

**FOUR PAWS ANIMAL WELFARE FOUNDATION**  
**THE PROMOTION OF ACCESS TO INFORMATION MANUAL**  
**("Manual")**

## 1. PREAMBLE

- 1.1. The Promotion of Access to Information Act, No. 2 of 2000, as amended (“**PAIA**”) came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the state or by any other person where such information is required for the exercise or protection of any right.
- 1.2. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights and provided that no grounds of refusal contained in PAIA are applicable.
- 1.3. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 1.4. This Manual is compiled in accordance with section 51 of PAIA, as amended by the Protection of Personal Information Act, No. 4 of 2013 (“**POPIA**”), which gives effect to everyone’s Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.
- 1.5. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	LAST UPDATED
2.0	Fiona Miles	14/04/2025

## 2. PURPOSE OF THIS PAIA MANUAL

- 2.1. The purpose of this PAIA manual is:
  - 2.1.1. to provide a list of all records held by FOUR PAWS;
  - 2.1.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;

2.1.3. to define the manner and form in which a request for information must be submitted; and

2.1.4. to comply with the additional requirements imposed by POPIA.

### **3. ABOUT FOUR PAWS**

3.1. The business of FOUR PAWS Animal Welfare Foundation is to raise awareness, educate the public, and promote lasting change in human behaviour towards animals. Through targeted campaigns and projects, we work to create meaningful change for animals at both a systemic and individual level. We raise funds to support our vision of a world where humans treat animals with respect, empathy, and understanding, and to enable our actions such as providing disaster relief, emergency rescue missions, and other interventions where necessary..

3.2. Information required in terms of section 51(a) of PAIA

3.2.1. Name of private body: FOUR PAWS Animal Welfare Foundation

3.2.2. Director: Fiona Miles

3.2.3. Street Address: 9B Bell Crescent, The Green Building,  
Westlake Business Park, Westlake, 7945

3.2.4. Postal Address: Same as above

3.3. Details of information officer

3.3.1. Information officer: Fiona Miles

3.3.2. Email: Fiona.miles@four-paws.org.za

3.3.3. Phone number: 021 702 4277

### **4. INFORMATION REGULATORS GUIDE**

An official guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated guide are available from the Information Regulator in the manner prescribed.

Any enquiries regarding the guide should be directed to:

**Postal address:** PO Box 31533, Braamfontein, Johannesburg, 2017

**Physical address:** JD House, 27 Stiemans Street, Braamfontein, Johannesburg, 2001

**E-mail Address:** infoereg@justice.gov.za /  
complaints.IR@justice.gov.za

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

## **5. ENTRY POINT FOR REQUESTS**

- 5.1. PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 5.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable FOUR PAWS to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right.
- 5.3. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 5.4. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 5.5. The Information Officer will facilitate the liaison with its legal team on all of these requests.
- 5.6. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 4 above.

## **6. AUTOMATICALLY AVAILABLE INFORMATION**

- 6.1. Information that is obtainable via the FOUR PAWS website about FOUR PAWS is automatically available and need not be formally requested in terms of this Manual.

- 6.2. The following categories of records are automatically available for inspection, purchase or photocopying:
  - 6.2.1. brochures;
  - 6.2.2. press releases;
  - 6.2.3. publications; and
  - 6.2.4. various other marketing and promotional material.

## **7. CATEGORIES OF PERSONAL INFORMATION COLLECTED BY FOUR PAWS**

- 7.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by FOUR PAWS will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected. Please also refer to the [FOUR PAWS's Data Privacy Statement](#) for further information.
- 7.2. Generally, FOUR PAWS collects and holds information such as, but not limited to: names, addresses, contact information, occupations, dates of birth and any other information which assists FOUR PAWS in conducting its business and complying with its legal obligations.
- 7.3. FOUR PAWS collects personal information by way of face-to-face interaction, emails, by the user using our website, petitions and from third parties. FOUR PAWS may collect and hold information from current and prospective donors, its own employees and prospective employees as well as contractors and others.
- 7.4. **The purpose of processing personal information**

Depending on the category of personal information, which is collected, the purposes for processing may include:

  - 7.4.1. to inform individuals about emergency missions, regular news updates and as part of client service management;
  - 7.4.2. the provision of information, products or services to data subjects;
  - 7.4.3. to communicate with data subjects; and
  - 7.4.4. the provision of effective advertising.

**7.5. A description of the categories of data subjects and of the information or categories of information relating thereto**

FOUR PAWS holds information and records on the following categories of data subjects:

- 7.5.1. donors of FOUR PAWS;
- 7.5.2. persons who participate in FOUR PAWS' petitions;
- 7.5.3. personnel and employees of FOUR PAWS;
- 7.5.4. contractors of FOUR PAWS;
- 7.5.5. suppliers of FOUR PAWS; and
- 7.5.6. service providers of FOUR PAWS.

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

Depending on the nature of the personal information, FOUR PAWS may supply information or records to the following categories of recipients:

- 7.6.1. other companies that FOUR PAWS may be affiliated to;
- 7.6.2. FOUR PAWS's business partners;
- 7.6.3. other parties in response to legal process or when necessary to conduct or protect its legal rights;
- 7.6.4. other parties in connection with certain business transactions. In the event that FOUR PAWS restructures or sells any of its businesses or assets, FOUR PAWS may disclose data subjects' personal information to the prospective buyer of such business or assets or other transacting party;
- 7.6.5. companies that provide services to FOUR PAWS or act on its behalf may have access to information about data subjects. These companies are limited in their ability to use information they receive in the course of providing services to FOUR PAWS or data subjects; and
- 7.6.6. third-parties where the data subject provides consent.

**7.7. Planned trans-border flows of personal information**

7.7.1. FOUR PAWS is based in and operates from South Africa. Data subjects' information, including personal information, may be transferred to, processed and/or maintained on servers located outside of the data subject's country of residence. If that happens, personal information will only be transferred to and stored in countries that have equivalent, or better, data protection legislation than South Africa and/or is subject to an adequacy decision of the European Commission of 10 July 2023. If personal data is transferred to third countries for which there is no adequacy decision of the European Commission, this is done on the basis of the standard contractual clauses.

**7.8. A general description of information security measures implemented by FOUR PAWS**

FOUR PAWS takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in its possession. FOUR PAWS takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

**8. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION**

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- 8.1. Companies Act 71 of 2008;
- 8.2. PAIA;
- 8.3. POPIA; and
- 8.4. Such other legislation as applicable from time to time.

**9. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST**

- 9.1. FOUR PAWS maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.
- 9.2. Please note further that many of the records held by FOUR PAWS are those of third parties, such as donors, supporters and employees, and FOUR PAWS

takes the protection of third-party confidential information very seriously. In particular, where FOUR PAWS acts as professional advisors to stakeholders, many of the records held are confidential and others are the property of the client and not of FOUR PAWS. For further information on the grounds of refusal of access to a record please see paragraph 10.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

Category of records	Records
<p><b>Internal records</b></p> <p>The records listed pertain to FOUR PAWS's own affairs</p>	<ul style="list-style-type: none"> <li>• Memoranda and Articles of Association</li> <li>• Financial records</li> <li>• Operational records</li> <li>• Intellectual property</li> <li>• Marketing records</li> <li>• Internal correspondence</li> <li>• Service records</li> <li>• Statutory records</li> <li>• Internal policies and procedures</li> <li>• Minutes of meetings</li> </ul>
<p><b>Personnel records</b></p> <p>For the purposes of this section, “<b>personnel</b>” means any person who works for or provides services to or on behalf of FOUR PAWS and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of FOUR PAWS. This includes partners, directors, all permanent, temporary</p>	<ul style="list-style-type: none"> <li>• Any personal records provided to us by our personnel</li> <li>• Any records a third party has provided to us about any of their personnel</li> <li>• Conditions of employment and other personnel-related contractual and quasi legal records</li> </ul>



and part-time staff as well as consultants and contract workers.	<ul style="list-style-type: none"> <li>• Employment policies and procedures</li> <li>• Internal evaluation and disciplinary records and</li> <li>• Other internal records and correspondence.</li> </ul>
<b>Donor-related records</b>	<ul style="list-style-type: none"> <li>• Records pertaining to donations made by FOUR PAWS' donors.</li> </ul>
<p><b>Other third party records</b></p> <p>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which FOUR PAWS is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to FOUR PAWS.</p>	<ul style="list-style-type: none"> <li>• Personnel, client, or FOUR PAWS records which are held by another party as opposed to being held by FOUR PAWS</li> <li>• Records held by FOUR PAWS pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.</li> </ul>
<b>Other records</b>	<ul style="list-style-type: none"> <li>• Information relating to FOUR PAWS</li> <li>• Research information belonging to FOUR PAWS or carried out on behalf of a third party.</li> </ul>

## 10. REQUEST PROCEDURE

### 10.1. Completion of the prescribed form

10.1.1. Any request for access to a record in terms of PAIA must substantially correspond with [Form 2](#) of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested.

- 10.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 10.1.3. POPIA provides that a data subject may, upon proof of identity, request FOUR PAWS to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.
- 10.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, FOUR PAWS must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 10.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 10.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by FOUR PAWS, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form and submit it to the Information Officer at the postal or physical address, or electronic mail address set out above.
- 10.1.7. A data subject may also request FOUR PAWS to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that FOUR PAWS is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions. A data subject that wishes to do so must submit a request to the Information Officer at the postal or physical address, or electronic mail address set out above on the prescribed form.

## 10.2. **Proof of identity**

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

### **10.3. Payment of the prescribed fees**

10.3.1. There are two categories of fees which are payable:

10.3.1.1. the request fee: R140.00

10.3.1.2. the access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs.

10.3.2. Section 54 of PAIA entitles FOUR PAWS to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

10.3.3. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

### **10.4. Timelines for consideration of a request for access**

10.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

10.4.2. The Information Officer or Deputy Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with [Form 3](#) of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations

10.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

### **10.5. Grounds for refusal of access and protection of information**

10.5.1. There are various grounds upon which a request for access to a record may be refused. These grounds include:

10.5.1.1. the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;

10.5.1.2. the protection of commercial information of a third party (for example: trade secrets; financial, commercial,

scientific or technical information that may harm the commercial or financial interests of a third party);

- 10.5.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;
- 10.5.1.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- 10.5.1.5. if the record was produced during legal proceedings, unless legal privilege has been waived;
- 10.5.1.6. if the record contains trade secrets, financial or sensitive information or any information that would put FOUR PAWS (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- 10.5.1.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by FOUR PAWS.

10.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

10.5.3. If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

## **11. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

11.1. If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

11.2. There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the

request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

- 11.3. Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

## **12. AVAILABILITY OF THIS MANUAL**

Copies of this Manual are available for inspection, free of charge, at the offices of FOUR PAWS (during normal office hours) and at <https://www.four-paws.org.za/>