

PROMOTION OF ACCESS TO INFORMATION MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (AS AMENDED) AND THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

FOR FIREBLADE AVIATION PROPRIETARY LIMITED

DATE	VERSION
2022	1
October 2025	2

1. OVERVIEW

Fireblade Aviation Proprietary Limited (“**Fireblade**”, “**Us**” or “**We**”) are a company located in South Africa and conducts business as a provider of aviation related activities.

2. DEFINITIONS

For purposes of the Manual –

- 2.1 **“Data Subjects”** means data subjects as defined in POPIA;
- 2.2 **“Information Officer”** means the registered Information Officer of Fireblade referred to in 5;
- 2.3 **“Manual”** means this PAIA Manual and all annexures hereto from time to time;
- 2.4 **“PAIA”** means the Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 2.5 **“Personal Information”** means Personal Information as defined in POPIA;
- 2.6 **“POPIA”** means the Protection of Personal Information Act No.4 of 2013 and all regulations promulgated thereunder from time to time;
- 2.7 **“Processing”** shall have the meaning as set out in POPIA, and **“Processed”** shall have a corresponding meaning;
- 2.8 **“Record”** means any recorded information of Fireblade in whatever form or medium that is in the possession or under the control of Fireblade and whether created by Fireblade or any other party;
- 2.9 **“Regulator”** means the South African Information Regulator;
- 2.10 **“RSA”** means the Republic of South Africa;
- 2.11 **“Requestor”** means any person, including a public body or official thereof, making a Request for Access to a Record of Fireblade or a person acting on behalf of such person;
- 2.12 **“Request for Access”** means a Request for Access to a Record in terms of section 50 of PAIA.

3. OBJECT OF PAIA AND POPIA

- 3.1 The object of PAIA is to give effect to the constitutional right of access to any information held by another person and that is required for the exercise or protection of any rights. PAIA requires organisations to compile a Manual as a guide to Requesters of Information. The manual also serves to indicate the types of Records held by Fireblade and the availability of such records from Fireblade.
- 3.2 The object of POPIA includes promoting the protection of Personal Information Processed by public and private bodies and introducing certain conditions to establish minimum requirements for the Processing of Personal Information.

4. PURPOSE OF THE MANUAL

The purpose of the Manual is to –

- 4.1 facilitate Requests for Access to Records of Fireblade as provided for in PAIA, including-
 - 4.1.1 to check the categories of Records held by Fireblade which are available without a person having to submit a Request for Access;
 - 4.1.2 to have a sufficient understanding of how to make a Request for Access, by providing a description of the subjects on which Fireblade holds Records and the categories of Records held on each subject;
 - 4.1.3 to know the Records of Fireblade which are available in accordance with any other legislation;
 - 4.1.4 to access the details of the Information Officer who will assist the public with Requests for Access;
 - 4.1.5 to know the description of the Guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 4.2 to set out in respect of POPIA the Processing of Personal Information –
 - 4.2.1 Data Subjects and Personal Information Processed by Fireblade;
 - 4.2.2 the purpose of Processing of the Personal Information;

- 4.2.3 the recipients of the Personal Information;
- 4.2.4 if Fireblade has planned to transfer or Process the Personal Information outside of RSA and the recipients to whom the Personal Information may be supplied; and
- 4.2.5 whether Fireblade has appropriate security measures to ensure the confidentiality, integrity, and availability of the Personal Information.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF FIREBLADE

Information Officer: Rukayya Naicker

E-mail: information.officer@firebladeaviation.com

Deputy Information Officer: Marchele Chaman

E-mail: information.officer@firebladeaviation.com

National or Head Office

Postal Address: P O Box 7181

Bonaero Park, Gauteng, 1622

Physical Address: Denel Precinct, Astro Park, Atlas Road

Kempton Park, Gauteng, 1619

Telephone: 010 595 3920

Website: <https://www.firebladeaviation.com/>

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

- 6.1 The Information Regulator has, in terms of section 10(1) of PAIA updated and made available the revised guide on how to use PAIA (“Guide”)
- 6.2 Members of the public can inspect or make copies of the Guide from the offices of Fireblade, and the office of the Information Regulator, during normal working hours.
- 6.3 The Guide can be obtained –

- 6.3.1 upon request from the Information Officer; and
- 6.3.2 from the website of the Information Regulator:
(<https://inforegulator.org.za/paia-guidelines/>).

6.4 A copy of the Guide is also available at our offices in the following official languages; for public inspection during normal office hours –

- [English](#)
- [Zulu](#)

6.5 You can access the Guide in the other languages [here](#).

6.6 The Guide contains the description of –

- 6.6.1 the objects of PAIA and POPIA;
- 6.6.2 the manner and form of a Request for Access to a Record;
- 6.6.3 the assistance available from the Information Officer and Regulator in terms of PAIA and POPIA;
- 6.6.4 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;
- 6.6.5 the provisions of section 51 of PAIA requiring a private body to compile a manual, and how to obtain access to a manual;
- 6.6.6 the provisions of section 52 of PAIA providing for the voluntary disclosure of categories of records by a private body;
- 6.6.7 the notices in terms of section 54 of PAIA regarding fees to be paid in relation to Requests for Access; and
- 6.6.8 the regulations made in terms of section 92 of PAIA.

7. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF PAIA

7.1 Records of public nature, typically those disclosed on [Fireblade's website](#) and in its various reports, may be accessed without the need to submit a formal request in terms of this Manual.

7.2 Other non-confidential records, such as statutory records maintained in CIPC and the Master's Office, may be accessed without the need to submit a formal request in terms of this Manual; however, an appointment to view such records will still have to be made with the Information Officer.

7.3 The following categories of information are automatically available for inspection, purchase of photocopying:

- 7.3.1 Brochures
- 7.3.2 Press releases
- 7.3.3 Publications
- 7.3.4 Various marketing and promotional material.

8. DESCRIPTION OF THE RECORDS OF FIREBLADE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Where applicable, certain Records held by Fireblade are available in terms of different legislation (other than PAIA). The specific records which are available in terms of such legislation are set out below and these records are not necessarily available to Requestors in terms of such legislation are set out below and these records are not necessarily available to Requestors in terms of PAIA. This legislation includes (but is not limited to):

- Air Services Licensing Act 1990
- International Air Services Licensing 1990
- Civil Aviation Act 2009
- Administration of Estates Act 66 of 1965
- National Key Points Act 1980
- Arbitration Act 42 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Constitution of South Africa Act 108 of 1996

- Criminal Procedure Act 51 of 1977
- Customs and Excise Act 91 of 1964
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Environment Conservation Act 73 of 1989
- Estate Agency Affairs Act 112 of 1976
- Explosives Act 13 of 1956
- Hazardous Substances Act 15 of 1973
- Income Tax Act 58 of 1962
- Insolvency Act No 24 of 1936
- Labour Relations Act 66 of 1995
- Mine Health and Safety Act 29 of 1996
- National Credit Act 34 of 2005
- National Dust Control Regulations, 2013 under the National Environmental Management: Air Quality Act 39 of 2004
- National Environmental Management Act 107 of 1998
- National Environmental Management: Waste Act 59 of 2008
- National Water Act 36 of 1999
- Occupational Diseases in Mines and Works Act 78 of 1973
- Occupational Health and Safety Act 85 of 1993
- Pensions Funds Act 24 of 1956
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Prevention of Organised Crime Act 14 of 1998
- Protected Disclosure Act 26 of 2000
- Promotion of Access of Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Stock Exchanges Control Act No 1 of 1985
- Stock Exchanges Control Amendment Act 54 of 1995 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- Tax Administration Act 28 of 2011
- Trademarks Act 194 of 1993

- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

9. DESCRIPTION OF THE SUBJECTS ON WHICH FIREBLADE HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects	Description of Records
Corporate	<ul style="list-style-type: none"> ▪ Records relating to the appointment of directors, auditors, and other officers ▪ Records relating to the Incorporation of Fireblade ▪ Statutory compliance documents ▪ Minutes and resolutions
Human Resources	<ul style="list-style-type: none"> ▪ Personnel documents and records ▪ Employment contracts ▪ Medical aid records ▪ Pension Fund records ▪ Disciplinary records ▪ Salary records ▪ Disciplinary code and/or procedures ▪ Leave records ▪ Training records ▪ Training manuals ▪ Address lists ▪ Internal telephone lists ▪ Remuneration and benefits records
Finance	<ul style="list-style-type: none"> ▪ Annual financial statements and management accounts ▪ Bank statements ▪ Orders, quotes and invoices ▪ Asset Register ▪ Insurance Information

Subjects	Description of Records
Tax	<ul style="list-style-type: none"> ▪ Pay-as-you-earn (PAYE) records ▪ Income tax returns ▪ Value added tax records ▪ Skills development levies records ▪ Unemployment Insurance Fund records
Risk & Compliance	<ul style="list-style-type: none"> ▪ Contracts ▪ Testing certificates ▪ Policies and Procedures ▪ Risk assessments ▪ Compliance records
Operational and Maintenance	<ul style="list-style-type: none"> ▪ Aircraft related records ▪ Flight plans ▪ Requests for Proposals ▪ Operation reviews ▪ Client records and identification documents ▪ Vendor records ▪ Contracts ▪ Internal and external correspondence ▪ Information technology ▪ Strategic plans ▪ Marketing materials ▪ Visitor records ▪ Contact records

10. PROCESSING OF PERSONAL INFORMATION

The full Privacy Notice of Fireblade is available at www.firebladeaviation.com which sets out –

- 10.1 the Purpose for which Fireblade Processes Personal Information;
- 10.2 a Description of the categories of Data Subjects, Personal Information, categories of Personal Information relating thereto and categories of Recipients;

- 10.3 planned transborder flows of Personal Information;
- 10.4 general description of Information Security Measures to be implemented by Fireblade to ensure the confidentiality, integrity and availability of the information.

11. HOW TO REQUEST ACCESS TO A RECORD

- 11.1 We have authorised and designated our Information Office to deal with all matters relating to and our obligations under PAIA and POPIA.
- 11.2 A Requester must comply with all procedural requirements contained in PAIA relating to a Request for Access to a Record.
- 11.3 To request a Record, the Requestor must complete the prescribed form, (Form 02 - Request for Access to Record) [Regulation 7].
- 11.4 The Request must be sent to the Information Officer at the addresses in paragraph 5.
- 11.5 The Requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa.
- 11.6 PAIA makes provision for certain grounds upon which a Request for Access to Information must be refused. On this basis, the Information Officer will decide whether to grant a request to information.

12. PRESCRIBED FEES

- 12.1 Depending on your request, we may be entitled to charge you certain fees. The fees which may be payable are prescribed and available on the Information Regulator website.
- 12.2 Before attending to your request, we will advise you of the total fees you will need to pay.

13. POPIA: OBJECTION, CORRECTION OR DELETION REQUESTS

- 13.1 Section 11(3) of POPIA provides that a Data Subject may object, at any time, to the processing of Personal Information on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.

13.2 If you wish to object to the processing of any of your Personal Information you must complete **FORM 1 (OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017** [Regulation 2(1)] and submit it to the Information Officer at the postal or physical address, or electronic mail address set out in paragraph 5. (Form 1 available here:

<https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFO.pdf>.

13.3 You may also request the correction or deletion of Your Personal that you believe is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or was obtained unlawfully; or You may request that we destroy or delete a record of Your Personal Information that We are no longer authorised to retain. Such request must be submitted using **FORM 2 “REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017** [Regulation 3(2), and submit it to the Information Officer at the postal or physical address, or electronic mail address set out in paragraph 5 Form 2 is available here:

<https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFO-OR.pdf>

14. ALL REQUESTS

14.1 The Requestor must provide sufficient detail to enable the Information Officer to identify the Record(s) requested and the Requestor.

14.2 If the request is made on behalf of another person, the Requestor must submit proof of the capacity in which the Requestor is making the request, to the reasonable satisfaction of the Information Officer.

14.3 PAIA makes provision for certain grounds upon which a Request for Access to information must be refused. On this basis, the Information Officer will make a decision whether to grant a request for access to information.

15. INFORMATION OR RECORDS NOT FOUND

15.1 If all reasonable steps have been taken to find a Record, and such a Record cannot be found or do not exist, the Information Officer will notify the Requestor, by way of an affidavit, that it is not possible to give access to the requested record.

16. UPDATING OF THIS MANUAL

The Manual will be reviewed and updated, if necessary, on a periodic basis but no less than one each year.

Issued by

INFORMATION OFFICER

