

PAIA MANUAL

THE RUZICKA FOUNDATION

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, and including information relating to the Protection of Personal Information Act 4 of 2013 (POPIA).

DRAFT – FOR COMPLETION AND LEGAL REVIEW

Field	Details
Website	the-ruzicka-foundation.com
Email	info@theruzickafoundation.com
Telephone	+27 (0)79 017 2294
Physical address	90 Bree Street, Cape Town 8000, South Africa
Last updated	[insert date]
Version	1.0 Draft

Important completion note: Replace all bracketed fields before publication. The legal form, registration numbers, Information Officer details, PBO/Section 18A status, and office-bearer details must match the official registration documents and certificates of The Ruzicka Foundation.

Contents

1. Introduction and purpose of this manual
 2. Details of The Ruzicka Foundation
 3. Guide on how to use PAIA and POPIA
 4. Categories of records available without a formal PAIA request
 5. Records available in terms of other legislation
 6. Subjects and categories of records held by the Foundation
 7. Processing of personal information under POPIA
 8. Procedure for requesting access to records
 9. Grounds for refusal and partial access
 10. Availability of this manual
 11. Updating of this manual
 12. Approval and signature
- Annexure A: Practical request guidance

1. Introduction and Purpose of this Manual

This PAIA Manual is prepared for The Ruzicka Foundation in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000, as amended. It is intended to assist any person who wishes to request access to records held by The Ruzicka Foundation and to explain how such requests may be submitted and processed.

This Manual also includes information required for transparency regarding the Foundation’s processing of personal information under the Protection of Personal Information Act 4 of 2013.

The Ruzicka Foundation is a non-profit organisation established to create lasting positive change across Africa by supporting vulnerable children, strengthening local communities and helping to protect endangered African wildlife and natural habitats.

Access to records may be subject to the procedural requirements, fees, time periods, limitations and grounds of refusal contained in PAIA and other applicable laws.

2. Details of The Ruzicka Foundation

Item	Details
Full legal name	The Ruzicka Foundation
Trading / public name	The Ruzicka Foundation
Legal form	[Non-Profit Company / Trust / Voluntary Association / other – insert exact legal form]
NPO registration number	[insert NPO registration number if registered]
NPC / company registration number	[insert CIPC/NPC registration number if applicable]
Trust registration number	[insert Trust registration number if applicable]
PBO number	[insert SARS PBO number if applicable]
Section 18A reference number	[insert if formally approved by SARS; otherwise state “Not applicable / not yet approved”]
Physical address	90 Bree Street, Cape Town 8000, South Africa
Postal address	[insert postal address, if different from physical address]
Website	the-ruzicka-foundation.com
Email address	info@theruzickafoundation.com
Telephone number	+27 (0)79 017 2294
Office visits	By appointment only

2.1 Head of the Private Body / Information Officer

For the purposes of PAIA and POPIA, the Information Officer is the person responsible for receiving and coordinating access-to-information requests and data-subject requests, unless another person has been duly authorised and registered where required.

Item	Details
Information Officer	[insert full name]
Position / capacity	[Chairperson / Director / Trustee / CEO / authorised officer – insert exact role]
Email	info@theruzickafoundation.com
Telephone	+27 (0)79 017 2294
Physical address	90 Bree Street, Cape Town 8000, South Africa

2.2 Deputy Information Officer

If a Deputy Information Officer is appointed, the details should be inserted below. If none is appointed, state “Not appointed at this time”.

Item	Details
Deputy Information Officer	[insert full name / Not appointed at this time]
Position / capacity	[insert role]
Email	[insert email]
Telephone	[insert telephone]

3. Guide on How to Use PAIA and POPIA

The Information Regulator has made available a Guide on how to use PAIA and POPIA. The Guide explains, among other things, the objectives of PAIA and POPIA, how to request access to records, the assistance available from Information Officers and the Information Regulator, remedies available when a request is refused or ignored, and the applicable forms and fees.

The Guide may be obtained from the Information Regulator or from its website. Copies may also be inspected or requested through public and private bodies during normal working hours, where available.

Information Regulator contact details

Item	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll-free	0800 017 160
Email	enquiries@infoeregulator.org.za
Website	infoeregulator.org.za

4. Categories of Records Available Without a Formal PAIA Request

The following categories of records may be available without a formal request under PAIA, either through the Foundation’s website, by email request, or by public inspection where appropriate. Availability remains subject to privacy, confidentiality, copyright, donor restrictions, security and applicable law.

Category	Types of record	Access method
Website and public information	Mission, vision, project descriptions, donation information, contact details, public updates	Website / upon request
Legal and compliance documents	Legal Notice / Impressum, Privacy Policy, PAIA Manual, Donation Terms, Refund Policy	Website / upon request
Registration information	NPO certificate, registration details, founding document summary, PBO/Section 18A status where applicable	Upon request / website if published
Public reports	Annual narrative reports, impact summaries, public financial summaries, where approved for publication	Website / upon request
Fundraising materials	Brochures, campaign descriptions, public donation appeals, newsletters	Website / upon request
Contact information	General contact details, office appointment information	Website

5. Records Available in Terms of Other Legislation

The Foundation may keep records in accordance with applicable South African legislation. The following table should be adapted to the Foundation’s exact legal form, registrations, tax status, employment status and operational structure.

Legislation	Records that may be held
Promotion of Access to Information Act 2 of 2000	PAIA Manual; PAIA request records; access decisions; correspondence with requesters and the Information Regulator
Protection of Personal Information Act 4 of 2013	Privacy policies; data-subject requests; consent and communication preferences; information officer records; data processing and security records
Nonprofit Organisations Act 71 of 1997	NPO registration certificate; founding document; accounting records; annual narrative reports; financial statements; accounting officer reports; office-bearer details, if applicable
Companies Act 71 of 2008	Memorandum of Incorporation; company registration records; director records; resolutions; annual returns, if the Foundation is an NPC
Trust Property Control Act 57 of 1988	Trust deed; Letters of Authority; trustee resolutions and administration records, if the Foundation is a trust
Income Tax Act 58 of 1962	PBO approval records; Section 18A receipts and supporting records; tax records and donor tax information, where applicable
Tax Administration Act 28 of 2011	Tax registration records; SARS correspondence; submissions; supporting documentation
Electronic Communications and Transactions Act 25 of 2002	Electronic communications, website and online donation records, electronic transaction information, where applicable
Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995	Employment contracts, HR policies, leave records, disciplinary records, if staff are employed
Unemployment Insurance Act 63 of 2001 and COIDA 130 of 1993	UIF and compensation records, where applicable
Occupational Health and Safety Act 85 of 1993	Health and safety records, where applicable
Financial Intelligence Centre Act 38 of 2001	Donor due diligence or anti-money laundering records, where applicable
Other applicable laws	Records required by any other law applicable to the Foundation’s operations

6. Subjects and Categories of Records Held by the Foundation

The Foundation may hold records under the following subjects. Access to any specific record depends on whether the requester satisfies PAIA requirements and whether a ground of refusal applies.

Subject	Categories of records
Governance and founding records	Founding document, constitution, MOI or trust deed; registration certificates; board/trustee/director records; minutes; resolutions; policies; delegation of authority records
Non-profit compliance	NPO records; PBO/Section 18A records; annual reports; narrative reports; accounting officer reports; filings and correspondence with regulators
Financial and accounting records	General ledgers; management accounts; financial statements; bank statements; invoices; receipts; budgets; donor income; expenditure records; asset registers; audit/accounting officer records
Donor and fundraising records	Donor details; donation history; donation receipts; pledge records; fundraising campaigns; donor communications; payment-provider records; ActiveDonor records; newsletter subscriptions
Project and beneficiary records	Project applications; partner due diligence; project agreements; project monitoring reports; impact reports; beneficiary support records; safeguarding records; photographs and media consent records

Wildlife conservation records	Conservation project proposals; ranger support records; habitat protection/restoration records; wildlife monitoring records; partner reports; community-based conservation records
Children and community welfare records	Education, healthcare, nutrition, protection and community-support project records; partner reports; beneficiary or guardian information, where applicable
Human resources and volunteer records	Recruitment records; employment contracts; payroll records; leave and performance records; volunteer agreements; confidentiality undertakings; training records
Suppliers and partners	Supplier contracts; service agreements; quotations; purchase orders; invoices; banking details; NGO/community partner records; grant or sponsorship agreements
Legal and risk records	Contracts; legal opinions; insurance policies; disputes; complaints; risk assessments; safeguarding incident records; PAIA/POPIA requests and decisions
Communications and website records	Website content; press releases; social media content; email communications; photographs and media; public enquiries; cookie or website analytics records
Information technology and security records	User access records; system logs; backups; cybersecurity records; data retention and deletion records; service-provider security documentation

7. Processing of Personal Information under POPIA

7.1 Purposes of Processing Personal Information

The Foundation may process personal information for the following purposes:

- to receive, process, reconcile and acknowledge donations;
- to issue donation confirmations, tax receipts or Section 18A receipts where applicable and legally permitted;
- to manage donor relationships, donor communications, newsletters and fundraising campaigns;
- to administer projects, grants, sponsorships, partners and beneficiaries;
- to support children, community and wildlife conservation initiatives, including project monitoring and reporting;
- to manage volunteers, employees, contractors, service providers and office bearers;
- to comply with legal, tax, accounting, audit, governance, reporting and regulatory obligations;
- to respond to enquiries, complaints, PAIA requests and data-subject requests;
- to maintain website, information security, recordkeeping and operational systems;
- to protect the rights, safety and legitimate interests of the Foundation, donors, beneficiaries, children, communities, partners and the public.

7.2 Categories of Data Subjects and Personal Information Processed

Category of data subject	Personal information that may be processed
Donors and supporters	Name, surname, organisation name, contact details, identity/tax details where required for receipts, donation amount, donation history, payment references, communication preferences, correspondence
Website visitors and enquirers	Name, email, telephone, enquiry details, website analytics, cookie identifiers, IP address, device/browser information where applicable
Beneficiaries, children, guardians and community members	Name, contact details, age/date of birth, family or guardian information, education/health/community support information, photographs/media, consent records, project participation details, safeguarding information where applicable
Conservation partners and community partners	Contact details, organisation details, role, project reports, banking details, contractual records, due-diligence information
Board members, trustees, directors and	Identity information, contact details, addresses, roles, qualifications,

office bearers	declarations of interest, governance records, signatures, registration details
Employees, contractors and volunteers	Identity information, contact details, CVs, qualifications, employment history, payroll and tax details, banking details, health/safety information, disciplinary/performance records, emergency contacts
Suppliers and service providers	Contact details, registration details, tax/VAT numbers, banking details, contracts, invoices, correspondence, due-diligence information
Job applicants	CVs, contact details, qualifications, employment history, references, interview notes, background checks where lawful
Complainants and PAIA/POPIA requesters	Identity and contact details, request details, proof of authority, correspondence, records relating to the request, outcome records

7.3 Recipients or Categories of Recipients of Personal Information

Category of information	Recipients or categories of recipients
Donor and donation information	Banks, payment processors, ActiveDonor or donor-management systems, accountants, auditors/accounting officers, SARS where applicable, authorised Foundation personnel
Project and beneficiary information	Approved project partners, grant administrators, safeguarding personnel, monitoring/evaluation partners, professional advisers, authorised Foundation personnel
Employee/volunteer information	Payroll providers, SARS, UIF/COIDA bodies where applicable, HR advisers, training providers, legal advisers, authorised Foundation personnel
Supplier/partner information	Banks, accountants, auditors/accounting officers, legal advisers, service providers, regulators where required
Website and communications information	Website hosting providers, email platforms, analytics providers, IT support providers, marketing/newsletter platforms where used
Legal or regulatory information	Information Regulator, Department of Social Development, CIPC, SARS, law enforcement, courts, regulators, legal advisers, auditors/accounting officers where legally required or justified

7.4 Planned Transborder Flows of Personal Information

Personal information may be stored or processed outside South Africa where the Foundation uses cloud-based services, website hosting, email systems, donor-management systems, payment providers, accounting platforms or other service providers whose infrastructure is located in other jurisdictions.

Where personal information is transferred outside South Africa, the Foundation will take reasonable steps to ensure that such transfer is permitted under POPIA and that appropriate safeguards, contractual protections or lawful grounds for transfer are in place.

Known countries / regions of storage or processing: [insert if known, e.g. South Africa, European Economic Area, United States, United Kingdom, or “to be confirmed with service providers”].

7.5 Information Security Measures

The Foundation aims to implement reasonable technical and organisational measures to protect personal information against loss, unauthorised access, unlawful processing, disclosure, alteration or destruction. Measures may include:

- restricted and role-based access to donor, beneficiary and project records;
- password protection and multi-factor authentication where available;
- secure payment processing through reputable third-party payment providers;

- confidentiality undertakings for personnel, volunteers, contractors and service providers where appropriate;
- secure storage and backup of electronic records;
- regular review of access rights and deletion or archiving of records no longer required;
- reasonable antivirus, anti-malware, firewall and device-security measures;
- data minimisation, retention controls and internal recordkeeping procedures;
- incident response procedures for suspected data breaches or unauthorised disclosure.

8. Procedure for Requesting Access to Records

Requests for access to records must be submitted to the Information Officer or Deputy Information Officer using the prescribed PAIA request form, currently Form 2: Request for Access to Record of Public or Private Body.

A requester seeking access to a record of a private body must provide sufficient detail to identify the requested record and must indicate the right that the requester seeks to exercise or protect and explain why the record is required for the exercise or protection of that right.

8.1 How to Submit a Request

Requests should be sent to:

Item	Details
Information Officer	[insert full name]
Email	info@theruzickafoundation.com
Telephone	+27 (0)79 017 2294
Physical address	90 Bree Street, Cape Town 8000, South Africa

The requester must provide adequate proof of identity. If the requester acts on behalf of another person, proof of authority must also be provided.

8.2 Request Fees and Access Fees

The Foundation may require payment of the prescribed PAIA request fee and/or access fee where permitted by law. The requester will be notified of any fee payable before the request is further processed or before access is granted.

Where a hard copy of this Manual or other records is requested, reasonable reproduction, copying or postage fees may be charged in accordance with applicable regulations.

8.3 Time Periods

The Foundation will respond to a valid PAIA request within the time period prescribed by PAIA, subject to any lawful extension. The requester will be notified in writing whether access is granted or refused, and if refused, the reasons for refusal and available remedies will be provided as required by law.

8.4 Forms of Access

Where access is granted, records may be provided by inspection, electronic copy, printed copy or another form reasonably available to the Foundation, subject to the nature of the record, applicable fees, privacy, confidentiality and security considerations.

9. Grounds for Refusal and Partial Access

Access to a record may be refused on the grounds provided for in PAIA. These may include, without limitation:

- mandatory protection of the privacy of a third party who is a natural person;
- protection of commercial information of a third party or of the Foundation;
- protection of confidential information supplied by a third party;
- protection of the safety of individuals or property;
- records privileged from production in legal proceedings;
- protection of research information, project security, beneficiary safety or safeguarding-sensitive records;
- records that cannot be disclosed without breaching a legal duty of confidentiality.

If only part of a record is subject to a ground of refusal, the Foundation will consider whether partial access can reasonably be granted by redacting the protected information and releasing the remainder of the record.

If a request is refused or not responded to within the applicable time period, the requester may lodge a complaint with the Information Regulator or approach a court, where permitted by PAIA.

10. Availability of this Manual

A copy of this Manual is available:

- on the Foundation’s website at the-ruzicka-foundation.com;
- at the Foundation’s office for public inspection during normal business hours by appointment;
- to any person upon request, subject to payment of a reasonable prescribed fee for hard copies where applicable;
- to the Information Regulator upon request.

11. Updating of this Manual

The Foundation will review and update this Manual on a regular basis, and whenever required by changes in law, registration status, governance structure, operations, categories of records, processing activities or contact details.

12. Approval and Signature

This Manual is issued by the Information Officer / Head of The Ruzicka Foundation.

Item	Details
Name	[insert full name]
Capacity	[insert role / title]
Signature	_____
Date	[insert date]

Annexure A: Practical Request Guidance

To help process a request efficiently, a requester should include the following information when submitting a PAIA request:

- full name and contact details of the requester;
- proof of identity and, where applicable, proof of authority to act for another person;
- a clear description of the record requested;
- the form in which access is preferred, for example electronic copy or inspection;
- the right that the requester wishes to exercise or protect;
- an explanation of why the requested record is required for the exercise or protection of that right;
- whether the request relates to the requester’s own personal information;
- any request for assistance due to disability, language, literacy or other accessibility needs.

Suggested Website Footer Link Text

PAIA Manual | Privacy Policy | Legal Notice / Impressum | Donation Terms | Contact

Completion Checklist Before Publication

- Insert the Foundation’s exact legal form and registration numbers.
- Insert the official NPO registration number and PBO/Section 18A references only if confirmed.
- Insert the full name and role of the Information Officer and any Deputy Information Officer.
- Confirm whether the Information Officer has been registered with the Information Regulator where required.
- Confirm the list of records and laws applicable to the Foundation’s actual legal form and operations.
- Confirm payment providers, donor-management tools, cloud systems and countries of processing.
- Review the manual with a South African legal or compliance adviser before publishing.