



CLOVELLY COUNTRY CLUB

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

Prepared in compliance with PAIA and POPIA

Version: 1.3

Date of Adoption: June 2026

Review Date: June 2027

Information Officer: Paul Eric Stoner

IO Registration No: 00701/2022-2023/IRRTT

SECTION 1: INTRODUCTION AND LEGISLATIVE FRAMEWORK

1.1 Purpose of this Manual

This manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and sets out the types of records held by Clovelly Country Club (hereinafter referred to as "the Club"), the procedures for requesting access to such records, and the rights of requesters in terms of the Act.

1.2 Legislation

This manual gives effect to the following principal legislation:

- Promotion of Access to Information Act 2 of 2000 (PAIA)
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Companies Act 71 of 2008 (as applicable to the Club's legal structure)
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Income Tax Act 58 of 1962
- Consumer Protection Act 68 of 2008

1.3 Availability of this Manual

This manual is available:

- On the Club's official website at: www.clovelly.co.za
- At the Club's registered office at 177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
- From the Information Officer upon written request
- From the Information Officer upon written request at gm@clovelly.co.za

SECTION 2: DETAILS OF THE CLUB

2.1 Club Information

Full Legal Name	Clovelly Country Club
Registration Number	Not Applicable
Legal Form	Voluntary Sport Association
Physical Address	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
Postal Address	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
Telephone Number	+27 21 784 2111
Email Address	gm@clovelly.co.za
Website	www.clovelly.co.za

2.2 Information Officer

The Club has designated the following person as its Information Officer, duly registered with the Information Regulator:

Full Name	Paul Eric Stoner
Title / Position	Information Officer
IO Registration Number	00701/2022-2023/IRRTT
IO Registration Date	13 January 2022
Telephone	+27 21 784 2111
Email Address	gm@clovelly.co.za
Postal Address	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town

2.3 Deputy Information Officer

Full Name	Not Applicable
Title / Position	Not Applicable
Telephone	Not Applicable
Email Address	Not Applicable

SECTION 3: GUIDE ON HOW TO USE THE ACT

The Information Regulator has compiled a guide to assist persons wishing to exercise their rights under PAIA. This guide is available from the Information Regulator, which assumed full responsibility for PAIA administration from 1 July 2021. The guide is available at:

Organisation	Information Regulator (South Africa)
Telephone	010 023 5200
Email	infoereg@justice.gov.za
Website	www.inforegulator.org.za
Postal Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

SECTION 4: RECORDS HELD BY THE CLUB

4.1 Categories of Records

Clovelly Country Club holds the following categories of records. Some records may be accessed without a formal PAIA request; others require a formal application on the prescribed Form 2 (in terms of the Regulations Relating to the Promotion of Access to Information, 2021).

4.1.1 Governance and Constitutional Records

- Memorandum of Incorporation (MOI) / Constitution and Club Rules
- Board and Committee resolutions and minutes
- Annual General Meeting (AGM) minutes
- Register of directors, trustees, and office bearers
- Correspondence with the Information Regulator

4.1.2 Membership Records

- Membership application forms and agreements
- Membership register (names, categories, contact details)
- Membership fee schedules and levy notices
- Previous club affiliation records
- Correspondence with members
- Disciplinary records and hearing outcomes
- Handicap and competition records (Golf RSA / Handicaps Network Africa / ScoreCapture)
- Clubmaster SA member account records

4.1.3 Financial Records

- Annual financial statements
- Management accounts
- Auditor / independent reviewer reports
- Banking records and bank statements
- Debtor and creditor ledgers
- Levy and subscription records
- VAT returns and SARS correspondence
- Payroll records
- Capital expenditure records
- Investment and loan agreements

4.1.4 Human Resources and Employment Records

- Employment contracts and job descriptions
- Payroll and salary records
- Leave records
- Disciplinary and grievance records

- UIF and COIDA records
- SARS employee tax certificates (IRP5s)
- Training and development records

4.1.5 Contracts and Supplier Records

- Service level agreements (maintenance, security, IT, catering, etc.)
- Lease agreements
- Insurance policies and claims records
- Procurement and tender records
- Clubmaster SA service agreement
- Golf RSA and Handicaps Network Africa agreements

4.1.6 Property and Facilities Records

- Title deeds / lease agreements for Club property at 177 Clovelly Road
- Municipal rates and services records
- Building plans and construction records
- Environmental compliance records
- Water rights and irrigation records
- Maintenance logs and asset registers

4.1.7 Course and Operations Records

- Golf course maintenance records and schedules
- Equipment inventory and service records
- Pro shop stock and sales records
- Catering and liquor license records
- Health and safety records and compliance certificates
- Competition and event records
- Sponsorship agreements

4.1.8 IT, Data and Website Records

- Member database and Clubmaster SA records
- CCTV footage (retained only as long as required; subject to POPIA)
- Website user data, cookies and device data (as described in the Club's Privacy Notice)
- Email and correspondence records
- Social media records

SECTION 5: RECORDS AVAILABLE WITHOUT FORMAL PAIA REQUEST

The following records are made available by Clovelly Country Club without requiring a formal PAIA request:

- This PAIA Manual
- Club Constitution / Memorandum of Incorporation
- Club Rules (general)
- Current membership fee schedules
- Contact details of the Information Officer
- Approved AGM minutes (once formally adopted)
- Competition results and handicap information
- Club newsletters and official member communications
- Privacy Notice (published on the Club website at www.clovelly.co.za)

These records are available on the Club's website and/or from the Club office at 177 Clovelly Road, Fish Hoek, Cape Town, upon request.

SECTION 6: HOW TO REQUEST ACCESS TO RECORDS

6.1 Prescribed Form

All requests for access to records must be made on the prescribed Form 2, as published in terms of the Regulations Relating to the Promotion of Access to Information, 2021 (PAIA Regulations). Form 2 applies to both public and private bodies and replaces the previously prescribed Form C. This form is available:

- On the Information Regulator's website: www.inforegulator.org.za
- From the Club's Information Officer on request (gm@clovelly.co.za)
- Attached as Annexure A to this manual

6.2 Where to Submit Requests

Completed Form 2 requests must be submitted to the Information Officer, Paul Eric Stoner, at:

Hand Delivery	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
Postal Address	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
Email	gm@clovelly.co.za
Telephone	+27 21 784 2111

6.3 Request Fee

A non-refundable request fee of R140.00 (or as updated by regulation) is payable when submitting a formal PAIA request. This fee is waived for requests relating to the requester's own personal information.

6.4 Access Fee

If the request is granted, an access fee may be charged to cover reproduction and search costs, in accordance with the prescribed tariff published under PAIA.

6.5 Response Timeframe

The Club will respond to a PAIA request within 30 days of receipt of the properly completed Form 2 and payment of the request fee. This period may be extended by a further 30 days in certain circumstances, in which case the requester will be notified in writing.

6.6 Grounds for Refusal

Access to records may be refused on the following grounds (not exhaustive):

- The record contains personal information about a third party who has not consented to disclosure
- Disclosure would reveal commercial information that could prejudice a third party

- The record is protected by legal privilege
- Disclosure could endanger the safety of an individual
- The record relates to an ongoing investigation or legal proceedings
- The record does not exist or cannot be found after reasonable search

SECTION 7: REMEDIES AVAILABLE TO REQUESTERS

If a request is refused, or if the Club fails to respond within the prescribed timeframe, the requester has the following remedies:

7.1 Internal Appeal

A requester may lodge an internal appeal with the Club's Committee within 60 days of receiving the refusal. The Committee must decide on the appeal within 30 days.

7.2 Complaint to the Information Regulator

A requester may lodge a complaint with the Information Regulator if not satisfied with the outcome of an internal appeal, or if the Club fails to respond timeously.

Organisation	Information Regulator (South Africa)
Email	infoereg@justice.gov.za
Telephone	010 023 5200
Website	www.infoeregulator.org.za
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

7.3 Court Application

A requester may approach the High Court for relief under PAIA if all other remedies have been exhausted.

SECTION 8: PROCESSING OF PERSONAL INFORMATION (POPIA)

Clovelly Country Club processes personal information in compliance with the Protection of Personal Information Act 4 of 2013 (POPIA). Paul Eric Stoner (IO Registration No: 00701/2022-2023/IRRTT) is the Club's registered Information Officer responsible for POPIA compliance.

8.1 Categories of Personal Information Processed

The Club processes the following categories of personal information, as described in the Club's Privacy Notice published on www.clovelly.co.za:

- Name and contact information (address, telephone number, email, ID number)
- Billing information (credit card, bank account, billing contact details)
- Gender and age
- Previous club affiliation
- Geographic and location information
- Employee personal and financial information
- CCTV images of members, visitors and staff at the Club premises
- Website usage data (cookies, IP addresses, browser type, device identifiers)
- Golf performance and handicap data (via Golf RSA / Handicaps Network Africa)

8.2 Purpose of Processing

Personal information is processed for the following purposes:

- Administration of membership and Club operations
- Processing of payments, levies and billing
- Interfacing with Golf RSA, Clubmaster SA and Handicaps Network Africa
- Communication with members, staff and service providers
- Compliance with legal obligations
- Safety and security of the Club premises (CCTV)
- Organisation of competitions and events
- Direct marketing (with opt-out facility as described in the Privacy Notice)

8.3 Third Parties with Whom Personal Information is Shared

Golf RSA / Handicaps Network Africa	Handicap administration and competition data
Clubmaster SA	Member management system and billing
Club employees and consultants	Service delivery on behalf of the Club
Legal / regulatory bodies	Where required by law or court order

8.4 Data Retention

Personal information is retained only for as long as necessary for the purposes set out in this manual and the Club's Privacy Notice, or as required by applicable law. CCTV footage is retained only as long as required and is kept secure at all times.

8.5 Data Subject Rights

In terms of POPIA, members and other data subjects have the right to:

- Request access to their personal information held by the Club
- Request correction or deletion of inaccurate or outdated information
- Object to the processing of their personal information
- Opt out of direct marketing communications
- Lodge a complaint with the Information Regulator

Requests relating to personal information may be submitted to the Information Officer at gm@clovelly.co.za or by post to 177 Clovelly Road, Clovelly, Fish Hoek, Cape Town.

8.6 Special Personal Information

Clovelly Country Club does not knowingly collect or process special personal information such as religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, health or sex life, or criminal behaviour or biometric information.

SECTION 9: DOCUMENT CONTROL AND REVIEW

Version Number	1.3
Date of Adoption	June 2026
Approved By	Club Committee — Clovelly Country Club
Next Review Date	June 2027
Information Officer	Paul Eric Stoner
IO Registration No	00701/2022-2023/IRRTT
IO Registered Date	13 January 2022
Amendments	Version 1.1: All references to prescribed “Form C” updated to “Form 2” in accordance with the Regulations Relating to the Promotion of Access to Information, 2021. Version 1.2: Section 3 updated to reflect that the Information Regulator replaced the SAHRC as the responsible authority for PAIA administration with effect from 1 July 2021. All Section 3 contact details updated to Information Regulator. Section 1.3 availability bullet updated accordingly. Version 1.3: Removed “fax” from Section 8.1 personal information categories. Section 1.3 availability bullet corrected. Section 4.1.1 regulatory bodies reference updated. Section 7.1 updated to reference Club Committee. Section 9 submission statement corrected.

This manual will be reviewed annually or whenever there is a material change in the Club's operations, structure, or applicable legislation. Updated versions will be published on the Club's website and made available at the Club's principal place of business.

ANNEXURE A: PAIA REQUEST FORM (FORM 2) REFERENCE

The prescribed Form 2 for requesting access to records is not reproduced here in order to ensure requesters always use the most current version as published by the Information Regulator in terms of the Regulations Relating to the Promotion of Access to Information, 2021.

The current Form 2 is available at:

- www.inforegulator.org.za (Forms section – PAIA Regulations 2021)
- www.justice.gov.za (Promotion of Access to Information Act resources)
- From the Club's Information Officer: gm@clovelly.co.za

Completed Form 2 requests, together with proof of payment of the request fee (R140.00), should be submitted to:

Information Officer	Paul Eric Stoner
Club	Clovelly Country Club
Physical Address	177 Clovelly Road, Clovelly, Fish Hoek, Cape Town
Email	gm@clovelly.co.za
Telephone	+27 21 784 2111

END OF PAIA MANUAL

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