

PAIA Policy Manual

Prepared in terms of section 51 of the Promotion of Access to
Information Act 2 of 2000 (as amended)

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1 Acronyms and Abbreviations

DIR	Director
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Service of South Africa
PAIA	Promotion of Access to Information Act no.2 of 2000 (as amended)
POPIA	Protection of Personal Information Act no.4 of 2013
RainTree	RainTree Business Coaching (Pty LTD)
Regulator	Information Regulator of South Africa
Republic	Republic of South Africa

2 Purpose of This PAIA Manual

This PAIA Manual is here to help you understand how to access information from RainTree Business Coaching, and to explain how RainTree process and protect personal information. It covers what records RainTree already make available without needing a formal request and gives a good sense of what information RainTree hold, how to request it, and how RainTree manage requests. It also tells where to find the official PAIA Guide created by the Regulator, explains how RainTree deal with personal information, and outlines what steps RainTree take to keep data secure.

The manual provides insight into what types of information RainTree in the different categories, who to contact to access specific information, and what to expect if data needs to be shared or processed outside of South Africa. The manual also explains data security measures.

3 How to Request Access to Information

If you're looking to access information or just have a question about how your personal data is handled, our team is here to help. Leoni Grobler, our Managing Director, is also the Chief Information Officer. Angela Heeley is our Programme Director and also serves as the Deputy Information Officer. And if you're not sure who to ask, Faranah is your go-to person for general information access queries. You can also get in touch with us via our head office — information@raintreecoaching.com.

The form to request access to information can be found on the following link:
<https://raintreecoaching.com/wp-content/uploads/2026/07/20250505-RainTree-Coaching-PAIA-Access-to-Information-Application-Form.pdf>

4 Understanding the PAIA Guide

The Regulator has put together a really helpful guide that walks you through the ins and outs of PAIA. It's written in a way that's easy to understand and is available in all official South African languages. The guide explains the objectives of both PAIA and POPIA, provides contact details for the relevant government appointed officers, and outlines how to request a record and what kind of support is available from both RainTree and the Regulator.

The guide also covers what steps you can take if your access request isn't handled correctly — including how to appeal, complain to the Regulator, or apply to court. You'll also find guidance on voluntary disclosures, fee structures, and where to get copies of this manual. You can download the guide from the Regulator's website at <https://www.justice.gov.za/inforeg>.

5 Records You Can Access Without a Formal Request

There are certain records RainTree make readily available — no request forms needed. This includes our Privacy Policy and our POPIA Policy, both of which are published on our website.

6 Records Available Under Other Laws

Some of the records RainTree hold are governed by specific legislation. For example, our Memorandum of Incorporation is available under the Companies Act 71 of 2008, and this PAIA Manual itself is made available under the Promotion of Access to Information Act 2 of 2000.

7 Other Records RainTree Keep

RainTree keep a variety of internal records. These include (but are not limited to):

- Strategic documents like annual reports and strategic plans,
- HR-related policies and employee records,
- Finance documents such as budgets, invoices, and SARS submissions, and
- Operational documents such as coaching content, registers and feedback reports.

RainTree is committed to managing all records responsibly and securely.

8 Processing Personal Information

RainTree collect and use personal information only when RainTree need to, and only for clear and defined purposes. For example, RainTree process client information as part of our coaching work or — with consent — for marketing. RainTree use employee information for HR management, performance tracking, payroll, and tax reporting. RainTree process company information for billing and accounting, and RainTree work with supplier information to manage contracts and payments effectively.

RainTree collect different types of information for different groups of people (or “data subjects”). For clients, this might include names, contact details, Identity numbers, and bank details. For employees, RainTree may also collect qualifications, gender, and race information — always with a clear purpose and in line with the law. The same applies to service providers and companies RainTree works with.

9 Sharing and Securing Personal Information

RainTree never shares personal information unless written permission has been received from the person concerned — unless the law requires us to, like in the case of a request from SAPS. When it comes to sharing information outside of South Africa, RainTree also stick to this principle and fully comply with GDPR and POPIA requirements. To keep everything secure, RainTree has implemented safeguards to protect the confidentiality, integrity, and availability of the data RainTree processes.

10 Where to Find This Manual

You can download a copy of this manual from our website at www.raintreecoaching.com/PAIAManual, or you can request one directly from our Information Officer or Deputy Information Officer. If the Information Regulator ever needs a copy, RainTree will provide it.

11 When Access to Information Might Be Refused

While RainTree Business Coaching is committed to openness and transparency, there are certain instances where RainTree may have to refuse a request for information — always within the boundaries of the law and with respect for all parties involved.

RainTree will not release information if doing so would mean unlawfully or unreasonably disclosing personal details — this includes the personal information or privacy of any individual, including children. RainTree also cannot share information that contains trade secrets, intellectual property, or sensitive financial, scientific, or technical information that belongs to a third party, if it could harm their business interests or give someone else an unfair commercial advantage.

In some cases, information might have been shared with RainTree in confidence — and where releasing that would break that trust or any agreement or law, RainTree need to keep it private. Similarly, RainTree will protect anything that could compromise someone's safety, reveal property vulnerabilities, or is considered legally privileged (like information protected under attorney-client confidentiality).

RainTree also reserve the right to protect RainTree's own commercially sensitive information. This includes things like trade secrets, financial data, intellectual property, or software, tools, and systems that RainTree has developed. If sharing this would harm RainTree's position in negotiations or business, RainTree won't make it available.

Research information, whether it belongs to RainTree or a third party, will also be protected if releasing it would reveal personal or institutional identities, or if it could put the research at risk. Lastly, RainTree may need to decline a request if it's clearly frivolous or would require an unreasonable amount of time or resources to process — RainTree will engage meaningfully before reaching that conclusion.

12 What Happens if a Record Can't Be Found

If you've asked for a record and RainTree has done its best to find it but it can't, our Information Officer will issue a formal letter (an affidavit or affirmation) to let you know that, despite

reasonable efforts, the record isn't available. If the record turns up later, RainTree will provide access (if the usual conditions, including any fees, are met).

13 If You Disagree with a Decision

If RainTree has refused your request and you are not happy with the outcome, there are steps you can take.

RainTree does not have an internal appeals process (the Information Officer's decision is final), you can raise a complaint with the Information Regulator. You will need to do this in writing within 180 days of RainTree's decision. The Regulator will then investigate and decide how to proceed. That could include taking no further action, trying to conciliate the matter, or referring it to the Enforcement Committee. If needed, they may issue an official enforcement notice that changes or cancels our original decision — and they will give reasons for doing so.

You also have the right to take the matter to court. This includes approaching your local magistrate's court or another relevant court for a ruling.

14 Updating of the PAIA Manual

This manual will be reviewed annually.

14.1 Amendments and Updates:

Date	Revision Version	Authorised
03 May 2025	Draft of Manual	
	Version 2	