PROMOTION OF ACCESS TO INFORMATION MANUAL

OF

THE HILTONIAN SOCIETY NPC

(Company Registration No. 1928/001172/08)

(NPO Registration No. 017-583)

(PBO Registration No. 1811/13/2644)

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Dated – 23 September 2026

1. INTRODUCTION

The Hiltonian Society NPC (registered company number: 1928/001172/08) is a not-for-profit company registered in terms of the Companies Act No. 71 of 2008 and whose principal business is the ownership and operation of an independent boys' senior boarding school in the Midlands of KwaZulu-Natal, South Africa. Our school profile is available at https://hiltoncollege.com.

This Manual is compiled in accordance with the Promotion of Access to Information Act No. 2 of 2000 and the Regulations Relating to the Promotion of Access to Information, published under Government Notice R.757 in Government Gazette No. 45057 of 27 August 2021 ("PAIA"). The Manual is available on our website www.hiltoncollege.com and is available for inspection at the school (refer to contact details in section 3 of this Manual). For the purposes of this Manual, we refer to ourselves as the "Society", "we", "us" or "our".

PAIA ensures access to information held by the state or other individuals when necessary for exercising or protecting rights. It obliges the relevant body to release information unless specifically restricted by PAIA, outlines the procedures for such requests, and is interpreted alongside the Protection of Personal Information Act No. 4 of 2013 ("POPIA").

POPIA sets out minimum requirements for how personal information is handled by both public and private bodies, aiming to protect such information. It also amends aspects of PAIA to ensure a balance between the right to access information and the safeguarding of personal information by providing for (i) the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, (ii) providing for the issuing of codes of conduct, (iii) providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and (iv) to provide for matters concerned therewith.

The purpose of this Manual is to inform you of, guide you through, the procedural and other requirements with which a PAIA request must comply. The Manual also includes information on the submission of objections to the processing of personal information and requests to correct, delete or destroy personal information or records thereof in terms of POPIA.

2. BOARD OF DIRECTORS AND COMPANY SECRETARY

Directors:

- AG Johnston (Chairman);
- STM Seopa (Deputy Chairman);
- LM Burgoyne
- JA Clark;
- BW Falcon;
- PF Feuilherade
- DR Gain;
- GA Hancock;
- ZS Jali;
- CA Jankowitz;
- PMP Ngcongo
- SC Reid.

Company Secretary:

- E Defillo (Company Secretary)

3. CONTACT DETAILS AND INFORMATION OFFICER

The Chief Executive Officer of the Society is **George Julian Harris** who is the **Information Officer** of the Society, as Headmaster of Hilton College, for the purposes of PAIA and POPIA and is the person to whom requests for access to records should be addressed. His contact details are as follows:

Physical address:

Hilton College, College Avenue, Hilton, 3245, KwaZulu-Natal, South Africa.

Postal address:

PostNet Suite 0083, Private Bag X6011, Hilton, 3245, KwaZulu-Natal, South Africa

Telephone: 033-3830100

Fax: 033-3431058

Email: headmaster@hiltoncollege.com

Website: www.hiltoncollege.com

4. GUIDE COMPILED BY THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

The South African Human Rights Commission ("SAHRC") compiled a guide on how to use PAIA ("the Guide").

From 1 July 2021, the Information Regulator assumed the functions of the SAHRC and has in terms of section 10(1) of PAIA updated and made available the Guide compiled by the SAHRC for anyone who wishes to exercise any right contemplated by PAIA and POPIA.

The Guide is available for inspection at the offices of the Information Regulator and on its website (https://inforegulator.org.za). The Guide can also be obtained upon request to our Information Officer (contact details reflected in section 3 of this Manual).

Any queries regarding the Guide must be directed to the Information Regulator on the following details:

The Information Regulator (South Africa)

Toll Free number: 0800 017 160

Landline: 010 023 5200

Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Helpdesk platform: "iSupport" is the Information Regulator's central helpdesk platform and offers a single point of contact in terms of timely and accurate responses. You will find the "iSupport" link on their website (https://inforegulator.org.za) under "Contact Us"

Email (complaints): PAIAComplaints.IR@justice.gov.za

Email (general enquiries): enquiries@inforegulator.org.za

5. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Records maintained by the Society in terms of other legislation include but are not limited to the:-

- Basic Conditions of Employment Act No. 75 of 1997;
- Companies Act No. 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act No. 130 of 1993;
- Employment of Educators Act No. 71 of 1998;
- Employment Equity Act No. 55 of 1998;
- Financial Intelligence Centre Act No. 38 of 2001;
- Income Tax Act No. 58 of 1962;
- Labour Relations Act No. 66 of 1995;
- Local Government Municipal Property Rates Act No. 6 of 2004;

- Medical Schemes Act No. 131 of 1998;
- National Education Policy Act No. 27 of 1996;
- Occupational Health and Safety Act No. 85 of 1993;
- Pension Funds Act No. 24 of 1956;
- Skills Development Act No. 97 of 1998;
- Skills Development Levies Act No. 9 of 1999;
- South African Schools Act No. 84 of 1996;
- South African Council for Educators Act No. 31 of 2000;
- Unemployment Insurance Act No. 63 of 2001;
- Unemployment Insurance Contributions Act No. 4 of 2002; and
- Value Added Tax Act No. 89 of 1991.

6. DESCRIPTION OF THE DATA SUBJECTS AND CATEGORIES OF RECORDS

This section of the Manual sets out the subject and categories of records held by the Society. The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under PAIA. Certain grounds of refusal set out in PAIA may be applicable to a request for such records.

The purpose of the processing of the information described below is required to operate the business of a school, and its related activities, which, by its very nature, is dependent upon the holding, and processing of personal information. Trans-border flows of personal information generally relate only to the authorized transfer of information in respect of connected persons, such as parents and pupils, who are not ordinarily resident in South Africa.

Categories of records / data subjects	**Description of records held**
Statutory Company Information	• Member records; • Members' register; • Directors' register; • Minutes of board meetings, committee meetings, resolutions and annual general meetings; • Constitutional documents; and • Filings with the Companies and Intellectual Property Commission.
Management	• Minutes of meetings; and • Internal correspondence,
Finance	• Accounting records; • Tax records; • Debtors' records; • Creditors' records; • Insurance records; • External auditor's reports; • Interim and annual financial statements; • Bank statements and other banking records for business and trust accounts; • Invoices issued in respect of debtors and billing information; and • Records regarding the Society's financial commitments.
Human Resources	• List of employees; • Statistics regarding employees; • Employment contracts; • Conditions of employment; • Information relating to prospective employees; • Personnel records including personal details, disciplinary records, performance and internal evaluation records;

- Employee tax information;
- Records of Unemployment Insurance Fund contributions;
- Records regarding group life assurance and disability income protection;
- Provident fund records;
- Payroll records;
- Health and safety records;
- Workplace skills plans;
- Codes of conduct;
- Disciplinary code and procedure;
- Grievance procedure;
- Appeal procedure;
- Remuneration policy;
- Internal policies and procedures regarding dismissals, performance appraisals, recruitment, selection, advertising of positions, appointments, retirement, promotions, leave, extended sick leave, study leave, salaries, overtime, bonuses, medical aid, health and safety, adoption leave and benefits, B-BBEE procurement, loans, smoking, use of company resources including telephones, motor vehicles and computers, sexual harassment, and HIV-Aids policy.
- Training schedules and material; and
- Correspondence relating to personnel.

Suppliers

- Supplier lists and details of suppliers including banking details; and
- Agreements with suppliers.

Information Technology

- Computer software;
- Support and maintenance agreements; and
- Records regarding computer systems and programmes.

Property

- Asset registers;
- Lease agreements in respect of immovable property;
- Title deeds;
- Records regarding insurance in respect of movable property; and
- Records regarding insurance in respect of immovable property.

Parents & Pupils

- Names;
- Addresses;
- Contact details;
- Identity numbers;
- Personal information;
- Photographs; and
- Scholastic and educational records.

Miscellaneous

- General internal and external correspondence; and
- Publications.

7. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT REQUEST

Certain records are available without a person having to request access in terms of PAIA such as publicly available information about the Society, news publications, press releases, brochures and marketing material. Certain information is also available on the Society's website at www.hiltoncollege.com.

8. INFORMATION SECURITY MEASURES

Protecting the security and confidentiality of your personal information is a priority for us. We have put in place appropriate technical, administrative, and physical safeguards to prevent unauthorised access, disclosure, or misuse of personal information.

Information is essentially controlled via restricted access to buildings where appropriate, locked doors, computer firewalls and password protection. The general premises have 24/7 patrolling guards. Certain records, such as payroll and accounts, have access limited by user.

We are dedicated to regularly reviewing and, where needed, updating our security practices to ensure your personal information remains protected.

9. REQUEST PROCEDURE

Completion of Prescribed Form

A request for access to a record in terms of PAIA must substantially correspond with **Form 2** of Annexure A to the Regulations relating to PAIA. **Form 2 is annexed to this Manual** for your ease of reference, alternatively, you may access the form on https://inforegulator.org.za/paia-forms. The request must be made to our Information Officer (contact details in section 3 of this Manual).

Payment of Prescribed Fee

The prescribed fees in respect of private bodies for requests to private bodies are set out in Annexure B to the Regulations relating to PAIA and can be accessed on https://www.justice.gov.za/paia/paia.htm.

10. OBJECTION

Data subjects have the right to object to the processing of their personal information at any time, provided they have reasonable grounds related to their specific circumstances, unless the law allows such processing. To do this, the data subject must fill out the required form (Appendix C FORM 1 - Objection to the processing of personal information in terms of section 11(3) of the POPIA Regulations relating to the protection of personal information, 2018 [Regulation 2]) which is available on https://inforegulator.org.za/popia-forms. This form must be submitted to our Information Officer using the contact details provided in section 3 of this Manual.

11. CORRECTION

Data subjects have the right to request the correction or deletion of their personal information if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained. Additionally, they may request the destruction or deletion of any records that the Society is no longer authorised to retain, as provided for under POPIA's Regulations regarding retention and restriction of records.

A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to our Information Officer (contact details provided in section 3 of this Manual) on the required form (Appendix D - FORM 2 - Request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of section 24(1) of POPIA's Regulations relating to the protection of personal information, 2018 [Regulation3]) . This form is also available on https://inforegulator.org.za/popia-forms.

12. GROUNDS FOR REFUSAL OF ACCESS AND PROTECTION OF INFORMATION

A request for access to a record may be declined on several grounds, including the protection of a third party's personal or commercial information, such as trade secrets or sensitive financial, scientific, or technical data. Requests may also be refused if disclosure would violate a duty of confidence, compromise an individual's safety, prejudice property rights, or reveal information produced during legal proceedings unless privilege has been waived. Further grounds for refusal include information that could disadvantage the Society in negotiations, harm its competitive position, or undermine security measures.

However, section 70 of PAIA stipulates that disclosure of a record becomes mandatory if it would reveal a significant breach of the law or highlight a serious and imminent public safety or environmental risk, provided the public interest in disclosure clearly outweighs any potential harm. If access to information affects a third party, that party must be notified within 21 days of the request, after which they have a further 21 days to make representations regarding the release of the record.

13. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

When the Information Officer approves a request for access to a specific record, access must be provided to the requester within thirty days of notification of the decision. If access to information is refused, the requester will receive correspondence outlining the available appeal procedure.

Should the requester remain dissatisfied following an appeal, they may escalate the matter to the Information Regulator or seek recourse through a competent court. If the access decision affects a third party and the Information Officer grants access, the third party has thirty days to appeal the decision in court. If no appeal is lodged within this period, access to the record must be granted to the requester.

14. CHANGES TO THIS MANUAL

This Manual may be amended and updated from time to time, provided that if the Society does so, it will ensure that such changes are carried out subject to and published in accordance with PAIA and POPIA.

(Page down to next page for Form 2 referred in section 9 above)

FORM 2

REQUEST FOR ACCESS TO RECORD

[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

_____
_____
_____
_____
(Address)

E-mail address: _____

Fax number: _____

*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:	
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

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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