



LINKS GOLF CLUB (RF) LTD

Registration number 2006/017924/06

(“SFLHOA”)

PAIA MANUAL

**Prepared in terms of section 51 of the Promotion of Access to Information Act
2 of 2000 (as amended)**

**DATE OF COMPILATION: 22/04/2026
DATE OF NEXT REVISION: 01 May 2027**

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"GM"	General Manager
1.2	"DIO"	Deputy Information Officer;
1.3	"IO"	Information Officer;
1.4	"Minister"	Minister of Justice and Correctional Services;
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	"POPIA"	Protection of Personal Information Act No.4 of 2013;
1.7	"Regulator"	Information Regulator; and
1.8	"Republic"	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LINKS GOLF CLUB (RF) LTD (Please check and amend details below)

3.1. Information Officer

Name: Andre Grove
Tel: 042 200 4500
Email: gm@stfrancislinks.com

3.2. Deputy Information Officer

Name: Andrew Barton
Tel: 042 200 4500
Email: finman@stfrancislinks.com:

3.3 Access to information general contacts

Email: finman@stfrancislinks.com
Website: <https://www.stfrancislinks.com>

3.4 National or Head Office

Postal Address: 1 Jack Nicklaus Drive, St Francis Links Golf Estate, St Francis Bay 6312
Physical Address: 1 Jack Nicklaus Drive, St Francis Links Golf Estate, St Francis Bay 6312
Tel: 042 200 4500
Email: finman@stfrancislinks.com

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;

- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*
 a) *that record is required for the exercise or protection of any rights;*
 b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
 c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁵ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁶ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
- 4.5.1. upon request to the Information Officer;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
- 4.6.1 English and Zulu

5. CATEGORIES OF RECORDS OF LINKS GOLF CLUB (RF) LTD WHICH ARE AVAILABLE THROUGH AN ACCESS REQUEST

Category of records	Types of the Record	Available on Website	Available upon request
Companies Act Records	- Documents of Incorporation. - Memorandum of Incorporation.		X

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body 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

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

	• Minutes of meeting of the Board of Directors. • Minutes of the Audit Risk and Compliance Committee. • Minutes of meetings of Members/Shareholders. • Proxy forms. • Share certificates; and • Share Register and other statutory registers and/or records and/or documents. • Special resolutions/Resolutions passed at General and Special meetings. • Records relating to the appointment of: ○ Auditors. ○ Directors. ○ Prescribed Officers. ○ Public Officer; and ○ Company Secretary		
Financial records	• Annual Financial Statements • VAT Records • PAYE records • Fixed asset register • Banking records • UIF Records • Management reports • Invoices • Debtors and creditors information		X
Secretarial	• Memorandum of Incorporation • Minutes of the Board of Directors • Minutes of the Audit Risk and Compliance Committee • Company Register and other statutory registers • Records relating to the appointment of directors/auditors and other officers • Resolutions • Minute Book		
Income Tax records	• PAYE Records • Documents issued to employees for income tax purposes.		X

	• Records of payments made to SARS on behalf of employees. • All other statutory compliances: ○ VAT ○ Skills Development Levies ○ UIF ○ Workmen's Compensation		
Personal documents and records	• Personal records of the personnel • Employments contracts • Retirement benefit records • Disciplinary records • Salary records • Training Records • Correspondence relating to personnel • Leave records • UIF Returns • Internal policies and procedures		X
Procurement records	• Standard Terms and Conditions for supply of services and products. • Contractor, client and supplier agreements. • Lists of suppliers, products, services and distribution; and • Policies and Procedures.		X
Customer/Clients and third parties related records	• Contracts with Clients and Members/Shareholders • Any records the Client and Members/Shareholders have provided to SFLHOA or a third party acting for or on behalf of SFLHOA • Records, reports, designs and the like generated by SFLHOA for their clients and members/shareholders • Records generated pertaining to Clients and Members/Shareholders/Related parties, including transactional records		X

Marketing Records	• Marketing strategies • Communications strategies • Agreements		X
Risk Management and Audit	• Audit reports. • Risk management frameworks; and Risk management plans		X
Safety, Health and Environment	• Occupational Health and Safety records • Records of incidents in the workplace		X
IT Records	• Services Level Agreements • Equipment Register • Policies, Procedures and guidelines • Licensing agreements		X

6. DESCRIPTION OF THE RECORDS OF LINKS GOLF CLUB (RF) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

***NB:** Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable legislation.*

Category of Records	Applicable Legislation
• Memorandum of Incorporation (MOI) • Annual General Meeting Reports • Annual financial statements • Accounting Records • Notice and minutes of all member/shareholder meetings Basic Conditions of Employment Act, No. 75 of 1997 · Companies Act, No. 71 of 2008 · Compensation for Occupational Injuries and Health Diseases Act, No. 130 of 1993	Companies Act 71 of 2008 and other applicable legislation

· Consumer Protection Act 68 of 2008 · Electronic Communications and Transactions Act 25 of 2002 · Employment Equity Act, No. 55 of 1998 · Income Tax Act, No. 58 of 1962 · Labour Relations Act, No. 66 of 1995 · Non-profit Organisations Act 71 of 1997 · Occupational Health & Safety Act, No. 85 of 1993 · Promotion of Access to Information Act, No. 2 of 2000 · Skills Development Act, No. 97 of 1998 · Skills Development Levies Act, No. 9 of 1999 · Unemployment Contributions Act, No. 4 of 2002 · Unemployment Insurance Act, No. 63 of 2001 · Value Added Tax Act, No. 89 of 1991	
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Employee Records	Basic Conditions of Employment Act No. 53 of 2003
B-BBEE Records	Broad-Based Black Economic Empowerment Act 53 of 2003
Accident Records	Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
	Competition Act No. 89 of 1998
	Consumer Affairs (Unfair Business Practice) Act No. 71 of 1988
	Electronic Communications Act No.36 of 2005
	Electronic Communications and Transactions Act No. 25 of 2002
Employment Equity Plan.	Employment Equity Act No. 55 of 1998

• License • Representative and Key Individual Registers • Debarments • Accounting and Auditing Records • Profile changes	Financial Advisory and Intermediary Services Act No. 37 of 2002
• Cash transactions in excess of R 49 999. • Transactions and activities by clients that appear suspicious or unusual. • Any suspicion that client may possess or control property that is linked to terrorism • Staff screening	Financial Intelligence Centre Act No. 38 of 2001
	Financial Sector Regulation Act No. 9 of 2017
• PAYE Records • Documents issued to employees for income tax purposes. • Records of payments made to SARS on behalf of employees. • All other statutory compliances: ○ VAT ○ Skills Development Levies ○ UIF ○ Workmen's Compensation	Income Tax Act No. 58 of 1962
	Insurance Act No. 18 of 2017
	Intellectual Property Law Amendment Act no. 38 of 2017
• Disciplinary Code and Records. • Employee benefits arrangements rules and records. • Employment Contracts. • Employment Equity Plan. • Forms and Applications. • Grievance Procedures. • Leave Records. • Payroll reports/ Wage register. • Pension Fund Records. • Safety, Health and Environmental records. • Salary Records.	Labour Relations Act No. 66 of 1995

• SETA records. • Standard letters and notices. • Training Manuals. • Training Records. • Workplace and Union agreements and records.	
	National Health Act No. 61 of 2003
• Complete Safety, Health and Environment Risk Assessment. • Environmental Managements Plans. • Inquiries, inspections, examinations by environmental authorities.	Occupational Health and Safety Act No. 85 of 1993
	Pensions Funds Act No. 24 of 1956
	Prevention and Combating of Corrupt Activities Act No. 12 of 2004
	Prevention of Organised Crime Act No. 121 of 1998
• PAIA Manual and Guide • PAIA Reporting (where applicable) • Subject Access requests	Promotion of Access to Information Act No. 2 of 2000
	Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2020
Whistle Blowing Policy	Protected Disclosures Act No. 26 of 2000
• POPIA Policy • PAIA Manual and Guide	Protection of Personal Information Act No. 4 of 2013
	Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
	Regulation of Interception of Communication and Provision of Communications Act, No.2 of 2000
	Regulation of Interception of Communications and Provisions of Communication Related
	Information Act No. 70 of 2002
	Skills Development Act 97 of 1998
	Skills Development Levies Act No 9 of 1999
	South African Reserve Bank Act No. 90 of 1989
	Supreme Court Act No. 59 of 1959
	Unemployment Insurance Act No. 63 of 2001
	Unemployment Insurance Contributions Act No 4 of 2002
	Value Added Tax Act No 89 of 1991

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LINKS GOLF CLUB (RF) LTD.

Category of records	Types of the Record	Available on Website	Available upon request
Companies Act Records	• Documents of Incorporation. • Memorandum of Incorporation. • Minutes of meeting of the Board of Directors. • Minutes of the Audit Risk and Compliance Committee. • Minutes of meetings of Shareholders. • Proxy forms. • Register of debenture-holders. • Register of directors' shareholdings. • Research and development. • Share certificates; and • Share Register and other statutory registers and/or records and/or documents. • Special resolutions/Resolutions passed at General and Class meetings. • Records relating to the appointment of: ○ Auditors. ○ Directors. ○ Prescribed Officers. ○ Public Officer; and ○ Company Secretary		X
Financial records	• Annual Financial Statements • VAT Records • PAYE records • Fixed asset register • Banking records • UIF Records • Management reports • Invoices		X

	Debtors and creditors information		
Secretarial	- Memorandum of Incorporation - Minutes of the Board of Directors - Company Register and other statutory registers - Records relating to the appointment of directors/auditors and other officers - Resolutions - Minute Book		
Income Tax records	- PAYE Records - Documents issued to employees for income tax purposes. - Records of payments made to SARS on behalf of employees. - All other statutory compliances: - VAT - Skills Development Levies - UIF - Workmen's Compensation		X
Personal documents and records	- Personal records of the personnel - Employments contracts - Retirement benefit records - Disciplinary records - Salary records - Training Records - Correspondence relating to personnel - Leave records - UIF Returns - Internal policies and procedures		X
Procurement records	- Standard Terms and Conditions for supply of services and products. - Contractor, client and supplier agreements. - Lists of suppliers, products, services and distribution; and		X

	• Policies and Procedures.		
Customer/Clients and third parties related records	• Contracts with Clients and Members • Any records the Client and Members have provided to SFLHOA or a third party acting for or on behalf of SFLHOA • Records, reports, designs and the like generated by SFLHOA for their clients and members • Records generated pertaining to Clients and Members, including transactional records		X
Marketing Records	• Marketing strategies • Communications strategies • Agreements		X
Risk Management and Audit	• Audit reports. • Risk management frameworks; and Risk management plans		
Safety, Health and Environment	• Occupational Health and Safety records • Records of incidents in the workplace		
IT Records	• Services Level Agreements • Equipment Register • Policies, Procedures and guidelines • Licensing agreements		

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

- To support the administration of residents
- To support the administrators of visitors
- To support the administration of contractors
- To support the administration of suppliers
- To support the administration of staff
- To support engagement with suppliers
- To support engagement with the general public
- To support engagement with investors and the media

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Residents	Record of residents' life cycle
Visitors	Record of visitors' life cycle
Employees	Record of employee life cycle
General public	Tracking general enquires and website visits
Media	Record of media interactions

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Customer/member information, visitor information, employee Information	Service Providers
Returns e.g. Employment Equity returns	Statutory authorities
Income tax information	Tax Authorities
Financials information relating to business	Financial institutions

8.4 Planned transborder flows of personal information

- Flows service providers /operators /reinsurers

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- Physical security measures
- Cyber security measures
- Training in information security
- Policies in information security
- Audit of information security
- Any particular security framework implemented

9. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS

9.1. PAIA FORM 02: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

In terms of Section 53 (1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation (7), Form 02 should be used to request access to a record held by a Public or Private body in terms of PAIA. Form 02 can be downloaded from the Information Regulator website under Documents/Forms. It can also be downloaded using the link below.

[Form 02: Request for Access to Record](#)

Please note: Do not use Form 02 for personal information requests (Data Subject Requests). The appropriate form for these requests is described in point 14.2 below.

9.2. POPIA FORM 2: 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)

In terms of the Protection of Personal Information Act of 2013, Section 24 and the Regulations relating to the Protection of Personal information, 2017, [Regulation 3(2)] Form 2 should be used to raise requests for the correction or deletion of personal information, or destroying or deletion of record of personal information. Form 2 is available on the Information Regulator website under Documents/Forms. It can be downloaded using the link below:

[Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information](#)

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available- On <https://stfrancislinks.com/>

10.1.1 LINKS GOLF CLUB (RF) LTD office for public inspection during normal business hours;

10.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.3 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The LINKS GOLF CLUB (RF) LTD management team will on a regular basis update this manual.

Issued by

Information Officer

A handwritten signature in blue ink, appearing to be 'J. G. G.', is written over a horizontal line.