

SOMERSET WEST COUNTRY CLUB

(NPC) Reg: 1998/013790/08

NPO Reg: 094-210-NPO

NLC Society Reg. No: 00566 | Scheme Reg. No: 00566/01



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013

Effective date: August 2026

1. INTRODUCTION

1.1. This manual is published by Somerset West Country Club (NPO Registration Number 094-210-NPO), a non-profit organisation ("the Club", "we", "us"), in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). PAIA gives effect to the constitutional right of access to any information held by a public or private body that is required for the exercise or protection of any right.

1.2. This manual is intended to assist members of the public and other requesters to understand what records the Club holds, how to request access to those records, and what to expect from the request process. It should be read together with the Club's Privacy Policy, which explains in more detail how the Club processes personal information under the Protection of Personal Information Act 4 of 2013 ("POPIA").

1.3. As from 1 January 2022, private bodies are no longer required to file this manual with the Information Regulator, but must make it available as set out in clause 8 below.

2. CONTACT DETAILS

Body	Somerset West Country Club
Registration	NPO Registration Number 094-210-NPO; registered as a society with the National Lotteries Commission (Reg. No. 00566)
Physical / postal address	Rue De Jacqueline, Somerset West Country Club, Cape Town, 7130
Telephone	021 852 2925
Email	chairperson@swcountryclub.co.za
Website	www.swcountryclub.co.za
Information Officer	Sonja Koehler, Chairperson
Deputy Information Officer	Neil Stokes, Treasurer

2.1. All PAIA requests should be directed to the Information Officer at the address, email or telephone number set out above.

3. HOW TO USE THIS MANUAL AND PAIA

3.1. The Information Regulator has published a Guide, in terms of section 10 of PAIA, containing information to assist a requester to exercise their rights under PAIA (including the manner and form in which requests must be made). The Guide is available from the Information Regulator, whose details are as follows:

Information Regulator (South Africa)	
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 Toll-free: 0800 017 160
General enquiries	enquiries@inforegulator.org.za

PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

4. RECORDS AVAILABLE WITHOUT A FORMAL REQUEST

4.1. The following records are made freely available by the Club, without the need to lodge a formal PAIA request, at the Club's offices and/or on the Club website:

4.1.1. this PAIA manual;

4.1.2. the Club's Privacy Policy (POPIA);

4.1.3. the Club's constitution;

4.1.4. the official rules and terms and conditions of any Club lottery / raffle, including the currently registered 2027 Ryder Cup Grand Prize Draw;

4.1.5. the Club's National Lotteries Commission society and scheme registration confirmations;

4.1.6. general Club membership and facility information; and

4.1.7. annual financial statements presented to members at the Club's AGM.

5. DESCRIPTION OF RECORDS HELD

5.1. In terms of section 51(1)(b) of PAIA, the Club holds records falling within the categories listed in the table below. This description is provided in sufficient detail to facilitate a request for access; it does not mean that access will necessarily be granted, as all requests are considered against the grounds for refusal set out in Chapter 4 of Part 2 of PAIA.

Governance records	Constitution, board/governing body minutes and resolutions, policies, correspondence with regulators (including the National Lotteries Commission)
Financial records	Annual financial statements, audit reports, banking records, budgets, invoices and receipts, VAT and tax records
Membership records	Membership applications, member contact and subscription records
Lottery / raffle records	Ticket sales and purchaser records, draw and winner records, NLC application and registration documents, lottery returns (form SL04/14), beneficiary receipts (form SL05/14), prize-winner declarations (form SL06/14), prize supplier agreements and invoices
Employment / HR records	Records relating to any Club staff, contractors or volunteers, where applicable
Marketing and communications records	Website and social media content, newsletters, sponsorship and marketing materials
Legal and compliance records	Contracts, insurance policies, legal correspondence, POPIA and PAIA compliance records
IT and security records	Records relating to the Club's website, online ticketing portal and related security or access logs

6. HOW TO REQUEST ACCESS TO A RECORD

6.1. Who may request: Any person (including a company, close corporation, trust or other legal entity) may request access to a record held by the Club, provided the requester needs the record for the exercise or protection of a right, and follows the procedure set out below.

6.2. Procedure: A requester must:

6.2.1. complete the prescribed request form (Form 2 under the PAIA Regulations, 'Request for access to record of private body'), available from the Information Regulator's website or the Club's Information Officer;

- 6.2.2. provide sufficient detail to enable the Information Officer to identify the record and the requester, and state the right the record is required to exercise or protect;
 - 6.2.3. indicate the form of access required (for example, a copy, inspection, or an electronic copy) and how the record should be delivered; and
 - 6.2.4. submit the completed form, together with any required fee, to the Information Officer at the contact details in clause 2.
- 6.3. Fees. A requester must pay the prescribed request fee (currently R50, or as prescribed from time to time under the PAIA Regulations) before the request will be processed, except where the request is for the requester's own personal information. If access is granted, an access fee and reproduction fee (for example, for photocopying or electronic media) may also be payable, calculated in accordance with the tariff prescribed under PAIA. The Information Officer will notify the requester of the applicable fees before proceeding.
- 6.4. Response time: The Club will respond to a request as soon as reasonably possible, and in any event within 30 (thirty) days of receipt of a complete request, as required by PAIA. This period may be extended once, by a further period not exceeding 30 days, in the circumstances permitted by section 57 of PAIA, in which case the requester will be notified in writing.
- 6.5. Grounds for refusal: The Club may refuse a request, or part of a request, on the grounds set out in Chapter 4 of Part 2 of PAIA, which include, among others, protection of the privacy of a third party's personal information, protection of commercial information of a third party, legal privilege, and protection of the safety of individuals or property. Where access is refused, the Information Officer will provide adequate reasons for the refusal, as required by PAIA.
- 6.6. Remedies: PAIA does not provide for an internal appeal against a private body's decision. A requester who is dissatisfied with the Club's decision (including a refusal, a deemed refusal due to non-response, or the fees charged) may lodge

a complaint with the Information Regulator, or apply to a court, for appropriate relief, within the time limits prescribed by PAIA.

7. PERSONAL INFORMATION PROCESSED (SECTION 51(1)(c))

7.1. In terms of section 51(1)(c) of PAIA, read with POPIA, the Club provides the following description of the personal information it processes. Full details, including the purposes and legal bases of processing, retention periods, and data subject rights, are set out in the Club's Privacy Policy.

Categories of data subjects	Club members; lottery ticket purchasers and participants; lottery prize winners; website and online portal users; job applicants, staff, contractors and volunteers (where applicable); suppliers and service providers
Categories of personal information	Names and contact details; identity/passport numbers; date of birth; physical and postal addresses; banking and payment details; ticket purchase and transaction records; photographs and, where provided, testimonials; correspondence; website usage data
Purpose of processing	Administering Club membership; selling and administering lottery tickets; conducting and monitoring the lottery draw; verifying age and eligibility; notifying and publicising winners; delivering the prize (including visa facilitation); complying with legal and regulatory obligations (including to the National Lotteries Commission, SARS and FICA, where applicable); and, where consented to, marketing communications
Recipients / third parties	LDP Compliance Proprietary Limited (independent auditor / draw monitor); the National Lotteries Commission; prize/travel suppliers (including flight, accommodation, event-ticket and visa facilitation providers); payment processors and banks; professional advisors; and the Information Regulator or law enforcement where legally required
Safeguards	Access to personal information is restricted to authorised persons on a need-to-know basis; records are stored securely (physically and electronically) and are retained only for as long as necessary

	for the purposes described above or as required by law, after which they are securely destroyed or de-identified
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8. AVAILABILITY OF THIS MANUAL

- 8.1. This manual is available free of charge: (a) on the Club's website at www.swcountryclub.co.za; (b) for inspection at the Club's offices at Rue De Jacqueline, Somerset West Country Club, Cape Town, 7130, during normal business hours; and (c) on request from the Information Officer, who may charge a reasonable fee for a printed copy to cover reproduction costs.
- 8.2. This manual will be reviewed and updated from time to time to reflect changes in the Club's operations or in applicable law.