



---

**Manual for promotion of Access to Information of**  
**Windy Corner Racing Pigeon Primary Cooperation Ltd (Co-Op)**  
**T/a Nafstore & Odra**

---

**Registration Number 2010/002356/24**



31 NOVEMBER 2020  
WINDY CORNER RACING PIGEON PRIMARY CO-OP LTD  
2 Station Road Nigel 1491

**Manual for promotion of Access to Information of**  
**Windy Corner Racing Pigeon Primary Cooperation Ltd (Co-Op)**  
**Registration Number 2010/002356/24**  
**T/a**  
**Nigel Animal Feed Store (Nafstore)**  
**On the Day Racing Association (Odra)**

## **TABLE OF CONTENTS**

1. INTRODUCTION
2. COMPANY CONTACT DETAILS
3. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10
4. THE ACT
5. RECORDS ARE AUTOMATICALLY AVAILABLE
6. APPLICABLE LEGISLATION
7. SCHEDULE OF RECORDS
8. PURPOSE OF PROCESSING OF PERSONAL INFORMATION
9. DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION
10. PLANNED RECIPIENTS OF PERSONAL INFORMATION
11. PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION
12. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION
13. FORM OF REQUEST
14. AVAILABILITY OF THE MANUAL
15. FEES IN RESPECT OF PRIVATE BODIES

**PAIA MANUAL in terms of Section 51 of The Promotion of Access to Information  
Act 2/2000 (the “ACT”) of Windy Corner Racing Pigeon Primary Co-Op  
Ltd Registration Number 2010/002356/24**

### **1. INTRODUCTION**

Registered in 2010, the Co-Op offers a range of predominantly Racing Pigeon transport, Competitions, products and services to its members on the East Rand from their premises in Le-Martel Estate 2 Station Road Nigel.

Many of the Co-Op’s products and services are also available to non-Members, including various Competitions and transport facilities open to amateur pigeon control bodies in their area of operation.

A focus of the Co-Op is to offer a competition called Loft Grouping to Members and non-Members using technology and extended mathematical calculations as means to enable them to interact with the Co-Op.

The Co-Op also plays a vital advocacy role in the well-being of racing pigeons; therefore, their slogans of “In the Interest of the Pigeon” and “The Pigeon first, not just the first pigeon”. The co-op strives to counteract the perception that the racing pigeon sport is cruel to animals by working closely with the NSPCA.

### **2. COMPANY CONTACT DETAILS**

The Co-Op directors have delegated their powers to the Executive: Corporate Affairs, as Information Officer. The latter’s details appear hereunder to deal with all matters in connection with Requests for information on the Co-Op’s behalf and ensure compliance with the PAIA statute.

#### **2.1. Designated/duly authorised persons:**

Executive Directors: Mr J, S. van der Walt (CEO)

Mr B. Greyling (COO)

Information Officer: Mr G. Hartzenberg (Executive: Corporate Affairs)

## 2.2. Contact Details:

Postal Address: 103 Bendor Avenue, Overkruin, Heidelberg. Gauteng 1441

Street Address: 2 Station Road Nigel Gauteng 1491

Telephone Number: 011 814-7111 Cell Number 0832692492

Email: [koot@odra.co.za](mailto:koot@odra.co.za)

## 3. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10

The Co-Op has compiled a guide, as required by Section 10 of the Act, in the form of a constitution compiled as required in the companies act referring to a Cooperation, an Operations manual containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in this Act. It is available in English on the website <https://www.odra.co.za>. The Guide is also available for inspection, among other things, at the office of the offices of the Human Rights Commission at 29 Princess of Wales Terrace, corner York and St. Andrews Street, Parktown, Johannesburg, Gauteng, at [www.sahrc.org.za](http://www.sahrc.org.za).

For further information, please get in touch with the SAHRC:

E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

Postal address: Private Bag 2700, Houghton, 2041

Telephone: +27 11 484 8300

Fax: +27 11 484 0582

[Click here](#) to view or download the guide.

## 4. THE ACT

4.1. The PAIA statute grants a requester access to records of a private body if the record is required for the exercise or protection of appropriate legal rights. If a public body lodges a request, the public body must be acting in the public interest.

4.2. Requests in terms hereof shall be made by the prescribed procedures and, where applicable, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

4.3. Requesters are referred to the Guide in terms of Section 10, compiled by the South African Human Rights Commission and will contain information to exercise Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: +27-11-877 3600

Fax Number: +27-11-403 0625

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

## 5. RECORDS ARE AUTOMATICALLY AVAILABLE

5.1. The following Records are automatically available without a person having to request access in terms of the Act:

5.1.1. The web page <https://www.odra.co.za> is accessible to anyone who has access to the Internet. The Odra website hosts the following categories of information:

- Products and Services
- Membership application
- Calculator/s and Tools
- Blogs on our subjects of interest
- Transport detail

5.1.2. Product and promotional brochures/pamphlets

5.1.3. News and marketing information

- 5.1.4. Corporate communications
- 5.1.5. Other literature intended for public viewing.
- 5.1.6. 5.1.6 The Privacy centre/portal provides guidelines to requesters and data subjects on the processes to be followed in addressing rights regarding the protection of personal information and access to information held by the organisation.

## **6. APPLICABLE LEGISLATION**

### **LEGISLATION**

1. Companies Act No 71 of 2008
2. Value-Added Tax Act No 89 of 1991
3. Income Tax Act No 58 of 1962
4. King IV Code
5. Short-term Insurance Act 53 of 1998
6. Competition Act No 89 of 1998
7. IFRS and various other codes and legislation (auditing)
8. Regulations for the Retention and Preservation of Company Records, 1983
9. Promotion of Access to Information Act No 2 of 2000
10. Protection of Personal Information Act No 4 of 2013
11. Financial Sector Regulation Act 2017
12. National Credit Act 34 of 2005
13. Customs and Excise Act 91 of 1964
14. Trademarks Act No 194 of 1993
15. Electronic Communications & Transactions Act 25 of 2002
16. Electronic Communications Act 36 of 2002
17. National Road Traffic Act 1996
18. Financial Advisory and Intermediary Act 2002
19. Administration of Road Traffic Offences Act No 46 of 1998 (AARTO)
20. Prescribed Rate of Interest Act No 55 of 1975
21. Business Names Act 27 of 1960
22. Local Government Municipal Property Rates Act 6 of 2004
23. Copyright Act 98 of 1978
24. Financial Intelligence Centre Act 38 of 2001
25. Public Holidays Act 36 of 1994
26. Land Survey Act 8 of 1997
27. Deeds Registries Act 47 of 1937
28. Copyright Act 98 of 1978
29. National Environmental Management Act 107 – 1998
30. Prescription Act 68 of 1969
31. S A National Roads Agency Act 7 of 1998
32. Arbitration Act, 1965 (Act 42 of 1965)
33. Broad-Based Black Economic Empowerment Act 53 of 2003
34. Consumer Protection Act 68 of 2008
35. Employment Equity Act No 55 of 1998
36. Labour Relations Act No 66 of 1995
37. Constitution of South Africa Act No 108 of 1996
38. BBBEE Codes of Good Practice
39. Basic Conditions of Employment Act No 75 of 1997
40. Promotion of Equality and Prevention of Unfair Discriminations Act 4 of 2000
41. Human Rights Commission Act, 1994 (Act 54 of 1994)
42. South African Human Rights Commission Act, 2013 (Act 40 of 2013)
43. Skills Development Levy Act No 9 of 1999

44. Skills Development Act No 97 of 1998
45. Unemployment Insurance Act No 63 of 2001
46. Unemployment Insurance Contributions Act 4 of 2002
47. Occupational Health and Safety Act No 85 of 1993
48. Compensation for Occupational Injuries and Diseases Act 130 of 1993
49. Prevention and Combating of Corrupt Activities Act 12 of 2004
50. Regulation of Interception of Communications and Provision of Communication Related and Information Act 70 of 2002
51. Hazardous Substances Act 15 of 1973 (ERS)
52. Consumer Affairs (Unfair Business Practices) Amendment Act No 21 of 2001.
53. Protected Disclosures Act No 26 of 2000
54. National Environment Management Act 107 of 1998
55. National Environmental Management Waste Act 59 of 2008
56. Poultry Regulations No. R. 153 of 2006
57. Animal Protection Act 71 of 1962

If regulations, requirements, rules and regulations or any stipulation controlling the same subject matter, amongst all the applicable legislation, clash with one or the other, national, provincial legislation or the highest authority will prevail.

## 7. SCHEDULE OF RECORDS

General information about The Cooperation can be accessed via the internet at <https://www.odra.co.za>, which is available to all persons who have access to the internet. The subjects on which the Co-Op holds records and the categories on each topic in Section 51(1) are listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused by Sections 62 to 69 of the Act:

RECORDS	SUBJECT
Compliance	BBBEE compliance Internal auditing and risk Legislative compliance Regulatory reports Policies and procedures Membership with industry regulators, i.e. SASCOC, Sanpo, FCI, and ICASA
Corporate Governance	Annual reports Board and Sub-Committee Administration Co-Op Directorships Co-Op Registrations Strategic Management
Financial	Audit management Financial Statements Budgets Creditors control Debtors control Insurance Management accounts Financial and Tax Records Asset Register



Marketing	Marketing and promotions Market research and surveys Product Brochures Member Handbook Rule book Marketing strategies Customer Database Brand licencing Agreements Social Media activity
Public Affairs	Media statements ODRA Results Goldendrop competitions Research and Development projects Affiliations Donations/funding and sponsorships received
Operations	Vendor/supplier Database Call Records Membership in industry bodies and associations
Human Resources	Employee database Disciplinary action Job profiles Performance management Staff benefits and incentives Training and skills development SETA/other accreditation
IT	Information systems Network security Software licences Technology assets Disaster Recovery
Procurement	Contracts/Agreements Compliance documentation of service providers Procurement proposals and tenders Service provider records Service Level Agreements
Property Management	Building management Preventative and reactive maintenance Safety Audits Surveillance records

## 8. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

The Co-Op processes personal information:

- To support engagement with the media
- To support engagement with service providers
- To support engagement with members, customers, and the general public
- To support engagement with industry bodies
- To support recruitment and management of staff
- To support relationships with statutory and other authorities such as the NSPCA
- To support sales and marketing activities

## **9. DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION**

The following data subjects, and personal information processed, have been identified by the organisation:

- Employees: a record of employee life cycle
- Funders and donors: records as maintained by Public Affairs
- Members
- Co-Op Customers
- General public: tracking general enquiries and website visits
- Industry bodies: membership records
- International Affiliates
- Media: records of media interactions
- Service providers: a record of service provider life cycle
- Statutory and other authorities: contact details

## **10. PLANNED RECIPIENTS OF PERSONAL INFORMATION**

- National and International control bodies and regulators
- Employee Benefits providers (Wellness, tax assistance etc.)
- Trade union
- Medical Schemes
- Recruitment Agencies
- Telecommunication providers
- Financial institutions
- Funders and donors
- Industry bodies
- Operators (service providers)
- Statutory authorities
- Media

## **11. PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION**

- Flows to operators (service providers)
- Flows to donors and funders.
- Flows through the use of social media.

## **12. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**

- Physical security measures
- Access controls
- Home and mobile measures
- Internal security measures
- Cyber security measures
- Anti-spam measures
- Anti-virus measures
- Firewalls
- Password control

- Training in information security and other POPO requirements
- Selective training of key staff
- Policies for information security
- Comprehensive coverage of all IT-related issues
- Audits of information security
- Provisions around security in all provider contracts/agreements

### **13. FORM OF REQUEST**

13.1. The requester must complete Form C and submit this form together with a request fee to the person delegated to deal with requests (for “the Information Officer”).

13.2. The form must be submitted using any of the methods noted below: Postal Address of the Co-Op 2 Station Road Nigel 1491, Physical Address: 2 Station Road, Nigel. Tel. No +27-011-814-7111. E-mail address of the delegated Information Officer: koot@odra.co.za.

13.3. The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester:

- the requester should indicate which form of access is required.
- the requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed.
- The requester must identify the right that is sought to be exercised or protected and explain why the requested record is required to exercise or protect that right.
- If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is requesting the satisfaction of the designated head of the private body.
- A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- Every other requester, who is not a personal requester, must pay the required request fee.
- The Information Officer must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request.
- The requester’s fee to a private body is R 80 00. The requester may lodge an application to the court against the tender or payment of the request fees.
- After the Information Officer has decided on the request, the requester must be notified in the required form.
- If the request is granted, a further access fee must be paid for the search, reproduction, preparation, and any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

13.4. The Co-Op has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

### **14. AVAILABILITY OF THE MANUAL**

14.1. This manual is available for inspection at the Head Offices of the Co-Op, free of charge or from the SAHRC.

Signature omitted for security reasons signed co; signed able on request.

Information Officer of the Co-op; signed J. S. van der Walt.

Signed copy available on request.

Date: 1 April 2022

Next revision date of this document: 1 April 2023

### **15. FEES IN RESPECT OF PRIVATE BODIES**

15.1. The following is a breakdown of the fees structure to determine how fees relating to the determined cord of a private body are to be calculated:

15.1.1. Part III of Regulation 187 published in the Government Gazette on the 15 February 2002:



- The fee for a copy of the manual as contemplated in regulation 9(2) (c) is R 1, 50 for every photocopy of an A 4-size page or part thereof.
- The fees for reproduction referred to in regulation 11(1) are as follows:
  - (a) For every photocopy of an A 4-size page or part thereof, R 1, 50
  - (b) For every printed copy of an A 4-size page or part thereof held on a computer or in electronic or machine-readable form, R 0, 95

(c) For a copy in a computer-readable form on USB R 90, 00

(d) (i) For a transcription of visual images, for an A 4-size page or part thereof, R 60,00,

(ii) For a copy of visual images, R 80, 00

(e) (i) For a transcription of an audio record, for an A 4-size page or part thereof, R 30,00;

(ii) For a copy of an audio record, R 50, 00

15.1.2. The request fee payable by a requester other than a personal requester, referred to in Regulation 11(2), is R 70, 00.

15.1.3. The access fees payable by a requester referred to in Regulation 11(3) are as follows:

a) For every photocopy of an A 4-size page or part thereof, R 1, 50;

b) For every printed copy of an A 4-size page or part; thereof held on a computer or in the electronic or machine-readable form R 0, 95;

c) For a copy in a computer-readable form on USB R 90, 00

d) (i) For a transcription of visual images, for an A 4-size page or part thereof, R 60,00;

(ii) For a copy of visual images, R 80, 00

e) (i) For a transcription of an audio record, for an A 4-size page or part thereof R 40, 00;

(ii) For a copy of an audio record, R 50, 00

f) To search for and prepare the record for disclosure, R 50 00; for each hour or part of an hour reasonably required for such search and preparation.

15.1.4. For purposes of section 54(2) of the Act, the following applies:

- Six hours as the hours to be exceeded before a deposit is payable
- One-third of the access fee is payable as a deposit by the requester.

15.1.5. The actual postage is payable when a record copy must be posted to a requester.

Note: This manual is based on “EXAMPLE OF A MANUAL FOR A PRIVATE BODY” issued by the South African Human Rights Commission, with further additions to enhance its usefulness and comply with the Protection of Personal Information Act, No. 4 of 2013