

MEDIATION ACADEMY SOUTH AFRICA (PTY) LTD

PAIA Manual

and Record of Processing Activities

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

read with section 17 of the Protection of Personal Information Act 4 of 2013 (POPIA).

Registration number: 2019/516065/07

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Next review: June 2027 (or sooner if records or processing change)

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1. Introduction and purpose of this manual

This manual is the PAIA manual of Mediation Academy South Africa (Pty) Ltd (“the Company”, “we”, “us”). It is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), and it also serves as the Company’s record of processing activities as required by section 17 of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

PAIA gives effect to the constitutional right of access to information. It allows any person to request access to records held by a private body where the record is required to exercise or protect a right. This manual explains what records the Company holds, how a requester can ask for access to them, and the fees and procedures that apply.

POPIA regulates how the Company processes (collects, uses, stores and shares) personal information. Section 17 of POPIA requires every responsible party to keep a record of its processing activities. To avoid keeping two separate documents, the Company has combined that record into this manual (sections 7 to 12).

This manual is available free of charge on the Company’s website, and a copy may be inspected at the Company’s premises during normal business hours. A copy will be provided to any person on request (a reasonable reproduction fee may apply) and to the Information Regulator on request.

2. About the Company

Registered name	Mediation Academy South Africa (Pty) Ltd
Type of entity	Private company (Pty Ltd) — a “private body” as defined in PAIA
Registration number	2019/516065/07
Nature of business	Training, education and professional development in the field of mediation (including family and divorce mediation), and related advisory services.
Registered / physical address	5c Waterford Close, Helderberg Rural AH, Gordon’s Bay, Western Cape, 7135
Postal address	5c Waterford Close, Helderberg Rural AH, Gordon’s Bay, Western Cape, 7135
Website	www.mediationacademy.co.za

General email	info@mediationacademy.co.za
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3. Information Officer and contact details

In terms of section 1 of PAIA and section 1 of POPIA, the head of a private body is automatically its Information Officer. The Information Officer is responsible for dealing with requests made under PAIA and for encouraging and ensuring the Company's compliance with POPIA. All requests under this manual must be addressed to the Information Officer.

Information Officer	Albert (Barry) Greyvenstein
Capacity	Head of the Company / Director
Email	barry@mediationacademy.co.za
Telephone	074 118 4847
Postal / physical address	5c Waterford Close, Helderberg Rural AH, Gordon's Bay, Western Cape, 7135

The Information Officer has been (or will be) registered with the Information Regulator as required by POPIA before performing the duties of an Information Officer. The Company has not appointed a Deputy Information Officer at the date of this manual.

4. The Information Regulator

A requester who believes the Company has not dealt properly with a request, or a data subject who has a complaint about how the Company handles personal information, may lodge a complaint with the Information Regulator:

Information Regulator (South Africa)	
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
General enquiries	enquiries@inforegulator.org.za
PAIA / POPIA complaints	PAIAComplaints@inforegulator.org.za / POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

5. The PAIA Guide published by the Information Regulator

The Information Regulator has, in terms of section 10 of PAIA, published a guide in an easily comprehensible form to help a

person exercise their rights under PAIA. The guide is available in all official languages and explains how to use the Act. It can be obtained from the Information Regulator at the contact details above, or downloaded from the Regulator’s website at <https://inforegulator.org.za>.

6. How to request access to a record

6.1 The prescribed request form

A request for access to a record held by the Company must be made on the prescribed PAIA request form (“Form 2 – Request for Access to Record of Private Body”) made under the PAIA Regulations. The form must be completed in full and sent to the Information Officer at the contact details in section 3. A copy of the form is available from the Information Officer on request and on the Information Regulator’s website.

6.2 What the requester must do

1. Use the prescribed Form 2 and provide enough detail to enable the Company to identify the record and the requester.
2. Identify the right the requester is seeking to exercise or protect and explain why the requested record is required to exercise or protect that right.
3. State the form of access required (for example inspection, a copy, or a transcript) and indicate the preferred manner of receiving the decision (for example email or post).
4. If the request is made on behalf of another person, submit proof of the capacity in which the requester is making the request, to the satisfaction of the Information Officer.
5. Pay the prescribed request fee and, once access is granted, the prescribed access fee (see section 6.4).

6.3 How the Company will handle the request

The Information Officer will decide on the request within 30 days of receiving it. This period may be extended by a further 30 days in the circumstances allowed by section 57 of PAIA (for example where the request is for a large number of records). The Company will notify the requester in writing of the decision, the fees payable, and the right to lodge an internal appeal or to apply to court.

Access may be refused on any of the grounds set out in Chapter 4 of Part 3 of PAIA, including the mandatory protection of the privacy of a third party who is a natural person, the commercial information of a third party, and records privileged from production in legal proceedings.

6.4 Fees

Two types of fee may apply, as prescribed in the PAIA Regulations and updated by the Minister from time to time:

- A request fee — a non-refundable fee that a requester (other than a personal requester seeking their own personal information) must pay before the request is processed.
- An access fee — calculated according to the prescribed tariff, covering reproduction, search and preparation time, and postage where applicable.

The Company will provide the requester with a written estimate of the access fee before processing the request where required, and may require a deposit where the preparation time is likely to exceed the prescribed threshold. The current prescribed fees are those published in the PAIA fees notice in force at the time of the request.

7. Categories of records held by the Company

The following describes the subjects on which the Company holds records and the categories of records held on each subject (section 51(1)(b)(iv) of PAIA). Listing a record below does not mean it is automatically available; access is subject to the grounds for refusal in PAIA.

Subject / category	Examples of records held
Company and governance records	Memorandum of Incorporation, CIPC records, share register, director and shareholder resolutions, minutes.
Financial records	Management accounts, annual financial statements, invoices, bank records, tax records (VAT, PAYE, income tax), payroll.
Client and course records	Enrolment and intake forms, course registrations, attendance records, assessment results, certificates issued, correspondence.
Marketing and enquiry records	Website enquiries, mailing lists, leads, marketing materials and consent records.
Employee and contractor records	Employment contracts, service-provider agreements, CVs, ID copies, payroll and leave records, performance records.
Supplier and operational records	Contracts with suppliers and operators, service agreements, correspondence.
Information and technology records	System and account records, backups, and records relating to the Company’s Google Workspace environment.

8. Records available without a formal PAIA request

8.1 Records available under other legislation

Certain records held by the Company are accessible in terms of other legislation without using PAIA, for example records available under the Companies Act 71 of 2008, the Income Tax Act, the Value-Added Tax Act, the Basic Conditions of Employment Act, and the Labour Relations Act. Access to those records is governed by the relevant Act and the procedures it prescribes.

8.2 Records automatically available (section 52 notice)

The Company has not published a notice under section 52(2) of PAIA listing categories of records that are automatically available without a request. Records that the Company makes freely available (for example marketing material, public course information and the contents of its website) may be obtained directly without a formal PAIA request.

9. POPIA: record of processing activities

This section, together with sections 10 to 12, is the Company’s record of processing activities required by section 17 of POPIA and gives the information required by section 51(1)(c) of PAIA. It describes the purpose of processing, the categories of data subjects and personal information, the recipients of personal information, planned transborder flows, and a general description of the security measures applied.

9.1 Purpose of processing

The Company processes personal information for the following purposes:

- To register and enrol clients for mediation training courses and to deliver, assess and certify those courses.
- To respond to enquiries, provide quotations and information, and manage the relationship with clients and prospective clients.
- To administer the business, including invoicing, payments, accounting, and record-keeping.
- To comply with legal and regulatory obligations (for example tax, company law and, where applicable, accreditation requirements).
- To employ and manage staff and to contract with and manage service providers and operators.
- To carry out direct marketing of the Company’s own courses and services to existing clients and to others who have consented, in accordance with section 69 of POPIA.

9.2 Categories of data subjects and personal information

Category of data subject	Categories of personal information processed
Clients / course participants	Name, ID or passport number, contact details, billing details, qualifications and study records, assessment and certification records, payment information.
Prospective clients / enquirers	Name, contact details, area of interest, and the content of enquiries.
Employees and contractors	Name, ID number, contact and banking details, remuneration, tax and statutory details, CV and qualifications, performance and leave records.
Suppliers and operators	Contact-person name, business contact details, banking details, and contract records.

The Company does not, as a general rule, process the special personal information of children or special categories of personal information (such as health, religion or criminal behaviour) except where it is necessary and permitted under POPIA and with the appropriate safeguards.

10. Recipients of personal information

The Company may share personal information with the following categories of recipients, only as far as necessary and subject to appropriate safeguards and operator agreements where required by section 21 of POPIA:

- Cloud and IT service providers that host the Company’s systems and data (for example its Google Workspace environment and related storage).
- Accountants, bookkeepers, auditors and tax practitioners engaged by the Company.
- Payment processors and financial institutions for the purpose of receiving payments.
- Professional advisers (for example legal advisers) where necessary to exercise or protect a right.
- Regulators, government bodies and courts where the Company is required by law to disclose information, or where disclosure is necessary for the establishment, exercise or defence of a legal claim.

11. Planned transborder (cross-border) flows of personal information

The Company uses cloud-based services (including Google Workspace) whose servers and infrastructure may be located outside the Republic of South Africa. As a result, personal information may be stored or processed in other countries. Where personal information is transferred outside South Africa, the Company will do so only in accordance with section 72 of POPIA — for example where the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, or where the data subject consents, or where the transfer is necessary for the performance of a contract with or in the interest of the data subject.

12. Security safeguards (general description)

This is a general description allowing a preliminary assessment of the suitability of the Company’s information security measures, as required by section 51(1)(c)(v) of PAIA. It is deliberately general so as not to compromise security.

The Company takes reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control and to prevent loss of, damage to, or unauthorised access to that information, including, as appropriate:

- Access controls — personal information is kept in access-controlled systems (primarily a managed Google Workspace environment) and access is limited to staff who need it to perform their duties, protected by individual accounts and passwords.
- Authentication — use of strong passwords and, where available, multi-factor authentication on key accounts.
- Storage and backup — reliance on reputable cloud providers that maintain their own physical and network security, encryption in transit, and resilient backups.
- Device and email security — reasonable measures on the devices used to access Company data and care in handling email.

- Operator agreements — written arrangements with third parties that process personal information on the Company’s behalf, requiring them to maintain appropriate security and confidentiality.
- Staff awareness — making staff aware of their obligations to keep personal information confidential and to report any suspected security compromise.

The Company reviews these measures from time to time and will notify the Information Regulator and affected data subjects of any security compromise as required by section 22 of POPIA.

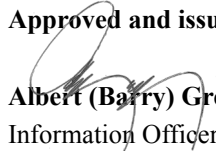
13. Availability and updating of this manual

In terms of section 51(3) of PAIA, this manual is available:

- on the Company’s website at www.mediationacademy.co.za;
- for public inspection at the Company’s principal place of business during normal business hours;
- to any person on request, on payment of a reasonable reproduction fee; and
- to the Information Regulator on request.

The Company will update this manual on a regular basis as required by section 51(2) of PAIA, and at least annually.

Approved and issued by:


Albert (Barry) Greyvenstein

Information Officer / Director, Mediation Academy South Africa (Pty) Ltd

Date: 2026/06/27