



PAIA MANUAL

Prepared as required and in accordance with section 51 of the
Promotion of Access to Information Act 2 of 2000 ("PAIA")

This Manual applies to THINK DIGITAL ACADEMY

Version No.1

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1. Introduction

The Promotion of Access to Information Act gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.

Specifically, section 51(1) of the Act provides that within six months after the commencement of this section (31 December 2011) or within six months after coming into existence of the private body concerned, the head of a private body must compile a manual that must contain information regarding the subjects and categories of records held by such private bodies.

In this context, a “private body” is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).

THINK DIGITAL ACADEMY falls within the definition of a “private body” and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognizes that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance.

Accordingly, this manual provides a reference to the records held by THINK DIGITAL ACADEMY and the process that needs to be adopted to access such records.

All requests for access to information (other than information that is available to the public) must be addressed to the Information Officer named in section 1.4 of this Manual.

1.1. About Think Digital Academy

Think Digital Academy is an online school providing Gr R – 12 curricula to students. We collect and process information for educational and administrative purposes.

1.2. Purpose of PAIA manual

This PAIA manual is intended to promote transparency and guide individuals in accessing information held by Think Digital Academy in accordance with the Promotion of Access to Information Act (PAIA) and to provide information on data protection in accordance with the Protection of Personal Information Act (POPI).

1.3. Contact Information

For any inquiries, requests, or concerns related to access to information or data protection, please contact:

1.4. Information Officer

Name: Mr. Artwell Chipendo

Physical Address: 9th Floor, Atrium on 5th, 5th Street, Sandhurst Johannesburg

Telephone Number: 012 998 1472

Email address: artwell@thinkdigitalacademy.org

1.5. Head Office

Physical Address: 9th Floor, Atrium on 5th, 5th Street, Sandhurst Johannesburg

Telephone Number: 012 998 1472

Email address: info@thinkdigitalacademy.org.

Website: <https://www.thinkdigitalacademy.org/>

2. Manual availability and guidelines

Copies of this manual can be obtained from the Information Officer of THINK DIGITAL ACADEMY. Alternatively, the copy can be found at our official website at <https://www.thinkdigitalacademy.org/>. Any related costs will be for the account of the requester.

2.1. Access to information Principles

Think Digital Academy is committed to upholding the principles of transparency, accountability, and the right to access information as provided by PAIA.

2.2. Records available

In terms of Section 52(2) of the Act (Voluntary Disclosures) -:

THINK DIGITAL ACADEMY has not published a notice in terms of Section 52(2) of the Act, however, it should be noted that the information relating THINK DIGITAL ACADEMY and its operations as obliged by Act is freely available on its website. Further information in the form of privacy policy, advertising material and other public communication is made available from time to time.

2.3. Information Records held by Think Digital Academy.

Think Digital Academy maintains records related to its educational activities, including administrative records, financial records, and academic records. This information is set out in [Section 2.3.1](#) of this manual.

2.3.1. Categories of Data Subjects and Related Personal Information.

The table below sets out the types of personal information that we process for different kinds of data subjects.

Data Subjects	Type of Personal Information
Parents and / or guardians	<ul style="list-style-type: none">Identifying information – such as name, identification numberContact information – such as phone number or email addressAddress information – such as physical or postal addressFinancial information – such as bank detailsDemographic information – such as race, gender, or ethnicity
Students	<ul style="list-style-type: none">Identifying information – such as name, date of birth, identification number of any kindContact information – such as phone number or email addressAddress information – such as physical or postal addressDemographic information – such as race, gender, or ethnicityAcademic records

Employees	<ul style="list-style-type: none"> • Identifying information – such as name, date of birth, identification number of any kind • Contact information – such as phone number or email address • Address information – such as physical or postal address • Educational information – such as educational qualifications • Financial information – such as bank details • Demographic information – such as gender, marital status, race, ethnicity, national origin, age, date of birth and language • Employment information – including previous employers
Service providers	<ul style="list-style-type: none"> • Identifying information – such as registration number • Contact information – such as address, email address and phone numbers • Financial information – such as bank details, tax, and VAT numbers • Contract data • Organization data • Confidential correspondence

2.3. Information available on our official website

- Privacy Policy
- PAIA Manual
- Request forms for information as prescribed by PAIA

3. Information Request Procedure

- The requester must use the prescribed form to make the request for access to a record. A request form is available on our official website - <https://www.thinkdigitalacademy.org>
- The request must be made to the Information Officer named in Section 2 above. This request must be made to the address or email address of the business.
- The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required. The requester should also indicate if any other manner should be used to inform the requester. If this is the case, please furnish the necessary particulars to be so informed.

- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer aforesaid.
- The prescribed request fee must be attached.

3.1. Access to information under POPI

Think Digital Academy is dedicated to the protection of personal information as per the requirements of the Protection of Personal Information Act (POPI).

Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right; and
- The requester complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as completed in Chapter 4 of Part 3 of the Act.

3.2. Denial of access to information under POPI

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person.
- The protection of commercial information held concerning any third party.
- The protection of financial, commercial, scientific, or technical information that may harm the commercial or financial interests of any third party.
- Disclosures that would result in a breach of duty of confidence owed to a third party.
- Disclosures that would jeopardize the safety or life of an individual.
- Disclosures that would prejudice or impair the security of property or means of transport.
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme.
- Disclosures that would prejudice or impair the protection of the safety of the public.
- Disclosures that are privileged from production in legal proceedings unless the privilege has

been waived.

- Disclosure of details of any computer programme.
- Disclosures that will put THINK DIGITAL ACADEMY at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of THINK DIGITAL ACADEMY.
- Disclosures of any record containing information about research and development being carried out or about to be carried out by THINK DIGITAL ACADEMY

If access to a record or any other relevant information is denied, our response will include:

- Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

3.3. Form of Request

Requests can be made in writing, using the official request form available on our website or by sending a letter or email. Details of the requester, the information sought, and any other relevant information should be included.

Relevant forms are:

1. Form 02: [Request for Access to Record \[Regulation 7\]](#)- Public & Private Bodies.
2. Form 03: [Outcome of request and of fees payable](#) [Regulation 8]- Public & Private Bodies
3. Form 04: [Internal Appeal Form](#) [Regulation 9]- Public Bodies only.

3.4. Request Fees

The applicable fees are prescribed in terms of the Regulations promulgated under the Act. There are two basic types of fees payable in terms of the Act:

- Request Fee

The non-refundable request fee of R50.00 (excluding VAT) is payable on submission of any request for access to any record. This does not apply if the request is for personal records of the requester. No fee is payable in such circumstances.

- Access Fee

The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed as identified in Government Notice Number 187, Regulation 11, Part III of Annexure A.

3.5. Time frame for Responding.

Think Digital Academy will respond to requests within the timeframes prescribed by PAIA and notify the requester of any extension if necessary.

3.6. Third-party Notices.

In cases where a third party's rights may be affected by the release of information, we will notify the third party and allow them to make representations.

4. Review and Appeal.

4.1. Internal Review

If you are not satisfied with the response to your request, you may request an internal review by our Information Officer.

4.2. External Review

If you are still dissatisfied after the internal review, you may seek an external review by contacting the Information Regulator.

5. Contact Information

INFORMATION OFFICER	PHYSICAL ADDRESS	CONTACT DETAILS
Artwell Chipendo	Spaces 9th Floor, Atrium on 5 th 5th Street, Sandhurst Johannesburg 2196	Tel: 012 998 1472 Email: artwell@thinkdigitalacademy.org

REGULATOR	PHYSICAL ADDRESS	POSTAL ADDRESS
INFORMATION REGULATOR	JD HOUSE 27 STIEMENS STREET BRAAMFONTEIN, JOHANNESBURG 2001	P O BOX 31533 BRAAMFONTEIN JOHANNESBURG 2017 EMAIL: COMPLAINTS.IR@JUSTICE.GOV.ZA INFOREG@JUSTICE.GOV.ZA

6. Updating of the Manual

The information officer of THINK DIGITAL ACADEMY will on a regular basis update this manual.