committee.
- You have the right to object to the sharing of your information with another party. This request should be made in writing to the standing committee.
- You possess the right to refuse consent. If you choose not to disclose your information willingly with the Club or any other listed third party, please be aware that certain hiring processes will be unable to proceed. Additionally, certain information is mandated by law, and the Club is required to communicate such information with statutory bodies. If you desire to withdraw some consent, please contact the Club Manager to discuss this further.
- You are accountable for appropriately identifying yourself and verifying your information when the Club requests it.

Please bear in mind that any requests to the Club regarding your own information will be examined and may or may not be granted. For access to your PI, please refer to [Section 1, Subsection 9](#).



1.7. Cookies

Computer "cookies" are sometimes referred to as HTTP cookies, online cookies, Internet cookies, or browser cookies. The phrase is an abbreviation for "magic cookie," a term that refers to a packet of data that a computer receives and then sends back unchanged or altered. Whatever it is called, a computer cookie contains data. When you visit a website, the website sends you a cookie. It is stored by your computer in a file placed within your web browser.

The computer cookie's aim is to assist the website in tracking your visits and activities. This is not always a negative attribute. For instance, many online shops utilise cookies to track the goods in a user's shopping cart as they navigate the site. Without cookies, each time you clicked a new link on the site, your shopping basket would reset to zero. That would make purchasing anything online extremely tough!

Additionally, a website may use cookies to keep track of your most recent visit or your login information. Many individuals find this useful for storing passwords for frequently visited websites or for simply keeping track of what they have browsed or downloaded in the past.

Internally, the Club does not make use of any cookies; however, externally hosted websites, owned by the Club, do make use of Cookies. These cookies are strictly necessary for it to function, and they do not store any personal information.

1.8. Information shared with Third Parties

Certain Third Parties offer the Club with software and systems that are used in the business's day-to-day operations. These systems enable the Club to carry out its daily business tasks. Where applicable PI is shared with them to ensure that the system operates as intended and produces the expected outcomes.

Information is further supplied to Third parties designated by statute and / or required by law and are thus mandatory. This means that the Club does not need the consent of the data subject before sharing relevant personal information with them.



To ensure compliance, the Club has requested Third Parties to declare in writing that they are POPIA compliant and committed to treat all information given to them in accordance with the Act. Third Parties that violate the Act shall be held accountable by law.

All Third Parties should ensure that they have read, understood, and signed the Club's Third Party POPIA Agreement and Consent Declaration. Please request the declaration by emailing the Club at hgolfc@absamail.co.za



Section 3: Prescribed Forms

Annexure A: Request for Access to a Record(s)

FORM 1

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

Note:

1. Proof of identify must be attached by the requestor
2. If requests are 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 the request is made (when made on behalf of another person):			
Postal Address:			
Street Address:			
E-mail Address:			
Contact numbers	Tel (B)		Facsimile
	Cellular		
Particulars of record requested			
<p>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.)</p>			
Description of record or relevant part of the record			



Reference number, if available:	
Any further particulars of record:	
Type of record (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
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 (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions, and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
Manner of access (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/ private body (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)	
Postal services to postal address	
Postal services to street address	
Courier services to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/ file transfer	



Preferred language: 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.	
Particulars of right to be exercised or protected If the provided space is inadequate, please continue on a separate page and attach it this Form. The requestor 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 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 exception 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 Requestor / 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



Annexure B: Fee Schedule

Fees for records as prescribed		Public Body	Private Body
1	Request fee payable by every requestor	R100	R140
2	Photocopy of an A4 page or part thereof	R1.50	R2.00
3	Printed copy of an A4 page or part thereof	R1.50	R2.00
4	For a copy in a computer-readable form on:		
	Flash drive (to be provided by the requestor)	R40	R40
	Compact Disc		
	If provided by requestor	R40	R40
	If provided to the requestor	R60	R60
5	Transcription of visual images for an A4 of part thereof	Service to be outsourced. Will depend on the quotation from the service provider	
6	Copy of visual images		
7	Transcription of an audio record, for an A4 page of part thereof	R24	R24
8	Copy of an audio record on:		
	Flash drive (to be provided by the requestor)	R40	R40
	Compact disc		
	If provided by requestor	R40	R40
	If provided to the requestor	R60	R60
9	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.	R100	R145
	May not exceed a total cost of	R300	R435
10	Deposit (if search exceeds 6 hours)	One third of the amount per request calculated in terms of 2-8	
11	Postage, e-mail or any other electronic transfer	Actual expense if any	

- The banking details to be used are as follows:

Pay: Heidelberg Golf Club

Bank: ABSA

Name: Heidelberg Gholfklub

Branch Code: 632005

Account Number: 1003700751

Reference: PAIA + surname



Annexure C: Third Party POPI Declaration

POPI Agreement and Consent Declaration
Third Party / Service Provider (herein referred to as "Third Party")
and
Heidelberg Golf Club (herein referred to as "Club")

Dear Third Party,

In terms of the South African Constitution, everyone has the right to privacy. The POPI Act (Protection of Personal Information Act 2013) assists by providing principles for the processing and safeguarding of Personal Information. Due to the nature of services and / or products that you render to Club, you may collect and process Personal Information as well as Special Personal Information (as defined in the POPI Act) belonging to Club and/or its employees (hereafter referred to as Personal Information).

Where Club shares Personal Information with you, you hereby acknowledge your obligations to comply with the provisions of the POPI Act, which include that you shall: -

- comply and ensure that you lawfully process Personal Information in accordance with your obligations as set out in the POPI Act.
- secure the integrity and confidentiality of the Personal Information in your possession by taking appropriate, reasonable, technical, and organisational measures to prevent the loss and unlawful access to and /or processing of Personal information.
- comply with applicable industry or professional rules and regulations, in relation to the safeguarding of the Personal Information.

You further warrant that all the Personal Information provided by you to Club complies with the conditions for lawful processing of Personal Information as set out in the POPI Act.

In the event of you sharing Personal Information of Club employees with us, we undertake to: -

- understand how and for what purpose the information is shared,
- ensure that the Personal Information of employees is processed in accordance with internal data privacy policies and in accordance with the provisions of the POPI Act,
- ensure that the Personal Information of employees is used for the purposes of the third-party obligation only, and
- not use or share the details of employees for direct marketing and/or to other unauthorised reasons.

The Club's Promotion of Access to Information Act manual, including the Club's Privacy Statement, is available at www.heidelberggolf.co.za.

The declaration shall continue to be in force and effect until the termination of the services/products provided.

Signed in acknowledgment and agreement with the contents contained herein

For Heidelberg Golf Club:

Signature _____
Full Name _____
Designation _____
Date _____

For the Third-Party:

Signature _____
Full Name _____
Designation _____
Date _____
Entity _____
ID/ Registration Number _____