

PAIA MANUAL

Prepared in terms of section 51
of the Promotion of Access to Information Act 2 of 2000 (as amended)

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5. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1. **“CEO”** Chief Executive Officer
- 1.2. **“DIO”** Deputy Information Officer;
- 1.3. **“IO“** Information Officer;
- 1.4. **“Minister”** Minister of Justice and Correctional Services;
- 1.5. **“PAIA”** Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- 1.6. **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.7. **“Regulator”** Information Regulator; and
- 1.8. **“Republic”** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

- 2.1. This PAIA Manual is useful for the public to-
 - 2.1.1. Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
 - 2.1.2. Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
 - 2.1.3. Know the description of the records of the body which are available in accordance with any other legislation;
 - 2.1.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
 - 2.1.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 2.1.6. Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 2.1.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto;

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- 2.1.8. Know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.1.9. Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.1.10. Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF MANATI ALTERNATE STUDENT FUNDING (PTY) LTD

3.1. Chief Information Officer

Email: privacy@manati.co.za

3.2. Deputy Information Officer

Email: privacy@manati.co.za

3.3. Access to information and general contacts

Email: info@manati.co.za

3.4. National or Head Office

Postal Address: POSTNET SUITE #084
PRIVATE BAG X80
BERGVLIET
WESTERN CAPE
7864

Physical Address: SUITE 310 SOVEREIGN QUAY
34 SOMERSET ROAD
GREENPOINT
CAPE TOWN
WESTERN CAPE
8005

Telephone: 010 594 5398

Email: info@manati.co.za

Website: <https://manati.co.za/>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.1.1. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.1.1.1. the Information Officer of every public body, and

4.3.1.1.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

4.3.1.2. the manner and form of a request for-

4.3.1.3. access to a record of a public body contemplated in section 11³; and

4.3.1.4. access to a record of a private body contemplated in section 50⁴;

4.3.2. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.3. the assistance available from the Regulator in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

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- 4.3.4.** all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
- 4.3.4.1.** an internal appeal;
 - 4.3.4.2.** a complaint to the Regulator; and
 - 4.3.4.3.** an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.5.** the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.6.** the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.7.** the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.8.** the regulations made in terms of section 92¹¹.
- 4.4.** Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5. CATEGORIES OF RECORDS OF MANATI ALTERNATE STUDENT FUNDING (PTY) LTD WHICH ARE AVAILABLE UPON REQUEST

Category of records	Types of the Record	Available on Website	Available upon request
Administration Records	Attendance registers Correspondence Founding Documents Licences (categories) Minutes of Management Meetings Minutes of Staff Meetings Shareholder Register		X
Human Resource Records	Conditions of Service Employee Records Employment Contracts General Correspondence Industrial and Labour Relations Records Information relating to Health and Safety Regulations Performance Appraisals Personnel Guidelines, Policies and Procedures Remuneration Records and Policies Skills Requirements Staff Recruitment Policies Statutory Records Training Records		X
Operation Records	Brochures on Company Information Client and Customer Registry Contracts General Correspondence Information relating to Employee Sales Performance Marketing and Future Strategies Sales Records		X
Finance Records	Annual Financial Statements Asset Register Banking Records Budgets Contracts Financial Transactions General Correspondence Management Accounts Purchase and Order Information Tax Records (company)		X

6. DESCRIPTION OF THE RECORDS OF MANATI ALTERNATE STUDENT FUNDING (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Employment Contracts / Employee Registers	Basic Conditions of Employment Act 75 of 1997
Complaints Register / Returns Policy	Consumer Protection Act 68 of 2008
<i>Letter of Good Standing (COIDA)</i>	Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
Registration Certificate with Department of Labour	Employment Services Act 4 of 2014
RMCP Manual (Risk Management and Compliance Programme)	Financial Intelligence Centre Act 38 of 2001
Income Tax Registration Certificate / Tax Returns	Income Tax Act 58 of 1962
Disciplinary and Grievance Procedures	Labour Relations Act 66 of 1995
NCR Registration Certificate / Credit Agreements	National Credit Act 34 of 2005
Health & Safety Policy / Incident Logs	Occupational Health and Safety Act 85 of 1993
Anti-Money Laundering Policy / Suspicious Transaction Register	Prevention of Organised Crime Act 121 of 1998
POPI Compliance Manual / Data Protection Policy	Protection of Personal Information Act 4 of 2013
WSP/ATR Submission or SDL Returns	Skills Development Levies Act 9 of 1999
Tax Clearance Certificate / Tax Records	Tax Administration Act 28 of 2011
UIF Registration Confirmation / Returns	Unemployment Contributions Act 4 of 2002
UIF Registration Certificate / Claims Records	Unemployment Insurance Act 63 of 2001
Vat registration certificate	Value Added Tax Act 89 of 1991

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY MANATI ALTERNATE STUDENT FUNDING (PTY) LTD

Subjects on which the body holds records	Categories of records
Administration Records	Attendance registers Correspondence Founding Documents Licences (categories) Minutes of Management Meetings Shareholder Register

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Subjects on which the body holds records	Categories of records
Human Resource Records	Conditions of Service Employee Records Employment Contracts General Correspondence Industrial and Labour Relations Records Information relating to Health and Safety Regulations Performance Appraisals Personnel Guidelines, Policies and Procedures Remuneration Records and Policies Skills Requirements Staff Recruitment Policies Statutory Records Training Records
Operation Records	Brochures on Company Information Client and Customer Registry Contracts General Correspondence Information relating to Employee Sales Performance Marketing and Future Strategies Marketing Records Sales Records
Finance Records	Annual Financial Statements Asset Register Banking Records Budgets Contracts Financial Transactions General Correspondence Management Accounts Purchase and Order Information Tax Records (company)
Information Technology (IT)	Asset Registers Software Licenses User Access Logs
Legal and Compliance	Legal Opinions Contracts Statutory Registers Compliance Checklists Litigation Files
Corporate Governance	Board Minutes Resolutions Delegation of Authority Risk Management Records
Operations / Service Delivery	Project Files Service Level Agreements Operational Reports Monitoring and Evaluation Records
Marketing and Communications	Media Releases Internal Newsletters

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

- 8.1.1. The organisation processes personal information in order to:
- 8.1.1.1. Perform its contractual obligations to clients, service providers, and employees;
 - 8.1.1.2. Comply with legal and regulatory obligations;
 - 8.1.1.3. Facilitate employment and human resources administration;
 - 8.1.1.4. Manage procurement, invoicing, and payments;
 - 8.1.1.5. Communicate with clients, stakeholders, and regulators;
 - 8.1.1.6. Conduct risk management and internal audits;
 - 8.1.1.7. Maintain access control and information security;
 - 8.1.1.8. Support marketing, client engagement, and business development.

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers or ID numbers, employment status and bank details, contact details
Service Providers	Names, registration number, VAT numbers, address, bank details, contact details
Employees	Name, ID, address, qualifications, gender, race, bank details, CV, Tax Income numbers, contact details
Prospective Employees	Names, CVs, ID numbers, academic qualifications, references, employment history, contact details
Directors / Shareholders	Names, ID numbers, shareholding information, contact details

8.3. The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Tax and payroll information	South African Revenue Service (SARS), payroll service providers
Employment and banking information	Financial institutions, pension and medical fund administrators
Shareholding and directorship records	CIPC, statutory auditors, legal advisors

8.4. Planned transborder flows of personal information

The organisation may store and process personal information on cloud platforms hosted outside the Republic of South Africa. These include:

Country / Region	Categories of Personal Information
European Union (Ireland)	Emails, client correspondence, cloud document storage
United States	Backup and disaster recovery, analytics and CRM systems

All transborder processing is subject to appropriate data protection agreements and safeguards in compliance with POPIA.

8.5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information:

The organisation has implemented and continues to improve the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- 8.5.1 Access Control: Role-based access to systems and records.
- 8.5.2 Encryption: Use of encryption protocols for data in transit and at rest.
- 8.5.3 Firewall and Network Security: Protection against external threats and unauthorised access.
- 8.5.4 Anti-virus / Anti-malware Software: Regular scanning and protection against malicious software.

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- 8.5.5 *Backup and Disaster Recovery: Regular data backups and secure recovery procedures.*
- 8.5.6 Employee Training: Regular POPIA awareness and data protection training.
- 8.5.7 Monitoring and Logging: Activity logs for detecting unauthorised access or data breaches.
- 8.5.8 Physical Security: Restricted access to servers and document storage areas.

9. AVAILABILITY OF THE MANUAL

- 9.1. A copy of the Manual is available-
 - 9.1.1. head office of the MANATI ALTERNATE STUDENT FUNDING (PTY) LTD for public inspection during normal business hours;
 - 9.1.2. to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 9.1.3. to the Information Regulator upon request.
- 9.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

- 10.1. The Deputy Information Officer of MANATI ALTERNATE STUDENT FUNDING (PTY) LTD will update this manual when needed.

Issued by

DIRECTOR