



PROMOTION OF ACCESS TO INFORMATION (PAIA) MANUAL

(Promotion of Access to Information Act, Act 2 of 2000)

Issued by the Conference of Apostles

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PAIA MANUAL OF THE OLD APOSTOLIC CHURCH

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1. INTRODUCTION

- 1.1 This Promotion of Access to Information Manual ("the Manual") is issued by the Conference of Apostles ("COA") of The Old Apostolic Church ("The Church") in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA"). PAIA requires private bodies operating within South Africa to compile a manual describing the records they hold and the procedure for requesting access to such records.
- 1.2 Although PAIA is a South African statute, The Church adopts the same governance principles and procedural standards globally to ensure uniformity, transparency, and accountability across all Provinces, Districts, Regions, and Apostleships. Accordingly, this Manual serves as the global standard for access-to-information governance within The Church, with Provincial Annexures ensuring compliance with national legislation in each jurisdiction.
- 1.3 The purpose of this Manual is to:
 - 1.3.1 enable and regulate requests for access to records held by The Church in terms of PAIA (South Africa) and equivalent access-to-information principles globally;
 - 1.3.2 describe the categories of records held by The Church;
 - 1.3.3 outline the procedure for requesting access to information;
 - 1.3.4 ensure compliance with PAIA, POPIA, and the PAIA Regulations, 2021;
 - 1.3.5 give effect to the constitutional right of access to information where such access is required for the exercise or protection of a right;
 - 1.3.6 incorporate and align with The Church's Global Privacy & Personal Information Regulation (2026); and
 - 1.3.7 establish a uniform governance framework applicable to all Provinces, Districts, Regions, Apostleships, and administrative structures of The Church.
- 1.4 This Manual applies globally to The Church and all its ecclesiastical, administrative, and governance structures. Each Province must complete Annexure A with its own Information Officer and Deputy Information Officer details, as required by PAIA (South Africa) and by equivalent national legislation where applicable.
- 1.5 This Manual must be read together with:
 - 1.5.1 the Constitution of The Church (COA RES 415);
 - 1.5.2 the Global Privacy & Personal Information Regulation (2026), which governs the processing, safeguarding, and retention of personal information within The Church; and

- 1.5.3 any Provincial Annexure or supplementary policy issued by an Apostolate to ensure compliance with national legislation applicable within its jurisdiction.

2. DESCRIPTION OF THE CHURCH

- 2.1 The Old Apostolic Church ("The Church") is a global Christian church established in terms of its Constitution (COA RES 415). In South Africa, The Church functions as an association of persons with a sui generis legal persona, recognised under common law. It is not a registered company, nor is it incorporated under the Companies Act. Its legal existence arises from its Constitution and the collective association of its Members.
- 2.2 In several other countries, the legal concept of an "association of persons" does not exist or is not recognised as a legal persona. Accordingly, in those jurisdictions The Church has been formally registered in the legal form required by national legislation, including but not limited to:
 - 2.2.1 a trust,
 - 2.2.2 a registered legal association,
 - 2.2.3 a company limited by guarantee,
 - 2.2.4 a non-profit company,
 - 2.2.5 a charitable organisation, or
 - 2.2.6 any other legally recognised entity appropriate to that jurisdiction.
- 2.3 Regardless of the legal form adopted in any country, all such entities form part of The Church and are subject to the Constitution and resolutions of the Conference of Apostles. ("COA"). The Church's global governance, doctrinal authority, and ecclesiastical structure remain uniform across all jurisdictions.
- 2.4 The Church's primary ecclesiastical functions include:
 - 2.4.1 the administration of the sacraments of Baptism, Sealing, and Confirmation;
 - 2.4.2 the provision of Pastoral Care to Members and visitors;
 - 2.4.3 the spiritual oversight and governance exercised by Apostles and Officers; and
 - 2.4.4 the maintenance of sacramental records in the Membership Register, as required by clause 4.3 of the Constitution.
- 2.5 The Church's administrative and operational functions include:
 - 2.5.1 congregational administration and record-keeping;
 - 2.5.2 officer administration and appointment processes;
 - 2.5.3 welfare and social support services;
 - 2.5.4 marriage officer administration (where applicable);
 - 2.5.5 financial, legal, and statutory compliance;
 - 2.5.6 governance reporting and coordination across Provinces and Districts.

- 2.6 Officers of The Church—including Apostles, Fourfold Officers, Elders, Priests, Underdeacons, as well as Congregational Helpers, perform their ecclesiastical and pastoral duties on a voluntary basis. They are not employees of The Church and do not receive remuneration for their ecclesiastical functions.
- 2.7 For clarity, the wife of an Officer, who participates in pastoral care, household visits, welfare support, and other ecclesiastical functions as part of the Officer's ministry, is likewise regarded as performing such duties on a voluntary and non-remunerated basis.
- 2.8 The Church processes personal information of Members, Officers, employees, service providers, and visitors as part of its ecclesiastical, pastoral, administrative, and governance responsibilities. Such processing is governed by The Church's Global Privacy & Personal Information Regulation (2026) and applicable national legislation.
- 2.9 Although PAIA is a South African statute, The Church adopts the same access-to-information governance principles globally to ensure consistency, transparency, and accountability across all jurisdictions. Each Province must, however, comply with its own national legislation and complete the relevant Provincial Annexure to this Manual.
- 2.10 For the purposes of PAIA (South Africa), The Church is classified as a private body, and each Province operating within South Africa must designate an Information Officer and Deputy Information Officers in accordance with PAIA and POPIA.

3. RECORDS AUTOMATICALLY AVAILABLE

- 3.1 In terms of section 52 of PAIA, certain categories of records may be made available to the public without requiring a formal PAIA request. The Church adopts a governance-aligned approach to transparency and therefore makes the following records automatically available, subject to the exclusions and protections set out in clause 3.6 below.
- 3.2 The following records are automatically available to any person, without the need to complete Form 2:
 - 3.2.1 **Publicly Accessible Information:** For purposes of this Manual, "publicly accessible information" refers only to doctrinal materials, articles, and official communications that have been intentionally published by The Church for public access through its official platforms (e.g., website, public circulars, public statements). This includes:
 - 3.2.1.1 The Church's Constitution (COA RES 415), where publicly published.

- 3.2.1.2 Public doctrinal statements, articles, and communications that have been formally released for public access.
- 3.2.1.3 Public notices issued by the Conference of Apostles or Apostolates.
- 3.2.1.4 Public statements, circulars, and announcements relating to Church activities, events, or programmes.
- 3.2.1.5 General information about congregations, including service times, locations, and contact details.
- 3.2.1.6 Publicly available governance information expressly published on The Church's website for public access.

3.2.2 **Records Available on The Church's Website**

- 3.2.2.1 Public communications and official announcements.
- 3.2.2.2 Public versions of policies or guidelines expressly designated for public access.
- 3.2.2.3 Contact details of Provincial Head Offices and administrative structures.
- 3.2.2.4 Information relating to community outreach, welfare initiatives, and public events.

3.2.3 **Records Available at Provincial Head Offices**

- 3.2.3.1 Publicly accessible governance documents.
- 3.2.3.2 Publicly available financial summaries or reports (where applicable and expressly designated for public access).
- 3.2.3.3 Publicly accessible versions of this PAIA Manual and any Provincial Annexures.

3.3 **Records NOT Automatically Available (Require Form 2)**

The following categories of records are not automatically available and require a formal PAIA request using Form 2:

- 3.3.1 Sacramental Information
- 3.3.2 Pastoral Information
- 3.3.3 Membership Register extracts.
- 3.3.4 Officer Information (excluding internal disciplinary records — see Section 6);
- 3.3.5 welfare and social support records;
- 3.3.6 financial, accounting, or donation records;
- 3.3.7 employee records;
- 3.3.8 service provider records;
- 3.3.9 internal governance records;
- 3.3.10 any confidential, sensitive, or non-public information.

3.4 **Financial, accounting, donation, and tithe records**

- 3.4.1 This includes all financial records, accounting information, donation records, and tithe information.
- 3.4.2 Tithe information constitutes sensitive personal financial information and is not automatically available. Access to tithe information is

restricted to the data subject and may not be disclosed to any third party, except where required by law.

3.4.3 EFT-based tithes may be identifiable and may be accessed by the data subject upon request. Cash tithes may not always be identifiable and may be recorded as anonymous or unallocated.

3.4.4 Tithe information forms part of The Church's confidential governance records and may be accessed by authorised ecclesiastical governance structures, including Apostles, Fourfold Officers, Elders, Priests, Congregational Chairmen, Congregational Secretaries, Treasurers, Financial Committee members, and Auditors, for legitimate governance purposes such as pastoral oversight, financial stewardship, and ordination considerations, in accordance with The Church's Global Privacy & Personal Information Regulation (2026).

3.4.5 Tithe information may not be disclosed under PAIA to any person other than the data subject and remains subject to the mandatory refusal grounds in Chapter 4 of PAIA, POPIA, and The Church's Confidentiality Protocols.

3.5 **Protection of Confidential and Sensitive Information:**

3.5.1 These records are protected by PAIA's mandatory refusal provisions, POPIA, and The Church's Confidentiality Protocols.

3.5.2 No pastoral, sacramental, welfare, confidential, or sensitive information shall ever be made automatically available. Access to such information is strictly regulated and may only be granted in accordance with PAIA, POPIA, and The Church's Global Privacy & Personal Information Regulation.

3.6 **Methods of Access for Automatically Available Records**

Where a record is automatically available, The Church may provide it:

3.6.1 electronically via its website;

3.6.2 electronically upon request; or

3.6.3 for inspection at a Provincial Head Office.

3.7 **Updates to Automatically Available Records**

The Church reserves the right to update the list of automatically available records from time to time, provided that such updates remain consistent with PAIA, POPIA, and the governance requirements of The Church.

3.8 **Classification of Information Assets**

All information assets of the Church, except Public Information, are classified as confidential. Confidential information includes:

3.8.1 Member Basic Information

3.8.2 Sacramental Information

3.8.3 Pastoral Information

3.8.4 Sensitive Personal Information

- 3.8.5 Officer Information
- 3.8.6 Governance Information
- 3.8.7 Financial Information
- 3.8.8 Employee and Service Provider Information

- 3.9 Confidential information may not be distributed outside the Church except in accordance with PAIA, POPIA, or lawful authority.

4. RECORDS AVAILABLE ON REQUEST

- 4.1 In terms of section 50 of PAIA, any person may request access to a record held by The Church, provided that:
 - 4.1.1 the record is required for the exercise or protection of a right;
 - 4.1.2 the requester complies with the procedural requirements of PAIA; and
 - 4.1.3 none of the refusal grounds in Chapter 4 of PAIA apply.
- 4.2 All requests for access to records must be submitted on Form 2 of the PAIA Regulations, 2021. The Church will not accept any request submitted on the repealed Form A. Form 2 must be submitted to the relevant Provincial/District/Regional Information Officer, together with sufficient information to identify:
 - 4.2.1 the record requested,
 - 4.2.2 the requester, and
 - 4.2.3 the right the requester seeks to exercise or protect.
- 4.3 Upon receipt of a valid request, the Information Officer will process the request in accordance with PAIA, POPIA, and The Church's Global Privacy & Personal Information Regulation. Access may be granted, partially granted (with redactions), or refused, depending on the nature of the record and the applicable legal protections.
- 4.4 **Categories of Records That May Be Requested**
 The following categories of records may be requested in terms of PAIA, subject to the mandatory and discretionary refusal grounds in Chapter 4 of PAIA:
 - 4.4.1 **Sacramental Records**
 - 4.4.1.1 Baptism, Sealing, and Confirmation details
 - 4.4.1.2 Congregational history
 - 4.4.1.3 Transfers between congregations
 - 4.4.1.4 Deceased records
 - 4.4.1.5 Unique Identifier (where applicable)
 - 4.4.1.6 Access is granted only to the data subject or an authorised representative.
 - 4.4.1.7 Third-party information will be redacted.
 - 4.4.1.8 Sacramental records may be corrected only to rectify factual inaccuracies. They may not be altered to change historical sacramental events.

4.4.2 **Pastoral Records**

- 4.4.2.1 Pastoral visit notes
- 4.4.2.2 Household composition
- 4.4.2.3 Welfare needs
- 4.4.2.4 Spiritual guidance information

These records are highly confidential and are protected under PAIA ss63–67 and POPIA. Access is limited to the data subject and may require redaction of third-party information.

4.4.3 **Membership Records**

- 4.4.3.1 Membership Register extracts
- 4.4.3.2 Congregational membership information
- 4.4.3.3 Historical membership movements

Access is restricted and subject to strict identity verification.

4.4.4 **Officer Records**

- 4.4.4.1 Appointment history
- 4.4.4.2 Office held
- 4.4.4.3 Status (active, resting, retired)
- 4.4.4.4 Marriage officer registration (where applicable)
- 4.4.4.5 Officer profile information

Access is limited to the Officer concerned or as required by law.

4.4.5 **Administrative and Governance Records**

- 4.4.5.1 Policies and internal guidelines
- 4.4.5.2 Non-confidential administrative documents
- 4.4.5.3 Certain governance records, where not protected by PAIA

Minutes, resolutions, internal reports, and internal communications are not accessible unless required by law.

4.4.6 **Financial and Accounting Records**

- 4.4.6.1 Financial statements (where not publicly available)
- 4.4.6.2 Accounting records
- 4.4.6.3 Donation records (excluding donor identities unless legally required)

These records are subject to PAIA's commercial and confidentiality protections.

4.4.7 **Employee Records**

- 4.4.7.1 Employment contracts
- 4.4.7.2 Payroll information
- 4.4.7.3 Leave records
- 4.4.7.4 Performance records

Access is limited to the employee concerned or as required by law.

4.4.8 **Service Provider Records**

- 4.4.8.1 Contracts
- 4.4.8.2 Invoices

4.4.8.3 Compliance documentation
Commercial confidentiality protections apply.

4.4.9 **Welfare and Social Support Records**

4.4.9.1 Applications for assistance

4.4.9.2 Support documentation

4.4.9.3 Welfare assessments

These records contain sensitive personal information and are strictly protected.

4.4.10 **ICT and Security Records**

4.4.10.1 Access logs

4.4.10.2 CCTV footage

4.4.10.3 System audit trails

Access is restricted to protect security, privacy, and operational integrity.

4.5 **Grounds for Refusal**

4.5.1 The Church may refuse access to a record where required or permitted by PAIA, including but not limited to:

4.5.1.1 personal information of third parties (s63),

4.5.1.2 confidential information (s64),

4.5.1.3 commercial information (s65),

4.5.1.4 safety and security concerns (s66),

4.5.1.5 privileged information (s67),

4.5.1.6 research information (s68),

4.5.1.7 internal operations (s69).

4.6 Where a record contains both disclosable and non-disclosable information, The Church may grant partial access with appropriate redactions.

4.7 **Timeframes and Fees**

4.7.1 The Information Officer will respond within 30 days, unless an extension is permitted under PAIA.

4.7.2 A request fee and access fee may apply, as prescribed in the PAIA Regulations.

4.7.3 No fee is payable for requesting access to personal information of the requester.

4.8 **Identity Verification**

The Church must verify the identity of any requester seeking access to personal information. Additional documentation may be required to prevent unauthorised disclosure.

4.9 **Provincial Variations**

Where national legislation in a particular country imposes additional requirements or restrictions, the relevant Provincial Annexure will apply in conjunction with this Manual.

4.10 Decentralised Record-Keeping and Multi-District Requests

- 4.10.1 The Church currently maintains a decentralised record-keeping structure. Each District or Region retains custody of its own sacramental, pastoral, membership, officer, welfare, administrative, and governance records.
- 4.10.2 Because records are decentralised, historical and current information relating to a single data subject may be located across more than one District. Requesters may therefore be required to submit PAIA Form 2 separately to each District that may hold relevant records.
- 4.10.3 The statutory 30-day timeframe in section 56 of PAIA applies per District. Where multiple Districts must be contacted, or where records must be traced across jurisdictions, the Information Officer may issue an extension under section 57 of PAIA.
- 4.10.4 If a District does not hold the requested record, the Information Officer must inform the requester and direct the requester to the District most likely to hold the record.
- 4.10.5 This decentralised structure reflects the Church's current administrative reality and pastoral governance model. Nothing in this Manual shall be interpreted as requiring the creation of a centralised database or the consolidation of District records prior to the implementation of the Church's global modernisation programme.

4.11 Transition to a Centralised Record System

- 4.11.1 The Church is implementing a global modernisation programme under the Global Privacy & Personal Information Regulation (2026), which will introduce a secure, centralised IT system for member and officer information.
- 4.11.2 Until the centralised system is fully implemented, all PAIA requests must be processed in accordance with the current decentralised record-keeping structure described in section 4.10.
- 4.11.3 District autonomy relates to financial and administrative governance. Record-keeping autonomy is temporary and will be replaced by a centralised system once implemented under the Global Privacy Regulation.
- 4.11.4 Once the centralised system becomes operational, PAIA requests will be processed through the central system, while Districts will retain full financial autonomy and administrative governance as defined by the Constitution and COA resolutions.

4.12 Location of Sacramental Records and Historical Gaps

- 4.12.1 Sacramental records are held in the District where the sacrament was administered. The District where a member was baptised is the primary record-holding District; the District where a member was sealed is the secondary record-holding District; and the District where a member was confirmed is the tertiary record-holding District.
- 4.12.2 Members who relocate between Districts do not transfer their sacramental records. The original sacramental records remain with the District(s) where the sacraments were administered.
- 4.12.3 However, where a member's status changes, for example, upon ordination as an Officer, the District responsible for the ordination will update and maintain an administrative copy of the member's sacramental information to ensure the completeness of the officer record.
- 4.12.4 This administrative copy does not replace or alter the original sacramental record, but forms part of the officer's governance file for administrative and pastoral purposes.
- 4.12.5 Requesters may therefore need to submit PAIA Form 2 to more than one District to obtain complete sacramental information.
- 4.12.6 Due to historical administrative practices, some sacramental records may be incomplete or missing. In such cases, the Information Officer will:
 - 4.12.6.1 confirm whether the record exists in any District;
 - 4.12.6.2 advise the requester if the record cannot be located;
 - 4.12.6.3 process the request based on available information; and
 - 4.12.6.4 escalate the matter to the relevant Apostle or Head Office where reconstruction or administrative allocation of dates may be required.
- 4.12.7 The administrative allocation of sacramental dates, where required, is a governance function of the Conference of Apostles and does not constitute the repetition of a sacrament.
- 4.12.8 Where sacramental records must be traced across multiple Districts or reconstructed, the Information Officer may issue an extension under section 57 of PAIA.

5. REQUEST PROCEDURE

5.1 Submission of Requests

- 5.1.1 Any person seeking access to a record held by The Church must submit a request in accordance with section 53 of PAIA. All requests must:

- 5.1.1.1 be made in writing;
 - 5.1.1.2 be submitted on Form 2 of the PAIA Regulations, 2021;
 - 5.1.1.3 be addressed to the relevant Provincial/District/Regional Information Officer;
 - 5.1.1.4 contain sufficient detail to identify the record requested; and
 - 5.1.1.5 include adequate proof of identity to enable verification of the requester.
- 5.1.2 The Church will not process any request submitted on the repealed Form A.

5.2 **Required Information in a Request**

- 5.2.1 A valid request must include:
- 5.2.1.1 the full names, identity number, and contact details of the requester;
 - 5.2.1.2 an indication of whether the requester is acting on their own behalf or as an authorised representative;
 - 5.2.1.3 a description of the record requested;
 - 5.2.1.4 the form of access required (inspection, copy, electronic copy, etc.);
 - 5.2.1.5 the right the requester seeks to exercise or protect;
 - 5.2.1.6 an explanation of why the requested record is required for the exercise or protection of that right;
 - 5.2.1.7 any additional information necessary to locate the record.
- 5.2.2 Where a requester acts on behalf of another person, proof of authority must be provided.

5.3 **Submission Channels**

- 5.3.1 Requests may be submitted:
- 5.3.1.1 by email to the Provincial/District/Regional Information Officer;
 - 5.3.1.2 by hand delivery to the Provincial Head Office; or
 - 5.3.1.3 by registered post to the address provided in the Provincial/District/Regional Annexure.
- 5.3.2 Electronic submissions must be in a format that allows The Church to verify authenticity and identity.

5.4 Acknowledgement of Receipt

- 5.4.1 Upon receiving a valid request, the Information Officer will:
 - 5.4.1.1 acknowledge receipt in writing;
 - 5.4.1.2 confirm whether any request fee is payable; and
 - 5.4.1.3 indicate the expected timeframe for processing the request.
- 5.4.2 If the request is incomplete or defective, the Information Officer may require the requester to correct or complete the request before processing.

5.5 Processing of Requests

- 5.5.1 The Information Officer will process the request in accordance with:
 - 5.5.1.1 PAIA (sections 50–56);
 - 5.5.1.2 POPIA (sections 23–25);
 - 5.5.1.3 the PAIA Regulations, 2021; and
 - 5.5.1.4 The Church's Global Privacy & Personal Information Regulation.
- 5.5.2 The Information Officer may:
 - 5.5.2.1 grant access;
 - 5.5.2.2 refuse access; or
 - 5.5.2.3 grant partial access with redactions where required by law.

5.6 Timeframes

- 5.6.1 The Information Officer must respond to the request within 30 days, unless:
 - 5.6.1.1 an extension is permitted under section 57 of PAIA; or
 - 5.6.1.2 the request is unusually complex or requires consultation with third parties.
- 5.6.2 Where an extension is required, the requester will be notified in writing.
- 5.6.3 Where a record must be traced across multiple Districts, or where the District does not hold the record locally, the Information Officer may extend the timeframe for responding to the request in accordance with section 57 of PAIA. The requester will be notified in writing of the extension and the reason for the extension.

5.7 Fees Payable

- 5.7.1 In accordance with the PAIA Regulations:

- 5.7.1.1 A request fee may be payable before the request is processed (except for personal information requests).
- 5.7.1.2 An access fee may be payable for the reproduction, search, preparation, or provision of the record.
- 5.7.2 Fees must be paid before access is granted.
- 5.7.3 The applicable fee schedule is included in Annexure D.

5.8 Identity Verification

- 5.8.1 The Church must verify the identity of any requester seeking access to:
 - 5.8.1.1 personal information;
 - 5.8.1.2 pastoral information;
 - 5.8.1.3 sacramental information;
 - 5.8.1.4 welfare information; or
 - 5.8.1.5 any sensitive or confidential record.
- 5.8.2 The Information Officer may request additional documentation to prevent unauthorised disclosure.

5.9 Third-Party Notification

- 5.9.1 Where a request relates to a record containing third-party personal information, commercial information, or confidential information, the Information Officer must:
 - 5.9.1.1 notify the third party in terms of sections 71–73 of PAIA;
 - 5.9.1.2 allow the third party an opportunity to make representations; and
 - 5.9.1.3 consider such representations before making a decision.

5.10 Decision and Communication

- 5.10.1 The Information Officer will notify the requester in writing of:
 - 5.10.1.1 whether access is granted, refused, or partially granted;
 - 5.10.1.2 the reasons for refusal (where applicable);
 - 5.10.1.3 any applicable fees;
 - 5.10.1.4 the form in which access will be provided; and
 - 5.10.1.5 the requester's right to lodge a complaint with the Information Regulator.

5.11 Manner of Access

- 5.11.1 Where access is granted, the record may be provided:

- 5.11.1.1 for inspection at the Provincial Head Office;
 - 5.11.1.2 as a paper copy;
 - 5.11.1.3 as an electronic copy; or
 - 5.11.1.4 in any other form reasonably required and available.
- 5.11.2 CCTV footage may only be viewed on site under supervision and will not be released electronically unless required by law.

5.12 Complaints and Remedies

- 5.12.1 If a requester is dissatisfied with:
- 5.12.1.1 the refusal of access;
 - 5.12.1.2 the form of access granted; or
 - 5.12.1.3 the fees charged,
- they may lodge a complaint with the Information Regulator in terms of section 77A of PAIA.

6. GROUNDS FOR REFUSAL

- 6.1 The Church may refuse access to a record where mandatory or discretionary refusal grounds apply in terms of Chapter 4 of PAIA. These refusal grounds exist to protect personal information, confidentiality, commercial interests, safety, and the integrity of The Church's internal operations.
- 6.2 Where a record contains both disclosable and non disclosable information, the Information Officer may grant partial access by redacting the protected portions, as permitted by section 28 of PAIA.
- 6.3 **Mandatory Grounds for Refusal**
- 6.3.1 The Church must refuse access to a record where any of the following apply:
- 6.3.1.1 Protection of Personal Information of Third Parties (PAIA s63)
 - 6.3.1.2 Access must be refused if disclosure would reveal personal information of a third party, including:
 - 6.3.1.2.1 identity information;
 - 6.3.1.2.2 contact details;
 - 6.3.1.2.3 family or household information;
 - 6.3.1.2.4 welfare or financial information;
 - 6.3.1.2.5 pastoral or sacramental information;

6.3.1.2.6 opinions or confidential communications.

6.3.2 This applies unless the third party has provided written consent or disclosure is required by law.

6.4 Protection of Confidential Information (PAIA s64)

6.4.1 Access must be refused if disclosure would reveal:

- 6.4.1.1 information supplied in confidence;
- 6.4.1.2 confidential pastoral or welfare information;
- 6.4.1.3 confidential ecclesiastical communications;
- 6.4.1.4 information protected by confidentiality undertakings.

6.4.2 This includes information shared with Officers or their wives during pastoral care.

6.5 Protection of Safety and Physical or Mental Well Being (PAIA s66)

6.5.1 Access must be refused if disclosure could reasonably be expected to:

- 6.5.1.1 endanger the life, safety, or well being of any individual;
- 6.5.1.2 expose a person to harassment, intimidation, or harm;
- 6.5.1.3 compromise the safety of Officers or Members.

6.6 Privileged Information (PAIA s67)

6.6.1 Access must be refused if the record is subject to:

- 6.6.1.1 legal professional privilege;
- 6.6.1.2 litigation privilege;
- 6.6.1.3 ecclesiastical confidentiality analogous to privilege.

6.7 Discretionary Grounds for Refusal

6.7.1 The Church may refuse access to a record where any of the following apply:

- 6.7.1.1 Commercial Information of Third Parties (PAIA s65)

6.7.2 This includes:

- 6.7.2.1 trade secrets;
- 6.7.2.2 financial, commercial, or technical information;
- 6.7.2.3 information supplied in confidence by service providers.

6.8 Protection of The Church's Commercial or Financial Interests (PAIA s68)

6.8.1 This includes:

- 6.8.1.1 internal financial information;
- 6.8.1.2 procurement processes;
- 6.8.1.3 contractual negotiations;
- 6.8.1.4 sensitive operational information.

6.9 Research Information (PAIA s69)

- 6.9.1 Access may be refused if disclosure would:
 - 6.9.1.1 expose research to plagiarism;
 - 6.9.1.2 prejudice ongoing research;
 - 6.9.1.3 reveal confidential methodologies.

6.10 Protection of Internal Operations (PAIA s69)

- 6.10.1 Access may be refused if disclosure would:
 - 6.10.1.1 prejudice The Church's governance processes;
 - 6.10.1.2 reveal internal deliberations, minutes, or resolutions;
 - 6.10.1.3 compromise internal investigations or disciplinary processes;
 - 6.10.1.4 interfere with the effective functioning of The Church.
- 6.10.2 This includes all internal communications, internal circulars, and administrative directives.

6.11 Records That Will Not Be Disclosed Under Any Circumstances

- 6.11.1 The following categories of records are never disclosable unless required by a court order or applicable law:
 - 6.11.1.1 pastoral records or notes;
 - 6.11.1.2 sacramental records (except to the data subject);
 - 6.11.1.3 welfare and social support records;
 - 6.11.1.4 confidential ecclesiastical communications;
 - 6.11.1.5 internal disciplinary records;
 - 6.11.1.6 internal governance deliberations;
 - 6.11.1.7 records containing information about minors;
 - 6.11.1.8 records containing sensitive personal information as defined in POPIA.
- 6.11.2 These records are protected by PAIA, POPIA, and The Church's Confidentiality Protocols.

6.12 Third Party Notification

6.12.1 Where a request relates to a record containing third party information, the Information Officer must:

- 6.12.1.1 notify the third party in terms of sections 71–73 of PAIA;
- 6.12.1.2 allow the third party to make representations;
- 6.12.1.3 consider such representations before making a decision.

6.13 Reasons for Refusal

6.13.1 If access is refused, the Information Officer will provide the requester with:

- 6.13.1.1 written reasons for refusal;
- 6.13.1.2 the legal basis for the refusal;
- 6.13.1.3 information on the right to lodge a complaint with the Information Regulator.

7. POPIA RELATED REQUESTS

7.1 In addition to access to information requests under PAIA, individuals have specific rights under the Protection of Personal Information Act 4 of 2013 ("POPIA") relating to the processing of their personal information. These rights apply to all personal information processed by The Church as part of its ecclesiastical, pastoral, administrative, and governance functions.

7.2 POPIA related requests must be submitted to the Provincial/District/Regional Information Officer and will be processed in accordance with:

- 7.2.1 sections 23–25 of POPIA (data subject rights);
- 7.2.2 the POPIA Regulations; and
- 7.2.3 The Church's Global Privacy & Personal Information Regulation (2026).

7.3 Types of POPIA Related Requests

The following requests may be made under POPIA:

7.3.1 Request for Access to Personal Information (POPIA s23)

7.3.1.1 A data subject may request confirmation of:

7.3.1.1.1 whether The Church holds personal information about them; and

7.3.1.1.2 access to such personal information.

7.3.1.2 This includes personal, sacramental, pastoral, welfare, and administrative information pertaining to the requester only.

7.3.1.3 Third party information must be redacted.

7.3.2 Request for Correction, Deletion, or Destruction (POPIA s24)

7.3.2.1 A data subject may request The Church to:

- 7.3.2.1.1 correct inaccurate personal information;
- 7.3.2.1.2 delete or destroy personal information that is no longer required; or
- 7.3.2.1.3 update incomplete or outdated information.

7.3.2.2 The Church may refuse deletion where:

- 7.3.2.2.1 retention is required by law;
- 7.3.2.2.2 retention is required for ecclesiastical record keeping (e.g., sacramental records);
- 7.3.2.2.3 retention is necessary for lawful governance or dispute resolution.

7.3.3 Objection to Processing of Personal Information (POPIA s11(3))

7.3.3.1 A data subject may object to the processing of their personal information on reasonable grounds relating to:

- 7.3.3.1.1 their particular situation;
- 7.3.3.1.2 direct marketing;
- 7.3.3.1.3 processing not aligned with the purpose for which the information was collected.

7.3.3.2 Objections cannot override:

- 7.3.3.2.1 sacramental record keeping obligations;
- 7.3.3.2.2 lawful pastoral care functions;
- 7.3.3.2.3 statutory obligations;
- 7.3.3.2.4 governance requirements of The Church.

7.3.4 Request for Information on Processing Activities (POPIA s18)

7.3.4.1 A data subject may request information on:

- 7.3.4.1.1 what personal information is collected;
- 7.3.4.1.2 the purpose of collection;
- 7.3.4.1.3 recipients of the information;
- 7.3.4.1.4 whether the information is supplied voluntarily or mandatory;
- 7.3.4.1.5 consequences of failure to provide information.

- 7.3.4.2 This information is generally provided through The Church's Privacy Notices and the Global Privacy & Personal Information Regulation.

7.3.5 **Complaint to the Information Regulator (POPIA s74)**

- 7.3.5.1 If a data subject believes their personal information has been unlawfully processed, they may lodge a complaint with the Information Regulator. The Church will cooperate fully with any investigation.

7.4 **Forms Required for POPIA Requests**

- 7.4.1 The following forms must be used:
 - 7.4.1.1 Form 1 – Objection to the Processing of Personal Information
 - 7.4.1.2 Form 2 – Request for Correction, Deletion, or Destruction
 - 7.4.1.3 Form 3 – Complaint to the Information Regulator
- 7.4.2 These forms are included in Annexure C.

7.5 **Verification and Identity Requirements**

- 7.5.1 Before processing any POPIA related request, The Church must verify the identity of the requester. Additional documentation may be required where:
 - 7.5.1.1 sensitive personal information is involved;
 - 7.5.1.2 pastoral or welfare information is requested;
 - 7.5.1.3 sacramental records are requested;
 - 7.5.1.4 the requester acts on behalf of another person.

7.6 **Interaction Between PAIA and POPIA**

- 7.6.1 Where a request relates to personal information of the requester, POPIA and PAIA operate together:
 - 7.6.1.1 POPIA governs the right of access to personal information.
 - 7.6.1.2 PAIA governs the procedure for accessing records.
- 7.6.2 Therefore:
 - 7.6.2.1 POPIA gives the right;
 - 7.6.2.2 PAIA provides the mechanism.
 - 7.6.2.3 Requests for personal information must still comply with PAIA's procedural requirements, including the use of Form 2.

7.7 Records That Cannot Be Deleted Under POPIA

- 7.7.1 Certain records cannot be deleted upon request, including:
 - 7.7.1.1 sacramental records (baptism, sealing, confirmation);
 - 7.7.1.2 historical membership records;
 - 7.7.1.3 records required for governance or legal compliance;
 - 7.7.1.4 records necessary for dispute resolution;
 - 7.7.1.5 records required by the Constitution of The Church.
- 7.7.2 These records form part of The Church's ecclesiastical archive and must be retained permanently or for the period prescribed by The Church's retention schedule.

7.8 Timeframes

The Information Officer must respond to POPIA related requests within a reasonable time, generally within 30 days, unless an extension is justified.

8. SECURITY SAFEGUARDS

- 8.1 The Church is committed to protecting all personal information in its possession or under its control. In accordance with section 19 of POPIA, The Church implements appropriate, reasonable technical, administrative, and physical safeguards to prevent:
 - 8.1.1 loss of personal information;
 - 8.1.2 unauthorised access or disclosure;
 - 8.1.3 unlawful destruction or alteration;
 - 8.1.4 misuse or unauthorised processing.
- 8.2 These safeguards apply globally as part of The Church's Global Privacy & Personal Information Regulation, subject to national legislation in each jurisdiction.
- 8.3 **Categories of Information Protected**
 - 8.3.1 The following categories of information are subject to enhanced protection measures:
 - 8.3.1.1 Sacramental Information (baptism, sealing, confirmation, transfers)
 - 8.3.1.2 Pastoral Information (household visits, welfare needs, spiritual guidance)
 - 8.3.1.3 Membership Information
 - 8.3.1.4 Officer Information

- 8.3.1.5 Welfare and social support records
- 8.3.1.6 Employee and service provider information
- 8.3.1.7 Financial and accounting records
- 8.3.1.8 Records relating to minors
- 8.3.1.9 Sensitive personal information as defined in POPIA

8.3.2 These categories are protected by both PAIA's refusal grounds and POPIA's security requirements.

8.4 **Technical Safeguards**

8.4.1 The Church implements reasonable and appropriate technical measures, having regard to its voluntary structure, available resources, and the nature of the information processed. These measures may include:

- 8.4.1.1 secure access controls and authentication mechanisms;
- 8.4.1.2 password protection and role-based access;
- 8.4.1.3 encryption of data in transit and at rest, where technically and operationally feasible;
- 8.4.1.4 secure servers and data storage environments;
- 8.4.1.5 audit logs and system monitoring, where available and reasonably practicable;
- 8.4.1.6 regular security updates and patching;
- 8.4.1.7 restricted access to databases and membership systems.

8.4.2 Security safeguards shall be proportionate to the technological, administrative, and resource capacity of each Province, District, or Region.

8.4.3 No Province, District, or Region shall be regarded as non-compliant solely due to limited infrastructure, provided that reasonable measures are implemented within its operational context.

8.5 **Administrative Safeguards**

8.5.1 Administrative safeguards include:

- 8.5.1.1 confidentiality undertakings for Officers, their wives, employees, and volunteers;
- 8.5.1.2 training on privacy, confidentiality, and data handling;
- 8.5.1.3 documented procedures for handling personal information;

- 8.5.1.4 access granted strictly on a “need-to-know” basis;
 - 8.5.1.5 secure procedures for the transmission of personal information;
 - 8.5.1.6 governance oversight by the Provincial/District/Regional Information Officer;
 - 8.5.1.7 compliance with The Church's Global Privacy & Personal Information Regulation.
- 8.5.2 Officers and their wives who participate in pastoral care are bound by strict confidentiality obligations.

8.6 Physical Safeguards

- 8.6.1 Physical safeguards include:
- 8.6.1.1 secure storage of paper records in locked cabinets or restricted rooms;
 - 8.6.1.2 controlled access to Provincial and congregational offices;
 - 8.6.1.3 visitor access controls;
 - 8.6.1.4 secure disposal of paper records through shredding or equivalent destruction;
 - 8.6.1.5 protection of devices used for Church administration.
- 8.6.2 Where congregations operate in shared or limited facilities, reasonable alternative measures must be implemented to ensure confidentiality.

8.7 Safeguards for Pastoral and Sacramental Information

- 8.7.1 Pastoral and sacramental information is subject to heightened protection and may only be accessed by persons who hold pastoral authority within The Church, including Apostles, Fourfold Officers, Elders, Priests, and, where applicable, their wives who participate in pastoral care. Access is strictly limited to such persons for the fulfilment of their ecclesiastical and pastoral duties.
- 8.7.2 Pastoral and sacramental information is subject to heightened protection, including:
- 8.7.2.1 prohibition on unauthorised copying, sharing, or distribution;
 - 8.7.2.2 secure storage of pastoral notes and sacramental registers;

- 8.7.2.3 strict confidentiality protocols during household visits and pastoral engagements;
- 8.7.2.4 prohibition on electronic transmission of sensitive information unless secure methods are used.
- 8.7.3 These protections reflect the sacred and confidential nature of pastoral and sacramental records.

8.8 **Third-Party Operators**

- 8.8.1 Where third-party service providers process personal information on behalf of The Church, The Church ensures that:
 - 8.8.1.1 written agreements are in place;
 - 8.8.1.2 appropriate security measures are implemented;
 - 8.8.1.3 processing is limited to The Church's instructions;
 - 8.8.1.4 confidentiality is maintained;
 - 8.8.1.5 compliance with POPIA or equivalent national legislation is ensured.

8.9 **Security Breaches**

- 8.9.1 In the event of a suspected or actual security compromise, The Church will:
 - 8.9.1.1 take immediate steps to contain the breach;
 - 8.9.1.2 assess the nature and extent of the compromise;
 - 8.9.1.3 notify affected individuals where required;
 - 8.9.1.4 notify the Information Regulator (South Africa) or equivalent authority where applicable;
 - 8.9.1.5 implement remedial measures to prevent recurrence.
- 8.9.2 All breaches must be reported to the Provincial/District/Regional Information Officer without delay.

8.10 **Continuous Improvement**

The Church reviews and updates its security safeguards regularly to ensure ongoing compliance with:

- 8.10.1 PAIA;
- 8.10.2 POPIA;
- 8.10.3 national legislation in each jurisdiction;
- 8.10.4 The Church's Global Privacy & Personal Information Regulation;

8.11 Processing and Retention

8.11.1 The processing, retention, and destruction of personal information within The Church are governed by the Global Privacy & Personal Information Regulation (2026).

8.11.2 All Provinces/Districts/Regions must comply with the processing and retention requirements set out in the Global Privacy Regulation once the standardised Processing Register and Retention Schedule have been formally adopted by the Conference of Apostles.

8.11.3 PAIA governs access to records as they are currently held. Processing and retention obligations fall under the Global Privacy Regulation and are not duplicated in this Manual.

8.12 Cross-Border Transfers

Cross-border transfers of personal information must be subject to an adequacy assessment, standard contractual clauses, or documented lawful basis and risk assessment. No transfer shall occur without documented safeguards.

9. IMPLEMENTATION

9.1 Each Province/District/Region must maintain training records for Officers and administrative staff (attendance lists, training materials, dates).

9.2 Head Office will provide standard implementation guides, breach templates, and pre-approved responses. Provinces must adapt and retain local training evidence for regulator inspection.

10. AVAILABILITY OF THE MANUAL

10.1 This Manual is made available in accordance with section 51(3) of PAIA and may be accessed by any person without the need to submit a formal PAIA request.

10.2 The Manual is available in the following formats:

10.2.1 Electronic Access

10.2.1.1 The Manual, together with all Provincial Annexures, is available on The Church's official website (where applicable).

10.2.1.2 Electronic copies may also be requested directly from the relevant Provincial/District/Regional Information Officer.

10.2.2 **Physical Inspection**

10.2.2.1 A physical copy of this Manual is available for inspection, during normal office hours, at each Provincial Head Office.

10.2.2.2 Provincial Annexures are available for inspection at the respective Provincial Head Offices.

10.2.3 **Copies on Request**

10.2.3.1 A requester may obtain a physical or electronic copy of the Manual from the Provincial/District/Regional Information Officer.

10.2.3.2 Reproduction fees may apply in accordance with the PAIA Regulations, 2021.

10.3 **Provincial Availability**

10.3.1 Each Province must ensure that:

10.3.1.1 the Manual is accessible to Members and the public;

10.3.1.2 the Provincial Annexure is completed and kept up to date;

10.3.1.3 the Manual is displayed or made available in a manner consistent with national legislation applicable in that jurisdiction.

10.3.2 Where a Province operates in a country with its own access-to-information legislation, the Provincial Annexure must reflect any additional statutory requirements.

10.4 **Updates and Revisions**

10.4.1 The Church may update or amend this Manual from time to time to ensure continued compliance with:

10.4.1.1 PAIA;

10.4.1.2 POPIA;

10.4.1.3 national legislation in each jurisdiction;

10.4.1.4 The Church's Global Privacy & Personal Information Regulation;

10.4.1.5 governance resolutions of the Conference of Apostles.

10.4.2 Updated versions of the Manual will be published on The Church's official website (where applicable) and made available at Provincial Head Offices.

10.5 Language Availability

10.5.1 Where required by national legislation or local governance needs, Provinces may make the Manual available in additional languages, provided that:

10.5.1.1 the translated version is consistent with the official English version; and

10.5.1.2 any translation is approved by the Provincial/District/Regional Information Officer.

10.6 Status of the Manual

10.6.1 This Manual is a public document for purposes of PAIA. It does not replace or override:

10.6.1.1 the Constitution of The Church;

10.6.1.2 the Global Privacy & Personal Information Regulation;

10.6.1.3 Provincial policies required by national legislation.

10.6.2 It must be read together with these instruments.

11. CONTACT DETAILS OF THE INFORMATION OFFICER

11.1 In terms of section 51(1)(a) of PAIA, each Province of The Church operating within South Africa must designate an Information Officer and may appoint one or more Deputy Information Officers. These appointments must be made in accordance with:

11.1.1 PAIA;

11.1.2 POPIA;

11.1.3 the PAIA Regulations, 2021; and

11.1.4 The Church's Global Privacy & Personal Information Regulation.

11.2 The term 'Information Officer' in this Manual includes Provincial, District, or Regional Information Officers, depending on the governance structure applicable in the jurisdiction.

11.3 Because The Church operates globally and is registered in different legal forms in various jurisdictions, each Province/District/Region must complete Annexure A with the following mandatory information:

11.3.1 Full name of the Information Officer

11.3.2 Position within The Church

11.3.3 Physical address

11.3.4 Postal address

- 11.3.5 Telephone number
- 11.3.6 Email address
- 11.3.7 Details of any Deputy Information Officers (if applicable)
- 11.4 The contact details of the Information Officer for each Province form an integral part of this Manual and must be:
 - 11.4.1 kept up to date at all times;
 - 11.4.2 published on The Church's official website (where applicable);
 - 11.4.3 available for inspection at the Provincial Head Office;
 - 11.4.4 included in the Provincial Annexure.
- 11.5 Where a Province operates outside South Africa, the Provincial Annexure must also reflect:
 - 11.5.1 the local statutory requirements for access-to-information compliance;
 - 11.5.2 the designated Information Officer or equivalent role under local law;
 - 11.5.3 any additional contact details required by national legislation.
- 11.6 All PAIA and POPIA-related correspondence must be directed to the relevant Provincial/District/Regional Information Officer as listed in the applicable Annexure A.
- 11.7 The Conference of Apostles may issue governance directives regarding the appointment, training, and responsibilities of Information Officers to ensure uniformity and compliance across all Provinces.

12. DEFINITIONS

- 12.1 For purposes of this Manual, unless the context indicates otherwise, the following terms shall have the meanings assigned to them below. Where a term is defined in PAIA or POPIA, the statutory definition applies unless expressly expanded for ecclesiastical or governance purposes.
- 12.2 **"Apostolate"** Refers to the ecclesiastical jurisdiction under the authority of an Apostle, comprising Districts, Regions, and congregations.
- 12.3 **"Church"** Means The Old Apostolic Church, established in terms of its Constitution (COA RES 415),

	including all Provinces, Apostolates, Districts, Regions, congregations, administrative structures, and legally registered entities forming part of The Church globally.
12.4 “Conference of Apostles” or “COA”	The highest ecclesiastical and governance authority of The Church, responsible for doctrinal, governance, and administrative oversight.
12.5 “Constitution”	The Constitution of The Church (COA RES 415), as amended from time to time.
12.6 “Data Subject”	Any natural person whose personal information is processed by The Church, including Members, Officers, employees, service providers, visitors, and applicants for assistance.
12.7 “Deputy Information Officer”	A person appointed by the Provincial/District/Regional Information Officer to assist with PAIA and POPIA compliance in terms of the PAIA Regulations, 2021.
12.8 “Information Officer”	The person designated by each Province in terms of PAIA and POPIA to oversee compliance, receive requests, and ensure lawful processing of personal information.
12.9 “Member”	A person recorded in The Church’s Membership Register in accordance with clause 4.3 of the Constitution.
12.10 “Officer”	An Apostle, Fourfold Officer, Elder, Priest, Underdeacon, or Congregational Helper appointed in accordance with the Constitution. For purposes of confidentiality and pastoral care, the term includes the wife of an Officer, who participates in pastoral duties and is bound by

	the same confidentiality obligations.
12.11 “Pastoral Information”	Information relating to household visits, spiritual guidance, welfare needs, pastoral notes, and any information shared with an Officer or his wife in the course of pastoral care. This information is confidential and subject to heightened protection.
12.12 “Personal Information”	Has the meaning assigned in POPIA and includes any information relating to an identifiable natural person, including but not limited to identity information, contact details, sacramental information, pastoral information, financial information, and membership information.
12.13 “POPIA”	The Protection of Personal Information Act 4 of 2013, including the Regulations and any amendments.
12.14 “PAIA”	The Promotion of Access to Information Act 2 of 2000, including the PAIA Regulations, 2021, and any amendments.
12.15 “Processing”	Any operation or activity concerning personal information, including collection, receipt, storage, updating, use, dissemination, or destruction, as defined in POPIA.
12.16 “Provincial Annexure”	The annexure completed by each Province, containing the contact details of the Information Officer, Deputy Information Officers, and any additional requirements imposed by national legislation applicable in that jurisdiction.
12.17 “Record”	Any recorded information, regardless of form or medium, held by The Church or under its control, whether created by The

- Church or received from a third party.
- 12.18 **“Sacramental Information”** Information relating to the administration of the sacraments of Baptism, Sealing, and Confirmation, including sacramental history, transfers, and deceased records. This information forms part of The Church's ecclesiastical archive and is permanently retained.
- 12.19 **“Sensitive Personal Information”** Personal information as defined in POPIA, including religious beliefs, health information, information relating to minors, and any information requiring enhanced protection.
- 12.20 **“Service Provider”** Any external person or entity contracted to provide goods or services to The Church, including IT providers, auditors, consultants, and maintenance contractors.
- 12.21 **“Website”** The official website of The Church or the official website of a Province, where applicable.

13. ANNEXURES

- 13.1 The following Annexures form an integral part of this Manual. Each Annexure must be completed, maintained, and updated by the relevant Province in accordance with PAIA, POPIA, and The Church's Global Privacy & Personal Information Regulation.
- 13.2 Where The Church operates outside South Africa, the Provincial Annexures must also reflect any additional requirements imposed by national legislation applicable in that jurisdiction.

List of Annexures

- 13.3 **Annexure A – Provincial/District/Regional Information Officer Details**
- 13.3.1 This Annexure must be completed by each Province and must include:
- 13.3.1.1 the name and contact details of the Information Officer;

- 13.3.1.2 the names and contact details of any Deputy Information Officers;
- 13.3.1.3 the physical and postal addresses of the Provincial Head Office;
- 13.3.1.4 the designated email address for PAIA and POPIA correspondence;
- 13.3.1.5 any additional statutory requirements applicable in that jurisdiction.

13.4 **Annexure B – Automatically Available Records (Provincial Addendum)**

- 13.4.1 Each Province must list any additional records that are automatically available within that Province, provided that:
 - 13.4.1.1 such records comply with PAIA and POPIA;
 - 13.4.1.2 no confidential, pastoral, sacramental, or sensitive information is included;
 - 13.4.1.3 the records have been intentionally published for public access.

13.5 **Annexure C – POPIA Forms**

- 13.5.1 This Annexure includes the prescribed POPIA forms:
 - 13.5.1.1 Form 1 – Objection to the Processing of Personal Information
 - 13.5.1.2 Form 2 – Request for Correction, Deletion, or Destruction
 - 13.5.1.3 Form 3 – Complaint to the Information Regulator
- 13.5.2 These forms must be used for all POPIA-related requests.

13.6 **Annexure D – PAIA Fee Schedule**

- 13.6.1 This Annexure contains the prescribed fees for:
 - 13.6.1.1 request fees;
 - 13.6.1.2 access fees;
 - 13.6.1.3 reproduction fees;
 - 13.6.1.4 search and preparation fees.
- 13.6.2 The fee schedule must be updated whenever the PAIA Regulations are amended.

13.7 **Annexure E – Provincial Legislative Requirements (Where Applicable)**

- 13.7.1 For Provinces operating outside South Africa, this Annexure must include:

- 13.7.1.1 the name of the applicable national access-to-information legislation;
- 13.7.1.2 any additional compliance obligations;
- 13.7.1.3 any statutory forms or procedural requirements;
- 13.7.1.4 the local authority responsible for oversight.
- 13.7.2 This ensures global consistency while respecting national legal frameworks.

13.8 **Annexure F – Internal Policies and Governance Instruments (Public Versions)**

- 13.8.1 This Annexure lists any internal governance instruments that are expressly designated for public access, such as:
 - 13.8.1.1 public versions of privacy notices;
 - 13.8.1.2 public governance summaries;
 - 13.8.1.3 public doctrinal statements;
 - 13.8.1.4 public versions of policies approved for publication.
- 13.8.2 Confidential or internal versions of policies must not be included.

13.9 **Updating Annexures**

- 13.9.1 Each Province is responsible for ensuring that its Annexures remain accurate and up to date.
- 13.9.2 Updates must be:
 - 13.9.2.1 approved by the Provincial/District/Regional Information Officer;
 - 13.9.2.2 communicated to the COA Secretariat (where applicable);
 - 13.9.2.3 published on The Church's website (where applicable);
 - 13.9.2.4 made available at the Provincial Head Office.
- 13.9.3 Updates to Annexures do not require amendment of the main Manual, provided that the structure and purpose of the Annexures remain unchanged.

13.10 **Status of Annexures**

The Annexures:

- 13.10.1 form part of this Manual;
- 13.10.2 must be read together with the Manual;
- 13.10.3 have the same legal force as the Manual;
- 13.10.4 may be relied upon by Members, Officers, and the public.

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ANNEXURE A(GAUTENG)— DISTRICT OF GAUTENG INFORMATION OFFICER DETAILS

(Template for completion by each Province)

A1. Province Details

Province/District/Region Name <i>(Select applicable)</i>	The Old Apostolic Church AME – District Gauteng
Country	South Africa

A2. Legal Status of The Church in This Province/District/Region

(This section is now mandatory for all Provinces/District/Region)

A2.1 Legal Form / Operating Name of Head Office – The Old Apostolic Church (South Africa) District Gauteng

Select or specify the legal form under which The Church is registered in this jurisdiction:

- ☒ Association of Persons (sui generis)

A2.2 If the entity is an Association of Persons (sui generis) and therefore not registered with a state registry:

As the entity operates as an Association of Persons and is not registered with a registration number, the following is attached:

- Scanned copy of the Church Constitution (COA RES 415) **and**
- Signed declaration by the Head of the Head Office confirming association status (Annexure G – Declaration of Responsible Party and Proof of Authority).

A2.3 If the entity is a registered legal entity (Trust, NPC, Company, Registered Association): N/A

A2.4 Governing Statute

Applicable National Legislation:

- ☐ Promotion of Access to Information Act 2 of 2000 (PAIA)
- ☐ Protection of Personal Information Act 4 of 2013 (POPIA)
- ☐ Labour Relations Act (for employee records)
- ☐ Occupational Health and Safety Act (for vendor/supplier vetting)

- Marriage Act / Civil Union Act (where applicable)

A2.5 Notes on Legal Persona

*The Church in South Africa functions as an **Association of Persons with a sui generis legal persona**, recognised under common law. It is not registered as a company or NPC. Its legal existence arises from its Constitution and the collective association of its Members.*

A3 Information Officer

- Full Name: Apostel I Brink
- Position in The Church: Apostle Head of Administration
- Physical Address: Gauteng District Head Office, 95 North Street, Regents Park, Johannesburg, 2197, Gauteng, South Africa
- Postal Address: P.O. Box 38, Linmeyer, 2105, Gauteng, South Africa
- Telephone Number: +27 (011) 681-7000
- Email Address (PAIA/POPIA correspondence): S.leRoux@oacww.com

A4. Deputy Information Officer(s)

Full Name	Position	Telephone	Email
Sister S. Le Roux	District Secretary	011 681 7000	S.leRoux@oacww.com
Sister J.A Scholtz	District Accountant	011 681 7000	J.Scholtz@oacww.com
Overseer Khumalo	Liaison	011 681 7000	w.khumalo@oacww.com
Sister C de Bruin	Human Resources	011 681 7000	c.debruin@oacww.com

A5. Statutory Requirements (Country-Specific)

- Local access-to-information legislation: Promotion of Access to Information Act 2 of 2000 (PAIA)
- Additional compliance obligations: POPIA Compliance; Labour Legislation (employee records); OHS Act (vendor/supplier vetting); Marriage Officer Administration (where applicable);
- Local oversight authority: Information Regulator South Africa

ANNEXURE B — AUTOMATICALLY AVAILABLE RECORDS

(PROVINCIAL/DISTRICT/REGION ADDENDUM)

(Template for Province-specific additions)

B1. Province/District/Region Name: The Old Apostolic Church AME – District Gauteng

B2. Additional Automatically Available Records

(Only records intentionally published for public access)

Category	Description of Record	Platform (Website/Office)	Notes
Public Governance Document	The Church's Constitution (COA RES 415), where publicly published	Website; District Office	Only the publicly released version; no internal amendments or drafts
Public Communications	District-wide public notices and announcements	Website; District Office	Only communications intentionally released for public access
Public Event Information	Outreach events, welfare drives, youth events, public programmes	Website; District Office	No internal planning documents included
Congregational Information	Service times, congregation locations, contact details	Website	Strictly non-confidential, public-facing information
Public Governance Information	Any governance information expressly published for public access	Website	Must be designated as public by the Apostolate

Important Restrictions

No record may be listed here if it contains:

- confidential information
- pastoral or sacramental information
- welfare or sensitive personal information
- internal governance or administrative content

Note: All information assets of The Church not listed in this Annexure as automatically available are confidential and may only be accessed through a formal PAIA request in accordance with Chapter 4 of this Manual.

ANNEXURE C— POPIA FORMS

(Template index — forms attached separately)

This Annexure must include the following prescribed POPIA forms:

Form 1 — Objection to the Processing of Personal Information

Form 2 — Request for Correction, Deletion, or Destruction

Form 3 — Complaint to the Information Regulator

C1. Province/District/Regional Name: _____

C2. Location of Forms

- Physical copies available at: _____
- Electronic copies available from: _____

C: FORM 1 — OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

(POPIA Section 11(3))

DETAILS OF DATA SUBJECT

Full Name:	
Identity / Passport Number	
Contact Number	
Email Address	
Physical Address	
Province / Apostleship	

DETAILS OF RESPONSIBLE PARTY (THE CHURCH)

Province / District / Region	
Information Officer	
Email (PAIA/POPIA)	

REASONS FOR OBJECTION

(Select applicable grounds)

- ☐ Processing is not aligned with the purpose for which the information was collected
- ☐ Processing affects me due to my particular situation
- ☐ Objection to direct marketing (see note)
- ☐ Processing is unnecessary or excessive for the stated ecclesiastical or administrative purpose
- ☐ Other (specify): _____

Provide full reasons:

SIGNATURE

Signature: _____ Date: _____

Note on Direct Marketing: The Old Apostolic Church does not engage in commercial direct marketing. If you object on the basis of direct marketing, the Information Officer will (a) confirm whether any processing falls within the scope of direct marketing; (b) if none exists, record the objection and notify you; (c) if processing for fundraising or event invitations is identified, an upheld objection will restrict processing for that specific purpose but will not require deletion of sacramental, governance, or other records where retention is lawful.

Note: Sacramental information cannot be deleted or destroyed. Where a valid objection is raised, processing may be restricted only for non-ecclesiastical purposes and only where such restriction does not conflict with The Church's sacramental, pastoral, governance, or constitutional obligations.

C: FORM 2 — REQUEST FOR CORRECTION, DELETION, OR DESTRUCTION

(POPIA Section 24)

DETAILS OF DATA SUBJECT

Full Name:	
Identity / Passport Number	
Contact Number	
Email Address	
Physical Address	
Province/District/Region/ Apostleship <i>(Where member were baptised or sealed)</i>	
Unique Identifier/Membership Number <i>(where applicable)</i>	
File/ Reference Number <i>(If known – Required for Officer Record/Welfare Records etc)</i>	

DETAILS OF INFORMATION TO BE CORRECTED / DELETED

Describe the personal information concerned:

Specify the request:

- ☐ Correct information
- ☐ Delete information
- ☐ Destroy information
- ☐ I request all relevant records, attachments, and metadata relating to the described subject and period.

Reason for request:

SUPPORTING DOCUMENTS

- ☐ Copy of ID / Passport
- ☐ Proof of authority (if acting for another person)
- ☐ Evidence supporting correction (if applicable)
- ☐ Payment confirmation (if PAIA request fee applies)

List documents attached (if any):

FORM OF ACCESS REQUESTED

- ☐ Email (PDF)
- ☐ Printed copy
- ☐ Inspection at Head Office
- ☐ Other (specify)

SIGNATURE

Signature: _____ Date: _____

Note: Sacramental information cannot be deleted or destroyed under POPIA. Where a valid objection is raised, processing may be restricted only for non-ecclesiastical purposes and only where such restriction does not conflict with The Church's sacramental, pastoral, governance, or constitutional obligations. Sacramental records may be corrected only to rectify factual inaccuracies. They may not be altered to change historical sacramental events. Objections cannot override sacramental record-keeping obligations. Deletion may be refused where retention is required for ecclesiastical, governance, statutory, or dispute-resolution purposes

C: FORM 3 — COMPLAINT TO THE INFORMATION REGULATOR

(POPIA Section 74)

DETAILS OF COMPLAINANT

Full Name:	
Identity / Passport Number	
Contact Number	
Email Address	
Physical Address	
Province/District/Region/Apostleship <i>(Where member were baptised/sealed)</i>	

DETAILS OF RESPONSIBLE PARTY (THE CHURCH)

Province / District / Region	
Information Officer	
Email (PAIA/POPIA)	

NATURE OF COMPLAINT

- ☐ Unlawful processing of personal information
- ☐ Failure to respond to POPIA request
- ☐ Failure to correct/delete information
- ☐ Unauthorised disclosure
- ☐ Security breach
- ☐ Other (specify): _____

Provide full details:

SIGNATURE

Signature: _____ Date: _____

ANNEXURE D—PAIA FEE SCHEDULE

(Template for Province/District/Region to insert applicable fees)

D1. District Name: The Old Apostolic Church AME – District Gauteng

Request Fees (Private Body)

Item	Description	Amount
1	Request fee, payable by every requester (except personal information requests)	R140.00

D2. Prescribed Fees (as per PAIA Regulations)

Item	Description	Amount
2	Photocopy or printed black & white copy (A4 page)	R2.00 per page
3	Printed copy of A4-size page	R2.00 per page
4	Copy in computer-readable form: flash drive (provided by requester)	R40.00
	Copy in computer-readable form: CD (requester provides CD)	R40.00
	Copy in computer-readable form: CD (Church provides CD)	R60.00
5	Transcription of visual images (A4 page or part thereof)	Outsourced — fee depends on service provider quotation
6	Copy of visual images	Outsourced — fee depends on service provider quotation
7	Transcription of audio record (A4 page)	R24.00
8	Copy of audio record on flash drive (requester provides drive)	R40.00
	Copy of audio record on CD (requester provides CD)	R40.00

Item	Description	Amount
	Copy of audio record on CD (Church provides CD)	R60.00

D3. Search and Preparation Fees

Item	Description	Amount
9	Search and preparation fee (per hour or part thereof, excluding first hour)	R145.00 per hour
	Maximum search/preparation fee	R435.00
10	Deposit (if search exceeds 6 hours)	One-third of total request cost (calculated using items 2–8)

D4. Delivery Fees

Item	Description	Amount
11	Postage, email, courier, or electronic transfer	Actual cost

D3. Date of Last Update: 30 June 2026

(Must be updated whenever PAIA Regulations change)

ANNEXURE E — PROVINCIAL LEGISLATIVE REQUIREMENTS

(For Provinces outside South Africa)

E1. District Name: The Old Apostolic Church AME – District Gauteng

E2. Country: South Africa

E3. Applicable National Legislation

- Access-to-information law: Promotion of Access to Information Act 2 of 2000 (PAIA)
- Privacy/data protection law: Protection of Personal Information Act 4 of 2013 (POPIA)

E4. Additional Compliance Obligations

- **Labour Relations Act 66 of 1995** – employee records
- **Basic Conditions of Employment Act 75 of 1997** – employment administration
- **Occupational Health and Safety Act 85 of 1993** – vendor/supplier vetting
- **Marriage Act 25 of 1961** and **Civil Union Act 17 of 2006** – marriage officer administration
- **Children’s Act 38 of 2005** – applicable to welfare matters
- **Electronic Communications and Transactions Act 25 of 2002** – electronic records and communications

E5. Statutory Forms or Procedures Required

- PAIA Form 2 – Request for Access to Record of Private Body
- POPIA Form 1 – Objection to Processing of Personal Information
- POPIA Form 2 – Request for Correction/Deletion of Personal Information
- POPIA Form 3 – Complaint to the Information Regulator
- Marriage Officer statutory forms (where applicable)
- Employee statutory documentation required under labour legislation
- Vendor vetting documentation required under OHS Act

E6. Local Oversight Authority

- Name: Information Regulator (South Africa)
- Website: www.inforegulator.org.za ([inforegulator.org.za](http://www.inforegulator.org.za) in Bing)
- Contact Details: Tel: +27 10 023 5246 Toll Free: 0800 017 160
- Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, Gauteng, South Africa

ANNEXURE F - PUBLIC GOVERNANCE INSTRUMENTS

(Public-facing versions only)

F1. District Name: The Old Apostolic Church AME – District Gauteng

F2. Public Governance Instruments Available

Document Type	Title	Version/Date	Location (Website/Office)
Governance Summary	Public Governance Overview (District Gauteng)	2026	Website; District Office
Doctrinal Statement	Public Doctrinal Statement (Approved for Publication)	Current	Website
Public Policy Version	Public-Facing PAIA Manual (2026)	2026	Website; District Office

Restrictions

Confidential or internal versions **must not** be included. This includes:

- Internal Privacy Regulation drafts
- Internal Privacy Notices
- Internal governance documents
- Committee documents (GWS/GSS, DAC, FOA, etc.)
- Internal training materials
- Any document containing personal, pastoral, sacramental, welfare, or sensitive information

ANNEXURE G – DECLARATION OF RESPONSIBLE PARTY AND PROOF OF AUTHORITY – For internal use only and to be retained on record of the respective Head Office.

Responsible Party for POPIA (legal entity or association): _____

Legal Representative / Contact for Legal Notices (name & office): _____

Email: _____

Telephone: _____

Declaration (to be signed by the Head of Head Office or authorised Apostle):

“I hereby declare that the information provided in Annexure A is true and correct. Where the Province/District/Region operates as an Association of Persons and no registration number exists, I attach the Church Constitution / COA resolution or equivalent founding document as proof of legal existence. I confirm that the Responsible Party named in Annexure A to the PAIA Manual is the entity accountable for POPIA compliance in this Province/District/Region.”

Signature: _____

Name & Office: _____

Date: _____

Retention and Availability: The Province/District/Region must retain the registration certificate or alternative proof and the signed declaration in its records and make them available to the Information Regulator or COA on request.

PAIA FORM 2 (REQUEST FOR ACCESS TO RECORD)

(PAIA Regulations, 2021 — Required Form)

OLD APOSTOLIC CHURCH

PARTICULARS OF PERSON REQUESTING ACCESS

Full Name:	
Identity / Passport Number	
Contact Number	
Email Address	
Physical Address	
Province/District/Region/Apostleship <i>(Where the member was baptised and/or sealed this will determine which Province/District/Region the sacramental records are kept)</i>	
Unique Identifier / Membership Number <i>(Where applicable)</i>	
Request is made on behalf of	

NOTE:

Proof of identity must be attached by the requester.

Are you requesting access on behalf of another person?

- ☐ Yes
☐ No

If yes, attach proof of authority.

SUPPORTING DOCUMENTS (mandatory)

- ☐ Copy of ID / Passport
☐ Proof of authority (if acting for another person)
☐ Any evidence supporting correction
☐ Payment confirmation (if PAIA request fee applies)

PARTICULARS OF RECORD REQUESTED

Description of the Record Provide a complete and specific description of the record you are requesting, including (where applicable):	

- the type of record (e.g., sacramental entry, membership extract, officer record, welfare record, administrative document, financial record, etc.) - the full name(s) of the person(s) to whom the record relates - relevant dates or date ranges - congregation, District, Region, or Province involved - any reference numbers, file numbers, or identifiers - any additional information that will assist The Church in locating the record	
Reference Number (If Known)	
Date / Date Range	
Type of Access Requested <i>This section refers to how you wish to legally access the record, as recognised under PAIA.</i>	☐ Inspection of the record (You will view the record at the Provincial/District/Regional Head Office. No copy will be provided.) ☐ Paper copy of the record (A printed copy will be provided. Reproduction fees may apply.) ☐ Electronic copy of the record (A digital copy will be provided in an appropriate format.) ☐ Certified copy of the record (A stamped, certified paper copy will be provided.) ☐ Other (specify):
Right to Be Exercised or Protected Explain why the requested record is required for the exercise or protection of a right, as required by section 50(1)(a) of PAIA:	
Explain why the record is required	
Form of Access Requested <i>This section refers to the practical method by which the record will be delivered or made available.</i>	☐ Email (PDF or scanned copy) ☐ Printed hard copy (to be collected in person) ☐ Printed hard copy (to be posted) ☐ USB drive (for electronic files, audio, or video) ☐ Inspection at Provincial/District/Regional Head Office

	☐ Viewing of audio/video material (e.g., CCTV) on site
	☐ Other (specify):

FEES

- ☐ I request access to my own personal information (no request fee payable)
- ☐ I understand that access fees may apply

IDENTITY VERIFICATION

The Church must verify the identity of any requester seeking access to:

- personal information
- pastoral information
- sacramental information
- welfare information
- any confidential or sensitive record

Additional documentation may be required.

IMPORTANT NOTICE REGARDING SACRAMENTAL INFORMATION

Sacramental information (including Baptism, Sealing, Confirmation, sacramental history, transfers, and deceased records) forms part of the **permanent ecclesiastical archive** of The Old Apostolic Church.

Accordingly:

- Such information **cannot be deleted or destroyed under POPIA**.
- Access may be granted **only to the data subject** or an authorised representative.
- Third-party information will be redacted.
- Processing may be restricted **only for non-ecclesiastical purposes**, and only where such restriction does not interfere with sacramental, pastoral, governance, or constitutional obligations.

Signature: _____ Date: _____