

PAIA Manual

OF MORE COLLECTION 1933 (PTY) LTD



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

("the Group")

DATE OF COMPILATION: 1 DECEMBER 2025
DATE OF LAST REVISION: 1 DECEMBER 2025

1.1 DEFINITIONS AND ABBREVIATIONS

FOR PURPOSES OF THIS MANUAL:

- 1.1. "CEO" means the Chief Executive Officer of the Group.
- 1.2. "CIO" means the Chief Information Officer.
- 1.3. "IO" means the Information Officer designated in terms of PAIA and POPIA.
- 1.4. "DIO" means the Deputy Information Officer appointed by the IO.
- 1.5. "Group" means More Collection 1933 (Pty) Ltd, comprising the following entities:
 - Lion Sands Private Game Reserve (Pty) Ltd
 - Tinga Private Game Lodge (Pty) Ltd
 - MORE Concession I (Pty) Ltd
 - Huntrex 101 (Pty) Ltd
 - Monwana Game Lodge (Pty) Ltd
- 1.6. "Minister" means the Minister of Justice and Correctional Services.
- 1.7. "PAIA" means the Promotion of Access to Information Act 2 of 2000, as amended.
- 1.8. "POPIA" means the Protection of Personal Information Act 4 of 2013.
- 1.9. "Regulator" means the Information Regulator established under POPIA.
- 1.10. "Republic" means the Republic of South Africa.

2. PURPOSE OF THIS MANUAL

- 2.1. This Manual is published in accordance with section 51 of PAIA and is intended to inform members of the public of:
 - 2.1.1. the structure and operations of the Group;
 - 2.1.2. the categories of records held by the Group;
 - 2.1.3. the procedure for submitting requests for access to records in terms of PAIA;
 - 2.1.4. the categories of personal information processed by the Group in terms of POPIA; and
 - 2.1.5. the contact details of the Information Officer and Deputy Information Officer(s).
- 2.2 This Manual enables a requester to -
 - understand what information is automatically available without submitting a PAIA request;
 - understand what categories of information may be requested in terms of PAIA;
 - understand the purposes for which personal information is processed;
 - understand the Group's obligations under POPIA; and
 - obtain the prescribed forms and guidance issued by the Information Regulator.

3. CONTACT DETAILS OF THE INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER(S) (SECTION 51(1)(B))

Information Officer:

- Name: Andre Nordier
- Designation: Group Commercial Manager
- Telephone: 011 880 9992
- Email: andren@more.co.za

Additional Information Officer:

- Name: Liz van Dyk
- Designation: Operations Support Manager: IT & Systems
- Telephone: 011 880 9992 ext 305
- Email: liz@more.co.za

Statutory Service Standard:

Requests must be processed within 30 (thirty) days, subject to one permitted extension of an additional 30 (thirty) days, with written notice to the requester explaining the reason for the extension.

4. GUIDE ON HOW TO USE PAIA

4.1. The Information Regulator has published a comprehensive Guide in terms of section 10 of PAIA.

4.2. The Guide is available in all official languages and braille from the office of the Regulator.

4.3. The Guide includes -

- the objects of PAIA and POPIA;
- the manner and form for submitting requests;
- assistance available from the Regulator;
- remedies available;
- information on prescribed fees; and
- obligations of public and private bodies.

4.4. The Guide is available from the Regulator's website at:

<https://www.justice.gov.za/inforeg>

4.5. The Group will make a copy of the Guide available on request, free of charge.

5. CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE

CATEGORY	TYPE OF RECORD	AVAILABLE ON WEBSITE	AVAILABLE ON REQUEST
Corporate Governance	Company profiles, strategy documents, public statements, governance reports		
Marketing and Communications	Brochures, promotional materials, media content		
ESG / Sustainability	Environmental, social and governance reports, sustainability disclosures		
Public Information	Public announcements, press releases		

You may add or customise categories such as "Product Information", "Public Policies", etc.

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Group holds records in accordance with, inter alia:

- Companies Act 71 of 2008 – statutory registers, resolutions, incorporation documents.
- Income Tax Act & VAT Act – tax records and correspondence.
- Labour Relations Act, Basic Conditions of Employment Act – employee records.
- Occupational Health and Safety Act – safety documentation.
- National Environmental Management Acts (if applicable) – conservation and compliance records.

7. CATEGORIES OF RECORDS HELD BY THE GROUP

The Group maintains (non-exhaustively):

- 7.1. Human Resources Records – employment contracts, leave records, payroll information, training records.
- 7.2. Financial Records – financial statements, budgets, invoices, tax submissions.
- 7.3. Statutory and Governance Records – board minutes, shareholder resolutions, corporate registers.
- 7.4. Operational Records – internal policies, procedures, operational manuals.
- 7.5. Legal and Compliance Records – agreements, NDAs, compliance frameworks, codes of conduct.
- 7.6. Client and Customer Records – booking information, service history, customer profiles.
- 7.7. Supplier/Vendor Records – onboarding documentation, contractual records, performance documents.

8. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

8.1. The Group processes personal information for legitimate business purposes, including but not limited to:

- client management and service delivery;
- employment and HR administration;
- procurement and vendor management;
- financial management;
- regulatory compliance (including FICA, Companies Act and tax obligations);
- risk management, fraud prevention and security purposes.

8.2. Categories of Data Subjects:

- clients/customers;
- employees;
- suppliers/contractors;
- shareholders;
- group companies;
- visitors;
- prospective employees and applicants.

8.3. Categories of Personal Information Processed:

- identification information;
- contact details;
- financial and transactional information;
- client preferences;
- employment information;
- security and access logs.

8.4. Personal Information Recipients:

- law enforcement and regulators;
- auditors and legal advisors;
- banks and insurers;
- third-party service providers;
- group companies.

8.5 Cross-Border Transfers:

If applicable, the Group stores or processes information using secure cloud solutions such as [INSERT PLATFORM, e.g., Microsoft 365, AWS, Google Cloud]. Appropriate contractual and technical measures are applied.

8.6. Security Measures:

The Group implements appropriate safeguards, including encryption, access controls, secure servers, cybersecurity monitoring, internal POPIA compliance programmes, and user authentication protocols.

9. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

9.1. Requests must be submitted on Form 2 as prescribed by Regulation 7 of the PAIA Regulations, 2021.

9.2. Requests submitted on outdated forms (e.g., "Form A") will be rejected.

9.3. Requests must be directed to the IO or DIO at the contact details listed above.

9.4. A requester must:

- provide sufficient detail to identify the record;
- specify the form of access;
- identify the right sought to be protected or exercised;
- pay the prescribed fees.

9.5. Data subjects requesting correction or deletion of personal information must also use Form 2.

10. RECORD OF REQUESTS

10.1. The Group maintains a register of all PAIA requests.

10.2. The register includes the requester identity, nature of request, decision taken, and reasons.

10.3. The register is available to the Regulator on request.

11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

More Collection 1933 (Pty) Ltd ("the Group") may refuse access to a record in circumstances permitted under Chapter 4 of PAIA. Requests will be considered on their own merits, but access must or may be refused in the following circumstances:

11.1. Protection of Personal Information of Third Parties

Access must be refused where disclosure would involve the unreasonable disclosure of personal information about a natural person or juristic person other than the requester. (This includes information protected under POPIA.)

11.2. Protection of Commercial Information of Third Parties

The Group must refuse access where records contain:

- (a) trade secrets of a third party;
- (b) financial, commercial, scientific or technical information of a third party where disclosure could cause harm to their commercial or financial interests;
- (c) information supplied in confidence by a third party where disclosure could prejudice the third party in commercial negotiations or competition.

11.3. Confidential Third-Party Information

Access must be refused where the information is protected by a duty of confidentiality arising from contract or law.

11.4. Safety and Security

Access must be refused where disclosure could reasonably be expected to:

- endanger the life or physical safety of an individual;
- prejudice or impair the security of a building, system, structure, or facility.

11.5. Privileged Records

Access must be refused where the record is privileged in legal proceedings, including attorney-client communications or litigation work product.

Discretionary Grounds for Refusal

11.6. Commercial Information of the Group

The Group may refuse access to its own -

- (a) trade secrets;
- (b) financial, commercial, scientific or technical information that could harm the Group's commercial interests if disclosed;
- (c) information that may disadvantage the Group in commercial negotiations or competition;
- (d) proprietary software, source code or intellectual property protected by copyright.

11.7. Research Information

The Group may refuse access to research information if disclosure would:

- expose the identity of a researcher;
- place the research at a commercial or academic disadvantage.

11.8. Additional Grounds for Refusal

11.8.1. Frivolous or Vexatious Requests

The Group may refuse access where a request is manifestly frivolous, vexatious, or made in bad faith.

11.8.2. Unreasonable Diversion of Resources

Access may be refused where providing the record would substantially and unreasonably divert the Group's internal resources.

11.8.3. Records Not Found or Non-existent

If a requested record cannot be located or does not exist, the Information Officer will provide an affidavit or affirmation confirming this. This constitutes a deemed refusal for purposes of PAIA

Requester Categories Under PAIA

PAIA differentiates between two categories of requesters:

1. Personal Requester

A personal requester is any requester seeking access to a record containing personal information about themselves.

The Group will voluntarily provide such information (subject only to reproduction fees).

No request fee is payable.

PAIA-Manual

2. Other Requester

Any requester seeking records containing information on another person is an "other requester". In these cases:

- the Group is not obliged to voluntarily provide access;
- section 71 requires the Information Officer to notify the affected third party;
- the third party may make representations as to why access should be refused;
- request and access fees apply.

paia-manual

The requester must comply strictly with all requirements of PAIA.

Prescribed Fees Payable Under PAIA

PAIA provides for two types of fees:

- (a) Request Fees, and
- (b) Access Fees.

These fee structures must be included in a compliant PAIA Manual.

1. Request Fee (Non-Refundable)

Payable by all requesters except personal requesters. Processing of a request will not begin until the request fee is paid.

PAIA-Manual

Amount: R250.00

2. Access Fee

Payable if the request is granted, and includes:

- reproduction fees;
- search and preparation fees;
- time spent exceeding the prescribed threshold (usually 6 hours).

PAIA-Manual

3. Reproduction Fee Schedule

(Identical to the Dieter manual table — required by PAIA)

Reproduction Type	Fee
A4 page photocopy.....	R1.10
Printed A4 page.....	R0.75
Computer-readable copy (e.g., CD).....	R70.00
Transcription of visual images (A4 page).....	R40.00
Copy of visual images.....	R60.00
Transcription of audio record (A4 page).....	R20.00
Copy of audio record.....	R30.00

PAIA-Manual

4. Access Fee Schedule

Access Type	Fee
A4 page photocopy.....	R1.10
Printed A4 page.....	R0.75
Computer-readable Stiffy Disk.....	R7.50
Computer-readable CD.....	R70.00
Transcription of visual images (A4 page).....	R40.00
Copy of visual images.....	R60.00
Transcription of audio (A4 page).....	R20.00
Copy of audio record.....	R30.00

12. AVAILABILITY OF THIS MANUAL

12.1. The Manual is available:

- 12.1.1. on the Group's website: www.more.co.za;
 - 12.1.2. at the Group's head office during business hours;
 - 12.1.3. upon request from the IO or DIO via email.
- 12.2. Hard copies may be subject to the prescribed fees.
- 12.3. Updated versions will be made available to the Regulator and published as required.

13. UPDATING OF THIS MANUAL

- 13.1. This Manual will be reviewed annually or whenever there are material changes to the Group's operations, structure or processing activities.
- 13.2. Updated versions shall be lodged with the Information Regulator and made publicly available.

Issued by:

Andre Nordier

Information Officer

MORE COLLECTION 1933 (PTY) LTD