



AKASIA GHOLFklub / AKASIA GOLF CLUB

SECTION 51 MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000
(HEREIN AFTER THE 'ACT')

INCORPORATING ADDITIONAL REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION IN TERMS OF
THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2014

FOR AKASIA GHOLFklub / AKASIA GOLF CLUB.

DATE OF COMPILATION 10 AUGUST 2021

A. INFORMATION REQUIRED UNDER SECTION 51(1)(a) OF THE ACT

1. COMPANY CONTACT DETAILS.

THE HEAD OF THE COMPANY:

The Chairperson. (Mr. Lucas van der Walt)

PHYSICAL ADDRESS OF HEAD OF COMPANY:

WATERBOK STREET / THERESAPARK / PRETORIA / SOUTH AFRICA

POSTAL ADDRESS OF HEAD OF COMPANY:

Akasia Golf Club.

PO Box 59555.

Karenpark.

0118.

EMAIL ADDRESS OF HEAD OF COMPANY:

TEL. NO. OF HEAD OF COMPANY:

012 x 5423999.

Cell. 061 007 6338.

2. DESCRIPTION OF MANUAL REFERRED TO IN SECTION 51 OF THE ACT

This Manual has been compiled in terms of Section 51 of the Act by Adv. J P Nordier (LPC Reg. No. 53803).

It contains information required by a person wishing to exercise any right, contemplated by the Act.

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The Manual is available for inspection, inter alia, at the office of AKASIA GHOLFklub / AKASIA GOLF CLUB at the physical address above and at the South African Human Rights Commission (SAHRC).

B. CONTENTS OF THE MANUAL

1. INTRODUCTION

AKASIA GHOLFKLUB / AKASIA GOLF CLUB – a Golf Club situated in Theresapark, Pretoria, South Africa. The Golf Club provide golfing facilities to the members of the club and the general public.

2. INTRODUCTION TO PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013. (HEREIN AFTER 'POPI')

2.1. REQUIREMENTS OF POPI

POPI requires the company to inform their clients as to the manner and process in which their personal information is used, disclosed, and destroyed.

The company guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

The Policy sets out the manner and procedure in which the company deals with their client's personal information as well as and stipulates the purpose for which said information is used.

2.2. PERSONAL INFORMATION COLLECTED

Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant, and not excessive."

The company collects and processes client's personal information pertaining to the client's needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, the company will inform the client as to the information required and the information deemed optional. Examples of personal information we collect include, but is not limited to:

- The Client's Identity number, name, surname, address, postal code, marital status, and number of dependents.
- Description of the client's residence, business, assets; financial information, banking details, etc.

The company also collects and processes the client's personal information for marketing purposes to ensure that our products and services remain relevant to our clients and potential clients. The company aims to have agreements in place with all product suppliers, insurers, and third-party service providers to ensure a mutual understanding with regard to the protection of the client's personal information. The company's suppliers will be subject to the same regulations as applicable to the company.

With the client's consent, the company may also supplement the information provided with information the company receives from other providers to offer a more consistent and personalized experience in the client's interaction with the company.

For purposes of this Policy, clients include potential and existing clients.

2.3. THE USAGE OF PERSONAL INFORMATION

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed. According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for the companies processing of Personal Information:

- The client's consents to the processing: - consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship.
- Processing complies with an obligation imposed by law on the company.

2.4. DISCLOSURE OF PERSONAL INFORMATION

The company may disclose a client's personal information to any of the subsidiaries, joint venture companies and/or approved product or third-party service providers whose services or products clients elect to use. The company has agreements in place to ensure that compliance with confidentiality and privacy conditions. The company may also disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary to protect the company's rights.

2.5. SAFEGUARDING CLIENT INFORMATION

It is a requirement of POPI to adequately protect personal information. The company will continuously review its security controls and processes to ensure that personal information is secure.

The following procedures are in place to protect personal information:

- THE COMPANY'S INFORMATION OFFICER is the Club Manager (Lourens de Lange) whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPI. He is assisted by Neill Malherbe who will function as the Group's Deputy Information Officer.
- HIS policy has been initiated and training on this policy and the POPI Act has already taken place.
- Each new employee will be required to sign an EMPLOYMENT CONTRACT containing relevant consent clauses for the use and storage of employee information, or any

other action so required, in terms of POPI.

- Every employee currently employed within the company will be required to sign an addendum to their EMPLOYMENT CONTRACTS containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- The company's archived client information is stored on premises, which is also governed by POPI, access is limited to these areas to authorized personal.
- Consent to process client information is obtained from clients (or a person who has been given authorisation from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

2.6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Clients have the right to access their personal information acquired and maintained by the company. Clients also have the right to ask the company to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, the company may no longer process said personal information. The company will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.

2.7. INFORMATION OFFICER DETAILS:

NAME: Lourens de Lange

TELEPHONE NUMBER: 012 x 5423999

FAX NUMBER: 012 x 5424073

E-MAIL ADDRESS: lourens@akasiacc.co.za

DEPUTY INFORMATION OFFICER DETAILS

NAME: Neill Malherbe

TELEPHONE NUMBER: 012 x 5423999.

FAX NUMBER:

E-MAIL ADDRESS: neill@nape.co.za

3. THE ACT (SECTION 51(1)(b))

The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: +27-11-877 3600

Fax Number: +27-11-403 0625

Website: www.sahrc.org.za

4. AMENDMENTS TO THE MANUAL

Amendments to, or a review of this Manual, will take place on an ad hoc basis or at least once a year.

5. AVAILABILITY OF THE MANUAL

This manual is made available in terms of Regulation Number R. 187 of 15 February 2002.

6. INFORMATION AS MAY BE PRESCRIBED UNDER SECTION 51(1)(f)

The Minister of Justice and Constitutional Development of the Republic of South Africa has not made any regulations in this regard.

7. INFORMATION REQUIRED IN TERMS OF SECTION 52 (2)

The Minister of Justice and Constitutional Development of the Republic of South Africa has not made any regulations in this regard.

8. RECORDS THAT CANNOT BE FOUND

If the company searches for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken the attempt to locate the record.

9. THE PRESCRIBED FORMS AND FEES

The prescribed forms and fees are available on the website of the Department of Justice and Constitutional Development at www.doj.gov.za under the regulations section.

J752 ENG / J754 AFR Form C Request for access to record of Private Body (Section 53(1) of the Promotion of Access to Information Act 2000 (Act No. 2 of 2000)) [Regulation 10]

The following electronic link can be accessed: https://www.justice.gov.za/forms/form_paia.htm

FORM OF REQUEST (Section 51 (1) (e))

To facilitate the processing of your request, kindly:

- Use the prescribed form, available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.
- Address your request to the Head of the Company (CEO).
- Provide sufficient details to enable the COMPANY to identify:
 - The record(s) requested.
 - The requester (and if an agent is lodging the request, proof of capacity).
 - The form of access required.
 - The postal address or fax number of the requester in the Republic.
 - If the requester wishes to be informed of the decision in any manner.
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

10. PRESCRIBED FEES (SECTION 51 (1))

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees (R50.00) before a request will be processed; if the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.
- The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.

11. APPLICABLE LEGISLATION

No	Ref	Act

1	No 61 of 1973	Companies Act
2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 95 of 1967	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 37 of 2002	Financial Advisory and Intermediary Services Act
8	No 75 of 1997	Basic Conditions of Employment Act
9	No 69 of 1984	Close Corporations Act
10	No 25 of 2002	Electronic Communications and Transactions Act
11	No 2 of 2000	Promotion of Access of Information Act
12	No 30 of 1996	Unemployment Insurance Act

12. LEGISLATION HELD AT PHYSICAL ADDRESS

- Basic Conditions of Employment Act of 1997.
- Employment Equity Act of 1998.
- Occupational Health and Safety Amendment Act of 1993.
- Labour Law Amendment Act of 2018.

13. SUBJECTS AND CATEGORIES OF PERSONAL RECORDS HELD AT PHYSICAL ADDRESS

- Identity Numbers.
- Dates of birth.
- Telephone numbers.
- Emails.
- Addresses.
- Banking details.
- Bank account numbers.
- Invoices.
- Licence numbers.

14. CUSTOMER PERSONAL INFORMATION SHARED BY COMPANY

- Member Identity numbers.
- Member Full Names.
- Member Contact details.

15. EMPLOYEE INFORMATION RECEIVED BY COMPANY

- Identity numbers.
- Dates of birth.
- Telephone numbers.
- Emails.
- Addresses.
- Income Tax numbers.
- Banking details.
- Bank Account numbers.

16. INFORMATION TECHNOLOGY PRACTISES BY COMPANY

- Physical security, (PCs locked to fixture/ locked in room).
- Network security control.
- Password controls.
- Virus & Malware protection.
- Software updates.
- Disaster recovery & back-up policy.

17. COUNTRIES OF OPERATION

Republic of South Africa.
