

**PUBLIC DOCUMENT • PAIA s51 • STATUTORY DISCLOSURE**

Compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000

# PAIA SECTION 51 MANUAL

## Community Development Initiatives International NPC

and its division We MiND Foundation

Field	Detail
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Information Officer	Louw Allan (Johannes Lodewikus Allan)
Deputy Information Officer	Donald Bernard Leffler (designated under POPIA s17(1) / s56)
IO Email	information.officer@wemindfoundation.co.za
IR Registration No.	2025-008244
Prepared by	Adv. Don Leffler — CDII / Leffler & Partners
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Website	www.wemindfoundation.co.za
NPC Registration	2012/201981/08
SARS PBO No.	930 041 456

*This Manual is a public document required under section 51 of the Promotion of Access to Information Act 2 of 2000. It is published on [www.wemindfoundation.co.za](http://www.wemindfoundation.co.za). A printed copy is available on request from the Information Officer at [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za).*

## 1. Preamble and Introduction

This Manual is compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended, read with the PAIA Regulations, 2021 (Government Gazette No. 45057, 27 August 2021) and the Protection of Personal Information Act 4 of 2013 ("POPIA"). Section 9 of the Constitution of the Republic of South Africa, 1996, enshrines the right of access to information. Section 14 of the Constitution guarantees the right to privacy. PAIA and POPIA give effect to these constitutional rights.

This Manual describes the records held by Community Development Initiatives International NPC ("CDII") and its division We MiND Foundation, the procedure for requesting access to those records, the applicable fees, and the grounds on which access may be refused. It also addresses CDII's obligations under POPIA in respect of the processing of personal information.

## 1.1 Document Hierarchy

Tier	Document	Authority and Status
1	PAIA Manual (this document)	Statutory (PAIA s51). Regulator-assessable. Legally binding. Prevails in the event of conflict with any other programme document.
2	Board Resolution	Governance authority. IO designation and POPIA compliance programme adoption.
3	POPIA s56 Delegation Instruments	Operational authority. Defines Deputy IO scope and limits.
4	CDII Privacy Statement and Cookie Policy	Statutory (POPIA s18). Published on www.wemindfoundation.co.za. Cross-referenced in this Manual.
5	Internal operational documents	Internal only. Not regulatory documents.

## 2. Acronyms and Definitions

Term	Meaning
PAIA	Promotion of Access to Information Act 2 of 2000, as amended.
POPIA	Protection of Personal Information Act 4 of 2013.
ECTA	Electronic Communications and Transactions Act 25 of 2002.
NPO Act	Non-Profit Organisations Act 71 of 1997.
IO / Information Officer	The person designated under POPIA s55(1) as head of the private body for PAIA and POPIA purposes. In CDII: Louw Allan.
DIO / Deputy IO	A person to whom the IO has delegated duties under POPIA s56. In CDII: Donald Bernard Leffler.
IR	The Information Regulator established under POPIA s39.
HPB	Head of Private Body — the head of the private body as designated under PAIA s1 and s51(1)(b)(iii). In CDII: Louw Allan.
SAR	Subject Access Request — a data subject rights request under POPIA ss23–26.
Form 2	The prescribed form for requesting access to a record of a private body (PAIA Reg 4, GG 45057, 27 August 2021). Replaces the former Form C.
GG	Government Gazette.
Responsible Party	A public or private body which determines the purpose and means of processing personal information (POPIA s1). CDII is the Responsible Party.
Operator	A person who processes personal information on behalf of a Responsible Party under a contract or mandate (POPIA s1).
eServices Portal	The Information Regulator's online portal: <a href="https://eservices.inforegulator.org.za">https://eservices.inforegulator.org.za</a>
DPA	Data Processing Agreement — agreement with an operator under POPIA s20/s21.

CDII	Community Development Initiatives International NPC, Reg 2012/201981/08.
We MiND Foundation	A division of CDII, operated through www.wemindfoundation.co.za. All PAIA and POPIA obligations for We MiND Foundation are discharged through CDII as the registered NPC.

### 3. Organisation Details

#### 3.1 Community Development Initiatives International NPC (CDII)

Field	Detail
Full legal name	Community Development Initiatives International NPC
Abbreviated name	CDII
CIPC Registration No.	2012/201981/08
Type of entity	Non-Profit Company (NPC) incorporated under the Companies Act 71 of 2008
SARS PBO No.	930 041 456 (registered 15 March 2013)
SARS Tax Reference	9162706189
IR Registration No.	2025-008244
B-BBEE Status	Level 1 Contributor
Registered address	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
Postal address	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
Telephone	+27 83 399 9911 / +27 72 7113 277
Website	www.wemindfoundation.co.za
IO email	information.officer@wemindfoundation.co.za

#### 3.2 We MiND Foundation

We MiND Foundation is a division of CDII operated through www.wemindfoundation.co.za. It is not a separately incorporated entity. All statutory obligations under PAIA, POPIA, the Companies Act, the NPO Act, and other applicable legislation are discharged through CDII as the registered NPC. References to "CDII" in this Manual include its division We MiND Foundation unless the context otherwise requires.

#### 3.3 Current Directors (CIPC) — as at 1 June 2026

Name	Designation	Appointment Date	Role in PAIA/POPIA
Allan, Johannes Lodewikus (Louw Allan)	Director	13 November 2012	Information Officer; Head of Private Body
Tlhagale, Mapula Patricia	Director	13 November 2012	Director
Leffler, Donald Bernard	Director	13 November 2012	Director; Deputy Information Officer (POPIA s56)

Note: Director ID numbers are held internally for statutory purposes and are registered with CIPC. They are not published in public-facing documents in order to protect directors from identity theft risk. Appointment details are available from CIPC on request.

## 4. Information Officer, Head of Private Body, and Deputy Information Officer

In terms of POPIA s55(1), the head of a private body is, by virtue of that position, the Information Officer. Under PAIA s1 and PAIA s51(1)(b)(iii), the Manual must separately identify the Head of Private Body (HPB). In CDII, Louw Allan is simultaneously the Head of Private Body under PAIA and the Information Officer under POPIA s55. These are separate statutory designations discharged through a single officer.

### 4.1 Head of Private Body and Information Officer

<b>Name</b>	Louw Allan (Johannes Lodewikus Allan)
<b>Designation</b>	Director • Information Officer • Head of Private Body
<b>PAIA Authority</b>	Head of Private Body under PAIA s1 and s51(1)(b)(iii)
<b>POPIA Authority</b>	Information Officer by operation of law (POPIA s55(1))
<b>IO Email</b>	information.officer@wemindfoundation.co.za (shared POPIA/PAIA inbox — operative contact for all regulatory correspondence)
<b>Direct Email</b>	louw@wemindfoundation.co.za
<b>Telephone</b>	+27 83 399 9911
<b>Address</b>	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
<b>IR Registration</b>	Registered on IR eServices portal — IR Reg No: 2025-008244

### 4.2 Deputy Information Officer (POPIA s56)

<b>Name</b>	Donald Bernard Leffler
<b>Designation</b>	Director • Deputy Information Officer • Legal Practitioner
<b>POPIA Authority</b>	Deputy Information Officer designated under POPIA s17(1) and s56
<b>IO Email (shared)</b>	information.officer@wemindfoundation.co.za
<b>Direct Email</b>	don@wemindfoundation.co.za
<b>Telephone</b>	+27 72 7113 277
<b>Address</b>	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
<b>Scope of delegation</b>	All POPIA and PAIA functions as delegated by the IO; administration of the IR eServices portal; legal practitioner and programme administrator functions; acts in the IO's absence with full IO authority.

### 4.3 Accountability Statement

The Information Officer is accountable to the Board of Directors for ensuring CDII's compliance with POPIA and PAIA. The IO reports to the Board on compliance metrics, data subject requests, security incidents, and regulatory correspondence. The Deputy Information Officer assists in all compliance functions and acts with full IO authority in the IO's absence. All data subject access requests, complaints, and enquiries relating to this Manual must be directed to information.officer@wemindfoundation.co.za or +27 83 399 9911.

## 5. PAIA and POPIA Framework

### 5.1 Right of Access to Information (PAIA)

Section 9 of the Constitution guarantees the right of access to information. PAIA gives effect to this right by establishing procedures for requesting access to records held by public and private bodies. Any person may request access to a record of CDII, subject to the grounds for refusal in PAIA Chapter 4.

### 5.2 Right to Privacy (POPIA)

Section 14 of the Constitution guarantees the right to privacy. POPIA gives effect to this right by regulating the processing of personal information. POPIA establishes eight conditions for lawful processing, creates data subject rights, and provides for the Information Regulator to oversee compliance.

### 5.3 Interaction Between PAIA and POPIA

PAIA and POPIA operate together. PAIA governs access to records; POPIA governs the processing of personal information. Where a PAIA access request involves personal information, both Acts apply. The IO must balance the right of access against the right to privacy on a case-by-case basis, applying the grounds for refusal in PAIA Chapter 4.

### 5.4 Key Legislative Instruments

Provision	Relevance to This Manual
PAIA s51	Requires this Manual — content and public availability.
PAIA Regulations 2021 (GG 45057)	Prescribes Form 2 (replacing Form C); fee schedule (Annexure B).
POPIA s18	Notification obligations — see CDII Privacy Statement (CDII/PS/2026/001 v3.3).
POPIA ss23–26	Data subject access rights — procedure in section 14 of this Manual.
POPIA s55	Information Officer designation.
POPIA s56	Deputy Information Officer designation and delegation.
POPIA s72	Cross-border data flows — addressed in section 16 of this Manual.
Companies Act s24	Retention of accounting records — 7 years.
NPO Act	Annual reporting obligations; governance requirements for NPOs.

### 5.5 Information Regulator Contact Details

Channel	Details
eServices Portal	<a href="https://eservices.inforegulator.org.za">https://eservices.inforegulator.org.za</a>
POPIA Complaints	<a href="mailto:POPIAComplaints@inforegulator.org.za">POPIAComplaints@inforegulator.org.za</a>
PAIA Complaints	<a href="mailto:PAIAComplaints@inforegulator.org.za">PAIAComplaints@inforegulator.org.za</a>
General Enquiries	<a href="mailto:infoereg@inforegulator.org.za">infoereg@inforegulator.org.za</a>
Telephone	010 023 5200
Toll-Free	0800 001 7160

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001
Postal Address	P.O. Box 31533, Braamfontein 2017
Website	<a href="https://info regulator.org.za">https://info regulator.org.za</a>

## 6. PAIA Guide

The Information Regulator has compiled a guide in terms of PAIA s10, containing information to assist any person wishing to exercise a right of access to information. The guide is available in all 11 official languages and may be obtained from [www.info regulator.org.za](http://www.info regulator.org.za), the Information Regulator's offices, or from the Information Officer of CDII on request at [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za).

## 7. Automatically Available Records and Proactive Disclosure

Category	Record	Access Method
This PAIA Manual	CDII PAIA Section 51 Manual v2.2	<a href="http://www.wemindfoundation.co.za">www.wemindfoundation.co.za</a> • Hard copy on request from IO
PAIA Form 2	Prescribed request form (GG 45057)	Annexure 1 to this Manual • <a href="http://www.info regulator.org.za">www.info regulator.org.za</a> • On request from IO
Privacy Statement	CDII Privacy Statement (CDII/PS/2026/001 v3.3)	<a href="http://www.wemindfoundation.co.za">www.wemindfoundation.co.za</a> • On request from IO
Cookie Policy	CDII Cookie Policy (CDII/CP/2026/001 v2.0 FINAL)	<a href="http://www.wemindfoundation.co.za/privacy/(Governance%20&amp;%20Good%20Practice%20section)">www.wemindfoundation.co.za/privacy/ (Governance &amp; Good Practice section)</a> • PDF: <a href="http://www.wemindfoundation.co.za/documents/">www.wemindfoundation.co.za/documents /</a>
NPO/NPC Registration	Certificate of Incorporation; MOI	Available from CIPC • On request from IO
B-BBEE Certificate	Current B-BBEE Affidavit / Certificate	On request from IO
SARS PBO Certificate	PBO Confirmation (PBO No. 930 041 456)	On request from IO
PAIA Annual Report	Annual report to IR (PAIA s83(4)) — most recent: April 2026	On request from IO • Submitted to IR eServices portal

## 8. Records Held by CDII

CDII holds records in the following categories. The listing of a category does not create an entitlement to access; all requests are assessed against the grounds for refusal in PAIA Chapter 4. A full Schedule of records with confidentiality classification is set out in Schedule 1.

Category	Subject Matter	Examples
Statutory / Corporate	NPC incorporation; CIPC records; MOI; statutory returns	Certificate of Incorporation; MOI; CIPC annual returns; director appointments
Financial	Accounting; donations; SARS PBO records; audit	Annual financial statements; donation records; SARS PBO certificates; s18A receipts

Governance	Board records; policies; compliance documents	Board minutes; resolutions; POPIA compliance programme; PAIA manual; privacy notices
Human Resources	Staff; volunteers; facilitators	Employment / service contracts; training records; volunteer agreements (anonymised per POPIA)
Programme / Operational	Education and community programmes; We MiND Foundation activities	Programme reports; learner records; assessment records; SETA/QCTO submissions; community project documentation
Donor and Sponsor	Donor management; s18A records	Donation agreements; donor contact records; s18A tax receipts; funding reports
Partnership	We MiND Foundation; third-party organisations	MoUs; shared programme records
Digital / Technology	Website; digital platforms; AI systems (current and future)	Website records; consent records; data processing agreements; technology service contracts
Legal and Compliance	Legal advice; contracts; regulatory correspondence	Legal opinions; contracts; IR correspondence; POPIA breach records

## 9. Records Available Under Other Legislation

Legislation	Relevant Records	Governing Authority
Companies Act 71 of 2008	Statutory registers; annual returns; financial statements	CIPC — <a href="http://www.cipc.co.za">www.cipc.co.za</a>
NPO Act 71 of 1997	NPO registration; annual reports; governance records	Dept of Social Development — <a href="http://www.dsd.gov.za">www.dsd.gov.za</a>
Income Tax Act 58 of 1962	Tax records; PBO returns; s18A records	SARS — <a href="http://www.sars.gov.za">www.sars.gov.za</a>
Basic Conditions of Employment Act 75 of 1997	Staff records; working hours; leave records	Dept of Employment and Labour
Labour Relations Act 66 of 1995	Staff disciplinary records; arbitration records	CCMA — <a href="http://www.ccma.org.za">www.ccma.org.za</a>
POPIA 4 of 2013	Personal information processing records; consent records; breach notifications	IR — <a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>
SAQA Act / QCTO / SETA	Learner registrations; assessment records; certification	SAQA / QCTO / Applicable SETA
ECTA 25 of 2002	Electronic transactions; website records; digital consent records	DCDT — <a href="http://www.dcdt.gov.za">www.dcdt.gov.za</a>

## 10. Procedure for Requesting Access to Records

### 10.1 How to Submit a Request

A request for access to a record of CDII must be submitted using the prescribed Form 2 (Annexure 1 of this Manual). Form 2 is also available from [www.wemindfoundation.co.za](http://www.wemindfoundation.co.za) and [www.inforegulator.org.za](http://www.inforegulator.org.za). Requests may be submitted:

- By email to the Information Officer: [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za)
- By post or hand delivery to: Information Officer, CDII, 02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
- In person at CDII's registered address by appointment — contact [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za) to arrange

#### Electronic Submission (ECTA)

Form 2 may be submitted electronically as a PDF to [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za). Electronic submissions must include a copy of a valid identity document but do not require a wet signature where identity is verifiable. Electronic submissions are valid under the Electronic Communications and Transactions Act 25 of 2002 (ECTA), incorporated into the PAIA Regulations 2021 (GNR 757, GG 45057).

### 10.2 Requirements for a Valid Request

The following must be provided for a request to be valid and for the 30-day processing clock to begin:

1. Completed Form 2 (Annexure 1 to this Manual).
2. Proof of identity of the requester (identity document, passport, or company registration document).
3. If requesting on behalf of another person: proof of capacity or written authority.
4. Sufficient description of the record requested to enable the IO to identify it.
5. Payment of the prescribed request fee of R140.00 — see section 11.

Incomplete submissions will be returned with written notification of the defect. The 30-day processing clock does NOT begin until a complete and valid request has been received.

### 10.3 The 30-Day Response Timeline

Step	Timeframe
Acknowledge receipt	Within 5 business days of receipt of a complete and valid request.
Notify of decision (grant or refuse)	Within 30 days of receipt of a complete and valid request (PAIA s56).
Extension (complex requests)	Additional 30 days permissible in circumstances set out in PAIA s57.
Deemed refusal	If no response within 30 days, the request is deemed refused (PAIA s58).

#### CRITICAL: 30-Day Clock

The 30-day clock runs from RECEIPT of a complete and valid request — NOT from the date of the IO's acknowledgement letter. PAIA s56(1).

## 11. Fees

The fees prescribed under the PAIA Regulations (Annexure B to GN R.757, GG 45057, 27 August 2021) are set out in full in Annexure 2 to this Manual. CDII is a private body and the private body fee schedule applies. Fees are subject to revision by regulation; the current prescribed fees as set out in GG 45057 apply until further amended.

### Key Fee Provisions

**Request fee: R140.00 (payable before the request is processed)**

**Note: CDII is not a registered VAT vendor. VAT does not apply to CDII's PAIA fees. The request fee payable is R140.00.**

**There are NO fee exemptions for requesters to a private body — including data subjects requesting their own personal information. The personal requester exemption was abolished by GG 45057.**

**A deposit may be required if the search is estimated to exceed 6 hours.**

**Access fees apply once the request is granted — see Annexure 2.**

**POPIA rights requests (correction, deletion, objection, consent withdrawal) are processed at no charge. These are separate from PAIA access requests.**

## 12. Grounds for Refusal of Access

Ground	PAIA Section	Notes
Mandatory refusal: protection of third-party personal information	s63	Mandatory — IO has no discretion.
Mandatory refusal: protection of commercial information of a third party	s64	Mandatory.
Mandatory refusal: protection of confidential information of a third party	s65	Mandatory.
Mandatory refusal: protection of safety of individuals or property	s66	Mandatory.
Mandatory refusal: records privileged from production in legal proceedings	s67	Mandatory. Applies to legal professional privilege.
Discretionary refusal: commercial information of CDII	s68	IO has discretion.
Discretionary refusal: research information	s69A	IO has discretion.
Record cannot be found or does not exist	s56(3)	IO must certify in writing.

### Public Interest Override (PAIA s70)

**The IO will apply the public interest override where refusal of access would reveal evidence of substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and where the public interest in disclosure clearly outweighs the harm contemplated in the relevant ground for refusal.**

**Refusal notice: If a request is refused, the IO must provide adequate reasons and inform the requester of the right to lodge a complaint with the Information Regulator or apply to court (PAIA s78).**

### 13. Third-Party Rights

Where a request involves the personal information or confidential information of a third party, the IO must notify that third party and give them an opportunity to make representations before granting access (PAIA ss71–73). The third party may consent to disclosure, object, or decline to respond. Data subjects have additional rights under POPIA ss23–26 — see section 14 below.

### 14. POPIA Data Subject Rights

In addition to the PAIA right of access, data subjects whose personal information is processed by CDII have the following rights under POPIA. Full details of these rights and the procedure for exercising them are set out in the CDII Privacy Statement (CDII/PS/2026/001 v3.3), available at [www.wemindfoundation.co.za](http://www.wemindfoundation.co.za).

Right	POPIA Provision	How to Exercise	Response
Access	s23	Written request to IO	30-day response from receipt of complete request. No charge.
Correction or deletion	s24	Written request to IO	30-day response. No charge.
Objection to processing	s11(3)	Written objection to IO	IO will stop processing unless a legitimate overriding ground exists.
Withdraw consent	s26	Written notice to IO	Takes effect immediately. Does not affect prior lawful processing.
Direct marketing opt-out	s69	Reply UNSUBSCRIBE or contact IO	Actioned within 5 business days.
Automated decisions	s71	Written request to IO	Human reconsideration within 30 days.
Complaint to IR	s74	Contact IR directly (see s5.5)	May be exercised at any time without first approaching CDII.

To exercise any POPIA data subject right, contact: [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za) • +27 83 399 9911 • 02 Hotel Road, Cullinan 1000, Tshwane.

#### IR Escalation

**Data subjects dissatisfied with the outcome of any request, or who receive no response within 30 days, may complain directly to the Information Regulator at [POPIAComplaints@info regulator.org.za](mailto:POPIAComplaints@info regulator.org.za) or [PAIAComplaints@info regulator.org.za](mailto:PAIAComplaints@info regulator.org.za) or Tel: 0800 001 7160. This right exists independently of any internal process and may be exercised at any time.**

### 15. Information Security and Access Limitation

CDII implements appropriate technical and organisational security measures to protect personal information against loss, damage, unauthorised access, or processing, in accordance with POPIA s19.

Measure	Description
Access controls	Role-based access to systems and records; principle of least privilege.
Encryption	Data in transit encrypted using TLS; data at rest encrypted using industry-standard protocols where technically feasible.
Staff training	Annual POPIA awareness training for all staff, volunteers, and facilitators who handle personal information.
Incident response	A formal breach response procedure is maintained. Breaches are reported to the IO and DIO immediately upon discovery.
Third-party contracts	All operators and service providers who process personal information on behalf of CDII are required to have a POPIA-compliant Data Processing Agreement (DPA) in place.

### 15.1 Breach Notification

In the event of a security compromise involving personal information (POPIA s22), CDII will notify the Information Regulator and affected data subjects as soon as reasonably possible after discovery. The following steps will be taken:

1. Contain the breach and preserve evidence immediately.
2. Notify the Information Regulator as soon as reasonably possible — submitted via the IR eServices portal (Form SCN1). eServices portal notification is mandatory since 1 April 2025; email notification is no longer accepted by the IR.
3. Notify affected data subjects as soon as reasonably possible, with sufficient information to enable protective action.
4. Take steps to remediate and prevent recurrence.

The IO ([information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za)) is the designated incident commander for all breach response activities.

## 16. Cross-Border Transfer of Personal Information (POPIA s72)

CDII's primary operations and data storage are based in South Africa. CDII does not deliberately transfer personal information to recipients in foreign countries in the ordinary course of its activities. However, the following situations may involve processing outside South Africa, and CDII takes steps to ensure compliance with POPIA s72 in each case:

Situation	Recipient / Country	Purpose	Safeguard / Status
Website hosting and content delivery	Netlify, Inc. — USA (global CDN)	Static website hosting and delivery for <a href="http://www.wemindfoundation.co.za">www.wemindfoundation.co.za</a>	Standard Netlify Inc. Terms of Service and Privacy Policy apply. No special-category personal information is transmitted via static hosting. A POPIA s72-compliant DPA will be concluded if and when form submissions (e.g. Netlify Forms) are introduced and begin processing personal information.
Website analytics	Google LLC — USA (Google Analytics 4)	Website usage statistics, once activated	Activated only once a consent banner is implemented — see CDII Cookie Policy (CDII/CP/2026/001 v2.0). Google's standard data processing terms apply.
AI/digital	TBC — subject to	Programme	Any offshore AI processing will

platforms (future)	technology audit	delivery; AI-assisted tools	require a POPIA s72-compliant DPA before implementation.
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This table will be updated as CDII's technology arrangements evolve. South African law (POPIA) is the primary legal framework for all processing of personal information by CDII. Where any conflict arises between South African law and any other jurisdiction's requirements, POPIA takes precedence for all data subjects whose information is processed by CDII in South Africa.

## 17. Digital Platforms and AI-Assisted Systems

CDII's programmes may incorporate digital platforms and artificial intelligence (AI) assisted tools in the delivery of education, skills development, and community programmes. Where AI or automated decision-making processes produce records containing personal information, those records are subject to PAIA access requests in the same manner as any other record.

Where an automated decision has been made about a data subject, POPIA s71 provides the right to request that the decision be reconsidered by a qualified human being. CDII ensures that meaningful human oversight is maintained over all automated decisions that have a legal or similarly significant effect on data subjects. Records generated through automated systems are held in accordance with CDII's data retention schedule (see CDII Privacy Statement s10).

## 18. Remedies

Remedy	Legal Basis	Contact / Process
Lodge a complaint with the IR	POPIA s74 / PAIA	POPIAComplaints@infoeregulator.org.za • 0800 001 7160. Primary and most accessible remedy.
Enforcement by IR	POPIA ss85–89	Investigations and enforcement notices issued by the IR.
Application to court	PAIA s78	High Court application for appropriate relief. Applicable after IR process or where urgency requires.

These statutory remedies exist independently of any internal process and may be exercised at any time without exhausting internal mechanisms first.

## 19. Availability of This Manual

This Manual is available for inspection during normal business hours at:

- CDII's registered address: 02 Hotel Road, Cullinan 1000, Tshwane, Gauteng

This Manual is available for download from:

- [www.wemindfoundation.co.za](http://www.wemindfoundation.co.za) — CDII / We MiND Foundation website

A copy may be requested from the IO at [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za) or +27 83 399 9911. This Manual has been submitted to the Information Regulator via the eServices portal (<https://eservices.infoeregulator.org.za>).

## 20. Annual Report and Review

### 20.1 Annual Report (PAIA s83(4))

CDII submits an Annual Report to the Information Regulator for each financial year, covering all requests for access to records received and processed during that year. The submission window is 1 April to 30 June annually, via the IR eServices portal. The most recent annual report was submitted in April 2026. All IO and DIO registrations must be current on the portal before submission.

### 20.2 Review Triggers

This Manual will be reviewed and, where necessary, updated in the following circumstances:

- Annually — as part of CDII's compliance calendar.
- Within 30 days of any change to the IO or DIO register.
- Within 30 days of any material regulatory amendment to PAIA or POPIA.
- Within 60 days of any data breach that reveals a gap in the Manual.
- On any other material organisational change affecting the processing of personal information.

Each review produces a new entry in the Revision History (Appendix A).

## Schedule 1 — Records Available (PAIA) with Confidentiality Classification

The following records are held by CDII and may be requested under PAIA, subject to the grounds for refusal in Chapter 4. The confidentiality classification is indicative only. Final access decisions are made by the IO on a case-by-case basis against PAIA Chapter 4 grounds for refusal.

Category	Subject Matter	Classification	Access Basis
Statutory / Corporate	Certificate of Incorporation; MOI; CIPC annual returns; director records	Internal / Public	Certain records publicly available via CIPC. Others: formal PAIA request.
Financial	Annual financial statements; donation records; SARS PBO; audit	Confidential	Formal PAIA request (ss64, 68).
Governance	Board minutes; resolutions; policies; compliance programme	Confidential	Formal PAIA request — may be protected under legal privilege (s67) or governance grounds (s68).
Human Resources	Staff and volunteer records	Strictly Confidential	Own records on request; formal PAIA request otherwise (ss63, 67, 68).
Programme / Operational	Learner records; assessment records; programme reports	Confidential	Participant's own records on request; formal PAIA request otherwise (ss63, 68).
Donor and Sponsor	Donation records; s18A receipts; donor contact details	Confidential	Formal PAIA request (ss63, 64, 68).
Legal and Compliance	Legal opinions; contracts; IR correspondence; POPIA records	Highly Confidential	Formal PAIA request — legal privilege applies (s67).
PAIA/POPIA Public Documents	This Manual; Privacy Statement; Cookie Policy; Form 2	Public	Automatically available at <a href="http://www.wemindfoundation.co.za">www.wemindfoundation.co.za</a> .
Digital / Technology	Website records; consent records; DPAs; technology contracts	Confidential — Strictly Confidential	Formal PAIA request (ss64, 66, 68).

## Schedule 2 — POPIA Processing Schedule

The following categories of data subjects and processing activities have been identified. This schedule should be read together with the CDII Privacy Statement (CDII/PS/2026/001 v3.3).

Data Subject	Personal Information	Purpose	Recipients
Programme participants / beneficiaries	Name; ID/passport; contact details; educational history; assessment data; digital signatures; photographs; health accommodation data	Programme delivery; assessment; certification; SETA/QCTO/SAQA compliance	SETA; QCTO; SAQA; accredited assessors; We MiND Foundation (joint delivery); SARS (statutory)
Staff and	Name; contact details;	Employment	SARS; UIF; auditors;

volunteers	employment records; bank details; tax references	relationship; payroll; statutory compliance	legal advisors
Directors	Name; appointment date; contact details (ID numbers held internally only)	Corporate governance; CIPC statutory requirements	CIPC; SARS; IR
Donors and sponsors	Name; organisation; contact details; donation records; bank details	Donor relationship management; s18A receipts; PBO compliance	SARS; auditors
Partners	Contact details; agreement information	Programme delivery; partnership administration	We MiND Foundation; SETA; legal advisors
Website visitors	IP address; browser type; pages visited; cookie data; consent preferences	Website functionality; analytics (with consent); security	Website hosting provider (Netlify); analytics provider (Google Analytics 4, once activated with consent)

## Annexure 1 — Form 2: Request for Access to Records

### Official Form Note

Form 2 is the prescribed form for PAIA access requests as published in Government Gazette 45057 (GN R.757, 27 August 2021). The form below must be completed in full and submitted to the Information Officer. The official prescribed Form 2 is also available from the Information Regulator eServices portal at <https://eservices.inforegulator.org.za> and from the IO on request at [information.officer@wemindfoundation.co.za](mailto:information.officer@wemindfoundation.co.za). In case of any discrepancy between the form below and the official gazette form, the official form prevails.

### FORM 2 — REQUEST FOR ACCESS TO RECORD OF A PRIVATE BODY

#### SECTION A — PARTICULARS OF PRIVATE BODY

Name of private body	Community Development Initiatives International NPC (CDII) / We MiND Foundation
Postal / physical address	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
Telephone	+27 83 399 9911 / +27 72 7113 277
Email	information.officer@wemindfoundation.co.za

#### SECTION B — PARTICULARS OF REQUESTER

Full name and surname	
Identity / Registration number	
Postal address	
Telephone (daytime)	
Email address	
Capacity (if acting for another person)	

#### SECTION C — PERSON ON WHOSE BEHALF REQUEST IS MADE (if applicable)

Full name	
Identity number	
Relationship to requester	

#### SECTION D — PARTICULARS OF RECORD REQUESTED

Description of record(s) / subject matter	
Reference number (if known)	
Any further particulars to identify the record	

#### SECTION E — REASON FOR REQUEST

Right being exercised or protected	
Explanation of connection between request and right	

#### SECTION F — FEES

Request fee	R140.00 (prescribed fee for private body requests — GG 45057). CDII is not a registered VAT vendor. No VAT applicable. Total payable: R140.00. Payment details will be provided by the Information Officer.
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**SECTION G — FORM OF ACCESS PREFERRED**

Personal inspection at CDII's offices (by appointment)     Printed copy     Electronic copy (PDF by email)

**SECTION H — SIGNATURE**

**Signature of requester**

\_\_\_\_\_

**Date**

\_\_\_\_\_

## Annexure 2 — Fee Schedule

The following fees apply to PAIA requests made to CDII, as prescribed by Annexure B to Government Notice R.757 in Government Gazette 45057 of 27 August 2021 (GG 45057). CDII is a private body and the private body fee schedule applies.

### Request Fee

Item	Description	Notes	Amount
1	Request fee — payable by every requester before the request will be processed	CDII is not a VAT vendor. No VAT applies.	R140.00

### Access / Reproduction Fees (payable once request is granted)

Item	Description	Notes	Amount
2	Photocopy of A4-size page or part thereof	Per page	R2.00
3	Printed copy of A4-size page or part thereof	Per page	R2.00
4(i)	Copy in computer-readable form on flash drive (provided by requester)		R40.00
4(ii)(a)	Copy on compact disc (provided by requester)		R40.00
4(ii)(b)	Copy on compact disc (provided to requester)		R60.00
5	Transcription of visual images per A4-size page	Outsourced	Quotation
6	Copy of visual images	Outsourced	Quotation
7	Transcription of audio record per A4-size page		R24.00
8(i)	Copy of audio record on flash drive (provided by requester)		R40.00
8(ii)(a)	Copy of audio record on compact disc (provided by requester)		R40.00
8(ii)(b)	Copy of audio record on compact disc (provided to requester)		R60.00
9	Search and preparation per hour or part thereof, EXCLUDING the first hour (first hour is FREE). Maximum total charge: R435.00	Per hour after first	R145.00
10	Deposit — payable if search likely to exceed 6 hours	One-third of estimated access fee	Variable
11	Postage, email or other electronic transfer	Actual expense	Variable

#### No Fee Exemptions for Private Body Requesters

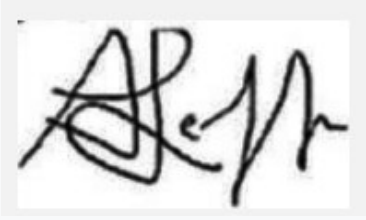
There is no exemption from the request fee for persons requesting access to their own personal information from a private body. The personal requester exemption was abolished by GG 45057. All requesters, including data subjects requesting their own information, must pay the R140.00 request fee.

**POPIA rights requests (access, correction, deletion, objection, consent withdrawal under POPIA ss23–26) are separate from PAIA requests and are processed at no charge.**

## Information Officer Approval and Certification

This Manual is issued under the authority of the Information Officer of Community Development Initiatives International NPC in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000, read with POPIA.

<b>Document Reference</b>	CDII/PAIA/S51/2026/001
<b>Version</b>	v2.2 (16 June 2026)
<b>Prepared by</b>	Adv. Don Leffler — CDII / Leffler & Partners
<b>Signed by</b>	Donald Bernard Leffler, Deputy Information Officer, acting with the written authorisation of Louw Allan, Information Officer
<b>Date</b>	16 June 2026

	<p>Date: 16 June 2026  IR Registration No: 2025-008244  information.officer@wemindfoundation.co.za  +27 83 399 9911</p> <p><i>This Manual supersedes all prior versions. The signed original must be retained by CDII and uploaded to the Information Regulator eServices portal.</i></p>
<p><b>Donald Bernard Leffler</b>  Deputy Information Officer  Community Development Initiatives  International NPC  Acting with the written authorisation of Louw Allan, Information Officer</p>	

## Appendix A — Revision History

Version	Date	Description	Author
1.0	May 2025	Original PAIA Manual (CDII internal). Basic PAIA s51 compliance. Form C used. Personal Gmail addresses. Single website URL. No version control.	CDII
1.1	Sep 2025	Revised version. Fee schedule updated. Director details amended. POPIA cross-reference added.	CDII
2.0	1 Jun 2026	Complete revision to Bata D-18 / CDII compliance standard. Key changes: Form C replaced with Form 2 (GG 45057); dedicated IO email (informationofficer@cdii.org.za); personal Gmail addresses removed; both websites added (www.cdii.org.za and www.wemindfoundation.com); We MiND Foundation division formally included; DIO (Don Leffler) formally designated under POPIA s56; director ID numbers removed from public document; 20-section structure aligned to Bata PAIA standard; three Schedules and two Annexures added; IR full contact table; AI/digital platforms clause; cross-border transfer table; breach notification procedure (Form SCN1 eServices); fee schedule corrected to GG 45057 private body rates; VAT note (CDII not a VAT vendor); statutory disclosure header; CDII brand palette	Adv. D Leffler — CDII

		applied; signature image embedded.	
2.1	10 June 2026	Phone corrected throughout (+27 72 7113 277 — CC-01). Internal version stamp aligned with filename.	Adv. Don Leffler — CDII
2.2	16 June 2026	Domain/email cascade correction following CDII's independent migration to www.wemindfoundation.co.za (CF-113/CF-116): all references to www.cdii.org.za and www.wemindfoundation.com consolidated to www.wemindfoundation.co.za throughout (Sections 1, 1.1, 2, 3.1, 3.2, 4.1, 4.2, 4.3, 6, 7, 10.1, 14, 19, Schedule 1, Annexure 1); IO/DIO email addresses updated to information.officer@wemindfoundation.co.za, don@wemindfoundation.co.za, and louw@wemindfoundation.co.za throughout. Cross-reference correction: Privacy Statement version citation corrected from v3.2 to v3.3 (Sections 5.4, 14, Schedule 2) to match the current Privacy Statement. Cookie Policy entry (Section 7) updated from v1.1 interim to v2.0 FINAL, with access method updated to reflect the new Governance & Good Practice hub structure. Section 16 (Cross-Border Transfer) substantively corrected to reflect CDII's actual current technical arrangements: the prior "website designer (country TBC)" and Cloudflare CDN rows removed and replaced with Netlify, Inc. (USA, static hosting) and Google LLC (USA, GA4 analytics, pending activation) — reflecting CDII's move to independently-controlled hosting. Schedule 2 "Website visitors" recipients column updated correspondingly. Breach notification numbered list (Section 15.1) reset to begin at 1 (was erroneously continuing the numbering from Section 10.2 as 6–9). Effective Date retained as 1 June 2026 (original effective date unchanged). Signature retained from v2.1; only the certification Date field updated to 16 June 2026.	Claude (Anthropic ) on instruction of Adv. Don Leffler — CDII

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