

PAIA MANUAL

MANUAL

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Prepared by: C4 EcoSolutions

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GLOSSARY

Table 1: Glossary of Terms and Definitions

Unit/Abbreviation/Acronym	Definition
Access to Information	The right to obtain information held by public and private bodies as governed by the Promotion of Access to Information Act (PAIA)
Chief Information Officer	The individual responsible for overseeing access to information requests and ensuring compliance with PAIA regulations
Confidential Information	Any data or records that contain sensitive details about third parties, trade secrets, or legally privileged information that cannot be disclosed under PAIA
Data Subject	A person whose personal information is processed by an entity
Electronic Format	A digital version of a document or record, such as a PDF or Word file, which can be accessed via electronic devices
Employee Information	Records related to employees, including payroll, performance reviews, disciplinary records, and leave records
Financial Service Providers	Entities that offer financial management services, including payroll processors, accounting firms, and auditors
Information Officer	The designated individual responsible for managing access to information requests and ensuring compliance with PAIA and POPIA
Legal and Compliance Records	Documents related to labor laws, regulatory requirements, and legal compliance obligations
Manual (PAIA Manual)	A document outlining the procedures and policies for accessing information from C4 EcoSolutions in compliance with PAIA
Memorandum of Incorporation	A legal document that defines the structure, rights, and duties of a company
Personal Information	Any information that can identify an individual, including names, contact details, employment history, and financial data
Planned Transborder Flow	The movement of personal information across international borders, subject to compliance with POPIA
POPIA (Protection of Personal Information Act, 2013)	Legislation that governs the processing of personal information in South Africa, ensuring data privacy and security
Processing (of Information)	Any operation performed on personal data, such as collection, recording, storage, or sharing
Project Deliverables	Final outputs or results of a consulting or environmental project undertaken by C4 EcoSolutions
Public Record	A document or information that is available for public access without requiring a PAIA request
Regulator (Information Regulator of South Africa)	The body responsible for overseeing compliance with PAIA and POPIA
Requester	Any individual or entity requesting access to records held by C4 EcoSolutions under PAIA.
Third Party	Any external individual, company, or organization that may have access to or process personal information
Trade Secret	Confidential business information that provides a company with a competitive advantage and is protected from disclosure
Vendor Information	Records related to suppliers, procurement policies, and contractual agreements with service providers



1 PURPOSE OF PAIA MANUAL

This manual contains information required to request access to records held by C4 EcoSolutions (Pty) Ltd (C4ES). This PAIA manual is useful for the public to:

- 1.1 Check the categories of records held by C4ES which are available without a person having to submit a formal PAIA request;
- 1.2 Have a sufficient understanding of how to make a request for access to a record of C4ES, by providing a description of the subjects on which C4ES holds records and the categories of records held on each data subject;
- 1.3 know the description of the records of C4ES which are available in accordance with any other legislation;
- 1.4 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;
- 1.5 Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 Know if C4ES 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;
- 1.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 Know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 Know if C4ES 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
- 1.10 Know whether C4ES has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed

2 APPLICABLE LEGISLATION

C4ES holds records in accordance with the following legislation:

Companies Act 71 of 2008

Labour Relations Act, 66 of 1995

Basic Conditions of Employment Act, 75 of 1997

Income Tax Act, 58 of 1962

Protection of Personal Information Act, 4 of 2013 (POPIA)

Promotion of Access to Information Act, 2 of 2000 (PAIA)

Electronic Communications and Transactions Act, 25 of 2002

3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF C4ES



3.1 CHIEF INFORMATION OFFICER

Name: Barbara Ikin

Position: General Manager

Email: Barbara.Ikin@C4es.co.za

Contact number: +27 64 695 9350

3.2 ACCESS TO INFORMATION GENERAL CONTACTS

Email: info@c4es.co.za

3.3 COMPANY DETAILS

Registration Number: 2015 / 156753 / 07

Head Office Address: 18 Gerrie Avenue, Tokai, Cape Town, South Africa, 7945

Postal Address: 18 Gerrie Avenue, Tokai, Cape Town, South Africa, 7945

Telephone Number: +27 21 712 028

Email Address: info@c4es.co.za

Website: www.c4es.co.za

4 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE REGULATOR'S 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 English, Sesotho and Afrikaans.
- 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, email 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 PAIA and section 56 of POPIA;
 - 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 11; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50;
 - 4.3.4 the assistance available from the Information Officer 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 and 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 of 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 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to the manual;
- 4.3.8 the provisions of sections 15 and 52 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 section 22 and 54 regarding fees to be paid in relation to requests for access, and
- 4.3.10 the regulations made in terms of section 92.
- 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 (www.justice.gov.za/infoereg/).
- 4.6 A copy of the Guide is available in English, Sesotho and Afrikaans for public inspection during normal office hours.

5 CATEGORIES OF RECORDS OF C4ES WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of Section 52 of PAIA the following categories of C4ES records are available without a person having to request access.

Table 2: Categories of available information

Category of record	Types of the Record	Available of Website	Available on request
Corporate Governance	Memorandum of Incorporation, Company Policies	No	Yes
HR and Employment	Employee code of conduct, HR Policies, workplace health and safety procedures	No	Yes
Operations and Projects	Publicly available project summaries, operational guidelines or organisational newsletters	Yes	Yes



Compliance Documents	Copies of licenses, permits, or certifications required for public display	No	Yes
External Communications	Press releases, newsletters or corporate brochures	No	Yes
Training Materials	Publicly available training manuals or resources	No	Yes
Environmental records	Non-confidential environmental policies, sustainability reports, or public project findings	No	Yes
Procurement and Vendors	Vendor application forms, procurement policies (non-confidential sections)	No	Yes
IT and Systems	Acceptable Use Policy, Cybersecurity awareness documents (non-sensitive)	No	Yes

6 DESCRIPTION OF THE TYPES AND CATEGORIES OF RECORDS HELD BY C4ES (AVAILABLE UPON REQUEST)

C4ES holds the following categories and types of records, which may be available upon request in accordance with PAIA:

Table 3: Types of Records Held by C4ES

Types of Records Held



Corporate Records	Company Registration Documents, Board Minutes, Shareholder Records
Operational Records	Project Documents, Contracts, Internal Policies and Procedures
Financial Records	Audits, Tax Returns, Budgets, Financial Statements
Employee Records	Payroll, Contracts, Disciplinary Records, Performance Review Records, Leave Records, Curriculum Vitae
Client Records	Project Deliverables, Agreements, Personal Information of Clients
Supplier Records	Contracts, Contact Details, Invoices, Payment Records

7 PROTECTION OF PERSONAL INFORMATION (POPIA COMPLIANCE)

7.1 THE PURPOSE OF PROCESSING PERSONAL INFORMATION

Table 4 outlines the purpose for processing information according to each category.

Table 4: Purpose of Processing Personal Information

Purpose of the Processing		
Employee Information	HR and Payroll Management	To administer salaries, benefits and leave
	Legal and Compliance	To fulfil labour law obligations and ensure compliance with regulatory requirements
	Performance Management	To evaluate and manage employee performance and career development



	Workplace Safety	To ensure the health and safety of employees in the workplace
	Training and Development	To support professional growth and maintain necessary certifications
	Project Leadership	Staff CVs are created and shared with clients and potential clients for bidding and resourcing requirements on projects
Client Information	Project Management	To plan, execute, and deliver consulting services as agreed upon in contracts
	Communication	To maintain effective communication regarding project updates, reports, and deliverables
	Invoicing and Financial Management	To facilitate payment processing and maintain accurate financial records
	Regulatory Compliance	To ensure compliance with international and local laws governing environmental projects and data sharing
	Quality Assurance and Feedback	To assess client satisfaction and improve services based on feedback
Supplier Information	Procurement Management	To manage and fulfil the procurement of goods and services required for operational efficiency
	Payment and financial administration	To process payments and maintain accurate financial records



	Compliance and Reporting	To ensure compliance with legal and regulatory requirements, such as tax compliance and procurement policies
	Performance Monitoring	To evaluate supplier performance and maintain high-quality standards for goods and services
	Contractual Obligations	To manage contractual relationships and ensure terms are fulfilled
Contractor Information	Engagement Management	To manage the relationship and coordinate activities related to specific projects
	Payment and Financial Administration	To process payments for services rendered and maintain accurate financial records
	Contractual Compliance	To ensure that all terms of the agreement are met, including adherence to timelines and quality standards
	Project Delivery	To facilitate project execution and ensure the successful delivery of outcomes in collaboration with contractors
	Legal and Regulatory Compliance	To meet obligations related to tax reporting, contract law, and other applicable regulations

7.2 THE RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

In the course of its operations, C4ES may share personal information with third parties to fulfill legal, operational, or contractual obligations. All third-party recipients are required to sign agreements ensuring they process personal information in compliance with POPIA and other relevant data protection laws.

Access is restricted to only the information necessary for the recipient to perform their specific functions.



Below are the categories of recipients of personal information:

Table 5: Categories of Recipients of information

Categories	Types of service providers	Services
Financial Service Providers	Accounting and Financial Firms	External accounting firms for bookkeeping, tax submissions and financial audits
	Payroll Processors	Providers of payroll systems and services for salary disbursement, tax calculations, and benefits administration
IT and Data Storage Providers	Cloud storage providers	Platforms for secure data storage and sharing
	Software and Productivity Tools	Providers of software like Microsoft Office for document creation, email and data management
	Third-Party IT Support	Companies providing IT maintenance, troubleshooting, and cybersecurity services
Regulatory Authorities	Government and Tax Authorities	Local or international tax authorities for compliance and reporting purposes
	Information Regulators	Entities requiring compliance documentation under POPIA or similar laws
Auditors	External and Internal Auditors	Firms conducting financial and operational audits



Legal Advisors	Law firms or Legal Consultants	Providers of legal services for dispute resolution, contract review, or compliance matters
Project Partners and Stakeholders	Consortium Partners	Organisations collaborating on joint projects
	Clients	Sharing project deliverables or client-specific analyses as part of contractual obligations
Sub-Contractors and Consultants	Independent Contractors or Sub-Consultants	Individuals or companies engaged to assist with specific projects
Compliance-related service providers	Background Check and Verification Providers	Firms performing background checks on employees or contractors
	Health and Safety Service Providers	Companies managing workplace safety and compliance
Travel and Logistics Providers	Travel Agencies and Car Rental Companies	Providers facilitating business travel arrangements
	Accommodation Providers	Hotels or lodging services for staff or consultants
Training and development Providers	Learning Management Systems (LMS) or Trainers	Platforms or individuals delivering training programmes to employees or contractors.
Insurers	Health and Risk Insurers	Providers offering medical, life, or professional indemnity insurance



Courier and Delivery Services

Logistics Companies

Providers facilitating the delivery of documents, equipment or materials

7.3 PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

From time to time we may need to share personal information of data subjects with third parties in other countries. We are required to ensure that when we need to do this, we comply with the POPIA.

Such sharing will only be done if one of the following requirements are met:

- a) The third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that:
 - i. Effectively upholds principles for reasonable processing of the information that are subsequently similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the Protection of Personal Information Act; and
 - ii. Includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;
- b) The data subject consents to the the transfer;
- c) The transfer is necessary for the performance of a contract between the data subject and the company in question, or for the implementation of pre-contractual measures taken in response to the data subject's request;
- d) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company in question and a third party; or
- e) The transfer is for the benefit of the data subject; and
 - i. It is not reasonably practicable to obtain the consent of the data subject to that transfer; and
 - ii. If it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

7.4 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY C4ES

Safeguarding and preserving the confidentiality, integrity, and availability of our client, employee and supplier information is imperative to our operations and treated as critical to our business strategy.

As a responsible business and as threats evolve, we are investing to continuously improve our information security posture. We are committed to embed and information security culture throughout our organisation and are continually working towards improving the security of our environment and information by:

Making sure information security controls are adequately implemented and applying monitoring to the control environment.

Making sure that information is protected with appropriate access, disclosure, disruption, modification or destruction.



Making sure access is restricted based on function with permission granted and modified based on changes in function with access revoked on termination of employment.

7.5 RIGHTS OF DATA SUBJECTS

Individuals have the right to:

- Access their personal data held by the company
- Request corrections or deletions of incorrect data
- Object to processing of their data
- Lodge complaints with the Information Regulator

8 AVAILABILITY OF THE MANUAL

A copy of the manual is available:

- 8.1.1 On https://c4es.co.za/wp-content/uploads/2025/02/C4ES_PAIA-Manual_Public_2025-02-07.pdf
- 8.1.2 At the C4 head office for public inspection during normal business hours;
- 8.1.3 To any person upon request; and
- 8.1.4 To the Information Regulator upon request

9 HOW TO REQUEST ACCESS TO RECORDS

- 9.1 Requestors are to complete the prescribed form. See Annexure A
- 9.2 The completed form may be posted/emailed to the Information Officer C4ES at the following address:

Table 6: Information Officer Addresses

Email	info@c4es.co.za
Postal address	18 Gerrie Avenue Tokai Cape Town South Africa 7945
Street address	18 Gerrie Avenue Tokai Cape Town South Africa 7945

- 9.3 The Information Officer will process the request and inform the requestor of the fees (if any) that he/she has to pay and of the further steps that will follow in the processing of the request.

Note: Access to certain records may be denied on the grounds set out in PAIA.



10 GROUNDS FOR REFUSAL OF ACCESS

Requests may be denied if the information falls under any of the following categories:

- Confidential information of third parties
- Personal information of employees or clients
- Trade secrets and propriety business information
- Information that may endanger the safety of an individual
- Records that are legally privileged.

If access is refused, the requester will be provided with reasons and may appeal the decision with the Information regulator.



ANNEXURE A

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) REQUEST FORM

(Section 53(1) of the Promotion of Access to Information Act, 2000)

PART A: PERSONAL DETAILS OF REQUESTER

1. **Full Name and Surname:** _____
2. **Identity/Passport Number:** _____
3. **Postal Address:** _____
4. **Physical Address:** _____
5. **Telephone Number:** _____
6. **Email Address:** _____
7. **Capacity in Which Request is Made:**

(Please tick the appropriate box)

- As an individual
- On behalf of another person (Provide proof of authority)

PART B: DETAILS OF THE RECORD BEING REQUESTED

1. Description of the Record:

(Provide sufficient detail to identify the record you are requesting)

2. Type of Record:

(Please tick the appropriate box)

- Employee Information
- Project Information
- Client Information
- Supplier Information
- Contractor Information
- Other (Please specify): _____

3. Relevant Time Period: _____

4. Format in Which Record is Requested:

(Please tick the appropriate box)

- Electronic Format
- Hard Copy
- Other (Please specify): _____



PART C: RIGHT TO BE EXERCISED OR PROTECTED

1. Specify the Right Being Exercised or Protected:

2. Explain Why the Record is Required to Exercise or Protect the Right:

PART D: DECLARATION

I, the undersigned, declare that the information provided in this form is true and correct and that I am entitled to access the requested record under the provisions of the Promotion of Access to Information Act, 2000.

Signature: _____

Date: _____

FOR OFFICE USE ONLY

- 1 **Reference Number:** _____
- 2 **Date Received:** _____
- 3 **Decision on Request:**

(Please tick the appropriate box)

- Approved
- Refused

- 4 **Remarks/Reasons for Decision:**

- 5 **Signature of Information Officer:** _____
- 6 **Date:** _____

