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Kira Investment (Pty) Ltd

PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- **IO** Information Officer;
- **Minister** Minister of Justice and Correctional Services;
- **PAIA** Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- **POPIA** Protection of Personal Information Act No. 4 of 2013;
- **Regulator** Information Regulator; and
- **Republic** Republic of South Africa

2. INTRODUCTION

The manual is prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000, and applies to Kira Investments (Pty) Ltd, a private body as defined in the Act. Kira Investments (Pty) Ltd consists of 2 main divisions, namely Advisory Services that deals with Risk and Resilience Management, as well as Kira Safaris, which assists guests with planning safari experiences as well as manages and operates Luxury Suites within the Dinokeng Game Reserve.

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1. Check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2. Have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3. Know the description of the records of the body which are available in accordance with any other legislation;
- 3.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6. Know if the body will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8. Know the recipients or categories to whom the personal information may be supplied;
- 3.9. Know if the body has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10. Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF KIRA INVESTMENTS (PTY) LTD.

- 4.1. Chief Information Officer
Name: Louisa Nana
Telephone: 082 662 5630

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Email: louisa@kira.co.za
4.2. Access to information general contacts
Email: louisa@kira.co.za
4.3. National or Head Office:
Postal Address: 18 Rooibank Road
Rooibank 89-JR
Pretoria
0001
Physical Address: 18 Rooibank Road
Rooibank 89-JR
Pretoria
0001
Telephone: 082 662 5630
Email: louisa@kira.co.za
Website: www.kirasafaris.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.1.1. The Guide is available in each of the official languages and in Braille.
- 5.1.2. The aforesaid Guide contains the description of-
- 5.1.3. The objects of PAIA and POPIA;
- 5.1.4. The postal and street address, phone and tax number and, if available, the electronic address of-
- 5.1.4.1. The Information Officer of every public body, and
- 5.1.4.2. Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA^[ii] and section 56 of POPIA^[iii]
- 5.1.5. The manner and form of a request for-
- 5.1.5.1. Access to a record of a public body contemplated in section 11^[iii], and
- 5.1.5.2. Access to a record of a private body contemplated in section 50^[iv]
- 5.1.6. The assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.1.7. The assistance available from the Regulator in terms of PAIA and POPIA;
- 5.1.8. All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
- 5.1.8.1. An internal appeal;
- 5.1.8.2. A complaint to the Regulator; and
- 5.1.8.3. An application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 5.1.9. The provisions of sections 14^[v] and 51^[vi] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.1.10. The provisions of sections 15^[vii] and 52^[viii] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.1.11. The notices issued in terms of sections 22^[ix] and 54^[x] regarding fees to be paid in relation to requests for access; and

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- 5.1.12. The regulations made in terms of section 92^(k).
- 5.2. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.3. The Guide can also be obtained-
 - 5.3.1. Upon request to the IO
 - 5.3.2. From the website of the Regulator (<https://www.justice.gov.za/inforeg/>)
- 5.4. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 5.4.1. English
 - 5.4.2. Afrikaans

6. CATEGORIES OF RECORDS OF KIRA INVESTMENTS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following categories of records are automatically available for inspection, purchase or photocopying. The information can be requested from the Information Officer and the request for this information need not be in terms of the Act.

The following information is available on our website (www.kirasafaris.co.za) and at our offices:

- Marketing and promotional brochures.
- Privacy Policy
- Terms and Conditions

7. DESCRIPTION OF THE RECORDS OF KIRA INVESTMENTS (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- Administration of Estates Act 66 of 1965.
- Administrative Adjudication of Road Traffic Offences Act, 46 of 1998 and Regulations.
- Arbitration Act 42 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Businesses Act, 71 of 1991
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Children's Act, 38 of 2005
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Companies Act 71 of 2008
- Currency and Exchanges Act 9 of 1933
- Deeds Registries Act 47 of 1937
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act, 25 of 2002
- Employment Services Act 4 of 2014
- Employment Tax Incentive Act 26 of 2013
- Income Tax Act 58 of 1962
- Insolvency Act 24 of 1936
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993

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- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Road Accident Fund Act, 56 of 1996
- Securities Transfer Tax Administration Act 26 of 2007
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Tax Administration Act 28 of 2011
- Transfer Duty Act 40 of 1949
- Trademarks Act 194 of 1993
- Copyright Act 98 of 1978
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991
- Wills Act, 7 of 1953

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY KIRA INVESTMENTS (PTY) LTD.

Subjects on which the body holds records	Categories of Records
Statutory Business Records	<ul style="list-style-type: none"> • Certificate of Change of Name • Certificate of Incorporation • Certificate to Commence Business • Memorandum of Incorporation • Resolutions
Accounting Records	<ul style="list-style-type: none"> • Annual financial statements and working papers • General ledger • Subsidiary ledgers (receivables, payables, etc.) • Bank statements • Customer and supplier statements and invoices • Cash books and petty cash books • Fixed asset register • Tax returns and assessments • VAT returns • Lease or instalment sale agreements • Budgets and business plans • Insurance records • Investment records • Auditor's reports • Inventory records • Systems documentation • Management reviews • Capital expenditure • Credit agreements

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Subjects on which the body holds records	Categories of Records
Distribution and Transportation	<ul style="list-style-type: none"> Permits and licenses
Fixed Property	<ul style="list-style-type: none"> Leases
Information Technology	<ul style="list-style-type: none"> Agreements Client database Hardware Internet Software packages Telephone lines, leased lines and data lines
Insurance	<ul style="list-style-type: none"> Claim records Details of coverage, limits and insurers Insurance policies
Legal, Agreements and Contracts	<ul style="list-style-type: none"> Acquisition or disposal documentation Agreements with contractors, suppliers and clients Agreements with customers Agreements with shareholders, officers or directors Material agreements relating to provision of services or materials Material licenses, permits and authorisations Contracts, including lease agreements and finance agreements Restraint agreements Sale agreements Settlement agreements Warranty agreements
Personal Records	<ul style="list-style-type: none"> Attendance register Employee evaluation and performance records Employee information records Employment contracts Expense accounts IRP 5 and IT 3 certificates Letters of appointment Leave applications Maternity Leave policy Medical aid records Payroll Personnel File Policies and procedures Salary and wage registers Salary slips UIF, PAYE and SDL returns Workmen's Compensation Documents

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Subjects on which the body holds records	Categories of Records
Sales and Marketing	<ul style="list-style-type: none"> Customers Service and product information

9. PROCESSING OF PERSONAL INFORMATION

Kira Investments (Pty) Ltd is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder.

Kira Investments (Pty) Ltd has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information.

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9.1. Purpose of Processing Personal Information

We process personal information for various reasons, including but not limited to the following:

- To manage information, products and/or services requested by data subjects
- To help us identify data subjects when they contact us
- Manage customers
- To maintain customer records
- Recruitment purposes
- Employment purposes
- Training purposes
- Travel purposes
- General administration
- Financial and tax purposes
- Legal or contractual purposes
- Health and safety purposes
- To monitor access, secure and manage our premises and facilities
- To transact with our suppliers
- To improve the quality of our products and services
- To help us detect and prevent fraud and money laundering under FICA
- To help us recover debts
- Marketing purposes
- Engaging with the public

9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Subjects on which the body holds records	Type of information
Business Partners	<ul style="list-style-type: none"> Name and Surname ID Number Contact number E-mail address Physical address

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Subjects on which the body holds records	Type of information
Customers	<ul style="list-style-type: none"> Name and Surname ID Number Age Contact Number E-mail address Physical address Special needs – disability
Employees	<ul style="list-style-type: none"> Name and Surname ID Number Age Contact Number E-mail address Physical address Employment history Next of kin and Emergency contract details Criminal history, alleged commission of offence and proceedings in respect of these offences.
Group companies	<ul style="list-style-type: none"> Company Name and Registration number VAT number Contact number E-mail address
Prospective employee	<ul style="list-style-type: none"> Name and Surname ID Number Age Contact Number E-mail address Physical address Employment history Next of kin and Emergency contract details Criminal history, alleged commission of offence and proceedings in respect of these offences.
Suppliers	<ul style="list-style-type: none"> Name and Surname Contact Number E-mail address Physical address
Visitors (Walk in)	<ul style="list-style-type: none"> Name and Surname Contact Number E-mail address

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9.3. The recipients or categories of recipients to whom the personal information may be supplied

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In processing your personal information, we may share it within the group of companies or with other third parties. These include but are not limited to:

- Group companies
- Other outsourced third-party service providers

9.4. Planned transborder flows of personal information

We may transfer to, and store personal information we collect about you, in countries other than South Africa, if the relevant business transactions or situation requires trans-border processing. These countries may not have the same data protection laws as South Africa, and in this instance, we will only transfer the information if we have consent from you, or it is necessary for the performance or conclusion of a contract between us.

9.5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of information

We have identified our security risks over the personal information we process in line with the Protection of Personal Information Act, and we have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorized access and disclosure, alteration and destruction of personal information.

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

10. AVAILABILITY OF THE MANUAL

10.1. A copy of the Manual is available-

10.1.1. On www.kirasafaris.co.za, if any;

10.1.2. Head office of KIRA Investment (Pty) Ltd for public inspection during normal business hours;

10.1.3. To any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4. To the Information Regulator upon request.

10.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The Information Officer of KIRA Investments (Pty) Ltd will update this manual on a regular basis.

Issued by

Louisa Nana
Director & Information Officer

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^[i] Section 17(1) of PAIA – For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

^[ii] Section 56(a) of POPIA – Each public and private body must make provision, in the manner prescribe in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

^[iii] Section 11(1) of PAIA – A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

^[iv] Section 50(1) of PAIA – A requester must be given access to any record of a private body if-

- a. That record is required for the exercise or protection of any rights;
- b. That person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c. Access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

^[v] Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

^[vi] Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

^[vii] Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

^[viii] Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

^[ix] Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require therequester to pay the prescribed request fee (if any), before further processing the request.

^[x] Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

^[xi] Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;

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(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.