

Promotion of Access to Information Act Manual

(Prepared in terms of section 51 of the *Promotion of Access to Information Act, 2000*)

for

Pangolin Africa NPC

1	Introduction	2
2	Organisation details	2
3	Information Officer	2
4	Guide on how to use PAIA	2
5	Description of business activities	3
6	Records available in terms of legislation.....	3
7	Categories of records held	4
8	Records automatically available	5
9	Security measures to protect personal information	5
10	Planned cross-border transfers of personal information.....	5
11	Request procedure	5
12	Availability of this Manual	6
	Annexure 1.....	7
	Annexure 2.....	9

1 Introduction

This manual is published in terms of section 51 of the *Promotion of Access to Information Act, 2000 (PAIA)*, read with the relevant provisions of the *Protection of Personal Information Act, 2013 (POPIA)*. It outlines the procedures for requesting access to records held by Pangolin Africa NPC and provides information about our processing of personal information as required under POPIA.

This manual is designed to help any person understand:

- what records Pangolin Africa holds;
- how to make a request for access to a record;
- what fees and timelines apply;
- how Pangolin Africa protects personal information; and
- what remedies are available if a request is refused.

2 Organisation details

- Name: Pangolin Africa NPC
- Legal form: Non-Profit Company (NPC)
- Registration number: 2018/380634/08
- Physical/registered address: 37 Eksteen Avenue, Bergvliet, 7945, Cape Town, South Africa
- General email: info@pangolin.africa
- Website: www.pangolin.africa

3 Information Officer

- Name: Sadicka Hajwnie-Timm
- Designation: Information Officer
- Email: sadicka@pangolin.africa
- Address: 37 Eksteen Avenue, Bergvliet, 7945, Cape Town, South Africa

The Information Officer is responsible for facilitating requests for access to records, ensuring compliance with PAIA and POPIA, and addressing queries relating to the processing of personal information. All requests and queries regarding access to information should be directed to the Information Officer.

4 Guide on how to use PAIA

The Information Regulator has published a Guide in terms of section 10 of PAIA, which explains how to exercise your right of access to information held by public and private bodies. The Guide is available in all official South African languages and in accessible formats.

Copies of the Guide are available (i) from the Information Regulator (details below); (ii) on the Information Regulator's website, accessible [here](#); or (iii) from Pangolin Africa's Information Officer, upon request.

Information Regulator contact details:

- Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
- Telephone: 010 023 5200

- General enquiries: enquiries@infoeregulator.org.za
- Complaints: complaints.POPIAComplaints@infoeregulator.org.za

5 Description of business activities

Pangolin Africa NPC is a non-profit organisation dedicated to the survival of the African pangolin. Operating through a three-pronged approach of publicity, participation and protection, Pangolin Africa partners with global stakeholders in tourism, conservation and business to contribute to the research, protection and rehabilitation of pangolins. Key activities and initiatives include:

- **"A Place for Pangolins"**: Building and maintaining a database of pre-approved candidate pangolin release sites across South Africa. Property owners/managers complete an online survey assessing the suitability of their land for rewilding rehabilitated pangolins. Final release approval is granted by the Department of Forestry, Fisheries and the Environment (**DFFE**); Pangolin Africa's pre-approval process readies a shortlist of vetted candidate sites.
- **"Pangolert"**: A WhatsApp-based pangolin sighting reporting service used by rangers, safari guides, tourists, law enforcement and researchers to report pangolin sightings in real time. Data is stored offline for security, with access restricted to vetted personnel.
- **Historic sightings form**: A website-based form for reporting historic pangolin sightings, collecting name, email, phone, sighting details, location (via What3Words), date/time and photographs.
- **Donor and fundraising activities**: Online donations via the website, GivenGain platform and direct bank transfer, as well as an online merchandise store.
- **"Pangolin Guardian" education programme**: An online course collecting participant registration details for conservation education.
- **General communications**: Newsletter sign-ups, supporter engagement and social media outreach.
- **Governance and administration**: Board governance, human resources/volunteer management, supplier/partner administration and financial management typical of a small NPC.

6 Records available in terms of legislation

Pangolin Africa holds records that may be available in terms of the following legislation, to the extent applicable to its activities as a non-profit company and employer:

- Companies Act 71 of 2008;
- Nonprofit Organisations Act 71 of 1997;
- Income Tax Act 58 of 1962;
- Value-Added Tax Act 89 of 1991;
- Basic Conditions of Employment Act 75 of 1997;
- Labour Relations Act 66 of 1995;
- Employment Equity Act 55 of 1998;
- Unemployment Insurance Act 63 of 2001;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Occupational Health and Safety Act 85 of 1993;

- Electronic Communications and Transactions Act 25 of 2002;
- Consumer Protection Act 68 of 2008; and
- Protection of Personal Information Act 4 of 2013.

The inclusion of legislation above does not create any right of access to records held under that legislation beyond what is provided for in PAIA or the relevant statute.

7 Categories of records held

This section describes the categories of records Pangolin Africa holds, organised by subject area, to assist requesters in identifying and formulating requests.

The categories of personal information processed across these records may include: names and contact details; identity/passport numbers; location and property data; financial and banking information; employment and qualification records; and photographs. For further details on how we process personal information, please see our Privacy Notice [\[insert hyperlink the Privacy Notice once finalised\]](#).

Category	Types of records	Data subjects
Release-site survey records	Survey responses, property assessments, maps and location data.	Property owners, managers and representatives.
Pangolert sighting records	Sighting reports, photographs, location data.	Rangers, guides, tourists, researchers, law enforcement.
Website sighting, contact and newsletter records	Contact forms, sighting reports, newsletter subscriptions.	Members of the public, supporters.
Donor and supporter records	Donation records, payment details, correspondence.	Individual and corporate donors.
Pangolin Guardian programme records	Registration details, course progress and completion records.	Programme participants.
Employee, contractor and volunteer records	Employment records, contracts, payroll records.	Employees, contractors, volunteers.
Governance records	Board minutes, resolutions, policies, registers.	Directors and officers.
Finance and compliance records	Financial statements, tax records, audit reports, funding agreements.	Internal records; auditors, banks, SARS.
Supplier and partner records	Contracts, invoices, correspondence.	Conservation partners, service providers.
IT and security records	System logs, vendor contracts, security records.	Internal records; service providers.

Potential recipients of personal information include: relevant Pangolin Africa officers, directors and employees; the DFFE (for release approvals); verified conservationists, scientists, researchers and NGOs (via

controlled database access); our service providers; banks and payment processors; auditors and professional advisers; and, where legally required, law enforcement or regulators.

8 Records automatically available

The following information is publicly available on Pangolin Africa's website without the need for a PAIA request, subject to the website's Terms and Conditions and Privacy Notice:

- organisational overview and "About Us" information;
- descriptions of projects and initiatives (A Place for Pangolins, Pangolert, Pangolin Guardian);
- educational content about pangolins and conservation;
- contact details;
- blog and news content; and
- merchandise/online store information.

9 Security measures to protect personal information

Pangolin Africa is committed to protecting the personal information in its possession or under its control against unauthorised access, processing, loss, damage or destruction, in accordance with POPIA. Measures implemented include:

- survey and general operational data stored by Pangolin Africa's cloud-based systems, with logical access controls restricting access to authorised personnel on a need-to-know basis;
- Pangolert sighting data, with access restricted to vetted personnel following a strict vetting process;
- password complexity requirements and credential management for all systems;
- confidentiality obligations imposed on all staff, contractors, volunteers and operators who process personal information; and
- written contracts with operators requiring appropriate security measures, limiting processing to agreed purposes, and imposing breach notification duties.

10 Planned cross-border transfers of personal information

Pangolin Africa may transfer personal information outside South Africa, for example when using cloud-based data hosting providers. Any such transfers are conducted in compliance with the requirements of POPIA.

11 Request procedure

PAIA grants a requester access to a record of a private body if: (i) the record is required for the exercise or protection of any right; (ii) the requester complies with the procedural requirements; and (iii) no ground of refusal applies. Access is not automatic.

To submit an access request, complete the prescribed request Form 2. A copy of this form, adapted with Pangolin Africa's details, is attached as **Annexure 1** to this manual. Submit the completed form to the Information Officer at the address or email stated above.

The form must contain sufficient detail to enable the Information Officer to identify:

- the record(s) requested;
- the identity of the requester (proof of identity must be attached);
- the form of access required (e.g., copy, inspection, electronic);

- the requester's contact details; and
- the requester must identify the right that they seek to exercise or protect and explain why the requested record is required for that purpose.

If the request is made on behalf of another person, the requester must submit proof of capacity to the reasonable satisfaction of the Information Officer.

If a requester is unable to complete the form due to illiteracy, disability or any other reason, the request may be submitted orally to the Information Officer, who will reduce it to writing.

Timeframes: The Information Officer will respond to a request within 30 days of receipt, unless an extension of a further period of not more than 30 days is required (in which case you will be notified).

Fees: A requester may be required to pay prescribed fees before the request is processed. Fees are detailed in **Annexure 2** of this manual.

Refusal: If a request is refused, the Information Officer will advise the requester of the reason(s) for refusal and of the requester's right to lodge an application with a court or a complaint with the Information Regulator against the refusal.

12 **Availability of this Manual**

A copy of this manual is available:

- on Pangolin Africa's website at www.pangolin.africa;
- at Pangolin Africa's registered office (37 Eksteen Avenue, Bergvliet, 7945, Cape Town) for inspection during normal business hours; and
- from the Information Officer, upon request.

Annexure 1

Request for access to records of a private body

Note:

- Proof of identity must be attached by the requester.
- If the request is made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The Information Officer	
Name of private body:	Pangolin Africa NPC
Physical address:	37 Eksteen Avenue, Bergvliet, 7945, Cape Town, South Africa
Email address:	info@pangolin.africa

Mark the applicable box with an "X"

Request is made in my own name	
Request is made on behalf of another person	

A. Particulars of requester

Full name(s) and surname:	
Identity/passport number:	
Postal address:	
Telephone number:	
Email address:	
Capacity in which request is made (if on behalf of another person):	

B. Particulars of record(s) requested

Provide sufficient detail to enable the Information Officer to identify the record(s). If the space below is insufficient, please continue on a separate page and attach.

Description of record(s) requested:	
Reference number (if known):	
Any further details:	

C. Form of access required

Mark the applicable box with an "X". Note: access in the form requested may be refused in certain circumstances. In that event, access will be given in another form reasonably determined.

Printed copy of record (A4 page)	
Copy in computer-readable form (flash drive / compact disc)	
Inspection of record at registered office	
Copy of record sent by post / courier / electronic transfer (such as email)	
Transcription of record content	

D. Rights to be exercised or protected

Indicate the right you seek to exercise or protect and explain why the record(s) requested are required for the exercise or protection of that right:

--

E. Declaration and signature

I declare that the information furnished in this form is true and correct to the best of my knowledge. I am aware that it is an offence to make a materially false statement in a request for access to a record.

Signature of requester / person on whose behalf request is made:	
Date:	

Annexure 2

Prescribed fees in terms of PAIA

A. Request fee

A request fee of R140.00 is payable by every requester, other than a personal information access request.

B. Access fee

The following access fees are payable for reproduction of a record, depending on the form of access.

Item	Description	Fee (ZAR)
1	Photocopy / printed black-and-white copy of an A4-size page or part thereof	R2.00 per page
2	Printed copy of A4-size page or part thereof held on computer or in electronic or machine-readable form	R2.00 per page
3	Copy in computer-readable form on flash drive (if provided by requester)	R40.00
4	Copy in computer-readable form on compact disc (if provided to requester)	R60.00
5	Transcription of visual images (e.g., photographs) per A4 page or part thereof	Outsourced: cost per quotation
6	Copy of visual images	Outsourced: cost per quotation
7	Transcription of audio record per A4 page or part thereof	R24.00 per page
8	Copy of audio record on flash drive (if provided by requester) or compact disc (if provided to requester)	R40.00 / R60.00

C. Search and preparation fee

R145.00 for each hour or part of an hour reasonably required for searching for and preparing the record for disclosure, excluding the first hour, to a maximum of R435.00.

D. Deposit

If the Information Officer is satisfied that the search for and preparation of the record will take more than 6 hours, a deposit is payable equal to one third of the amount that would be payable as the access fee.