



COLOURS OF HOPE

Registration Number 2016/403723/08

PBO Number 930080902

53 Hoylake Road, Greenside, Randburg, Johannesburg, 2193

Tel: 27 (0)82 657 5676

Web: www.coloursofhope.org.za | Email: info@coloursofhope.org.za

Colours of Hope Privacy Policy

Last Updated: 14 May 2026

**This document contains:
PAIA Manual
Protection of Personal Information
Data Policy**



COLOURSOFHOPE.ORG.ZA



[/COLOURSOFHOPEZA](https://www.instagram.com/COLOURSOFHOPEZA)

PAIA Manual



1. Objective and Purpose

- 1.1. Colours of Hope NPC is a Nonprofit COH incorporated in accordance with the Companies Act 71 of 2008 duly registered with CIPC, hereinafter referred to as "COH".
- 1.2. The manual has been prepared, as required by section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), for the COH. PAIA gives effect to the constitutional rights of access to any information held by a public or private body that is required for the exercise of protection of any rights.
- 1.3. The COH is committed to ensuring that all business is conducted in accordance with a proper governance and relevant legislation. To promote effective governance, it is necessary to ensure that all affected parties are educated and empowered to understand and access their rights in terms of PAIA, where applicable.
- 1.4. Where a request is made in terms of PAIA, the COH is obliged to release the information, except where PAIA expressly provides that the information may or must not be released.
- 1.5. The objective of this PAIA Manual is to outline a suitable approach and response to requests to access information and the essential procedural requirements attached to such requests. This PAIA Manual should be read in conjunction with the Protection of Personal Information Act 4 of 2013 ("POPIA"), where applicable.
- 1.6. This PAIA Manual informs requesters of procedural and other requirements, as prescribed by PAIA. It is important to note that Section 9 of PAIA recognises certain limitations to the right of access to information, including, but not limited to:
 1. Limitations aimed at the reasonable protection of privacy;
 2. Commercial confidentiality; and
 3. Effective, efficient and good governance.

Further to this, PAIA recognises the act of balancing a right to request information with any other rights, including such rights as contained in Constitution.

2. COH contact details (Section 51(1)(a))

All requests for information in terms of the COH's PAIA Manual must be directed to:

Information Officer:	Kaashifa Ismail
Address:	53 Hoylake Road, Greenside, 2193
Telephone Number:	082 657 5676
Email:	kaashifa@coloursofhope.org.za
Website:	www.coloursofhope.org.za

Deputy Information Officer:	Sa'uda Ismail
Address:	53 Hoylake Road, Greenside, 2193
Telephone Number:	082 657 5676
Email:	info@coloursofhope.org.za
Website:	www.coloursofhope.org.za

3. Access to records (Section 51(1)(b))

1. PAIA grants a requester access to certain records of a private body if the said records are required to exercise or protect any rights of the requester. Should a public body lodge such a request; it must be acting in the interest of the public.
2. Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner, at the rates provided. The prescribed form, manner and the tariff are dealt with in sections 6 and 7 respectively.
3. The South African Human Rights Commission (SAHRC) has compiled and published a useful guide in terms of section 10 of PAIA, containing valuable information for the purposes of exercising any right in terms of PAIA.
4. The guide is made available in all official languages on the website of the SAHRC at the following URL:
<https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>
5. Any enquiries regarding this guide should be directed to the SAHRC using the following contact information:

Postal Address: :	Private Bag 2700, Houghton, 2041
Telephone Number:	+27(0)11 877 3600

4. Policy Records available in terms of other legislation (Section 51(1)(c))

In terms of other legislation, policy records are available that have been amended, as relevant, from time to time. A list of "other legislation" is provided below, the list not being exhaustive, and where applicable:

1. Constitution of the Republic of South Africa, 1996 (the "Constitution")
2. Protection of Personal Information Act 4 of 2014 (the "POPI Act")
3. Promotion of Access to Information Act 2 of 2000 (the "PAIA")
4. The Companies Act 71 of 2008, where applicable
5. Nonprofit Organisations Act 71 of 1997
6. Childrens Act 38 of 2005, where applicable
7. Labour Relations Act 66 of 1995, where applicable
8. Basic Conditions of Employment Act 75 of 1997, where applicable
9. Employment Equity Act 55 of 1998, where applicable
10. Skills Development Levies Act 9 of 1999, where applicable
11. Unemployment Insurance Act 63 of 2001, where applicable
12. Electronic Communications and Transactions Act 25 of 2002 Electronic Communications Act 36 of 2005
13. Consumer Protection Act 68 of 2008
14. Broad-based Black Economic Empowerment Act 53 of 2003, where applicable
15. Compensation for Occupational Injuries and Diseases Act 130 of 1993
16. Tax Administration Act 28 of 2011
17. Income Tax Act 58 of 1962.

5. Schedule of records (Section 51 (1)(d))

The accessibility of the documents listed below may be subject to the grounds of refusal as set-out in this manual.

- 5.1. Records that are available without having to submit a request in terms of PAIA:
 1. Marketing material
 2. Pamphlets

2. Records that must be formally requested in terms of PAIA include:

1. The Memorandum of Incorporation
2. Minutes of meetings
3. Records relating to the appointment of representatives of the COH where applicable
4. Annual Financial Statements
5. Tax Returns
6. Accounting Records
7. Banking Records
8. Asset Register
9. Rental Agreements
10. Invoices
11. PAYE Records
12. Documents issued to employees for income tax purposes
13. Records of payments made to SARS on behalf of employees
14. Regional Services Levies
15. Skills Development Levies
16. UIF
17. Employment contracts
18. Employment Equity Plan
19. Medical Aid records
20. Pension Fund records
21. Disciplinary records
22. Salary records
23. Disciplinary code
24. Leave records
25. Training records
26. Training Manuals
27. Private Body records
28. Client related records and associated documentation and reports
29. Other records protected by way of confidentiality/non-disclosure agreements
30. Commercial activities of the COH.

3. In addition to the above, the COH may refuse a request for information made in terms of clause 5.2 on the following basis:

1. Mandatory protection of the privacy of a third party who is a natural person,

which would involve the unreasonable disclosure of personal information of that natural person;

2. Mandatory protection of the commercial information of a third party, if the record contains:
 - 2.1. Trade secrets of that third party;
 - 2.2. Financial, commercial, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - 2.3. Information disclosed in confidence by a third party to the COH if the disclosure could place that third party at a disadvantage.
3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
4. Mandatory protection of the safety of individuals and the protection of property;
5. Mandatory protection of records which would be regarded as privileged in legal proceedings;
6. Mandatory protection of records of a personal nature as defined in terms of POPIA;
7. The commercial activities of the COH, which includes but is not limited to trade secrets, financial, commercial or technical information as well as software platforms or programmes exclusively developed for the COH.
8. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

6. Form of a request for information (Section 51(1)(e))

- 6.1. A requester must use the prescribed form "Form C" to request access to the information as set out in 5.2 above. Form C can be downloaded from the following URL:
<https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- 6.2. The request must be addressed to the Information Officer as indicated in section 2.
- 6.3. The requester must provide sufficient detail on Form C to enable the contact person of the COH to establish who the requester of the said information is, as well as what information is being requested and in what format.
- 6.4. The requester must provide enough detail in respect of his/her contact details and

if the requester wishes to be informed of the decision of the COH in any specific manner (in addition to being written), the manner and particulars thereof.

- 6.5. The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 6.6. After the COH has reached a conclusion regarding the request, the requester will be notified in the required format.
- 6.7. If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.
- 6.8. The COH does not have internal appeal procedures; therefore, the decision made by the Information Officer of the COH is final. Requesters who are dissatisfied with a decision of the COH will have to exercise external remedies at their disposal.
- 6.9. A dissatisfied requester or a Third Party, may within 30 days of notification of the decision, apply to an appropriate court for relief.

7. Prescribed fees (Section 51(1)(f))

- 7.1. A requester who seeks access to a record containing personal information about that requester (a personal requester) is not required to pay a request fee subject to the volume of documentation requested being reasonable in nature and at the COH's reasonable discretion; alternatively, the requester must pay the required request fee, as prescribed from time to time.
- 7.2. Every other requester, who is not a personal requester, must pay the required request fee, as prescribed from time to time.
- 7.3. If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted). A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

7.4. Records may be withheld until the fees have been paid.

7.5. Fees:

1. The fee for a copy of the manual as contemplated in regulation 9 (2) (c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11 (1) are as follows:
 - 2.1. For every photocopy of an A4-size page or part thereof R 1,10
 - 2.2. For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R 0,75
 - 2.3. For a copy in a computer-readable form on compact disc R 70,00
 - 2.4. For a transcription of visual images (where applicable), for an A4-size page or part thereof R 40,00
 - 2.5. For a copy of visual images R 60,00
 - 2.6. For a transcription of an audio record, for an A4-size page or part thereof R 20,00
 - 2.7. For a copy of an audio record R 30,00
 - 2.8. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R50,00.
 - 2.9. The fees herein are subject to change so you undertake to confirm the fees applicable to your request with the COH as per Clause 2 prior to requesting the information you wish to request where a fee will be charged.

8. Availability of the manual (Section 51(3))

- 8.1. This manual is available for inspection at the offices of the COH free of charge upon prior arrangement with the said contact person of the COH as per Clause 2 or alternatively as contained below.
- 8.2. A copy will also be made available on the website of the COH should the COH have a website.

9. Information or records not found

- 9.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, the Information Officer shall notify the requester, by way of an affidavit or affirmation, that it is not possible to provide access to the requested records.

- 9.2. The affidavit or affirmation shall provide a full account of all the steps taken to find

the requested records or to determine the existence thereof, including details of all communications by the Information Officer with every person who conducted the search.

- 9.3. If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by the Information Officer.
- 9.4. The attention of the requester is drawn to the provisions of Chapter 4 of Part 3 of PAIA in terms of which the COH may refuse, on certain specified grounds, to provide information to a requester.

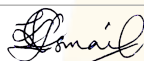
10. Information requested about a Third Party (Section 71 to 74)

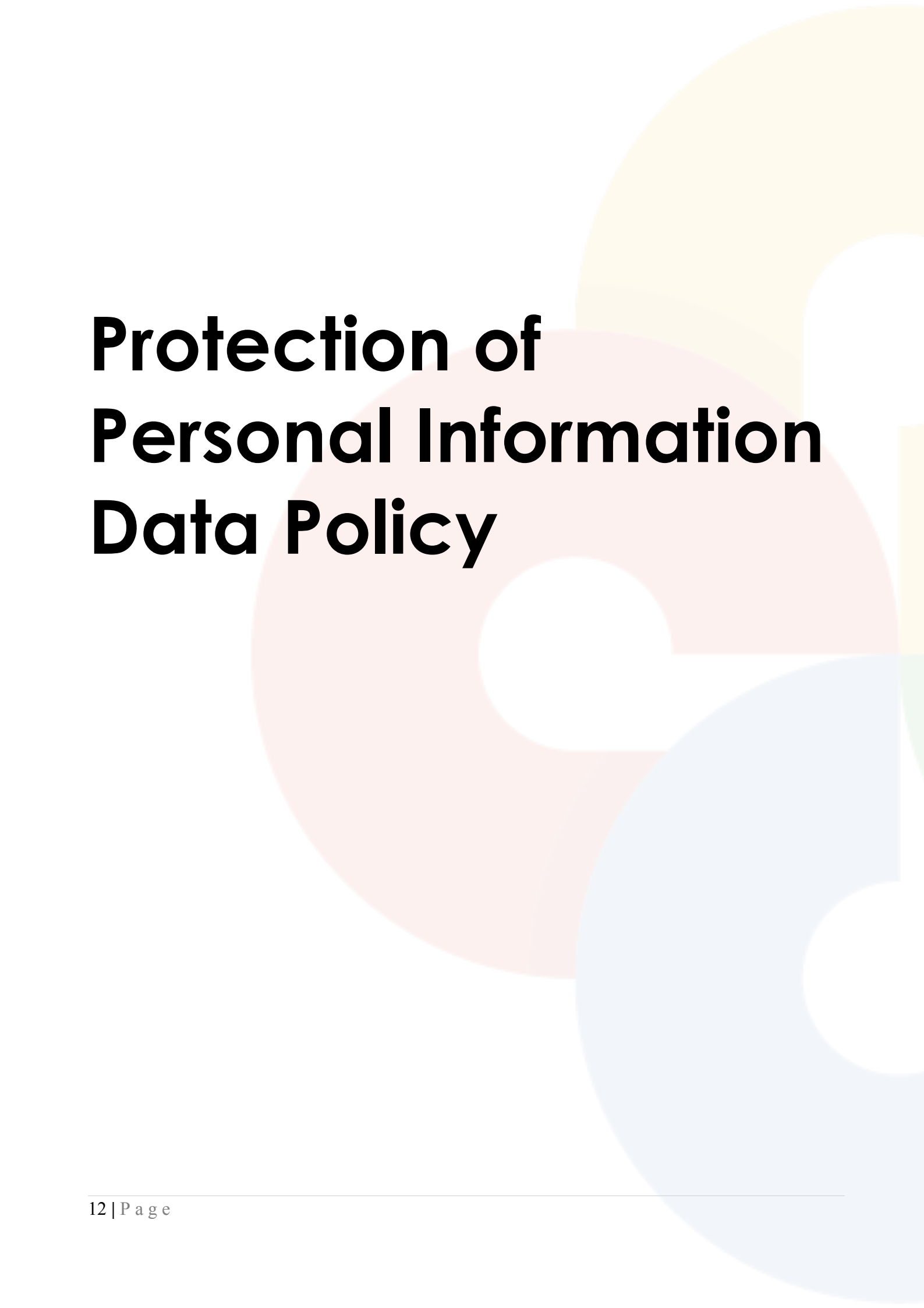
- 10.1. Section 71 of PAIA makes provision for a request of information or records about a Third Party.
- 10.2. In considering such a request, the COH will adhere to the provisions of section 71 to 74 of PAIA.
- 10.3. The attention of the requester is drawn to the provisions of Chapter 5 of Part 3 of PAIA in terms of which the COH is obliged, in certain circumstances, to advise Third Parties of requests lodged in respect of information applicable to or concerning such Third Parties.
- 10.4. Should you have any queries kindly contact the Information Officer (in Clause 2).

11. Policy Review and Updates

This Policy will be reviewed annually or as required by changes in legislation or business operations. Updates will be published on our website and made available on request.

Manual approval and information

Manual owner	Managing Director			
Manual type	Compliance			
Approver's signature				
Approved by (this version)	Kaashifa Ismail (Chair of COH)			
Approval date (this version)	14 May 2026			
Version number	V1			
<u>Summary of Manual history</u>				
<u>V e r s i o n</u> <u>number</u>	<u>D r a f t e d /</u> <u>a d a p t e d /</u> <u>reviewed by</u>	<u>Creation/review</u> <u>date</u>	<u>Approved</u> <u>by</u>	<u>Approval</u> <u>date</u>
V1	The COH Board	14 May 2026	K. Ismail	2026/05/14



Protection of Personal Information Data Policy

1. Objective and Purpose

1. Colours of Hope NPC ("the COH") is committed to protecting the privacy and personal information of all stakeholders, including employees, clients, service providers, and other data subjects.
2. This Policy sets out how we collect, process, use, store, share, and protect personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").
3. This policy should be read in conjunction with the Privacy Manual created in line with the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA").

2. Scope

This Policy applies to:

- 2.1 All processing of personal information by the COH or on its behalf.
- 2.2 All natural persons (clients, employees, suppliers, consultants, and contractors) and juristic persons whose information we may hold.
- 2.3 All processing activities, whether manual or automated.

3. Information Officer

The COH has appointed an Information Officer responsible for compliance with POPIA:

Information Officer:	Kaashifa Ismail
Address:	53 Hoylake Road, Greenside
Telephone Number:	082 657 5676
Email:	kaashifa@coloursofhope.org.za
Website:	www.coloursofhope.org.za

Deputy Information Officer:	Sa'uda Ismail
Address:	53 Hoylake Road, Greenside
Telephone Number:	082 657 5676
Email:	info@coloursofhope.org.za
Website:	www.coloursofhope.org.za

The Information Officer is registered with the Information Regulator of South Africa and can be contacted for any queries regarding this Policy.

4. Personal Information we can collect

We may process the following categories of personal information:

- 4.1 Identity information: name, ID number, passport, date of birth, gender, marital status.
- 4.2 Contact information: addresses, email, phone numbers.
- 4.3 Financial information: bank details, invoices, tax numbers.
- 4.4 Employment information: CVs, qualifications, contracts, leave, disciplinary records.
- 4.5 Transaction information: payments, account activity, client engagements.
- 4.6 Technical information: IP addresses, login data, browser/device information.
- 4.7 Usage information: website interactions, service usage statistics.
- 4.8 Location information: geolocation data from devices.
- 4.9 Marketing and communications preferences.

5. Special Personal Information

In limited circumstances, we may process special categories of personal information, such as race, health, biometric data, political affiliation, or criminal history. This will only be done where:

- 5.1 Processing is required by law,
- 5.2 Explicit consent has been obtained,
- 5.3 Processing is required for the establishment, exercise, or defence of legal rights, or
- 5.4 The information has been deliberately made public by the data subject.

6. Purpose of Processing

We process personal information for the following purposes:

- 6.1 To provide professional consultancy services to clients,
- 6.2 To manage employees, suppliers, and contractors,
- 6.3 For client onboarding and “know your client” (KYC) purposes,
- 6.4 For invoicing, billing, and financial administration,
- 6.5 For compliance with statutory and regulatory requirements,
- 6.6 For communication, marketing, and business development,
- 6.7 For security, fraud prevention, and record-keeping.

We will not process personal information for a purpose other than the one for which it was collected unless the new purpose is compatible with the original purpose, consent is obtained, or such processing is otherwise permitted by law.

7. Data Subject Rights

Under POPIA, you have the right to:

- 7.1 Access your personal information held by us,
- 7.2 Request correction or deletion of inaccurate, irrelevant, excessive, or outdated personal information,
- 7.3 Object to the processing of your information,
- 7.4 Withdraw consent previously given,
- 7.5 Lodge a complaint with the Information Regulator if you believe your rights have been infringed.

Requests must be submitted in writing to the Information Officer at info@coloursofhope.org.za. We take reasonable steps to ensure that personal information is complete, accurate, not misleading, and updated where necessary.

8. Security Safeguards

The COH takes reasonable, appropriate measures to protect personal information, including:

- 8.1 Physical security at offices,
- 8.2 Password and access controls,
- 8.3 Firewalls and encryption for digital data,
- 8.4 Staff confidentiality agreements,
- 8.5 Regular security reviews and training, and
- 8.6 Non-disclosure agreements

If a security compromise (data breach) occurs, the COH will notify affected individuals and the Information Regulator without undue delay.

9. Retention of Information

Personal information will not be retained longer than is necessary for achieving the purpose for which it was collected, unless required by law. Once the retention period expires, the information will be securely deleted or anonymised.

10. Record of Processing Activities

The COH maintains an internal record of processing activities as required by POPIA.

11. Cross-Border Transfers

Where personal information is transferred outside South Africa, the COH will ensure that the recipient is subject to binding agreements or is located in a jurisdiction with adequate data protection laws, in line with POPIA requirements.

12. Children's Information

If we process personal information of children (minors under the age of 18 years), we will obtain consent from a competent person (such as a parent or legal guardian), as required under POPIA.

13. Third-Party Recipients

- 13.1 Cookies and Website Tracking: We use cookies and similar technologies on our website. Users may adjust browser settings to refuse cookies, but some services may not function properly without them.
- 13.2 We may share personal information with trusted third parties, including:
 - 13.2.1 IT and cloud service providers,
 - 13.2.2 Auditors, consultants, and professional advisors,
 - 13.2.3 Regulators and law enforcement authorities,
 - 13.2.4 Contractors and suppliers assisting with business operations.
- 13.3 Any third party receiving personal information is required to uphold confidentiality and implement appropriate security measures.

14. Refusal of Access

The COH may refuse access to information where:

- 14.1 Disclosure would result in unreasonable harm to the privacy of a third party,
- 14.2 The information is subject to confidentiality or privilege,
- 14.3 Disclosure would harm the commercial or financial interests of the COH or a third party,
- 14.4 Requests are manifestly frivolous, vexatious, or excessive.

15. Complaints

If you are unhappy with how your personal information has been handled, you may contact our Information Officer. If you remain dissatisfied, you may lodge a complaint with the Information Regulator of South Africa:

Information Regulator (South Africa)

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Complaints (POPIA): POPIAComplaints@inforegulator.org.za

Website: www.inforegulator.org.za

16. Policy Review and Updates

This Policy will be reviewed annually or as required by changes in legislation or business operations. Updates will be published on our website and made available on request.

Manual owner	Sa'uda Ismail			
Manual type	Compliance			
Approver's signature				
Approved by (this version)	Kaashifa Ismail			
Approval date (this version)	22 June 2026			
Version number	V1			
Summary of Manual history				
<u>V e r s i o n</u> <u>n u m b e r</u>	<u>D r a f t e d /</u> <u>a d a p t e d /</u> <u>r e v i e w e d b y</u>	<u>C r e a t i o n / r e v i e w</u> <u>d a t e</u>	<u>A p p r o v e d b y</u>	<u>A p p r o v a l</u> <u>d a t e</u>
V1	The COH Board	14 May 2026	Kaashifa Ismail	2026/06/22

Turning Hope into Reality

