



# **STADIO HOLDINGS**

**THE PROMOTION OF ACCESS TO  
INFORMATION MANUAL**

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## 1. INTRODUCTION

Details of this manual

PAIA Manual	
Information officer	Mr CPD Vorster
Designated authority	Mrs KJ Ridge
Contact details	+27 87 288 3220
Date of adoption	1 July 2021
Revisions	30 October 2025

- 1.1. This information manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act, 2000 ("PAIA"), specifically section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy.

## 2. ABOUT STADIO HOLDINGS

- 2.1. STADIO Holdings Limited ("STADIO") is a company listed on the Johannesburg Stock Exchange and registered in the Republic of South Africa and is defined as a private body in PAIA.
- 2.2. STADIO facilitates the widening of access to higher education through its registered private higher education institutions in South Africa, [STADIO Higher Education](#), [Milpark Education](#) and [AFDA](#) (collectively referred to as the Group). These institutions operate under the Higher Education Act, 1997 and offer accredited qualifications through contact, distance, and blended learning to more than 50,000 students across multiple campuses and online.
- 2.3. The Group's service offerings can be found on their respective websites at [www.stadio.ac.za](http://www.stadio.ac.za), [www.milpark.ac.za](http://www.milpark.ac.za); and [www.afda.co.za](http://www.afda.co.za).
- 2.4. For further information on STADIO, refer to [www.stadio.co.za](http://www.stadio.co.za).

## 3. CONTACT DETAILS

Requests to STADIO in terms of PAIA (or POPIA) should be addressed to:

<b>Information Officer designate</b>	Kate Ridge (Head: Executive Support and Governance)
<b>Email</b>	<a href="mailto:informationofficer@stadio.co.za">informationofficer@stadio.co.za</a>
<b>Telephone (reception)</b>	087 288 3220
<b>Physical address:</b>	Office 101, The Village Square, cnr of Queen and Oxford Streets, Durbanville, 7550
<b>Postal address</b>	Office 101, The Village Square, cnr of Queen and Oxford Streets, Durbanville, 7550
<b>Fax</b>	Not applicable

## 4. INFORMATION REGULATOR'S GUIDE

- 4.1. The Information Regulator (established in terms of POPIA), has made a guide available which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. Copies of the guide are available from the Information Regulator in the manner prescribed. Any enquiries regarding the guide should be directed to:

**Postal Address:**

JD House  
27 Stiemens Street  
Braamfontein, Johannesburg, 2001  
P.O Box 31533, Braamfontein, Johannesburg, 2017

**Telephone Number:** 010 023 5200

**E-mail Address:** [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)

**Website:** eServices: Information Regulator ([infoeregulator.org.za](http://infoeregulator.org.za))

## **5. OBJECTIVES OF THIS MANUAL**

5.1. The objectives of this Manual are:

- 5.1.1. to provide a list of records held by STADIO;
- 5.1.2. explains how a person may submit requests for access to these records in terms of PAIA, as well as the grounds on which a request may be denied;
- 5.1.3. includes information on the submission of objections to the processing of personal information ; and
- 5.1.4. includes information on the submission of requests to delete or destroy personal information or records thereof in terms of POPIA.

## **6. TYPES OF RECORDS HELD - AVAILABLE ONLY ON REQUEST**

6.1. The following records are held by STADIO and grouped into the below categories of information that STADIO holds, some of which may include personal information.

### **6.2. General records:**

- 6.2.1. Statutory company information
- 6.2.2. Financial records;
- 6.2.3. Minutes of meetings of the board, executive committee, departmental meetings staff meetings, and other meetings;
- 6.2.4. Strategic plans and other operational policies;
- 6.2.5. Annual reports and other statutory reports and records;
- 6.2.6. Newsletters, press releases and other publications.

### **6.3. Employee Records:**

- 6.3.1. Employee records provided by employees;
- 6.3.2. Records provided by a third party relating to employees;
- 6.3.3. Conditions of employment and other employee-related contractual and quasi-legal records;
- 6.3.4. Internal evaluation records and other internal records;
- 6.3.5. Correspondence relating to employees;
- 6.3.6. Training schedules and material.

### **6.4. Internal Correspondence and Documents:**

- 6.4.1. Company policies and procedures;
- 6.4.2. Registers;
- 6.4.3. Minutes of meetings;
- 6.4.4. Statutory returns;
- 6.4.5. Powers of attorney;
- 6.4.6. Share certificates;
- 6.4.7. Title deeds;
- 6.4.8. Lease agreements;
- 6.4.9. Hire agreements;
- 6.4.10. Hire-purchase agreements;
- 6.4.11. Credit sale agreements;
- 6.4.12. Ordinary and conditional sale agreements;
- 6.4.13. Insurance policies and related claims.

### **6.5. Categories of records held on specific data subjects**

- 6.5.1. For most or all data subjects:

- 6.5.1.1. Contracts and agreements
- 6.5.1.2. Correspondence
- 6.5.1.3. Contact and biographical information
- 6.5.1.4. Unique identifiers
- 6.5.1.5. Records of current or past academic performance.

**6.5.2. Employees: Applicants (prospective employees), current employees, former employees, including contractors**

- 6.5.2.1. Records provided by applicants and employees
- 6.5.2.2. Statutory employee records pertaining to individual employees
- 6.5.2.3. Records of disciplinary and grievance processes
- 6.5.2.4. Records of appointments, promotions, terminations, performance appraisal
- 6.5.2.5. Employee records
- 6.5.2.6. Beneficiary forms
- 6.5.2.7. Health records
- 6.5.2.8. Time and attendance records
- 6.5.2.9. Leave records
- 6.5.2.10. Training records
- 6.5.2.11. Applications for special arrangements
- 6.5.2.12. CCMA and court cases, proceedings and reports
- 6.5.2.13. Notes and formal reports (with written consent of employee) regarding psychological counselling services to employees
- 6.5.2.14. Notes and formal reports regarding conflict management services to employees and departments
- 6.5.2.15. Special personal information: Health and disability information only as needed; race as required for EE and BBEE.

**6.5.3. Independent contractors, professional advisors and service providers**

- 6.5.3.1. Records provided by the independent contractors, advisors, or service providers
- 6.5.3.2. Certificates, claim forms, letters of appointment, company registration number
- 6.5.3.3. Identifying information, contact information, payment information.

**6.5.4. Visitors to physical and virtual STADIO spaces**

- 6.5.4.1. CCTV footage
- 6.5.4.2. Log-in/sign-in information and logs.

**6.5.5. Shareholders, board members and directors**

- 6.5.5.1. All records as required by law.

**6.6. Other Party Records**

- 6.6.1. Employee, supplier or private body records which are held by another party, as opposed to the records held by STADIO itself.
  - 6.6.2. Records held by STADIO pertaining to other parties, including without limitation, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.
  - 6.6.3. STADIO may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to STADIO.
- 6.7. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before STADIO will consider access.

6.8. STADIO processes personal information as stipulated in the Information Governance policy governed by POPIA.

## **7. TYPES OF RECORDS HELD - AVAILABLE WITHOUT A REQUEST TO ACCESS**

7.1. Records of a public nature, typically those disclosed on STADIO's website and in its various annual reports, may be accessed without the need to submit a formal application. This information includes amongst other things the information set out below.

### **7.2. Company Overview**

- 7.2.1. Company history and background.
- 7.2.2. Mission statement and core values.
- 7.2.3. Information about the management team
- 7.2.4. Details about the institutions within the Group and their focus areas
- 7.2.5. Group performance in the public domain

### **7.3. Contact Information**

- 7.3.1. Phone numbers and email addresses for general enquiries.
- 7.3.2. Physical address of the company's main office or facilities as well as its various institutions.

### **7.4. News and Updates**

- 7.4.1. Stock Exchange News Announcements
- 7.4.2. Press releases and company announcements.
- 7.4.3. Shareholder updates
- 7.4.4. Daily share price information

### **7.5. Frequently Asked Questions (FAQs)**

- 7.5.1. Answers to common queries about STADIO and its offerings.
- 7.5.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

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

8.1. Where applicable to its operations, STADIO also retains records and documents in terms of the legislation listed below.

Basic Conditions of Employment Act, 1997
Broad-based Black Economic Empowerment Act, 2003
Companies Act, 2008
Compensation for Occupational Injuries and Health Diseases Act, 1993
Competition Act, 1998
Employment Equity Act, 1998
Financial Intelligence Centre Act, 2001
Income Tax Act, 1962
Insolvency Act, 1936

Labour Relations Act, 1995
National Qualifications Framework Act ("the NQF Act"), 2008
Occupational Health & Safety Act, 1993
Prevention and Combating of Corrupt Activities Act, 2004
Promotion of Access to Information Act, 2000
Protection of Personal Information Act, 2013
Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002
Skills Development Act, 1998
Skills Development Levies Act, 1999
Telecommunications Act, 1996
Unemployment Insurance Act, 2001
Unemployment Insurance Contributions Act, 2022
Value Added Tax Act, 1991

8.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

**9. ENTRY POINT FOR REQUESTS**

- 9.1. 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.
- 9.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable STADIO 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.
- 9.3. The exercise of a data subject’s rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance.
- 9.4. 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.
- 9.5. The Information Officer has been delegated with the task of receiving and coordinating all requests for access to records in terms of PAIA, to ensure proper compliance with PAIA and POPIA.
- 9.6. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above

**10. HOW MUST A PERSON GO ABOUT ASKING FOR RECORDS?**

10.1. In terms of section 53 of the PAIA, data subjects making requests for information (“requester”) must submit the appropriate PAIA forms and include the information as detailed below. The forms can be found on our website at [www.stadio.ac.za](http://www.stadio.ac.za) or requested from [informationofficer@stadio.ac.za](mailto:informationofficer@stadio.ac.za).

10.1.1. The requester must provide sufficient detail on the request form to enable the STADIO information officer to:

- 10.1.1.1. adequately identify the record or records requested,
- 10.1.1.2. adequately identify the identity of the requester.
- 10.1.1.3. clearly indicate which form of access is required, if the request is granted.

- 10.1.1.4. identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 10.1.2. The requester should further indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed (e.g. the postal address or email address of the requester).
- 10.1.3. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the STADIO Information Officer.
- 10.1.4. The Information Officer must notify the requester (other than a personal requester, who is a requester seeking access to a record containing personal information about the requester) by notice, requiring the requester to pay the prescribed request fee (if any) and to provide proof of payment (e.g. a copy of the deposit slip), before further processing the request.
- 10.1.5. If the request is granted then a further access fee may need to be paid, which will be calculated by taking into account reproduction costs, search and preparation time and cost, and postal or other transport costs. If the search for and preparation of the record for disclosure, including arrangements to make it available in the requested form, requires more than the prescribed hours, the requester will be requested to pay as a deposit, the prescribed portion of the access fee which would be payable if the request is granted. The access fees are discussed in further detail below.
- 10.1.6. STADIO will process requests as soon as is reasonably possible, but within 30 (thirty) days from receipt of the request, unless third parties are required to be notified of the request or the 30 (thirty) day period is extended as provided for in PAIA. STADIO will notify the requester if the 30 (thirty) day period for processing a request is to be extended. STADIO will notify the requester of its decision in the required form, which is usually in writing. If the requester wishes to be informed of the decision on the request in any other manner, the requester must provide details of the required form and manner of notification.
- 10.1.7. STADIO may, and must in certain instances, refuse access to records on any of the grounds set out in PAIA which include: that access would result in the unreasonable disclosure of personal information about a third party, that it is necessary to protect the commercial information of a third party or of STADIO itself, that it is necessary to protect the confidential information of a third party, that it is necessary to protect the safety of individuals or property, that a record constitutes privileged information for the purpose of legal proceedings, that it is necessary to protect the research information of a third party or STADIO itself, or that it constitutes insider information in terms of the JSE Listing Requirements.
- 10.1.8. Where a request is refused, a requester may apply to the High Court within 180 (one hundred and eighty) days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The Court will determine whether the records should be made available or not. STADIO will not be liable for any legal fees or fees incurred by the requester.

## **11. AUTOMATICALLY AVAILABLE INFORMATION**

- 11.1. In terms of section 52(1)(a) of PAIA, the Information Officer 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 in terms of PAIA, including such categories available for inspection in terms of legislation other than PAIA; for purchase or copying from the private body; and from the private body free of charge; and how to obtain access to such records.

- 11.2. In terms of regulation 5 of the Regulations relating to the Promotion of Access to Information, 2021 (“**PAIA Regulations**”), the Information Officer may compile and keep a description of the categories of records contemplated in section 52(1)(a) of PAIA that are voluntarily disclosed or automatically available without a requester having to request access thereto. If such a description is compiled and kept, it must be updated as soon as practically possible after any amendment to the description occurs; and made available –
- 11.2.1. to the Information Regulator;
  - 11.2.2. on the website of STADIO ; and
  - 11.2.3. for inspection, at the registered head office of a private body concerned during normal office hours.
- 11.3. STADIO has voluntarily decided to make the information set out in section 7 above automatically available to the public and such information need not be formally requested in terms of this Manual.

## 12. **INFORMATION AVAILABLE IN TERMS OF POPIA**

- 12.1. In terms of POPIA, Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by STADIO will depend on the nature of the Personal Information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the Personal Information is collected. For further information, please refer to STADIO’s Information Governance Policy, which can be requested by emailing [informationofficer@stadio.ac.za](mailto:informationofficer@stadio.ac.za), and STADIO’s Privacy Policy, which is available at our website, <https://stadio.ac.za/>.
- 12.2. Categories of personal information collected by STADIO:
- 12.2.1. STADIO may collect all types of Personal Information, including Special Personal Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to –
  - 12.2.2. name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title, financial records and employment history, and family details, including their relationship to you;
  - 12.2.3. identification numbers issued by government bodies or agencies, such as your identity number, passport number, tax identification number and driving licence number and company registration number;
  - 12.2.4. demographic information such as your address, preferences and interests;
  - 12.2.5. information relevant to the provision of our products and services;
  - 12.2.6. information relevant to the procurement of products and services from suppliers;
  - 12.2.7. bank account or payment card details, income or other financial information;
  - 12.2.8. information that you provide to us as part of us;
  - 12.2.9. special or sensitive personal information as defined in applicable data protection legislation, including information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric information; information about your sex life;
  - 12.2.10. relevant information as required by applicable laws, including anti-money laundering legislation and as part of our client onboarding procedures, including evidence of source of funds;
  - 12.2.11. information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs;

- 12.2.12. still and video images captured by CCTV at our offices. We use CCTV to help provide a safe and secure environment and you may be recorded when you visit our offices; and
- 12.2.13. identity data, contact data and special personal information from publicly available sources or third parties.

12.3. The purpose of processing personal information:

- 12.3.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by STADIO will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.
- 12.3.2. In general, personal information is processed for purposes of dealing with complaints under the CPA, procurement purposes, records management, security, employment and related matters.

12.4. Description of the categories of Data Subjects:

STADIO holds information and Records on the following categories of Data Subjects

- 12.4.1. STADIO Internal Records;
- 12.4.2. Employees of STADIO;
- 12.4.3. Students of STADIO;
- 12.4.4. Prospective students of STADIO; and
- 12.4.5. Any third party with whom STADIO conducts business

Data Subject categories	Personal information that may be processed
<p>Internal Records The Records listed pertain to STADIO's own affairs</p>	<ul style="list-style-type: none"> <li>• Records relating to the incorporation of STADIO's shareholders and director e.g name, surname, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, registration number, marital status, date and place of birth, nationality, employer and job title.</li> <li>• Financial records;</li> <li>• Operational records;</li> <li>• Intellectual property;</li> <li>• Marketing records;</li> <li>• BBBEE information;</li> <li>• Internal correspondence;</li> <li>• Service records;</li> <li>• Statutory records;</li> <li>• Internal policies and procedures;</li> <li>• Minutes of meetings;</li> <li>• Insurance records, including group life assurance and disability income protection insurance; and</li> <li>• Information technology, including computer software, support and maintenance agreements.</li> </ul>
<p>Employee Records</p>	<ul style="list-style-type: none"> <li>• Any personal Records provided to STADIO by its Employees e.g name, surname, identity number, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer and job title.</li> </ul>

	<ul style="list-style-type: none"> <li>• Any Records a third party has provided to STADIO about any of their Employees;</li> <li>• Conditions of employment and other Employee-related contractual and quasi legal Records;</li> <li>• Employment policies and procedures;</li> <li>• Internal evaluation</li> <li>• Disciplinary Records; and</li> <li>• Other internal Records and correspondence.</li> </ul>
Student-related Records	<ul style="list-style-type: none"> <li>• Name, surname, identity number, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, residency, employer and job title (where applicable)</li> <li>• Basic academic history;</li> <li>• Special needs;</li> <li>• Registration agreements with the student and/or between the student/sponsor and other persons;</li> <li>• Details of transactions carried out with STADIO;</li> <li>• Financial Records;</li> <li>• Indemnities and guarantees;</li> <li>• Intellectual Property;</li> <li>• Letters;</li> <li>• Personal Information;</li> <li>• Records of correspondence or enquiries from Students or anyone acting on Student's behalf;</li> <li>• Special Personal Information, including biometric information, such as Images, and</li> <li>• Other Records and correspondence.</li> </ul>
Other Third-Party Records Records are kept in respect of other parties, including without limitation joint ventures and consortia to which STADIO is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such third parties may possess Records which can be said to belong to STADIO	<ul style="list-style-type: none"> <li>• Employee, client, or STADIO Records which are held by a third party as opposed to being held by STADIO; and</li> <li>• Records held by STADIO pertaining to third parties, e.g VAT numbers, banking details and names, 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>
Other Records	<ul style="list-style-type: none"> <li>• Information relating to STADIO e.g. brochures, and press releases; and</li> <li>• Research information belonging to STADIO or carried out on behalf of a third party.</li> </ul>

(the list of categories of data subjects is non-exhaustive).

### **13. THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED:**

13.1. Depending on the nature of the Personal Information, STADIO may supply information or Records to the following categories of recipients:

- 13.1.1. Local and foreign statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- 13.1.2. Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- 13.1.3. South African Revenue Services, or another similar local or foreign authority;
- 13.1.4. Anyone making a successful application for access in terms of PAIA or POPIA; and
- 13.1.5. Subject to the provisions of POPIA and other relevant legislation, STADIO may share information about a client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which STADIO operates.

#### **14. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION**

- 14.1. If a data subject visits STADIO's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.
- 14.2. STADIO may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will fully comply with applicable data protection legislation.
- 14.3. These countries may not have data-protection laws which are similar to those of South Africa.

#### **15. A GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY STADIO**

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

#### **16. REQUEST PROCEDURE (POPIA)**

- 16.1. Completion of the prescribed form:
  - 16.1.1. A request for an access to a record must be made to the Information Officer. This request must be made to the address, fax number or electronic mail address set out in this manual. Such requests must be made by means of the form attached hereto as Annexure B.
  - 16.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
  - 16.1.3. POPIA provides that a data subject may, upon proof of identity, request STADIO 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.
  - 16.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, STADIO 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.
  - 16.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
  - 16.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by STADIO, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Annexure C and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

16.1.7. A data subject may also request STADIO 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 STADIO is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

16.1.8. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above in this manual by means of the form attached hereto as Annexure D.

## **17. TIMELINES FOR CONSIDERATION OF A REQUEST FOR ACCESS**

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

17.2. Grounds for refusal of access and protection of information

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

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

17.3.2. 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);

17.3.3. if disclosure would result in the breach of a duty of confidence owed to a third party;

17.3.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;

17.3.5. if the record was produced during legal proceedings, unless that legal privilege has been waived;

17.3.6. if the record contains trade secrets, financial or sensitive information or any information that would put STADIO (at a disadvantage in negotiations or prejudice it in commercial competition); and/or

17.3.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by STADIO.

17.4. Section 70 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 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.

17.5. 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.

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

18.1. 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.

18.2. 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 the Information Regulator or a court of competent jurisdiction to take the matter further.

- 18.3. 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.

## **19. AVAILABILITY OF THIS MANUAL**

- 19.1. Copies of this Manual are available for inspection, free of charge, with the information officers at the offices of STADIO and at <https://stadio.co.za/>.

## **20. OTHER**

- 20.1. The Manual is updated on a regular basis in accordance with the requirements of section 51(2) of PAIA.

*Ends.*

Annexures to follow.

**ANNEXURE A: FORM 2: REQUEST FOR ACCESS TO RECORD**

**REQUEST FOR ACCESS TO RECORD [Regulation 7]**

Note:

If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The information officer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

**PERSONAL INFORMATION**

Full names:	
Identity number:	
Capacity in which request is made <i>(when made on behalf of another person):</i>	
Postal Address:	
Street Address:	
E-mail Address	
Contact numbers: Tel. (B): Cellular: Facsimile	
Full names of person on whose behalf request is made <i>(if applicable):</i>	
Identity number:	
Postal Address:	
Street Address:	
E-mail Address:	
Contact numbers: Tel. (B): Cellular: Facsimile	

**PARTICULARS OF RECORD REQUESTED**

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

**TYPE OF RECORD**

(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

**FORM OF ACCESS**

(Mark the applicable box with an "X")

Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription or virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

**MANNER OF ACCESS**

(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

<b>FEES</b>	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
c)	The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
d)	If you qualify for exemption of the payment of any fee, please state the reason for exemption.
Reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
Signature of requester / person on whose behalf request is made

**ANNEXURE B: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Facsimile / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Facsimile / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at ..... this ..... day of .....20.....

.....  
Signature of data subject/designated person

**ANNEXURE C: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an “x”.

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Facsimile / E-mail:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED

<b>D</b>	<p><b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or</b></p> <p><b>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b></p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*