

PAIA MANUAL

of
FAIRWAY FOOTPRINT (PTY) LTD
(Registration Number: 2026/014913/07)

FAIRWAY
FOOTPRINT

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

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FAIRWAY
FOOTPRINT

1. INTRODUCTION

- 1.1 Fairway Footprint (Pty) Ltd with Registration Number 2026/014913/07 (hereinafter referred to as “the Company”) is committed to the observance of and compliance with the directives of the South African Constitution and national legislation which endorse the key principles of good corporate governance, transparency, and accountability.
- 1.2 The Company operates the Fairway Footprint mobile application, which provides golf activity tracking and related services to users.
- 1.3 The Promotion of Access to Information Act No. 2 of 2000 (“**PAIA**”) give effect to carry out section 32 of the Constitution of the Republic of South Africa, 1996, which focusses on the right to access information i.e. everyone has the right of access to information held by the state or private body to enforce a culture of transparency and accountability.
- 1.4 Section 51 of PAIA obliges private bodies (including “the Company”) to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual must comply with.
- 1.5 This manual constitutes the Company’s PAIA manual. This manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2023 (“**POPIA**”). POPIA promotes the protection of personal information process by public and private bodies, including certain conditions to establish the minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.

2. AVAILABILITY OF THIS MANUAL

- 2.1 This PAIA manual will be updated as required or when the relevant legislation is amended.
- 2.2 The latest copy of this PAIA manual is available on the Company’s public facing website, <https://fairwayfootprint.com/>. Alternatively, this manual can be requested from the Information Officer of the Company.
- 2.3 The latest copy of this PAIA manual is also available:
 - 2.3.1 at the head office of the Company for public inspection during normal business hours;
 - 2.3.2 to any person upon request and upon the payment of a reasonable prescribed fee, and
 - 2.3.3 to the Information Regulator upon request.

3. THE COMPANY'S CONTACT DETAILS

- 3.1. All requests for access to records in terms of PAIA must be in writing and must be addressed to the designated Information Officer of the Company:

Designated Information Officer:	Rudolf Marthinus Lombard
Telephone number:	+27 82 847 6681
E-mail:	rm@fairwayfootprint.com
Physical Address:	14 Estelle Street, The Reeds, Centurion, Gauteng, South Africa, 0185
Website:	https://fairwayfootprint.com

4. GUIDE OF THE INFORMATION REGULATOR (SOUTH AFRICA)

- 4.1. The Information Regulator (South Africa) is mandated under PAIA to promote the right of access to information, monitor the implementation of PAIA, make recommendations to strengthen PAIA and to report annually to Parliament. The Information Regulator (South Africa) has compiled a guide in terms of section 10 that contains information which would be reasonably required of any person wishing to exercise any rights set out the Act.
- 4.2. The guide is available in all the countries' official languages, including braille and can be viewed at <https://info regulator.org.za/>.

5. CATEGORIES OF REQUESTORS

- 5.1 The capacity under which a requestor makes a request for records defines the category in which the requestor will be categorised. There are four categories of requestors:
- 5.1.1 A data subject who makes requests about themselves;
- 5.1.2 A representative who makes a request on behalf of the data subject;
- 5.1.3 A third party who requests information about a data subject, or
- 5.1.4 A public body who requests information in the public interest.

6. AUTOMATICALLY AVAILABLE INFORMATION

- 6.1 At this stage no notices have been published by the Information Regulator on the categories of records automatically available without a person having to request access thereto in terms of PAIA.

- 6.2 The records that are located on the Company's website are automatically available and need not be formally requested in terms of this manual.

7. RECORDS HELD BY THE COMPANY

- 7.1 The Company maintain records on the categories listed below. Take note that recording category or subject matter in this manual does not automatically imply that a request for access to such records would necessarily be successful. All requests for access will be evaluated on the merit of each case and in accordance with the provisions of PAIA.
- 7.2 Take further note that many of the records held by the Company relating to third parties are privileged and confidential. The Company places a high value on protecting such information and suggest that such requests are duly motivated for consideration.

No.	Category	Subject
1	Communication	Advertising and Promotional Information
		Media Releases
		Privacy Policy
		Promotion of Access to Information Act Manual
		Product Information
2	Companies Act Records	Document of Incorporation
		Memorandum of Incorporation
		Minutes of Annual General Meetings
		Minutes of Meetings of the Board of Directors
		Minutes of the Meetings of the Shareholders
		Proxy forms
		Share Register and other statutory registers and/or records and/or documents
		Special resolutions / resolutions passed
		Records relating to the appointment of: • Directors • Company Secretary
3	Financial Records	Bank Statements
		Banking details, accounts and records
		Debtors / Creditors statements and invoices
		Management Accounts
		Policies and procedures
4	IT and App Related Records	App user database (subject to privacy restrictions)
		Computer/ mobile device usage policy documents
		Data processing agreements with service providers
		Disaster Recovery Plans
		Information Security Policies / standards / procedures
		IT systems and user manuals
		System documentation and manuals

No.	Category	Subject
		Technical specifications and architecture
5	Legal Records	Agreements and Contracts
		Policy Records
		Trade Marks and Copyright
		All other statutory compliances
6	Operational Records	Client Information, Records, and Database
		Internal Communication Records
		Minutes of Meetings
		Policy Documents
		Product Sales Records
		Security Records
7	Procurement Records	Policies and Procedures
		Standard Terms and Conditions for supply of service and products
8	User Data Records	User account information
		User golf activity data (scores, rounds, courses)
		User preferences and settings
		User communication logs (support)
9	Website	Contact details
		Products and Services
		Promotion of Access to Information Act Manual
		FAQ
		Privacy Policy
		Publications and Articles

8. COMPANY RECORDS CLASSIFICATION KEY

8.1 Upon receipt of a request to access information, the information will be categorised as follows:

Classification No.	Access	Classification in terms of PAIA
1	May be disclosed	Public Access Document
2	May not be disclosed	Request after commencement of criminal or civil proceedings [Section 7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal Information that belongs to the requester of that information [Section 61]

Classification No.	Access	Classification in terms of PAIA
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [Section 63(1)] or juristic person
6	May not be disclosed	Likely harm the commercial or financial interest of third party [Section 64(a) & (b)]
7	May not be disclosed	Likely harm the Company or a third party in contract or other negotiations [Section 64(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [Section 65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [Section 66]
10	May not be disclosed	Legally privileged document [Section 67]
11	May not be refused	Environmental testing/investigation which reveals public safety/ environmental risk [Section 64(2); Section 68(2)]
12	May not be disclosed	Commercial information of private body [Section 68]
13	May not be disclosed	Likely to prejudice research and development information of the Company or a third party [Section 69]
14	May not be refused	Disclosure in public interest [Section 70]

9. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

9.1. The Company keeps information and records in accordance with various laws and legislation, which includes, but is not limited to the following legislation:

No.	Legislation
1	Competition Act 89 of 1998
2	Consumer Protection Act 68 of 2008
3	Copyright Act No 98 of 1978
4	Electronic Communications and Transactions Act 25 of 2002
5	Financial Intelligence Centre Act 38 of 2001
6	Income Tax Act 58 of 1962
7	Prevention of Combating of Corrupt Activities Act 12 of 2004
8	Prevention of Organised Crime Act 121 of 1998
9	Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
10	Protection of Personal Information Act 4 of 2013
11	South African Revenue Services Act 34 of 1997
12	Tax Administration Act 28 of 2011
13	The Companies Act 71 of 2008
14	The Constitution of the Republic of South Africa 1996

- 9.2 From time to time, the Company may be required to comply with other legislation as a result of the products and services being provided to users operating in different sectors.

10. POPIA COMPLIANCE

- 10.1 The Company implements the necessary security safeguards to ensure the confidentiality and integrity of all personal information, as prescribed by POPIA. This includes the use of secure storage facilities, password protected computers and encrypted storage. To ensure adequate protection of confidential and personal information we do not set out our full privacy and security measures in this manual.
- 10.2. The Company employs privacy-by-design principles, including granular user controls for data sharing and visibility within the Fairway Footprint application. Users have control over their display names, profile visibility, and participation in social features through opt-in consent mechanisms.

11. POPIA: CATEGORIES OF PERSONAL INFORMATION COLLECTED BY THE COMPANY

- 11.1 In the course of operating the Fairway Footprint application, the Company may collect the following categories of personal information from users:
- 11.1.1 Account Information: Name, email address, and unique identifier obtained through Google or Apple Sign-In services;
 - 11.1.2 User-Provided Information: Self-selected display name, user preferences, and settings;
 - 11.1.3 Golf Activity Data: Information related to golf rounds played, including courses, scores, dates, and performance statistics;
 - 11.1.4 Technical Data: Device information, IP addresses, app usage patterns, crash reports, and performance diagnostics;
 - 11.1.5 Approximate Location Data: Non-continuous location information used for suggesting nearby golf courses (with user consent where required);
 - 11.1.6 Communication Data: Correspondence with the Company through support channels.
- 11.2 For corporate and administrative purposes, the Company may also collect personal information from employees, contractors, and suppliers, including but not limited to identification details, contact information, and financial information as necessary for business operations.

12. POPIA: PURPOSE OF PROCESSING PERSONAL INFORMATION

- 12.1. The Company processes personal information for specified, explicit, and legitimate purposes, including:
- 12.1.1. To provide, operate, and maintain the Fairway Footprint application and services;
 - 12.1.2. To create and manage user accounts and authenticate users;
 - 12.1.3. To track, store, and visualize users' golf activity and history;
 - 12.1.4. To enable optional social features (such as leaderboards and friend connections) based on users' explicit opt-in consent;
 - 12.1.5. To improve app performance, stability, and user experience through analytics and diagnostics;
 - 12.1.6. To respond to user inquiries and provide customer support;
 - 12.1.7. To ensure the security of the application and prevent fraud; and
 - 12.1.8. To comply with legal and regulatory obligations.
- 12.2. The Company does not process personal information for direct marketing or advertising purposes without explicit consent, nor does it sell or share user data with third parties for their independent marketing purposes.

13. POPIA: CATEGORIES OF DATA SUBJECTS

- 13.1 The Company holds information and records on the following categories of data subjects:
- 13.1.1 Clients of the Company;
 - 13.1.2 Employees / personnel of the Company;
 - 13.1.3 Independent consultants of the Company;
 - 13.1.4 Suppliers of the Company, and
 - 13.1.5 any third party with whom the Company conducts business.

14. POPIA: CATEGORIES OF RECIPIENTS WITH WHOM PERSONAL INFORMATION ARE SHARED

14.1 Depending on the nature of the personal information, the Company may supply information or records to the following categories of recipients:

14.1.1. Trusted Service Providers (Operators): Cloud hosting providers, authentication services, analytics providers, and other technical service providers who process data on the Company's instructions under strict contractual safeguards;

14.1.2. Other App Users: Limited information (such as display name and golf scores) may be shared with other users only when the data subject has explicitly opted into social features;

14.1.3. Legal and Regulatory Authorities: When required by law, court order, or legal process, or to protect the rights, property, or safety of the Company, its users, or the public;

14.1.4. Professional Advisers: Auditors, legal counsel, and other professional advisers bound by confidentiality obligations.

14.2. The Company does not share users' personal information, scores, or activity data with golf courses or any other third parties for their independent purposes.

15. POPIA: TRANSBORDER FLOWS OF PERSONAL INFORMATION

15.1. Personal information collected by the Company may be stored or processed in South Africa or in other countries where our service providers operate. Any such transfer of personal information across borders will be conducted in accordance with POPIA and with appropriate safeguards in place, such as standard contractual clauses or the service provider's participation in an adequacy framework.

15.2. The Company ensures that all international data transfers comply with applicable data protection laws and that adequate protection is maintained for personal information regardless of where it is processed.

16. PRESCRIBED REQUEST PROCESS

16.1 To process a request for access to information, follow the following process:

16.1.1 The requester must use the prescribed form to make a formal request for access to a record;

16.1.2 The request must be made to the Information Officer of the Company;

16.1.3 The request must be made to the address and electronic mail address of the Company;

- 16.1.4 The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester;
- 16.1.5 The requester should also indicate which form of access is required;
- 16.1.6 The requester should state the necessary particulars to be so informed;
- 16.1.7 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right;
- 16.1.8 Should a request be made on behalf of another person, the requester must submit proof of this mandate and capacity in terms of which he/she is making the request to the satisfaction of the Information Officer of the Company; and
- 16.1.9 Pay the prescribed fee.

17. PRECIBED FORM

- 17.1 The application form can be obtained from <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- 17.2 A sample form is annexed to this manual, marked as "Annexure A".

18. PRECIBED REQUEST FEES

- 18.1 Prescribed fees were published by the Minister of Justice and Constitutional Development in the Government Gazette No. 23119, General Notice No. 187 of 15 February 2002. The Company's fee structure is annexed hereto, marked "Annexure B".

19. REFUSAL OF REQUESTS

- 19.1 Chapter 4 of PAIA stipulates the following grounds for refusing requests for information:
 - 19.1.1 Protection of a third party who is a natural person;
 - 19.1.2 Protection of confidential information of a third party including trade secrets, financial, scientific, commercial or technical information or computer programs;
 - 19.1.3 Protection of confidential information of a third party;
 - 19.1.4 Protection of safety of individuals and protection of property;
 - 19.1.5 Protection of records privileged from production in legal proceedings;

19.1.6 Commercial information of the Company, including trade secrets, financial, scientific, commercial or technical information or computer programs, and

19.1.7 Protection of research information of a third party and of the Company.

20. QUERIES AND REMEDIES

20.1 PAIA makes provision for the lodgement of a complaint or for an appeal against refusal of access to information.

20.2 A requester to whom or which the notice of refusal is given may within 21 days after the notice is given, make written representations to the Information Regulator (South Africa) as to why the request for access should be granted.

The Information Regulator (South Africa)	
Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address:	Private Bag 2700, Houghton, 2041
Tel:	+27 10 023 5200
Fax:	+27 11 484 7146
Website:	www.inforegulator.org.za
PAIA Complaints email:	PAIAComplaints@inforegulator.org.za
POPIA Complaints email:	PAIAComplaints@inforegulator.org.za
General enquiries email:	enquiries@inforegulator.org.za

20.3 The complainant who is not satisfied with the decision of the request may lodge an application with a court against the decision within 30 days after the decision was communicated.

21. ANNEXURES

21.1 Annexure A: Form 2 - PAIA Prescribed Request Form

21.2 Annexure B: The Company's Fee Structure

Issued by



RM Lombard
Information Officer

FORM 2 - REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

REPUBLIC OF SOUTH AFRICA

FORM 2 - REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer
RM Lombard
14 Estelle Street
The Reeds, Centurion, Gauteng
South Africa
0185

E-mail address: rm@fairwayfootprint.com

Mark with an "X"

☐ Request is made in my own name. ☐ Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made (when made on behalf of another person)	
Postal Address	
Street Address	
E-mail Address	

Contact Numbers	Tel. (B):	Facsimile:
	Cellular:	
Full names of person on whose behalf request is made (if applicable):		
Identity Number		
Postal Address		
Street Address		
E-mail Address		
Contact Numbers	Tel. (B):	Facsimile:
	Cellular:	

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
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Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (Mark the applicable box with an "X")

- ☐ Record is in written or printed form.
- ☐ Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)
- ☐ Record consists of recorded words or information which can be reproduced in sound.
- ☐ Record is held on a computer or in an electronic, or machine-readable form.

FORM OF ACCESS (Mark the applicable box with an "X")

- ☐ Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form).
- ☐ Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc).
- ☐ Transcription of soundtrack (written or printed document).
- ☐ Copy of record on flash drive (including virtual images and soundtracks).
- ☐ Copy of record on compact disc drive (including virtual images and soundtracks).
- ☐ Copy of record saved on cloud storage server.

MANNER OF ACCESS (Mark the applicable box with an "X")

- ☐ Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)
- ☐ Postal services to postal address
- ☐ Postal services to street address
- ☐ Courier service to street address
- ☐ Facsimile of information in written or printed format (including transcriptions)
- ☐ E-mail of information (including soundtracks if possible)
- ☐ Cloud share/file transfer

Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

FEES

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason:

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	
Facsimile	
Electronic communication (Please specify)	

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE	
Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Request Fees

Where the requester, other than a personal requester, requests information held by the Company, the requester shall be required to pay the prescribed fee of R50.00 (Fifty Rand and Zero Centz) before a request will be processed.

Access Fees

An access fee is payable in all instances where a request for access to information is granted which include fees associated with the search for, preparation of and reproduction of a record, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 22(8). The fee for search and preparation of the record is R30.00 (Thirty Rand and Zero Cents) per hour or part thereof, excluding the first hour, reasonably required for the search and preparation.

A requester requesting copies of all records that are publicly available, does not pay the request fee, but shall pay the prescribed access fee for reproduction.

Item	Fee
For every photocopy of an A4-size page or part thereof	R1.80
For every printed copy of an A4-size page or part thereof	R0.80
Compact disc (CD-ROM)	R200.00
A transcription of visual images, for an A4-size page or part thereof	R50.00
For a copy of visual images	R70.00
A transcription of an audio record; for an A4-size page or part thereof	R25.00
For a copy of an audio record	R40.00
Postal fee	R9.75
Courier of a record to a requestor	R99.00