Manual in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 4 of 2013 (POPIA)

PAIA and POPIA Manual

Salinareux Body and Mind CC t/a Songshan Kung Fu Executive Academy – Edenvale

Registration number 2010/065045/23

Version	Version 2.0 (replaces the September 2025 manual)
Date	24 November 2026
Next review	November 2027, or sooner if anything in this manual changes
Available at	www.songshanedenvale.com and at our premises

1. About this manual

1.1 PAIA gives everyone the right to request access to records held by a private body when the record is needed to exercise or protect a right. POPIA regulates how personal information is collected, used, stored and shared.

1.2 This manual:

- identifies the Academy and its Information Officer;
- explains how to ask for access to a record and what it costs;
- describes the records we hold, including records we keep because other laws require it;
- explains what personal information we process, why, who receives it, whether it leaves South Africa and how we protect it; and
- explains your rights under POPIA and how to use them.

1.3 In this manual, “the Academy”, “we”, “us” and “our” mean Salinareux Body and Mind CC t/a Songshan Kung Fu Executive Academy – Edenvale. Words defined in PAIA or POPIA have the same meaning here.

2. Our details

Legal name	Salinareux Body and Mind CC t/a Songshan Kung Fu Executive Academy – Edenvale
Registration number	2010/065045/23
Type of body	Close corporation under the Close Corporations Act 69 of 1984
Nature of business	Sports club offering Kung Fu (children and adults), Tai Chi, private lessons, holiday camps, workshops and events, gift vouchers and academy merchandise
Physical address	1st Floor, Virgo Centre, 108 Andries Pretorius Road, Edenvale, Gauteng, 1609
Postal address	1st Floor, Virgo Centre, 108 Andries Pretorius Road, Edenvale, Gauteng, 1609
Telephone / WhatsApp	063 377 7665 (+27 63 377 7665)
Email	info@songshanedenvale.com
Website	www.songshanedenvale.com

3. Information Officer

3.1 The member of Salinareux Body and Mind CC is the head of the Academy and its Information Officer under section 1 of PAIA and section 55 of POPIA. No Deputy Information Officer has been appointed; the Information Officer handles all PAIA and POPIA requests personally.

Information Officer	Graeme Cheyne Macintosh
Capacity	Member and head of the Academy
Physical and postal address	1st Floor, Virgo Centre, 108 Andries Pretorius Road, Edenvale, Gauteng, 1609
Email	info@songshanedenvale.com
Telephone / WhatsApp	063 377 7665 (+27 63 377 7665)

3.2 Please send all requests, objections and complaints about personal information to the Information Officer using the details above.

4. The Information Regulator's guide

4.1 The Information Regulator has published a guide, in each official language, on how to use PAIA and POPIA. It explains, among other things, how to request access to a record, the fees, the help available from the Regulator and the remedies available if a request is refused.

4.2 You can get the guide from the Regulator's website (https://inforegulator.org.za, under PAIA resources), by contacting the Regulator, or by asking our Information Officer for a copy (PAIA Form 1). A copy can be inspected at our premises during business hours.

4.3 The Information Regulator's contact details are:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

5. Records available without a formal request

5.1 The following are freely available, without a PAIA request or fee:

- This manual, our privacy notice and our terms and conditions (on our website and at the academy)
- Information on our website: classes, timetable, fees, events, camps, gift vouchers and shop
- Event and camp information, including ticket terms, cancellation policies and indemnity wording
- Our class rules and grading information, on request

5.2 Students, and parents or guardians of students under 18, who want a copy of their own records (for example registration details, payments, attendance or gradings) can simply ask the Information Officer. We

will verify identity first; no PAIA request fee is charged, although reasonable copying costs may apply.

6. Records we hold

6.1 Annexure A lists the subjects on which we hold records and the categories of records under each subject. Listing a record does not mean access will be granted: every request is assessed against the grounds for refusal in section 9.

6.2 Annexure B lists the laws under which we keep records. Some of these laws give certain people a right of access to particular records outside PAIA.

7. How to request access to a record

7.1 Complete PAIA Form 2 (Request for Access to Record), which is available from the Information Officer or at https://inforegulator.org.za/paia-forms. Send it to the Information Officer by email or deliver it to our physical address.

7.2 The request must give enough detail for us to identify:

- the record(s) requested;
- the identity of the requester (attach a copy of your ID);
- the form and manner of access you want;
- your email, postal address or other contact details; and
- the right you want to exercise or protect, and why the record is needed for that right.

7.3 If you request on behalf of someone else, attach proof of your authority to act for that person.

7.4 If you cannot complete the form because of illiteracy or disability, you may make the request orally and the Information Officer will help you.

7.5 We will decide on the request within 30 days of receiving it, and tell you the outcome in writing with reasons if access is refused. We may extend this period once by up to 30 days if the request is for a large number of records or needs a search that cannot reasonably be completed in 30 days; we will tell you in writing before the first 30 days end. If we do not respond in time, the request is regarded as refused.

7.6 If a record cannot be found after a reasonable search, or does not exist, we will tell you by affidavit, setting out the steps taken to find it.

7.7 If the record contains information about a third party, we will notify that third party as PAIA requires before deciding.

8. Fees

8.1 A **personal requester** (someone asking for their own personal information) does not pay the request fee, but may be charged the reproduction costs in Annexure C.

8.2 Every other requester must pay the request fee of R140.00 before we process the request.

8.3 If access is granted, an access fee is payable for reproduction and for search and preparation time beyond the first hour, as set out in Annexure C. If the search will take more than six hours, we may ask for a

deposit of up to one third of the access fee. A deposit is refunded if access is refused. Records are released once the access fee has been paid.

8.4 You may apply to be exempted from fees; give your reasons on Form 2.

8.5 Inspecting this manual is free. Printed copies are charged at the photocopy rate in Annexure C.

9. Grounds on which a request may be refused

9.1 Chapter 4 of Part 3 of PAIA sets out the grounds on which a private body must or may refuse access. In summary, we may refuse access where this is needed for:

- the mandatory protection of the privacy of a third party who is a natural person, including a deceased person (section 63); this includes students' health information and children's information;
- the mandatory protection of commercial information of a third party (section 64);
- the mandatory protection of certain confidential information of a third party (section 65);
- the mandatory protection of the safety of individuals and the protection of property (section 66);
- the mandatory protection of records privileged from production in legal proceedings (section 67);
- the protection of the Academy's own commercial information (section 68); and
- the protection of research information (section 69).

9.2 Access must nevertheless be granted where PAIA's public-interest override applies (section 70). Where only part of a record may be refused, we will give access to the rest of it (section 59).

10. If you are not satisfied with our decision

10.1 the Academy does not have an internal appeal procedure. The Information Officer's decision is final within the Academy.

10.2 If your request is refused, or you are unhappy with the fees, the time extension or the form of access, you may within 180 days of being notified of the decision:

- lodge a complaint with the Information Regulator (section 77A of PAIA), using PAIA Form 5 (Complaint Form) available at https://inforegulator.org.za; or
- apply to court for appropriate relief (section 78 of PAIA).

11. How we process personal information (POPIA)

11.1 the Academy is a responsible party under POPIA. We process personal information lawfully and only for the purposes set out below, collect only what we need, keep it accurate and secure, and keep it only as long as we need to or as the law requires. Our privacy notice at www.songshanedenvale.com/privacy-notice explains this in plain language.

11.2 Purposes of processing

- To enrol and register students, arrange trial classes and manage class attendance and gradings
- To run classes, private lessons, camps, workshops and events safely, including knowing about injuries or medical conditions and who to contact in an emergency

- To sell and deliver event tickets, gift vouchers and merchandise, and to process payments and refunds
- To keep signed indemnities, risk acknowledgements and parental consents
- To invoice, collect fees and keep accounting records
- To answer enquiries received by phone, WhatsApp, email, social media or our website
- To send class notices (such as closures and timetable changes) and, only with consent, news, events and offers
- To use photos or video of classes and events on our website and social media, only with consent (and, for children, the written consent of a parent or guardian)
- To manage instructors and staff, and to engage and pay suppliers
- To keep our website, systems and records secure and to comply with the law

11.3 Categories of data subjects and the personal information we process

Data subject	Personal information processed
Students (adults)	Name, ID number or date of birth, contact details, address, emergency contact, relevant injuries or medical conditions, membership, attendance, grading and payment records, signed indemnity, photo and marketing consents
Students who are children (under 18)	Name, date of birth or age group, school or grade where relevant, relevant injuries or medical conditions, attendance and grading records, photos or video only with written parental consent
Parents and guardians	Name, contact details, relationship to the child, consents given, payment details and communications
Event, camp and workshop guests	Name, contact details, age group, ticket and payment details, booking-form answers (including medical information and consents), check-in records
Gift voucher buyers and recipients	Buyer’s name, contact and payment details; recipient’s name and gift message if provided; voucher number, value and redemption history
Shop customers	Name, contact details, items ordered, sizes, payment and collection details
Website visitors and enquirers	Name, contact details and message content; basic website usage and cookie data
Instructors, staff and applicants	Name, ID number, contact details, qualifications and gradings, first-aid certificates, contract, remuneration, bank, tax and UIF details
Suppliers and service providers	Company and contact person details, registration and VAT numbers, bank details, contracts and invoices

11.4 Special personal information and children’s information

Information about injuries and medical conditions is health information and therefore special personal information. We ask for it, and process it, only with the consent of the student or, for a child, a parent or guardian (section 27(1)(a) of POPIA), so that instructors can adapt training and respond safely in an emergency. It is seen only by the head instructor and instructors who need it, and is shared only with emergency services if needed.

Most children’s information is collected through and with the consent of a parent or guardian (section 35(1)(a) of POPIA). Children’s photos or video are never used publicly without separate written permission from a

parent or guardian, and that permission can be withdrawn at any time.

We do not collect other special personal information (such as religious beliefs, race or biometric data).

11.5 Who receives personal information

Recipient	Why and what
Instructors and staff	Class lists, emergency contacts and relevant medical information needed to run classes safely
Emergency and medical services	Relevant medical and contact information in an emergency
Operators (service providers)	Website, events, online shop and member system (Wix), card payments (Yoco), online payments (PayPal), email and messaging providers (including WhatsApp and Google), accountant and IT support: only the information each needs to provide its service
Venue and event partners	Guest lists where needed for access or safety at an event
Kung Fu associations and grading bodies	Name and grading details, only where a student is registered or graded through that body
Authorities	SARS, the police or a court, only where the law requires it

We do not sell or rent personal information. Our service providers (operators) process personal information only on our instructions and must keep it confidential and secure (sections 20 and 21 of POPIA).

11.6 Transfers outside South Africa

Some of our service providers store or process information on servers outside South Africa:

Provider	Where information may be stored or processed
Wix.com (website, events, shop, bookings register, automated emails)	Wix is based in Israel and hosts data mainly in the United States and Europe
PayPal	Processes payments and payer data in the United States, Europe and other countries
WhatsApp (Meta)	Messages are end-to-end encrypted; service data is processed in the United States and other countries
Google (email and cloud storage)	May store email and files in the United States, Europe and other countries

These transfers are permitted under section 72 of POPIA because the providers are bound by laws or binding terms that provide an adequate level of protection, and the transfers are necessary to provide the service you asked for or to perform a contract in your interest. Yoco is a South African payment provider; card data is handled under card-industry security standards and may pass through international card networks.

11.7 How we protect personal information

- Paper registration forms, indemnities and consents are kept in locked storage at the academy
- Electronic records are kept in password-protected systems and devices; two-step verification is used where available
- Access to medical and children's information is limited to the head instructor and instructors who need it
- Our website and checkout use encrypted (HTTPS) connections; card payments are processed by Yoco or PayPal and we do not store card numbers
- Site member profiles are private, and site access is limited to the owner
- Operators must keep information confidential and secure and report any breach to us
- Records are destroyed securely (shredding or permanent deletion) at the end of their retention period

If we have reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and the affected data subjects as soon as reasonably possible (section 22 of POPIA).

11.8 How long we keep records

Record	Retention period
Student registration, attendance and grading records	While the student trains with us and 3 years after they leave (grading history may be kept longer, with consent, to confirm rank)
Signed indemnities, risk acknowledgements and injury or incident reports	3 years after the class or event; for children, until 3 years after they turn 18 (Prescription Act)
Medical information on booking forms	Until the class, camp or event is over and any related incident is closed, then deleted, unless part of an incident report
Event, ticket, voucher and shop orders	5 years (tax); gift vouchers at least until expiry (3 years from purchase)
Accounting, invoices and tax records	5 years from the date of submission of the related return (Tax Administration Act)
Employment and instructor records	At least 3 years after the relationship ends (Basic Conditions of Employment Act), and 5 years for tax records
Photo and video consents	While the image is used and 2 years after consent is withdrawn
Marketing consent records	While consent applies and 2 years after it is withdrawn

When a retention period ends, records are destroyed or deleted securely, or de-identified.

12. Your rights under POPIA

12.1 You have the right to:

- be told when your personal information is collected, and when it has been accessed or acquired by an unauthorised person;
- ask whether we hold personal information about you and request access to it (requests are handled under this manual; personal requesters pay no request fee);
- ask us to correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or to destroy a record we are no longer allowed to keep (section 24; POPIA Regulations Form 2);
- object to processing on reasonable grounds and to processing for direct marketing (section 11(3); POPIA Regulations Form 1);
- withdraw consent at any time, without affecting processing that took place before the withdrawal;
- not to receive unsolicited electronic direct marketing without your consent — you can opt out of our messages at any time, for example by replying STOP; and
- complain to the Information Regulator (POPIAComplaints@inforegulator.org.za) and to institute civil proceedings.

12.2 To use these rights, contact the Information Officer. The POPIA forms are available from the Information Officer or the Regulator's website, but a clear written request (including by email) is enough. We may ask you to confirm your identity before acting. We will respond as soon as reasonably possible and within the periods set by law.

13. Availability and updates

13.1 This manual is available on our website at www.songshanedenvale.com, at our premises at 1st Floor, Virgo Centre, 108 Andries Pretorius Road, Edenvale, Gauteng, 1609 for inspection during business hours free of charge, and from the Information Officer on request. A copy will be given to the Information Regulator on request.

13.2 We review this manual at least once a year and whenever our details, records or processing change. The latest version on our website applies.

Approved by Graeme Cheyne Macintosh, Member and head of the Academy and Information Officer, on 24 November 2026.

Annexure A: Subjects and categories of records held

Subject	Categories of records
Students and members	Registration forms, parental consents, indemnities and risk acknowledgements, emergency contacts, medical information provided, attendance registers, grading records and certificates
Events, camps and workshops	Event listings, ticket orders, booking forms, guest lists and check-in records, cancellation and refund records
Gift vouchers and shop	Orders, voucher numbers and redemption records, refunds, collection records
Close corporation and governance	Founding statement, CK documents, member records, CIPC annual returns, policies including this manual, privacy notice and terms
Finance and tax	Accounting records, bank statements, payment provider statements (Yoco, PayPal), supplier invoices, tax returns and assessments, VAT records (if registered)
Instructors and staff	Contracts, personnel files, qualifications and first-aid certificates, payroll, PAYE, UIF and SDL records
Suppliers and operators	Supplier contracts and invoices (including merchandise), operator and software agreements
Premises and safety	Lease, insurance, incident and first-aid records, equipment records
Marketing and communications	Correspondence, website and social media content, photos and video with consents, marketing consent records

Annexure B: Legislation under which records are kept

Records are kept in terms of the following laws, as amended. Where one of these laws gives a person a right of access to a record, that right may be used in addition to PAIA. This list may not be complete; a requester who relies on another law should say so on Form 2.

- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008 (as it applies to close corporations)
- Children's Act 38 of 2005
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- National Sport and Recreation Act 110 of 1998
- Income Tax Act 58 of 1962
- Tax Administration Act 28 of 2011
- Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997
- Labour Relations Act 66 of 1995
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Skills Development Levies Act 9 of 1999
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Occupational Health and Safety Act 85 of 1993
- Prescription Act 68 of 1969

Annexure C: Fees for private bodies

As prescribed in Annexure B of the Regulations relating to the Promotion of Access to Information, 2021. Amounts include VAT where applicable and change if the Regulations are amended.

Item	Description	Amount
1	Request fee payable by every requester other than a personal requester	R140.00
2	Photocopy of an A4-size page	R2.00 per page or part of a page
3	Printed copy of an A4-size page	R2.00 per page or part of a page
4	Copy in a computer-readable form on: (i) flash drive (provided by the requester); (ii) compact disc provided by the requester; (iii) compact disc provided to the requester	(i) R40.00; (ii) R40.00; (iii) R60.00
5	Transcription of visual images, per A4-size page	Outsourced; cost as quoted by the service provider
6	Copy of visual images	Outsourced; cost as quoted by the service provider
7	Transcription of an audio record, per A4-size page	R24.00
8	Copy of an audio record on: (i) flash drive (provided by the requester); (ii) compact disc provided by the requester; (iii) compact disc provided to the requester	(i) R40.00; (ii) R40.00; (iii) R60.00
9	Search for and preparation of the record for disclosure, for each hour or part of an hour, excluding the first hour	R145.00 per hour, to a maximum of R435.00
10	Deposit, if the search exceeds six hours	One third of the access fee
11	Postage, email or other electronic transfer	Actual cost, if any

Annexure D: Forms

Form	Use
PAIA Form 1	Request for a copy of the Information Regulator’s guide from an Information Officer
PAIA Form 2	Request for access to record
PAIA Form 3	Outcome of request and of fees payable (completed by us)
PAIA Form 5	Complaint to the Information Regulator
POPIA Form 1	Objection to the processing of personal information (section 11(3))
POPIA Form 2	Request for correction or deletion of personal information or destruction of a record (section 24)

All forms are available free of charge from the Information Officer (info@songshanedenvale.com) and from the Information Regulator’s website (https://inforegulator.org.za/paia-forms).