



Access to Information Manual

We respect your right of access to information. This manual will help you (the requester of information) to exercise that right and help you know how you may get access to our records. The **Promotion to Access of Information Act 2 of 2000** as amended from time to time (known as PAIA) requires us to draft and make this PAIA manual available to you. This enables you to

- Know what types of information we have.
- Know how to request access to it.

Date we last revised it: 01 April 2022

1. Introduction

- a. We describe who we are and what we do on our website, or you can ask us for this information. PAIA2 requires the information officer of a private body to compile a manual that contains information on the records it holds. A 'private body' means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. We are a private body.

2. Our details

- a. Our organisation's and information officer's details are on our website or available on request.

3. Records which we make automatically available

- a. Some records are automatically available to you without you needing to request access to them

Type of record	How to access it
Memorandum of Incorporation	Request by email
Directors' names	Visit our website
Banking details	Request by email
Newsletter and circulars	Register on our MailChimp
Information on our website	Visit our website
Company Privacy Policy	Visit our website

4. Records we hold to function

- a. We hold the following subjects and categories of records in electronic or physical format, which we do not make automatically available. You may request access to them.
 - i. Financial records
 - ii. Insurance records
 - iii. Tax records



5. Records we hold to comply with the law

- a. We hold shareholder information as required by the Share Block Act.
- b. We hold minutes of Board and General Meetings as required by the Companies Act.

6. How you can request access

- a. We have appointed our information officer to deal with all matters relating to PAIA so we can comply with our PAIA obligations. To request access to a record, please submit a signed and dated letter to our information officer's email address as listed in the Privacy Policy at www.cloverhill.co.za.
- b. Please ensure that the letter:
 - i. has enough information for the information officer to identify you, the requested records, and the form of access you require,
 - ii. specifies your email address, postal address, or fax number,
 - iii. describes the right that you seek to exercise or protect,
 - iv. explains why you need the requested record to exercise or protect that right,
 - v. provides any other way you would like to be informed of our decision other than in writing, and
 - vi. provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).
 - vii. If you do not provide this information, we may:
 1. reject the request due to lack of procedural compliance,
 2. refuse it if you do not provide sufficient information, or
 3. delay it

7. How we will give you access

- a. We will evaluate and consider all requests we receive. If we approve your request, we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA

8. How much it will cost you

- a. Request fees
 - i. When submitting your request, you must pay us a request fee as the law prescribes. You must pay us the prescribed fees before we give you access. You will receive a notice from our information officer upon your request, setting out the application procedure.
- b. Access fees
 - i. If we grant the request, you will have to pay us a further access fee the law prescribes that includes a fee for the time it takes us to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure. Our information officer will notify you if you need to pay a deposit for the access fee. The deposit may be up to one third of the prescribed access fee. The access fee will provide for:
 1. the costs of making the record, or transcribing the record,
 2. a postal fee (if applicable), and



3. the reasonable time we need to search for the record and prepare the record for you. If you paid the deposit and we refused your request, we will refund you the deposit amount. Until you have paid the fees, we may withhold the record you requested.

9. Grounds for us to refuse access

- a. We may have to refuse you access to certain records in terms of PAIA to protect:
 - i. someone else's privacy,
 - ii. another company's commercial information,
 - iii. someone else's confidential information,
 - iv. research information,
 - v. the safety of individuals and property, or
 - vi. records privileged from production in legal proceedings
- b. Our decision on giving you access
 - i. We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record.

10. Remedies available if we refuse to give you access

- a. If we deny your request for access, you may:
 - i. apply to a court with appropriate jurisdiction, or
 - ii. complain to the Information Regulator, for the necessary relief within 180 calendar days of us notifying you of our decision.

11. How we process and protect personal information

- a. We process the personal information of various categories of people for various purposes. Please refer to our website for our Privacy Policy or ask our information officer for a copy.