



Greenpop

JOIN THE TREEVOLUTION

The Greenpop Foundation NPC

(Registration Number: 1960/000196/07)

MANUAL

Published in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000

Date of compilation: 30 June 2021

Date of revision: 30 June 2021



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THE GREENPOP FOUNDATION NPC
CAPE TOWN OFFICE
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CAPE TOWN

TABLE OF CONTENTS

1. **Introduction**3

 1.1. Availability of this PAIA Manual

 1.2. Availability of guides to the PAIA and POPI Acts

2. **Company contact details**4

3. **Company records**.....4

 3.1. Company records availability

 3.2. Company record classification key

4. **Processing of personal information**6

 4.1. The purpose of processing of personal information by Greenpop

 4.2. Categories of data subjects and personal information processed by Greenpop

 4.3. Recipients or categories of recipients with whom personal information is shared

 4.4. Information security measures to protect personal information

 4.5. Trans-border flows of personal information

 4.6. Personal information received from third parties

5. **Prescribed request forms and fees**.....9

 5.1. Form of request

 5.2. Prescribed fees

6. **Remedies**.....10



1. **Introduction**

The Greenpop Foundation NPC (the “Company”) is a non-profit organisation (NPO#: 151-411 NPO; PBO#: 930050622) headquartered in Cape Town, South Africa. Greenpop works to restore ecosystems and empower environmental stewards through forest restoration, urban greening, food gardening, and environmental awareness projects.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”).

In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

1.1. **Availability of this PAIA Manual**

This manual is published on the Company website at www.greenpop.org or alternatively, a copy can be requested from the Information Officer (see contact details in section 2).

1.2. **Availability of guides to the PAIA and POPI Acts**

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

PAIA	POPI
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041 29 Princess of Wales Terrac Corner York and St Andrews Street Parktown Johannesburg 2193 Telephone number: (011) 484 8300	Information Regulator JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O Box 31533, Braamfontein, Johannesburg, 2017 Complaints email: complaints.IR@justice.gov.za General enquiries email: inforeg@justice.gov.za



Fax number: (011) 484 7146/7 Website : www.sahrc.org.za E-mail : PAIA@sahrc.org.za	
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2. Company contact details

Company contact details in terms of PAIA section 51:

The Greenpop Foundation NPC

Cape Town Office

3rd Floor

62 Roeland Street

Cape Town

South Africa

8000

Telephone number: +27 83 412 8006

Website : www.greenpop.org

Duly authorised persons:

Information Officer	Deputy Information Officer
Lauren Teasdale lauren@greenpop.org +27 83 412 8006	Carla Wessels carla@greenpop.org +27 79 262 3005

3. Company records

3.1. Company records availability

Departmental Records	Subject	Classification No
Fundraising Department	Donor Records	4,5
	Leads & Enquiry Database	4,5
	Fundraising Reports	12
Events Department	Event Attendee Records	4,5
	Medical Records & Health Insurance Details	4,5
	Event Enquires & applications Database	4,5



Programmes Department	Partner/Beneficiary Records	4,5
	Partner/Beneficiary Agreements	4,5,12
	Monitoring, Reporting & Evaluation Records	1
Communications Department	Public Organisational Records	1
	Launches and event records	4,5
	Media Releases	1
	Newsletter Subscribers (Mailchimp)	4,5
Human Resources Department	Employee Records	4,5,9
	Employee Contracts	4,5
	Personnel Guidelines, Policies and Procedures	12
	Employee Medical Records	4,5,8
	Payroll Records	4,5
	Recruitment Records	4,5
Finance Department	Audited Financial Statements	1
	Tax Records	4, 12
	Asset Register	12
	Supplier/Donor Records	4,5
	Management Accounts	12
Legal, Compliance & Governance Department	General Contract Documentation	6,12
	Company Guidelines, Policies and Procedures	12
	Intellectual Property Records	3
	B-BBEE Affidavit	1
	NPO Certificate	1
	PBO Approval	1

3.2. Company record classification key

Classification No.	Access	Classification [PAIA section]
1	May be Disclosed	Public Access Document



2	May not be Disclosed	Request after commencement of criminal or civil proceedings [s7]
3	May be Disclosed	Subject to copyright
4	Limited Disclosure	Personal Information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information [s61]
5	May not be Disclosed	Unreasonable disclosure of personal information or of Natural person [s63(1)] or Juristic Person [POPI]
6	May not be Disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be Disclosed	Likely to harm the Company or third party in contract or other negotiations [s64(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be Disclosed	Legally privileged document [s67]
11	May not be Refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(2); s68(2)]
12	May not be Disclosed	Commercial information of Private Body [s68]
13	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party [s69]
14	May not be Refused	Disclosure in public interest [s70]

4. **Processing of personal information**

Greenpop takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy regulations. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by Greenpop.



4.1. The purpose of processing of personal information by Greenpop

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact Greenpop;
- to maintain donor and event attendee records;
- for recruitment purposes;
- for employment purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to transact with our suppliers and business partners;
- to help us improve the quality of our work and programmes;
- to identify other projects, events and opportunities which might be of interest to data subjects and to inform them about these opportunities

4.2. Categories of data subjects and personal information processed by Greenpop

Categories of Data Subjects	Personal Information processed
Donors and potential donors	Donor personal information
	Donor contracts & agreements
	Donor financial records
Event attendees and potential event attendees	Event attendee personal information
	Event attendee medical details
	Event attendee medical aid information
	Event attendee indemnity forms
Employees	Employee Personal Information
	Employee Medical Information
	Employee contracts
	Employee performance records
	Payroll records
	Health and safety records



	Employment history
Job Applicants	Curriculum vitae and application forms

4.3. Recipients or categories of recipients with whom personal information is shared

We may share the personal information of our data subjects for any of the purposes outlined in Section 4.1, with: the following:

- our carefully selected business and programme partners who provide products and services to our donors or beneficiaries;
- and our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects;
- Or needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them. We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, our agencies and our suppliers, are required to adhere to data privacy and confidentiality principles.

4.4. Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Greenpop and its operators. In terms of the PoPI Act, operators are third parties that process personal information on behalf of Greenpop.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of Greenpop apply adequate safeguards as outlined above.

4.5. Trans-border flows of personal information



We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the PoPI Act.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.4.

4.6. Personal information received from third parties

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Greenpop Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

5. Prescribed request forms and fees

5.1. Form of request

To facilitate the processing of your request, kindly:

- i. Use the prescribed form on the Company website.
- ii. Address your request to the Legal Services and Compliance Department.
- iii. Provide sufficient detail to enable the Company to identify:
 - a. The record(s) requested.
 - b. The requestor (and, if an agent is lodging the request, proof of capacity).
 - c. The South African postal address, email address or fax number of the requestor.
 - d. The form of access required.
 - e. The South African postal address, email address or fax number of the requestor.
 - f. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

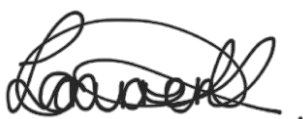
5.2. Prescribed fees

The following applies to requests (other than personal requests):

- i. No fee will be required for the request of records.

6. **Remedies**

The company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator, for relief.



Lauren Teasdale

Managing Director & Information Officer
The Greenpop Foundation

Cape Town, 30 June 2021