

Baleloko Investment Holdings (Pty) Ltd



PAIA MANUAL

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

DATE OF COMPILATION: 12/10/2026
DATE OF REVISION: 12/10/2026

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1. LIST OF ACRONYMS AND ABBREVIATIONS

NB: please insert relevant applicable acronyms and abbreviations

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO“	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

- 2.2 have a 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 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;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE Baleloko Investment Holdings (Pty) Ltd

3.1. Chief Information Officer

Name: Floyd Mohkena
Tel: +27 72 803 8905
Email: info@baleloko.co.za

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: n/a
Tel: n/a
Email: n/a
Fax Number: n/a

- 3.3 Access to information general contacts

Email: info@baleloko.co.za

3.4 National or Head Office

Postal Address:
1 Mushroom Road, Kyalami Gardens, Midrand, Gauteng,
1686

Physical Address: 1 Mushroom Road, Kyalami Gardens, Midrand, Gauteng,
1686

Telephone: +27 72 803 8905

Email: info@baleloko.co.za

Website: <https://baleloko.co.za/>

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

- 4.1. 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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;

¹ 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.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed 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.*

³ 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.*

⁴ 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.*

- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

4.4. 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.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF THE Baleloko Investment Holdings (Pty) Ltd WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
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⁹ Section 22(1) of PAIA- The information officer of a public 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.

¹⁰ 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.

¹¹ 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;
- (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.”

Corporate & Statutory	Company registration documents (MOI, CoR14.3); Share registers and certificates; Board and shareholder minutes; Resolutions; CIPC annual returns; Director and officer details.	x	
Financial & Tax	Annual financial statements; Management accounts; Budgets; Tax returns (Income Tax, VAT, PAYE); Tax clearance certificates; Invoices and payment records; Banking records; Asset registers.		x
Human Resources & Personnel	Employment contracts; Payroll records; Performance reviews; Disciplinary and grievance records; Leave records; Employee personal information; Training records; HR policies and procedures.		x
Client & Consulting Services	Client contracts and engagement letters; Project proposals and quotations; Consultation records; Project plans and reports; Correspondence with clients; Invoices and payment history.		x

Property & Asset Management	Title deeds; Lease agreements; Property management records (maintenance, inspections); Property valuations; Acquisition and disposal records.		x
Trust & Fiduciary Services	Trust deeds; Letters of Authority; Trustee resolutions; Beneficial ownership registers; SARS registration documents; Trust financial records.		x
Legal, Compliance & Governance	Legal contracts and agreements; Litigation and dispute records; Insurance policies; POPIA/PAIA manuals; Compliance registers (FICA, etc.); Internal policies.		x
Marketing & Public Affairs	Marketing brochures and firm profiles; Media releases; Website content; Publications (e.g., From Salary to Legacy).	x	

6. DESCRIPTION OF THE RECORDS OF Baleloko Investment Holdings (Pty) Ltd WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
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Memorandum of Incorporation; Share Certificates; Register of Directors; Annual Returns; Board Resolutions	Companies Act 71 of 2008
Tax Returns (ITR14, VAT201, EMP201); Tax Clearance Certificates; IRP5s; Financial Records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Employment Contracts; Payroll Records; UIF Registrations; COIDA Records; Employment Equity Reports; Skills Development Plans	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998
Trust Deeds; Letters of Authority; Beneficial Ownership Registers; Trustee Resolutions; FICA Compliance Records	Trust Property Control Act 57 of 1988; Financial Intelligence Centre Act 38 of 2001 (FICA); Tax Administration Act 28 of 2011
Client Agreements; Service Level Agreements; Invoices; POPIA Consent Forms; Data Processing Agreements	Consumer Protection Act 68 of 2008; Protection of Personal Information Act 4 of 2013 (POPIA)
Title Deeds; Lease Agreements; Property Management Records; Property Valuations	Deeds Registries Act 47 of 1937; Sectional Titles Act 95 of 1986; Rental Housing Act 50 of 1999
B-BBEE Certificates; B-BBEE Affidavits; Supplier Development Records	Broad-Based Black Economic Empowerment Act 53 of 2003
Workplace Health and Safety Policies; Incident Reports; Compensation Records	Occupational Health and Safety Act 85 of 1993
PAIA Manual; PAIA Request Forms; POPIA Privacy Policy	Promotion of Access to Information Act 2 of 2000; Protection of Personal Information Act 4 of 2013

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY Baleloko Investment Holdings (Pty) Ltd

Subjects on which the body holds records	Categories of records
Corporate & Statutory	- Company registration documents (MOI, CoR14.3) - Share registers and certificates - Board and shareholder minutes - Resolutions - CIPC annual returns - Director and officer details
Financial & Tax	- Annual financial statements - Management accounts and budgets - Tax returns (Income Tax, VAT, PAYE) - Tax clearance certificates - Invoices and payment records - Banking records - Asset registers
Human Resources	- Employment contracts and letters of appointment - Payroll records and salary information - Performance reviews and appraisals - Disciplinary and grievance records - Leave records - Employee personal information - Training and development records - HR policies and procedures
Client & Consulting Services	- Client contracts and engagement letters - Project proposals and quotations - Consultation records - Project plans and reports - Correspondence with clients - Invoices and payment history

Property & Asset Management	- Title deeds and property registration documents - Lease agreements - Property management records - Property valuations - Acquisition and disposal records
Trust & Fiduciary Services	- Trust deeds and founding documents - Letters of Authority - Trustee resolutions and minutes - Beneficial ownership registers - SARS registration documents - Trust financial records
Legal, Compliance & Governance	- Legal contracts and agreements - Litigation and dispute records - Insurance policies - POPIA and PAIA manuals - Compliance registers (e.g., FICA) - Internal policies and procedures
Marketing & Public Affairs	- Marketing brochures and firm profiles - Media releases - Website content - Publications (e.g., From Salary to Legacy)

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Baleloko Investment Holdings (Pty) Ltd and its subsidiaries process personal information for specific, explicitly defined, and lawful purposes related to our business functions and activities. We do not process personal information for any purpose other than those outlined below.

1. Provision of Professional Services (Consulting & Trust Services)

We process personal information to deliver our consulting, career development, and trust/fiduciary services. This includes:

Onboarding new clients and conducting initial consultations.

Preparing trust registration documents, Letters of Authority, and Master's Office submissions.

Conducting career coaching, CV development, and interview preparation.

Managing project management, business process reviews, and operational improvement projects.

Billing, invoicing, and collecting payments for services rendered.

2. Property Management and Investment

We process personal information to manage our property portfolio and tenant relationships. This includes:

Screening potential tenants (including credit and reference checks where legally required).

Drafting and administering lease agreements.

Managing property maintenance, inspections, and repairs.

Communicating with tenants, landlords, and property service providers.

3. Human Resources and Employment

We process personal information of our employees, contractors, and job applicants to manage the employment relationship. This includes:

Recruitment, selection, and appointment processes.

Payroll administration, tax deductions (PAYE), UIF, and COIDA submissions.

Performance management, training, and development.

Managing leave, disciplinary procedures, and employee benefits.

4. Statutory and Legal Compliance

We process personal information to comply with South African laws and regulations, including:

FICA (Financial Intelligence Centre Act): Verifying the identity of clients, trustees, and beneficial owners (KYC).

Tax Administration Act: Submitting tax returns and maintaining financial records.

Companies Act: Maintaining statutory registers and CIPC filings.

Master of the High Court: Submitting trust documentation and reporting.

Labour Legislation: Complying with employment equity, skills development, and health and safety requirements.

5. Business Operations and Administration

We process personal information to manage the day-to-day operations of the group. This includes:

Maintaining financial and accounting records.

Managing IT systems, website hosting, and data security.

Conducting internal audits, risk assessments, and quality assurance.

Managing supplier and vendor relationships.

6. Marketing and Communication

We process personal information to communicate with our stakeholders and market our services. This includes:

Sending newsletters, service updates, and promotional materials (only where consent has been provided or where there is a legitimate interest).

Promoting publications such as From Salary to Legacy.

Responding to website enquiries, contact form submissions, and general correspondence.

Managing our social media and public relations activities.

7. Fraud Prevention and Security

We process personal information to protect the organisation and our stakeholders.

This includes:

Monitoring and preventing fraudulent activities.

Ensuring the physical and digital security of our premises and IT systems.

Conducting due diligence on potential business partners and suppliers.

Consent and Legal Basis

Where we rely on consent to process personal information (e.g., for marketing), you may withdraw your consent at any time. However, much of our processing is necessary for the performance of a contract, to comply with legal obligations, or to protect our legitimate business interests.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Employees & Contractors	Name, ID/passport number, physical and postal address, contact numbers, email address, date of birth, gender, race, qualifications, employment history, bank details, salary/payroll information, tax numbers (PAYE), UIF registration, medical aid details, disciplinary records, performance reviews, and next of kin details.

Job Applicants	Name, ID/passport number, physical and postal address, contact numbers, email address, qualifications, CV/resume data, employment history, references, and criminal background checks (where legally permissible).
Clients (Consulting, Career & Trust Services)	Name, ID/passport number, physical and postal address, contact numbers, email address, financial information (for billing and trust funding), trust deeds and founding documents, beneficiary details, Letters of Authority, SARS tax numbers, beneficial ownership information (FICA compliance), coaching notes, career history, and CV details.
Tenants & Property Clients	Name, ID/passport number, physical and postal address, contact numbers, email address, banking details, credit check information, employment status, rental history, lease agreements, and property maintenance records.
Service Providers & Suppliers	Company registration number, VAT number, trade secrets, names of directors or representatives, contact details, banking details, tax clearance certificates, B-BBEE certificates, and service level agreements.
Website Visitors & Enquiries	Name, email address, phone number, company name (if provided), IP address, browser type, website usage data, and any other information voluntarily submitted via contact forms or enquiries.
Shareholders, Directors & Officers	Name, ID/passport number, physical and postal address, contact details, shareholding details, CIPC registration records, director's resolutions, and financial interests.
Regulators & Government Bodies	Names of designated officials, contact details, and relevant compliance records (e.g.,

	submitted tax returns, CIPC filings, Master's Office correspondence).
Trustees & Beneficiaries	Name, ID/passport number, contact details, letters of authority, trustee resolutions, and relevant financial information for the administration of trusts.

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

Dissemination of Personal Information Schedule

Category of Personal Information	Purpose of Processing & Dissemination	Recipients or Categories of Recipients to whom the Information May Be Supplied
Identity Numbers, Names, & Background Checks	Verification of identity, background checks, conflict of interest checks, and criminal history verifications for prospective staff, executives, trustees, or key vendor principals.	• South African Police Service (SAPS) • Managed Integrity Evaluation (MIE) / Authorized Verification Agencies • Professional Background Check Bureaus

Qualifications & Professional Accreditations	Verification of academic degrees, professional certifications, and memberships for consulting staff and executive personnel.	• South African Qualifications Authority (SAQA) • Tertiary & Educational Institutions • Professional Accrediting Bodies (e.g., SABPP, PMI)
Credit & Payment History	Assessing creditworthiness, financial solvency, and financial risk for potential property tenants, commercial clients, or major contract suppliers.	• Registered Credit Bureaus (e.g., TransUnion, Experian, TPN) • Financial Institutions & Commercial Banks
Banking & Payment Details	Processing outbound payments to suppliers, service providers, contractors, and beneficiaries; receiving lease/consulting payments.	• Commercial Banking Institutions • Regulated Payment Gateway Services • South African Revenue Service (SARS)
Tax & Financial Compliance Records	Statutory tax reporting, VAT administration, payroll taxes, statutory annual audits, and financial governance oversight across group entities.	• South African Revenue Service (SARS) • External Auditors & Independent Financial Reviewers • Companies and Intellectual Property Commission (CIPC)

Employment & Payroll Information	Employee administration, UIF/COIDA compliance, payroll processing, and statutory labor reporting.	• Department of Employment and Labour • Unemployment Insurance Fund (UIF) • Compensation Commissioner (COIDA) • External Payroll & Employee Benefit Administrators
Property & Tenant Records (Lease agreements, ID copies, proof of income)	Administration of residential and student accommodation lease agreements, property management, and tenant dispute resolution.	• Property Management Software Providers • Rental Housing Tribunal (in cases of formal dispute) • Local Municipalities & Utility Providers
Family & Legacy Planning Records (Client family structures, succession notes, estate documentation)	Providing specialized generational wealth consulting, succession planning, and family trust governance advisory services.	• Appointed Legal Counsel / Attorneys • External Trust & Fiduciary Specialists • Master of the High Court (where formal trust/estate registration is required)
Donor & Sponsorship Records (Pledges, donation history, EFT records)	Facilitating non-profit support, corporate social responsibility oversight, and auditing contributions to the Mokhena Foundation.	• The Mokhena Foundation (NPO) • Independent NPO/PBO Financial Auditors

8.4 Planned transborder flows of personal information

n/a

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

Baleloko Investments Holdings (Pty) Ltd, together with its subsidiaries and group entities, is committed to maintaining the highest standards of data security, confidentiality, and integrity. To safeguard all personal information under our care against unauthorized access, accidental loss, destruction, alteration, or unlawful processing, the Group has implemented robust technical, organizational, and physical security measures. These technical safeguards include full end-to-end data encryption for information both in transit and at rest, corporate-grade firewalls, continuous anti-virus and anti-malware software monitoring, secure cloud infrastructure with multi-factor authentication (MFA), and strict role-based access controls for all electronic database records. Organizationally and physically, personal information is protected through secure document storage with restricted physical keycard access, mandatory employee data privacy training, signed confidentiality agreements, and binding Operator (Data Processing) Agreements with all external service providers. Continuous vulnerability assessments, secure data backup protocols, and regular policy reviews are conducted to maintain resilience and strictly enforce compliance with the conditions for lawful processing under the Protection of Personal Information Act (POPIA).

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://baleloko.co.za/>

9.1.2 head office of Baleloko Investment Holdings (Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 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.

10. UPDATING OF THE MANUAL

The head of Baleloko Investments Holdings (Pty) Ltd will on a regular basis, update this manual.

Issued by

Floyd Mokhena (Chief Executive Officer)