



PAIA Manual

Mighty Minds Movement NPC

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

Date of compilation: 14 June 2026 · Date of revision: 14 June 2026

1. List of Acronyms and Abbreviations

Term	Meaning
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Constitutional Development
MMM	Mighty Minds Movement NPC
NPC	Non-Profit Company
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of This PAIA Manual

This Manual is published so that members of the public can:

- check the categories of records held by MMM that are available without having to submit a formal PAIA request;
- understand how to make a request for access to a record of MMM, through a description of the subjects on which MMM holds records and the categories of records held on each subject;
- know which records of MMM are available in accordance with other legislation;
- access the contact details of the Information Officer who will assist with records they intend to access;
- understand the Guide on how to use PAIA published by the Regulator, and how to obtain it; and

- understand how MMM processes personal information, including the purpose of processing, the categories of data subjects and information, the recipients of that information, any transfers outside the Republic, and the security measures applied.

MMM is a non-profit company incorporated in South Africa (Registration Number 2026/354843/08) that supports the education and development of young people, including through its scholarship programme and the Pathways Series. It operates the website www.mightymindsmovement.org.

3. Key Contact Details for Access to Information

3.1 Information Officer

Name	Matthew Moore Gibson
Designation	Information Officer (registered with the Information Regulator, Registration No. 2026-028865)
Email	matthew@mightymindsmovement.org

3.2 Deputy Information Officer

No Deputy Information Officer has been designated at the date of this Manual. Should one be designated in terms of section 17(1) of PAIA, their details will be inserted here.

3.3 General contact for access to information

Email	inquiries@mightymindsmovement.org (marked "Attention: Information Officer")
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3.4 Head Office

Postal / Physical Address	24 Francolin Road, Cape Town, 8005, South Africa
Email	inquiries@mightymindsmovement.org
Website	www.mightymindsmovement.org

4. Guide on How to Use PAIA and How to Obtain It

The Regulator has, in terms of section 10(1) of PAIA, updated and made available a Guide on how to use PAIA, in an easily comprehensible form, for any person who wishes to exercise a right under PAIA or POPIA. The Guide is available in each of the official languages and in braille.

The Guide contains a description of, among other things: the objects of PAIA and POPIA; the contact details of information officers and deputy information officers; the manner and form of a request for access to a record of a public or private body; the assistance available from an information officer and from the Regulator; the remedies available in law (including the manner of lodging an internal appeal, a complaint to the Regulator, and an application to court); the provisions requiring public and private bodies to compile a manual; the provisions for voluntary disclosure of records; the notices regarding fees payable; and the regulations made under PAIA.

The Guide may be obtained:

- upon request to the Information Officer (contact details in section 3);
- from the website of the Regulator at <https://info regulator.org.za>; and

- for inspection or copying at the offices of the Regulator and of public and private bodies during normal working hours.

5. Categories of Records Available Without a Request

MMM does not currently make any category of records automatically available without a formal PAIA request. All requests for access to records are dealt with under the procedure set out in this Manual and in PAIA. MMM may revise this position and publish a list of automatically-available records under section 52(1) of PAIA in future.

6. Records Available in Accordance with Other Legislation

The following records are created and held in accordance with other South African legislation. This list is not exhaustive and access remains subject to the relevant Act.

Category of records	Applicable legislation
Memorandum of Incorporation, registration records, director records, resolutions	Companies Act 71 of 2008
Annual financial statements and accounting records	Companies Act 71 of 2008
Income tax records; donation receipts (including section 18A receipts, where applicable)	Income Tax Act 58 of 1962
Tax returns, assessments and related records	Tax Administration Act 28 of 2011
Value-Added Tax records (if and when MMM is registered for VAT)	Value-Added Tax Act 89 of 1991
This PAIA Manual; records of access requests	Promotion of Access to Information Act 2 of 2000
Records relating to the processing of personal information	Protection of Personal Information Act 4 of 2013
Registration and reporting records (if MMM registers as a non-profit organisation with the Department of Social Development)	Nonprofit Organisations Act 71 of 1997
Website terms, electronic communications and data-protection records	Electronic Communications and Transactions Act 25 of 2002
Copyright and intellectual-property records relating to published content, photographs and educational materials	Copyright Act 61 of 1978
Records relating to programmes, events or services offered to the public	Consumer Protection Act 68 of 2008
Anti-money-laundering and related compliance records	Prevention of Organised Crime Act 121 of 1998

MMM has no paid employees as at the date of this Manual and therefore does not hold employee records under labour legislation. Should MMM employ staff in future, this Manual will be updated to reflect the relevant records and legislation.

7. Subjects and Categories of Records Held by MMM

Subject	Categories of records
Governance and incorporation	Memorandum of Incorporation, CIPC registration documents, director and officer records, board and committee minutes, resolutions, policies
Finance and accounting	Annual financial statements, accounting records, bank records, invoices, receipts, budgets
Tax and regulatory	SARS correspondence and returns, public-benefit / section 18A records (where applicable), POPIA and PAIA compliance records
Donors and fundraising	Donor and supporter records, donation records and receipts, fundraising correspondence and proposals
Programmes and scholars	Pathways Series records, scholarship applications and selection records, scholar and alumni records, parental/guardian consent forms, partner-school agreements
Partners and contracts	Memoranda of understanding, service-provider and supplier contracts, confidentiality agreements
Website and IT	Website records, hosting and security logs, and analytics data where enabled
Communications and marketing	Newsletter and mailing-list records, published photographs and stories (with consent), correspondence and enquiries

8. Processing of Personal Information

8.1 Purpose of processing

MMM processes personal information to respond to enquiries and partnership requests; to process and acknowledge donations and issue receipts; to administer the Pathways Series with partner schools; to send newsletters and updates to people who have opted in; to operate, secure and improve its website; and to comply with South African law (including tax, company and non-profit law). MMM's full Privacy Policy is available at www.mightymindsmovement.org/privacy-policy.

8.2 Categories of data subjects and personal information

Categories of data subjects	Personal information that may be processed
Website visitors	IP address, browser and device information, pages visited, approximate region
Donors and supporters	Name, contact details, donation amount, tax-receipt details, payment-related information (processed by a third-party payment provider)
Corporate and school partners	Name, role, organisation, contact details, correspondence
Parents and guardians	Name, contact details, consent records
Students and scholars	Name, school, grade, contact details, application and programme records (subject to guardian consent)
Directors and volunteers	Name, contact details, role and governance records
Service providers	Name, registration details, contact details, banking details

MMM does not intentionally collect special personal information as defined in section 26 of POPIA (such as information concerning religious or philosophical beliefs, race or ethnic origin,

health or sex life, or biometric information) unless such collection is authorised under sections 26 to 33 of POPIA. Where special personal information is collected in the course of administering MMM's educational programmes (for example, health-related information of scholars where necessary for their welfare), such processing is carried out only with the consent of a competent person and in accordance with the applicable provisions of POPIA.

Where data subjects are children (persons under the age of 18 years), MMM processes their personal information in accordance with section 35 of POPIA. Such processing is carried out only with the prior consent of a competent person (typically a parent or legal guardian) and only where it is necessary for the administration of MMM's educational programmes, including the scholarship programme and the Pathways Series.

8.3 Recipients of personal information

Category of personal information	Recipients or categories of recipients
Website and operational data	Service providers (for example our website hosting and security provider; email, productivity and newsletter providers; and the donation payment processor)
Programme data	Partner schools, as needed to administer the Pathways Series and with appropriate consents
Financial and tax data	South African Revenue Service; professional advisers (legal, accounting, audit)
Governance and compliance data	Companies and Intellectual Property Commission (CIPC); Information Regulator; other authorities where required by law

MMM does not sell personal information.

8.4 Planned transborder flows of personal information

Some of MMM's service providers store or process information outside the Republic, including in the European Union and the United States (for example, our website hosting and security provider and certain email, productivity and newsletter providers). These transfers are made subject to the safeguards required by section 72 of POPIA, including contractual protections (such as data processing agreements and, for GDPR purposes, standard contractual clauses), the recipient being bound to provide an adequate level of protection, or the data subject's consent.

8.5 Information security measures

MMM implements reasonable and appropriate technical and organisational measures to protect personal information against loss, damage and unauthorised access, as required by section 19 of POPIA. These include encrypted connections (HTTPS), access controls and restriction of access on a need-to-know basis, confidentiality obligations on everyone working with MMM, and supervision of scholars who operate workstreams. If a data breach occurs that is likely to cause harm, MMM will notify the Regulator and affected individuals as required by section 22 of POPIA.

Where MMM engages an operator (a third party that processes personal information on behalf of MMM), it ensures that a written contract is in place as required by section 21 of POPIA, obliging the operator to establish and maintain appropriate security measures and to process personal information only with MMM's knowledge or authorisation.

9. Request Procedure, Forms and Fees

A request for access to a record of MMM must be made on the prescribed form (Form 2: Request for Access to Record of Private Body, as prescribed in the PAIA Regulations) and submitted to the Information Officer at the contact details in section 3. A copy of the prescribed form may be obtained from the Information Officer on request or downloaded from the Regulator's website at <https://info regulator.org.za>.

A requester must be given access to a record of MMM only if the record is required for the exercise or protection of a right, the requester complies with the procedural requirements of PAIA, and access is not refused on a ground set out in PAIA. The request must provide sufficient detail to enable MMM to identify the record and the requester, specify the form of access required, and identify the right the requester seeks to exercise or protect and why the record is required for that purpose.

Access to a record may be refused on one or more of the grounds set out in Chapter 4 of Part 3 of PAIA (sections 62 to 69), which include, among others: the mandatory protection of the privacy of a third party who is a natural person (section 63); the mandatory protection of commercial information of a third party (section 64); the mandatory protection of certain confidential information, and the protection of certain other confidential information, of a third party (sections 65 and 65A); the mandatory protection of the safety of individuals and the protection of property (section 66); the mandatory protection of records privileged from production in legal proceedings (section 67); the protection of research information of a third party and of MMM (section 68); and the mandatory protection of police dockets, defence, security and the international relations of the Republic (section 69). The Information Officer will provide adequate reasons for any refusal, as required by section 56 of PAIA.

A requester who seeks access to a record containing personal information about that requester (a "personal requester") is not required to pay the request fee. Any other requester must pay the prescribed request fee of R140.00 (or such other amount as may be prescribed from time to time) before the request will be further processed. The Information Officer may also require a deposit of not more than one-third of the applicable access fee where the preparation of the record will take more than the prescribed number of hours. The request fee will be refunded if the request for access is refused. The Information Officer will notify the requester of the decision within the period prescribed by PAIA (ordinarily 30 days, which may be extended in the circumstances PAIA allows).

Where a request for access relates to a record that contains information about a third party, the Information Officer will take all reasonable steps to inform that third party of the request, as required by section 71 of PAIA, and afford the third party an opportunity to make written representations as to why the request should be refused.

A requester who is aggrieved by a decision of the Information Officer may lodge a complaint with the Regulator or apply to a court, as described in the Regulator's Guide. There is no internal appeal against a decision of a private body.

10. Availability of the Manual

A copy of this Manual is available:

- on MMM's website at www.mightymindsmovement.org;
- at MMM's head office for inspection during normal business hours;
- to any person on request (a reasonable prescribed fee per A4 photocopy may apply); and
- to the Information Regulator on request.

11. Updating of the Manual

The head of MMM will update this Manual on a regular basis and whenever there is a material change to the information it contains.

Issued by

Matthew Moore Gibson
Information Officer
Mighty Minds Movement NPC

Signed at Cape Town on this 14th day of June 2026.