



GOLAZO (PTY) LTD

(Registration Number: 2025/196160/07)

**Responsible for the management and operation of
the Nelson Mandela Marathon**

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|------|--------------------|--|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “Golazo” | Golazo (Pty) Ltd |
| 1.4 | “IO“ | Information Officer; |
| 1.5 | “Minister” | Minister of Justice and Correctional Services; |
| 1.6 | “NMM” | Nelson Mandela Marathon |
| 1.7 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 |
| 1.8 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.9 | “Regulator” | Information Regulator; and |
| 1.10 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

2.1. The purpose of this manual is to assist persons requesting access to information held by Golazo (Pty) Ltd (“Golazo”) in relation to the Nelson Mandela Marathon (“NMM”) and related activities by;

2.1.1. setting out all relevant contact details of the Information Officer to whom requests for information in terms of the Promotion of Access to Information Act No. 2 of 2000 (“PAIA”) must be made;

2.1.2. identifying what information will be made available without a person having to submit a formal request in terms of the Act;

- 2.1.3. identifying what information will only be made available to a person upon submission of a formal request in terms of the Act;
 - 2.1.4. identifying what categories of information will not be made available to a person requesting access on the grounds specified in Part 3, Chapter 4 of the Act;
 - 2.1.5. identifying what information held by Golazo may be made available in accordance with any other legislation; and
 - 2.1.6. setting out the manner in which access must be sought, including the information that must first be disclosed to Golazo.
- 2.2. Information requested from Golazo will be made available in English, electronically.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GOLAZO

3.1. Chief Information Officer

Name: Bruce Parker-Forsyth
Tel: +27 87 820 7223
Email: bruce.parkerforsyth@golazo.com

3.2. Deputy Information Officer

Name: David Alan Clarke
Tel: +27 87 820 7223
Email: david.clarke@golazo.com

3.3 Access to information general contacts

Email: info@nelsonmandelamarathon.com

3.4 National Office

Physical Address: 65 Ave De Mist, Rondebosch, Cape Town, South Africa

Telephone: +27 87 820 7223

Email: info@nelsonmandelamarathon.com

Website: www.nelsonmandelamarathon.com

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;

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.*

- 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;
- 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;

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.

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.

- 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;
 - 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

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

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.”

5. CATEGORIES OF RECORDS OF THE NELSON MANDELA MARATHON WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. The following information held by, and relating to, NMM is publicly available and may be downloaded from the website without a person having to submit a formal request in terms of the Act:

Category of records	Types of the Record	Available on Website
Public Affairs / Website	<ul style="list-style-type: none"> • Race information and entry information • Race routes, event schedules and participant guides • Press releases, announcements and media statements • Official event rules, participation terms, limitation of liability and indemnity provisions • NMM Website Privacy Policy • NMM Website Terms and Conditions • Publicly released information relating to the Nelson Mandela Marathon Global Running Series and related events 	X

5.2. Categories of information that will not be made available on the grounds specified in Part 3, Chapter 4 of the PAIA.

5.2.1. The disclosure of the following information held by, and relating to, NMM will be refused on the grounds stipulated in Part 3, Chapter 4 of the Act.

5.2.1.1. Non-aggregated and/or personal participant information (save where such information is already publicly available and/or a participant has expressly consented to the disclosure of his/her information);

5.2.1.2. Personal information pertaining to NMM's directors, shareholders, employees, contractors, sub-contractors, suppliers, partners, sponsors, service providers, affiliates and ambassadors (save where such information is already publicly available and/or the individual has expressly consented to the disclosure of his/her information);

5.2.1.3. Documents and/or records containing the trade secrets of NMM or any third party;

5.2.1.4. Documents and/or records outlining the commercial and/or strategic plans of NMM or any third party;

5.2.1.5. Information deemed to be privileged within the context of legal proceedings (save where such privilege has been waived).

6. DESCRIPTION OF THE RECORDS OF GOLAZO WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Company name	Companies Act 71 of 2008
Registration number	Companies Act 71 of 2008
List of shareholders	Companies Act 71 of 2008
List of directors	Companies Act 71 of 2008

Registered business address	Companies Act 71 of 2008
Registered physical address	Companies Act 71 of 2008
VAT number	Value-Added Tax Act 89 of 1991
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing Personal Information

- 7.1.1 Golazo, in relation to the NMM, processes personal information for purposes including, but not limited to:
- 7.1.2 event registration and participation management;
 - 7.1.3 participant identification and verification;
 - 7.1.4 race timing, results processing and publication of official event results;
 - 7.1.5 payment processing and financial administration;
 - 7.1.6 communication with participants, partners, suppliers and stakeholders;
 - 7.1.7 accreditation, safety and security management;
 - 7.1.8 marketing, media, promotional and public relations activities;
 - 7.1.9 compliance with legal and regulatory obligations;
 - 7.1.10 sponsorship and partnership administration;
 - 7.1.11 employment and human resource management;
 - 7.1.12 website administration and analytics; and
 - 7.1.13 the general administration, organisation and operation of the Nelson Mandela Marathon and related events.

7.2 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
Participants / Entrants	Name, surname, date of birth, nationality, identity/passport number, gender, contact details, emergency contact information, race results, medical information voluntarily disclosed, photographs and video recordings

Categories of Data Subjects	Personal Information that may be processed
Sponsors / Partners	Names, contact details, registration numbers, VAT numbers, and contractual information
Service Providers/ Suppliers	Names, registration numbers, VAT numbers, addresses, banking details, contractual information and trade secrets
Employees / Contractors	Address, qualifications, gender, race, employment records, remuneration information and banking details
Website Users	IP addresses, cookies, online identifiers, browser information and website usage data
Media Representatives / Stakeholders	Names, contact details, organisation details and accreditation information

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity numbers and names, for verification purposes	Government authorities and regulatory bodies
Participant information, for race administration	Timing service providers, accreditation providers and event operations teams
Payment and banking information	Payment processors, banks and financial institutions
Medical or emergency information	Emergency medical services and authorised healthcare providers
Accreditation and security information	Security providers, law enforcement agencies and venue authorities
Website usage and analytics data	Website hosting providers, analytics providers and IT service providers

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Names and photographs for media and promotional purposes	Media houses, broadcasters, sponsors and marketing agencies
Qualifications and employment records	Verification agencies and professional bodies

7.4 Planned transborder flows of personal information

7.4.1 Golazo may transfer and/or store certain personal information outside the Republic of South Africa where necessary for the operation, administration and promotion of the Nelson Mandela Marathon and related activities. This may include:

- 7.4.1.1 cloud storage and hosting services located outside South Africa;
- 7.4.1.2 international event management and registration platforms;
- 7.4.1.3 communication and marketing platforms;
- 7.4.1.4 timing, analytics and customer relationship management systems; and
- 7.4.1.5 collaboration with international partners, affiliates and service providers.

7.4.2 Personal information may accordingly be transferred to countries including Belgium and other jurisdictions in which Golazo Group entities, technology providers or service providers operate.

7.4.3 Any such transborder transfer of personal information shall be undertaken in accordance with applicable data protection laws, including POPIA, and subject to appropriate safeguards being implemented.

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

7.5.1 Golazo implements reasonable technical and organisational measures to protect personal information against loss, misuse, unauthorised access, disclosure, alteration or destruction. Such measures may include:

- 7.5.1.1 secure cloud-based storage systems;

- 7.5.1.2 password protection and user access controls;
- 7.5.1.3 firewalls and network security measures;
- 7.5.1.4 data encryption technologies;
- 7.5.1.5 anti-virus and anti-malware solutions;
- 7.5.1.6 secure payment processing systems;
- 7.5.1.7 confidentiality undertakings with employees and service providers;
- 7.5.1.8 regular software updates and system monitoring; and
- 7.5.1.9 internal policies and procedures relating to information security and data protection.

8. AVAILABILITY OF THE MANUAL

8.1 A copy of the Manual is available

- 8.1.1 on www.nelsonmandelamarathon.com
- 8.1.2 Head office of Golazo (PTY) LTD for public inspection during normal business hours;
- 8.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 8.1.4 to the Information Regulator upon request.

8.2 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.

9. UPDATING OF THE MANUAL

The head of Golazo will on a regular basis update this manual.

Issued by

Bruce Parker-Forsyth
Chief Information Officer
21 May 2026