



The Gammie on the Go Foundation

because you can

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and incorporating required information in terms of the Protection of Personal Information Act 4 of 2013

Name of Private Body: The Gammie on the Go Foundation NPC

NPC Registration Number: 2025/168894/08

PBO Number: 930087021

Date of Compilation: 21 July 2026

Version: 1.0

1. List of Acronyms and Abbreviations

- 1.1 "CEO" means Chief Executive Officer;
- 1.2 "CIPC" means Companies and Intellectual Property Commission;
- 1.3 "DIO" means Deputy Information Officer;
- 1.4 "Foundation" means the Gammie on the Go Foundation NPC;
- 1.5 "IO" means Information Officer;
- 1.6 "Minister" means Minister of Justice and Correctional Services;
- 1.7 "NPC" means Non-Profit Company;
- 1.8 "PAIA" means Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.9 "POPIA" means Protection of Personal Information Act No. 4 of 2013;
- 1.10 "Regulator" means Information Regulator of South Africa;

1.11 **"Republic"** means Republic of South Africa; and

1.12 **"SARS"** means South African Revenue Service.

2. Introduction and Purpose of This Manual

2.1 About the Foundation

2.1.1 The Gammie on the Go Foundation NPC (the **"Foundation"**) is a non-profit company registered in South Africa. Its mission is to improve the lives of individuals living with physical disabilities by connecting them with prosthetics, orthotics, mobility aids, and assistive equipment, and by supporting their broader rehabilitation and wellbeing journey.

2.1.2 The Foundation helps people stay mobile when practical barriers threaten their independence and focuses on targeted interventions that restore movement and dignity. The Foundation does not seek to replace existing systems but works alongside public and private healthcare structures, stepping in where small gaps create life-changing consequences.

2.1.3 The Foundation's three focus areas are prosthetic funding, mobility equipment, and rehabilitation assistance. Services provided include prosthetic components, liners, feet and sockets, orthotics and assistive equipment, fitting and adjustment costs, and wheelchairs and mobility aids, delivered in partnership with prosthetists, orthotists, physiotherapists, biokineticists, and psychologists.

2.1.4 The Foundation is a South African non-profit company, with registration number 2025/168894/08, incorporated on 25 February 2025.

2.2 Publication and Purpose of this Manual

2.2.1 This manual has been published with the purpose of complying with PAIA, which gives effect to the constitutional right of access to records held by public and private bodies where such access is required for the exercise or protection of rights, subject to justifiable limitations. This manual explains how to request access to the Foundation's records and describes the categories of records held, the process to follow, the applicable grounds on

which a request may be refused, and the remedies available if access is refused.

2.2.2 In compliance with section 51 of PAIA, read with section 110 of POPIA, this manual also provides a high-level description of the Foundation's processing of personal information.

2.2.3 Specifically, this PAIA Manual is useful for the public to:

2.2.3.1 check the categories of records held by the Foundation which are available without a person having to submit a formal PAIA request;

2.2.3.2 have a sufficient understanding of how to make a request for access to a record of the Foundation, by providing a description of the subjects on which the Foundation holds records and the categories of records held on each subject;

2.2.3.3 know the description of the records of the Foundation which are available in accordance with any other legislation;

2.2.3.4 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;

2.2.3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.2.3.6 know if the Foundation processes 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;

2.2.3.7 know the recipients or categories of recipients to whom personal information may be supplied;

2.2.3.8 know if the Foundation has planned to transfer or process personal information outside the Republic; and

- 2.2.3.9 know whether the Foundation has appropriate security measures to ensure the confidentiality, integrity, and availability of personal information which is to be processed.

3. Key Contact Details

3.1 Head / Registered Office

Name of Private Body:	The Gammie on the Go Foundation NPC
Head of Private Body:	Sean Clarke (Founder and Director)
Registration Number:	2025/168894/08
PBO Number:	930087021
VAT Registration Number:	9912962181
Physical Address:	87 7th Street, Parkhurst, Johannesburg, Gauteng, 2196
Postal Address:	87 7th Street, Parkhurst, Johannesburg, Gauteng, 2196
Telephone:	083 385 9024
Email:	sean@gammieonthego.co.za
Website:	www.gammieonthego.co.za

3.2 Information Officer

- 3.2.1 The Foundation's Information Officer is responsible for ensuring the Foundation's compliance with POPIA and PAIA and for handling queries, access requests, and complaints relating to the processing of personal information.

- 3.2.2 The Foundation's Information Officer's details are as follows:

Name: Kaylin Clarke

Email: Kaylinvd7@gmail.com

Telephone: 072 010 4103

Address: 87 7th Street, Parkhurst, Johannesburg, Gauteng, 2196

4. Guide on How to Use PAIA

- 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 (the "**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 Guide contains a description of, amongst other things, the objects of PAIA and POPIA, the postal and street address, phone and fax number, and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body.
- 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 from the Information Officer using the prescribed Form 1, which can be accessed on the Information Regulator's website via the following link: <https://inforegulator.org.za/paia-forms/>; and
- 4.5.2 from the Information Regulator's website at <https://inforegulator.org.za/>.
- 4.6 A copy of the Guide is also available in English and Afrikaans for public inspection during normal office hours.
- 4.7 Any queries regarding the Guide must be directed to the Information Regulator using the contact details provided below.
- 4.8 **Information Regulator's Contact Details:**

Physical address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Website:	https://inforegulator.org.za/
Email Address:	POPIA complaints: POPIAComplaints@inforegulator.org.za
	PAIA complaints: PAIAComplaints@inforegulator.org.za

	General enquiries: enquiries@infoeregulator.org.za
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5. Records Available without a Person Having to Request Access

5.1 The Foundation may, from time to time, make certain categories of records automatically available without a requester having to submit a formal PAIA request. These records may be made available on the Foundation's website or for inspection at the Foundation's office, and may include public statements, media releases, brochures, newsletters, and general information about the Foundation's programmes and initiatives; annual reports and impact summaries made public by the Foundation; and policies or notices expressly marked as publicly available on the Foundation's website.

5.2 The following records are, or may from time to time be, made available on the Foundation's website at www.gammieonthego.co.za or upon written request to the Information Officer, without the need to submit a formal PAIA request:

Category of Records	Types of Record	Available on Website	Available on Request
Privacy Notice / Privacy Policy	Foundation Privacy Notice	☒	☒
PAIA Manual	This Manual	☒	☒
Public statements and media releases	Brochures, newsletters, general information about programmes and initiatives	☒	☒
Annual reports and impact summaries	Annual impact reports (if made public)	☒	☒
Fundraising information	Corporate partnership information, Move with Purpose programme details, Section 18A certificate availability	☒	☒

5.3 If hard copies of records are requested, a requester may be charged the prescribed reproduction fee for copies as provided for in the PAIA Regulations.

6. Records Available in terms of Other Legislation

6.1 The following legislation, amongst others which may become applicable from time to time including any subsequent amendment thereto, is applicable to and observed by the Foundation in undertaking its day-to-day operations.

- 6.2 Unless disclosure is prohibited by applicable legislation, regulation, or contractual obligation, records held in terms of the legislation listed below will be made available for inspection upon a request being made in accordance with this Manual:

Category of Records	Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Registration Certificate (COR14.3)	Companies and Intellectual Property Commission (CIPC)
Income Tax Exemption and PBO records	Income Tax Act 58 of 1962
Section 18A certificate records	Income Tax Act 58 of 1962
Financial records and audited statements	Auditing Professions Act 26 of 2005; Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Non-profit organisation records	Non-Profit Organisations Act 71 of 1997
Employment-related records	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997
Health and safety records	Occupational Health and Safety Act 85 of 1993
Personal information processing records	Protection of Personal Information Act 4 of 2013
VAT and tax records	Value Added Tax Act 89 of 1991; Income Tax Act 58 of 1962
Children's records	Children's Act 38 of 2005

7. Subjects and Categories of Records held by the Foundation

Important Note: Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

7.1 Corporate Governance and Statutory Records

Including incorporation documents, Memorandum of Incorporation, CIPC filings, NPO registration records, governance policies, board and committee charters, minutes and resolutions, delegations of authority, and conflict of interest disclosures.

7.2 Beneficiary Records

Records relating to beneficiaries of the Foundation's mobility support programmes, including:

- Beneficiary intake and application records, including full name, identity number or date of birth, gender, contact details, information about the beneficiary's physical disability, health condition, medical history, and rehabilitation needs, and information about the beneficiary's financial circumstances and household situation (for vetting and support purposes);
- Eligibility assessment and verification records;
- Records relating to the coordination of assistive devices and equipment;
- Ongoing support programme records;
- Photographs, video footage, voice recordings, and written accounts (where consent has been provided); and guardian or caregiver details, where the beneficiary is a minor or lacks legal capacity.

Note: All records containing health and disability information constitute Special Personal Information under POPIA and will be handled with heightened care. Access to such records will only be provided to the person to whom the records relate, or to a duly authorised representative with proof of consent or legal authority. Where a request relates to health or other records relating to the physical or mental health or well-being of a beneficiary, and the Information Officer is of the opinion that disclosure of the record might cause harm, the Information Officer may, before giving access, consult with a health practitioner nominated by the relevant person or their representative.

7.3 Donor and Fundraising Records

Including full name and contact details of donors; banking and payment information where donations are made; correspondence and communication records; tax-related information for Section 18A receipts; donation history and engagement records; donor registers; donation agreements; donation receipts;

donor due diligence and screening documentation; acknowledgements; restrictions and conditions on funding; and donor communication records.

7.4 Volunteer and Ambassador Records

Including full name and contact details; relevant skills, qualifications, or professional background; photographs and video footage where consent has been provided; and correspondence and communication records.

7.5 Clinical and Operational Partner Records

Including full name, professional title, contact details, and practice or employer information; professional registration details (e.g. HPCSA registration); correspondence and communication records; and banking details where applicable.

7.6 Financial and Tax Records

Including audited financial statements, management accounts, reconciliations, general ledger extracts, banking confirmations, payment records, procurement records, supplier contracts, SARS correspondence, tax exemption documentation, and other tax filings. Section 18A records are retained as required by the Income Tax Act.

7.7 Human Resources Records

Including employee and volunteer files, employment/volunteer agreements, vetting and background checks where lawful, training records, performance records, payroll and benefits administration records, leave records, and discipline and grievance records.

Note: Personnel records may only be requested by the person to whom the record pertains, unless a requester demonstrates a right to access and relevant legal authority.

7.8 Strategy, Programmes, and Operations Records

Including programme design documents, project proposals, grant criteria, due diligence frameworks, monitoring and evaluation records, impact assessments,

training materials, outreach materials, event records, and post-implementation reviews.

7.9 Communications and Marketing Records

Including publications, website content, newsletters, social media records, brand assets and guidelines, and stakeholder engagement correspondence.

7.10 Information Technology and Security Records

Including information security policies and standards, access control logs, asset registers, vendor/service-level agreements, system architecture and hosting arrangements, business continuity and incident response records, and data protection impact assessments.

7.11 Legal, Compliance, and Risk Records

Including contracts and MOUs, compliance registers, regulatory filings, insurance policies, risk assessments, legal opinions, and dispute resolution records.

7.12 Third-Party Records

Records are kept in respect of other third parties, including contractors, suppliers, agents, and/or service providers. Certain third parties may also possess records that belong to the Foundation and process such records for and on behalf of the Foundation as processing operators. Records held by the Foundation pertaining to other parties may include financial records, correspondence, contractual records, electronic mail, and records provided by or about those third parties.

8. Processing of Personal Information (POPIA)

This section provides a description of the Personal Information Processing activities undertaken by the Foundation as required under section 51(1)(e)(i) to (vii) of PAIA.

The Foundation processes Personal Information in accordance with POPIA and its Privacy Policy. The Privacy Policy is available on the Foundation's website at: www.gammieonthego.co.za.

8.1 Purpose of Processing

The Foundation collects and processes personal information only for specific, clearly defined, and lawful purposes. Those purposes include:

- 8.1.1 **Beneficiary support and programme delivery:** To assess applications for support, verify eligibility, coordinate the provision of assistive devices and equipment, manage ongoing support programmes, and facilitate clinical partnerships in connection with a beneficiary's care.
- 8.1.2 **Fundraising and donor relations:** To receive, process, and receipt donations; to communicate with donors and fundraising contacts; to issue Section 18A tax certificates; and to report to donors and sponsors on the Foundation's impact.
- 8.1.3 **Awareness, advocacy, and media:** To tell the story of the Foundation's work; to raise public awareness of physical disability and assistive technology; and to produce and publish content for fundraising and awareness purposes - in each case, subject to and in accordance with the consent obtained from the relevant data subjects.
- 8.1.4 **Volunteer and ambassador management:** To engage, communicate with, and manage volunteers and ambassadors, and to coordinate their participation in Foundation activities.
- 8.1.5 **Clinical and operational partnerships:** To coordinate with clinical professionals and service providers involved in the delivery of support to beneficiaries.
- 8.1.6 **Legal and regulatory compliance:** To comply with applicable legislation and regulatory requirements, including POPIA, the Companies Act 71 of 2008 (as applicable to non-profit companies), the Income Tax Act 58 of 1962, and any other law to which the Foundation is subject.
- 8.1.7 **Organisational administration:** To manage internal operations, including record-keeping, financial management, audit, governance, and the improvement of services and processes.

- 8.1.8 **Website operation:** To operate and maintain the Foundation's website, monitor website usage, and improve the user experience

8.2 Categories of Data Subjects and Personal Information Processed

The personal information collected will depend on the nature of the relationship with the data subject.

Categories of Data Subjects	Personal Information That May Be Processed
Beneficiaries (and their families and caregivers)	Full name, identity number or date of birth, gender; contact details (telephone number, email address, residential address); information about the beneficiary's physical disability, health condition, medical history, and rehabilitation needs (special personal information); financial circumstances and household situation; photographs, video footage, voice recordings, and written accounts (where consent has been provided); guardian or caregiver details where the beneficiary is a minor or lacks legal capacity
Donors and Fundraising Contacts	Full name and contact details; banking and payment information; correspondence and communication records; tax-related information for Section 18A receipts; donation history and engagement records
Volunteers and Ambassadors	Full name and contact details; relevant skills, qualifications, or professional background; photographs and video footage where consent has been provided; correspondence and communication records
Clinical and Operational Partners	Full name, professional title, contact details, and practice or employer information; professional registration details (e.g. HPCSA registration); correspondence and communication records; banking details where applicable
Website Visitors	IP address and device information; pages visited, time spent on pages, and browsing behaviour; information submitted via web forms or contact requests; cookie-related data
Employees and Service Providers	Name, contact details, identity number, qualifications, banking details, registration numbers, contractual and employment-related information

8.3 Special Personal Information

- 8.3.1 Given the nature of the Foundation's work, it necessarily processes special personal information - in particular, information relating to the health,

disability, and physical condition of beneficiaries. The Foundation will only process such information in accordance with applicable legal bases and will take additional care in handling it.

- 8.3.2 The Foundation recognises that some of its beneficiaries are minors. The processing of children's personal information is subject to additional protections under section 35 of POPIA. The Foundation will not process the personal information of a minor without the prior consent of a competent person - being a parent, legal guardian, or other person legally authorised to consent on the minor's behalf.

8.4 **Recipients or Categories of Recipients of Personal Information**

The Foundation will not sell personal information to any third party. Personal information may be shared with the following:

Category of Personal Information	Recipients or Categories of Recipients
Beneficiary information	Orthotists, prosthetists, physiotherapists, biokineticists, psychologists, and other clinical or rehabilitation professionals involved in providing care and support to a beneficiary, to the extent necessary for that purpose
Operational personal information	IT and cloud service providers, payment processors, accounting and audit professionals, and legal advisers, where those providers are bound by appropriate data protection obligations
Anonymised beneficiary information	Donors and sponsors (in de-identified or appropriately anonymised form only, for impact reporting purposes; personal information that identifies a beneficiary will not be shared without explicit consent)
All categories	Regulators, courts, or law enforcement authorities where required to do so by law, court order, or lawful request
Donor, donation, and tax-related information	SARS, auditors, accounting advisers, and legal advisers (where required for tax, audit, regulatory, or legal compliance purposes)
Health and disability information	Clinical and rehabilitation professionals involved in providing care and support to a beneficiary, and legal advisers (where necessary for legal compliance, risk management, or the establishment, exercise, or defence of legal rights)

8.5 **Planned Transborder Flows of Personal Information**

- 8.5.1 In some instances, personal information may be stored on or processed by servers or systems located outside of South Africa - for example, through the use of cloud-based platforms or international social media channels.
- 8.5.2 The countries to which personal information may be transferred include, in particular, the United States of America (through the use of cloud-based services and social media platforms such as Google, Meta (Facebook and Instagram), and similar providers whose servers are located in the United States) and, potentially, other countries in which the Foundation's third-party service providers host or process data from time to time. The Foundation will update this section as its service provider landscape evolves.
- 8.5.3 Where personal information is transferred to a foreign country, the Foundation will ensure that the recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection substantially similar to POPIA's conditions for lawful processing, as required by section 72 of POPIA.

8.6 **Information Security Measures**

- 8.6.1 The Foundation takes the security of personal information seriously and implements appropriate technical and organisational measures to protect it against unauthorised access, disclosure, alteration, loss, or destruction.
- 8.6.2 Personal information may be stored in hard copy form in secure physical storage at the Foundation's offices or at a third-party storage facility; electronically on password-protected devices and systems; and on the servers of trusted cloud-based service providers operating under contractual data protection obligations.
- 8.6.3 Access to personal information is limited to Foundation personnel and authorised partners who need access for the purposes described in this Manual, and only to the extent necessary for those purposes.
- 8.6.4 The Foundation implements appropriate, reasonable technical and organisational measures to ensure the confidentiality, integrity, and

availability of personal information, including user access controls, encryption in transit and at rest where appropriate, security awareness, vendor due diligence, incident response procedures, and physical and logical safeguards proportionate to risk.

- 8.6.5 In the event of a security compromise or data breach that is likely to result in harm to a data subject, the Foundation will notify the Information Regulator and the affected data subjects as required by sections 22 and 23 of POPIA.

8.7 **Data Subject Rights**

Under POPIA, Data Subjects have the following rights:

- 8.7.1 Right of access to Personal Information held about them;
- 8.7.2 Right to request correction, deletion, or destruction of Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained;
- 8.7.3 Right to object to the Processing of their Personal Information on reasonable grounds;
- 8.7.4 Right to request restriction of Processing in certain circumstances; and
- 8.7.5 Right to lodge a complaint with the Information Regulator regarding any interference with their Personal Information.

8.8 **Contact for Privacy Matters**

Privacy-related queries and requests should be directed to the Information Officer using the contact details set out in Section 3.2 above.

9. **Requesting Access to Records in terms of PAIA**

9.1 **The Request Procedure**

- 9.1.1 A request for access to a Record in terms of PAIA must substantially correspond with Form 2 of Annexure A to the Regulations Relating to the Promotion of Access to Information Act, 2021. The prescribed request form

can be accessed on the Information Regulator's website via the following link: <https://infoeregulator.org.za/paia-forms/>.

9.1.2

The request must be made to the Information Officer using the contact details provided in Section 3.2 above, and must provide sufficient detail to enable the Information Officer to identify the Record and the Requester. The following information must be provided:

Type of Information	Details to be Provided
Personal Information	• Full names and identity number of the Requester • Proof of identity • Contact details including postal address, street address, email address, and telephone numbers • If the request is made on behalf of another person, the full details of that person and proof of authorisation
Record Details	• Full particulars of the Record to which access is requested • Reference number (if known) • Description of the Record or relevant part of the Record • Type of Record (written, virtual images, audio, electronic)
Form and Manner of Access	The Requester should indicate which form of access is required, including: - Printed copy of Record - Written or printed transcription - Copy on electronic media (flash drive, compact disc, cloud storage) - Manner of delivery (personal inspection, postal service, courier, facsimile, email)
Right to be Exercised or Protected	The Requester must identify the right that he or she is seeking to exercise or protect, and provide an explanation as to why the requested Record is required for the exercise or protection of that right.

9.1.3

The Information Officer will Process requests in accordance with the timelines prescribed in PAIA, and will notify the Requester of the decision in the required form.

- 9.1.4 If a requester is unable to complete the prescribed form due to illiteracy or disability, the Information Officer will, on request, assist and reduce the oral request to writing in the prescribed form.

9.2 Fees

- 9.2.1 The Information Officer must notify the Requester (other than a Personal Requester) by notice, requiring the Requester to pay the relevant fee before further Processing the request. A Personal Requester does not pay such fee.
- 9.2.2 The Requester may lodge a complaint with the Information Regulator or an application to court, as applicable under PAIA, against the tender or payment of the request fee.
- 9.2.3 The Information Officer will then make a decision on the request and notify the Requester in the required form.
- 9.2.4 If the request is granted, the Requester will be notified of the access fee that must be paid for the search, reproduction, preparation, and for any time that had exceeded the prescribed hours to search and prepare the Record for disclosure.
- 9.2.5 The prescribed fees for requests to private bodies are set out in Annexure B to the Regulations Relating to the Promotion of Access to Information Act, 2021.

9.3 Third-Party Notification

- 9.3.1 Where a request may involve records containing third-party personal, commercial, or confidential information, the Foundation will take all reasonable steps to notify the third party and invite representations within the statutory period. The Foundation will decide with due regard to any representations and notify both the requester and third party as required by PAIA. Access, if granted, may be deferred pending expiry of the applicable period for complaints or applications.

- 9.3.2 Where the record requested contains information about a third party, the Foundation is obliged to inform them of such request. This serves to allow the third party the opportunity to respond by either granting consent to the access request or to provide reasons why the request should be denied. The reasons provided by the third party will be considered by the Information Officer in making a final decision regarding whether access should be granted or refused.

9.4 **Grounds for Refusal of Access**

- 9.4.1 PAIA prescribes mandatory and discretionary grounds upon which access must or may be refused. Without limitation, access may be refused in the following circumstances:

Grounds for Refusal	Description
Mandatory protection of privacy of a third party (section 63 of PAIA)	The Foundation may refuse access to a record if the disclosure of that record would involve the unreasonable disclosure of personal information relating to a third party, including a deceased individual.
Mandatory protection of commercial information of a third party (section 64 of PAIA)	The Foundation may refuse a request for access to a record if the record comprises or is constituted by trade secrets of a third party; financial, commercial, scientific or technical information of a third party, which if disclosed is likely to cause harm to that third party's commercial or financial interests; or information supplied in confidence by a third party, the disclosure of which could reasonably place the third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
Mandatory protection of confidential information of a third party (section 65 of PAIA)	The Foundation may refuse access to a record which, if disclosed, would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement or contractual relationship.
Mandatory protection of safety of individuals and property (section 66 of PAIA)	The Foundation may refuse a request for access to a record if its disclosure could reasonably be expected to endanger the life or physical safety of an individual or would be likely to prejudice or impair the security of a building, structure or system, means of transport, or any other property.
Mandatory protection of records privileged from production in legal	The Foundation may refuse a request for access to a record if the record is privileged from

proceedings (section 67 of PAIA)	production in legal proceedings unless the person entitled to the privilege has waived the privilege.
Commercial information of the Foundation (section 68 of PAIA)	The Foundation may refuse a request for access to a record if the record contains trade secrets of the Foundation; financial, commercial, scientific or technical information of the Foundation, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Foundation; or information the disclosure of which could reasonably be expected to put the Foundation at a disadvantage in contractual or other negotiations or prejudice the Foundation in commercial competition.
Research information (section 69 of PAIA)	The Foundation may refuse a request for access to a record if the record contains information about research being or to be carried out by or on behalf of a third party or the Foundation, the disclosure of which would be likely to expose the third party, the Foundation, a researcher, or the subject matter of the research to serious disadvantage.
Manifestly frivolous or vexatious requests	The Foundation may refuse manifestly frivolous or vexatious requests, or requests that would substantially and unreasonably divert the Foundation's resources.

9.4.2 Where only a part of a record is subject to refusal, the Foundation will endeavour to grant access to the remainder that can reasonably be severed.

9.5 **Records that Cannot Be Found or Do Not Exist**

If all reasonable steps have been taken to find a record requested and there are reasonable grounds for believing that the record is in the Foundation's possession but cannot be found or does not exist, the Information Officer will, by way of affidavit or affirmation, notify the requester that it is not possible to give access to that record.

10. **Remedies**

10.1 **Internal Appeal**

The Foundation does not have an internal appeal procedure regarding PAIA and POPIA requests for access to information. As such, the decision made by the Information Officer is final, subject to the requester's rights to complain to the Information Regulator or apply to court as set out below.

10.2 **Complaint to the Information Regulator**

- 10.2.1 In terms of section 77A of PAIA, if a request is denied by the head of a private body, the requester is entitled to lodge a complaint with the Information Regulator within 180 days of the decision, in the prescribed manner and form for appropriate relief.
- 10.2.2 The Regulator may investigate, attempt to mediate, conciliate or settle, issue an Enforcement Notice, or decide to take no action for reasons permitted by PAIA.

10.3 **Application to Court**

- 10.3.1 A requester is further entitled in terms of section 78(2)(b) to apply to a court with appropriate jurisdiction within 180 days for appropriate relief.
- 10.3.2 The court may examine the record(s) and grant any just and equitable order, including confirming, amending, or setting aside the decision, requiring action, granting interim or specific relief, or making costs orders

11. **Availability of Manual**

- 11.1 This Manual is available for inspection at the Foundation's registered office during normal business hours. An electronic copy of the Manual is also available on the Foundation's website via the following link: www.gammieonthego.co.za
- 11.2 Copies of this Manual may be requested from the Information Officer using the contact details set out in Section 3.2 above.

12. **Changes to this Manual**

This Manual may be amended and updated from time to time, provided that if the Foundation does so, it will ensure that such changes are carried out subject to and published in accordance with PAIA and POPIA.