

	PAIA Manual		Reference no:	HR-MAN-03
	Department:	Administration/Human Resources	Version no:	1.0
	Process Owner:	Sue-Ann Crockett	Date:	03/08/2026
	Author:	Nicole Hart	Review Period:	3 years

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

Afrikelp (Pty) Ltd

Version: 1.0

Effective Date: 1 July 2026

Review Date: 1 July 2029

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1. Introduction

This Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (PAIA).

Its purpose is to facilitate requests for access to records held by Afrikelp (Pty) Ltd while ensuring compliance with both PAIA and the Protection of Personal Information Act, 2013 (POPIA).

2. Company Information

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Company Name

Afrikelp (Pty) Ltd

Registration Number

1987/000065/07

Physical Address

22A Falcon Crescent

Matroosfontein

Cape Town

7490

Postal Address

P.O. Box 50953

West Beach

Cape Town

7449

Website

www.afrikelp.com

3. Contact Details

Information Officer

Name: Nicole Hart

Position: Chief Executive Officer

Telephone: 021 551 3556

Email: nhart@afrikelp.com

Deputy Information Officer (if appointed)

Name: Waldo Schoeman

Email: wschoeman@afrikelp.com

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4. Guide on How to Use PAIA

The Information Regulator has compiled a guide explaining how to exercise rights under PAIA.

The guide is available from: **The Information Regulator (South Africa)**

JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Website: <https://www.justice.gov.za/infoereg/>

Email: PAIACompliance@infoeregulator.org.za

5. Purpose of this Manual

This Manual explains:

- what records Afrikelp holds;
 - how to request access to those records;
 - how requests are processed;
 - applicable fees;
 - grounds for refusing access;
 - how Afrikelp protects personal information.
-

6. Records Available Without Formal Request

The following information may be made available without submitting a PAIA request, subject to availability:

- Company brochures
 - Product information
 - Technical data sheets
 - Marketing material
 - Published policies
 - Website information
 - Sustainability reports
-

7. Categories of Records Held by Afrikelp

Corporate Records

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- Memorandum of Incorporation
- Company registration documents
- Shareholder records
- Board resolutions

Financial Records

- Annual financial statements
- Accounting records
- Tax records
- Banking information

Human Resources

- Employment contracts
- Leave records
- Payroll records
- Training records
- Performance records

Operational Records

- Manufacturing records
- Quality management documentation
- Product specifications
- Laboratory reports
- Trial reports
- Research documentation

Commercial Records

- Customer information
- Supplier agreements

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- Distributor agreements
- Sales records
- Quotations
- Contracts

Compliance Records

- POPIA Policy
 - Privacy Policy
 - PAIA Manual
 - Information Officer registration
 - Risk assessments
 - Health and Safety documentation
-

8. Processing of Personal Information

Afrikelp processes personal information in accordance with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

Personal information is processed lawfully, fairly and transparently for legitimate business purposes, including employment administration, customer relationship management, supplier management, commercial operations, regulatory compliance and financial administration.

8.1 Categories of Data Subjects and Personal Information

Afrikelp processes personal information relating to the following categories of data subjects:

Category of Data Subject	Personal Information Processed
Employees	Name, identity/passport number, date of birth, contact details, address, emergency contacts, qualifications, employment history, payroll information, banking details, tax information, leave records, performance records, emergency contacts, beneficiaries
Job Applicants	Name, contact details, curriculum vitae, qualifications, employment history, references

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Category of Data Subject **Personal Information Processed**

Customers	Contact person details, company information, email addresses, telephone numbers, delivery addresses, billing information, bank details
Distributors and Agents	Contact details, company information, contract information, banking details where applicable
Suppliers and Service Providers	Contact details, company details, banking information, tax information, contracts
Directors and Shareholders	Identity information, contact details, statutory records
Website Users	Name, email address, and information voluntarily submitted through website enquiries

8.2 Categories of Data Subjects and Categories of Personal Information Processed

The table below provides a summary of the categories of personal information processed by Afrikelp in the ordinary course of its business.

Processing Activity	Data Subjects	Personal Information Processed	Purpose of Processing
Human Resources	Employees	Name, identity/passport number, contact details, address, emergency contacts, banking details, tax number, qualifications, beneficiaries, employment history, leave records, performance records	Employment administration, payroll, legal compliance
Recruitment	Job Applicants	Name, contact details, CV, qualifications, employment history, references	Recruitment and selection
Customer Management	Customers	Contact person details, company name, email address, telephone number, delivery address, billing information	Sales, order processing, customer support
Distributor Management	Distributors and Agents	Contact details, company information, contracts, banking information (where applicable)	Commercial management and distribution

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Processing Activity	Data Subjects	Personal Information Processed	Purpose of Processing
Supplier Management	Suppliers and Contractors	Contact details, company details, banking information, tax information, contracts	Procurement, payments and supplier administration
Finance	Customers, Suppliers, Employees	Banking information, invoices, payment history, tax information	Financial administration and statutory compliance
Marketing	Customers, Website Users	Name, company, email address, telephone number	Marketing communications, newsletters and responding to enquiries
Website Enquiries	Website Visitors	Name, email address, telephone number and enquiry details	Responding to enquiries and customer service
Regulatory Affairs	Regulatory Contacts	Contact details, company information	Product registrations and regulatory compliance
Information Technology	Employees and Authorised Users	Username, login details, access logs, IP addresses, device identifiers	System administration, security and audit purposes

Afrikelp generally does not process special personal information as defined in POPIA. Where such information is processed (for example, employee medical certificates for sick leave, disability accommodation or occupational health purposes), it is processed only where permitted by POPIA and other applicable legislation, and access is restricted to authorised personnel.

8.3 Categories of Recipients of Personal Information

Afrikelp may disclose personal information where necessary to the following categories of recipients:

- Banks and financial institutions
- Auditors
- External legal advisers
- Regulatory authorities

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- Government departments where required by law
- Payroll service providers
- Information technology service providers
- Cloud service providers
- Professional consultants
- Courier and logistics providers
- Insurance providers
- Virtual Data Room providers used during corporate transactions

Personal information is disclosed only where necessary for legitimate business purposes or where required by law.

8.4 Planned Cross-Border Transfers of Personal Information

Afrikelp does not routinely transfer personal information outside the Republic of South Africa in the ordinary course of its business.

Where personal information is processed by international service providers or transferred outside South Africa, Afrikelp will ensure that such transfers comply with Section 72 of POPIA.

During corporate transactions or legal due diligence processes, Afrikelp may utilise secure Virtual Data Room (VDR) providers or other professional service providers that may process information outside South Africa. In such circumstances, Afrikelp will ensure that appropriate contractual, technical and organisational safeguards are in place to protect personal information.

8.5 Information Security Measures

Afrikelp has implemented appropriate technical and organisational measures designed to safeguard personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

These measures include, where appropriate:

- Role-based access controls
- Password-protected systems
- Multi-factor authentication where available
- Firewall and antivirus protection
- Secure backup procedures
- Secure storage of physical records

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- Controlled access to company premises
- Confidential disposal of records
- Staff awareness and POPIA training
- Information security policies and procedures
- Data breach response procedures

Security measures are reviewed periodically to ensure continued effectiveness.

8.6 Retention of Personal Information

Personal information is retained only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory or contractual obligations.

Retention periods are governed by Afrikelp's Record Retention Schedule.

8.7 Data Subject Rights

Data subjects have the right to:

- Request access to their personal information.
- Request correction or updating of inaccurate information.
- Request deletion of personal information where legally permissible.
- Object to the processing of personal information in certain circumstances.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Regulator.

Requests should be submitted to the Information Officer using the prescribed procedures.

For further information refer to the Afrikelp Privacy Policy.

9. Request Procedure

A requester wishing to obtain access to records must:

1. Complete the prescribed PAIA request form.
2. Submit the completed form to the Information Officer.
3. Provide sufficient information to identify the requested record.
4. Provide proof of identity where required.

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5. Pay the prescribed request fee (where applicable).

Afrikelp will consider the request in accordance with PAIA.

The requester will be informed of:

- whether access has been granted;
- applicable fees;
- reasons for refusal (if applicable).

10. Fees

On the rare case where there might be Fees payable, these will be determined on a case-by-case basis in accordance with the Regulations issued under PAIA.

Where applicable, requesters will be informed before processing commences.

11. Grounds for Refusal

Access may be refused where permitted by PAIA, including:

- protection of personal information;
- protection of confidential commercial information;
- protection of trade secrets;
- protection of legal privilege;
- protection of research information;
- where disclosure would prejudice the commercial interests of Afrikelp or third parties.

12. Availability of this Manual

This Manual is available:

- in electronic copy on the Company SharePoint;
- upon request from the Information Officer.

13. Approval

This Manual has been approved by:

Nicole Hart

Chief Executive Officer

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Afrikelp (Pty) Ltd

Signature: 

Date: 1 July 2026

- **Appendix A:** PAIA Request Form (Form 2 under the PAIA Regulations)
- **Appendix B:** Information Officer Appointment Letter
- **Appendix C:** Privacy Policy
- **Appendix D:** Record Retention Schedule