

Promotion of Access to Information (PAIA) Manual

CASH CONNECT MANAGEMENT SOLUTIONS (PROPRIETARY) LIMITED

REGISTRATION NUMBER: 2006/010530/07

(hereinafter referred to as "the Company")

Manual prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("the Act") for the Company and its material subsidiaries ("the Connect Group").

List of material subsidiaries:

- Cash Connect Capital (Pty) Ltd
- Cash Connect Rentals (Pty) Ltd
- Deposit Manager (Pty) Ltd
- Main Street 1723 (Pty) Ltd

1. Introduction

The Act, together with all relevant legislation, provides for the right of access to information held by public and private bodies when such information is requested for the exercise of protection of any rights.

This manual has been compiled to inform and assist any potential requesters of the procedural and other requirements which a request for information must meet as prescribed by the Act.

2. Overview of the Connect Group

The Connect Group through its several subsidiaries and divisions conduct the business of cash management and anything allied thereto, short term business lending, card payment acceptance solutions as well as the sale of various value-added service products in the telecommunications industry.

3. Information required in terms of section 51(1)(a) of the Act

Cash Connect Management Solutions (Pty) Ltd

Registration number: 2006/010530/07

Registered address:	Innesfree View 4 Harris Road Cnr Katherine & Harris Rd Sandown Ext 20 Sandton Gauteng 2196
Physical address:	Innesfree View 4 Harris Road Cnr Katherine & Harris Rd Sandown Ext 20 Sandton Gauteng 2196
Postal address:	PO Box 204 Wendywood

	Gauteng 2144
Telephone number:	011 010 4300
Fax number:	N/a
Chief Executive Officer:	Steven Heilbron
Public Information Officer:	Steven Heilbron

4. Section 10 Guide

The Act grants a requestor access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of The Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Physical Address: PAIA Unit – The Research and Development Department,
Braampark Forum 3, 33 Hoofd Street, Braamfontein

Postal Address: Private Bag 2700, Houghton 2041

Telephone Number: +27-11-877 3600

Facsimile Number: +27-11-403 0625

Website: www.sahrc.org.za

5. Applicable Legislation

Records are kept in terms of the following legislation:

- 5.1. Basic Conditions of Employment Act 75 of 1997
- 5.2. Broad-Based Black Economic Empowerment Act 53 of 2003
- 5.3. Companies Act 71 of 2008
- 5.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 5.5. Competition Act 89 of 1998
- 5.6. Consumer Protection Act 68 of 2008
- 5.7. Copyright Act 98 of 1978
- 5.8. Criminal Procedure Act 51 of 1977
- 5.9. Customs and Excise Act 91 of 1964
- 5.10. Customs Duty Act 30 of 2014
- 5.11. Debt Collectors Act 114 of 1998
- 5.12. Domicile Act 3 of 1992
- 5.13. Employment Equity Act 55 of 1998
- 5.14. Electronic Communications and Transactions Act 25 of 2002
- 5.15. Electronic Communications Act, 36 of 2005
- 5.16. Financial Advisory and Intermediary Services Act 37 of 2002
- 5.17. Financial Intelligence Centre Act 38 of 2001
- 5.18. Financial Markets Act 19 of 2012
- 5.19. Johannesburg Stock Exchange listing requirements

- 5.20. Income Tax Act 58 of 1962
- 5.21. Intellectual Property Laws Amendments Act 38 of 1997
- 5.22. Labour Relations Act 66 of 1995
- 5.23. Merchandise Marks Act 17 of 1941
- 5.24. National Credit Act 34 of 2005
- 5.25. National Payment System Act 78 of 1998
- 5.26. Occupational Health and Safety Act 85 of 1993
- 5.27. Pension Fund Act 24 of 1956
- 5.28. Prevention of Organised Crime Act 121 of 1998
- 5.29. Prevention and Combating of Corrupt Activities Act 12 of 2004
- 5.30. Protection of Personal Information Act 4 of 2013
- 5.31. Promotion of Access to Information Act 2 of 2000
- 5.32. Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- 5.33. Protected Disclosures Act 26 of 2000
- 5.34. Skill Development Levies Act 9 of 1999
- 5.35. Skills Development Act 97 of 1998
- 5.36. Tax Administration Act 28 of 2011
- 5.37. Tax Administration Laws Amendment Act 44 of 2014
- 5.38. Trade Marks Act 194 of 1993
- 5.39. Unemployment Insurance Act 63 of 2001
- 5.40. Unemployment Insurance Contributions Act 4 of 2002
- 5.41. Value Added Tax Act 89 of 1991
- 5.42. Such other legislation as may from time to time be applicable

6. Categories of Data Subjects and the Information the Connect Group may Collect

6.1. Employees

- 6.1.1. Name and contact details
- 6.1.2. Identity number and identity documents including passports
- 6.1.3. Employment history and references
- 6.1.4. Banking and financial details
- 6.1.5. Details of payments to third parties (deductions from salary)
- 6.1.6. Employment contracts
- 6.1.7. Employment equity plans
- 6.1.8. Medical aid records
- 6.1.9. Pension Fund records
- 6.1.10. Remuneration/salary records
- 6.1.11. Performance appraisals
- 6.1.12. Disciplinary records
- 6.1.13. Leave records
- 6.1.14. Training records

6.2. Consumers and prospective consumers

- 6.2.1. Postal and/or street address
- 6.2.2. title and name
- 6.2.3. contact numbers and/or e-mail address
- 6.2.4. ethnic group
- 6.2.5. employment history
- 6.2.6. age
- 6.2.7. gender
- 6.2.8. marital status

- 6.2.9. nationality
- 6.2.10. language
- 6.2.11. financial information
- 6.2.12. identity or passport number
- 6.2.13. browsing habits and click patterns on Connect Group websites.

6.3. Vendors /suppliers /other businesses

- 6.3.1. Name and contact details
- 6.3.2. Identity and/or company information and directors' information
- 6.3.3. Banking and financial information
- 6.3.4. Information about products or services
- 6.3.5. Other information not specified, reasonably required to be processed for business operations

7. Purpose of Processing Personal Information for each Category of Data Subject

7.1. For employees

- 7.1.1. Verification of applicant employees' information during recruitment process
- 7.1.2. General matters relating to employee's pension, medical aid, payroll, disciplinary action, training
- 7.1.3. Any other reasonably required purpose relating to the employment or possible employment relationship
- 7.1.4. Communicating with employees by email, SMS, letter, telephone or in any other way
- 7.1.5. Performing other administrative and operational purposes including the testing of systems
- 7.1.6. Complying with the Connect Group's regulatory and other obligations
- 7.1.7. Any other reasonably required purpose relating to the Connect Group business
- 7.1.8. Verifying and updating information

7.2. For consumers and prospective consumers

- 7.2.1. Performing duties in terms of any agreement with consumers
- 7.2.2. Make, or assist in making, credit decisions about consumers
- 7.2.3. Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with the Connect Group
- 7.2.4. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about the Connect Group's products and services, unless consumers indicate otherwise
- 7.2.5. To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers
- 7.2.6. Carrying out market research, business and statistical analysis
- 7.2.7. Performing other administrative and operational purposes including the testing of systems
- 7.2.8. Recovering any debt consumers may owe the Connect Group
- 7.2.9. Complying with the Connect Group's regulatory and other obligations
- 7.2.10. Any other reasonably required purpose relating to the Connect Group business
- 7.2.11. Verifying and updating information
- 7.2.12. Pre-scoring
- 7.2.13. Direct Marketing

7.3. For vendors /suppliers /other businesses

- 7.3.1. Verifying information and performing checks;
- 7.3.2. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- 7.3.3. Payment of invoices;
- 7.3.4. Complying with the Connect Group's regulatory and other obligations; and
- 7.3.5. Any other reasonably required purpose relating to the Connect Group's business

8. Recipients to Whom the Personal Information may be Supplied

- 8.1. Any firm, organisation or person that the Connect Group uses to collect payments and recover debts or to provide a service on its behalf;
- 8.2. Any firm, organisation or person that/who provides the Connect Group with products or services;
- 8.3. Any person who the Connect Group has reason to believe to be a data subject's/consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues;
- 8.4. Any payment system the Connect Group uses;
- 8.5. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Connect Group has a duty to share information;
- 8.6. Credit bureau;
- 8.7. Third parties to whom payments are made on behalf of employees;
- 8.8. Financial institutions from whom payments are received on behalf of data subjects;
- 8.9. Any other operator not specified;
- 8.10. Employees, contractors and temporary staff; and
- 8.11. Agents.

9. Record Classification

The Connect Group has implemented a system in accordance with which all of the entity's information has been classified into categories and access to such information has been established in respect of the classification of the information:

Classification No.	Classification	Access
1	Public Access Document	May be Disclosed
2	Request after commencement of criminal or civil proceedings [s7]	May not be Disclosed
3	Subject to copyright	May be Disclosed
4	Personal information that belongs to the requestor of that information [s61]	Limited Disclosure
5	Unreasonable disclosure of personal information of natural person [s63(1)]	May not be Disclosed
6	Likely to harm the commercial or financial interests of third party [s64(a)(b)]	May not be Disclosed
7	Likely to harm the Close Corporation or third party in contract or other negotiations [s64(c)]	May not be Disclosed
8	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]	May not be Disclosed

9	Likely to compromise the safety of individuals or protection of property [s66]	May not be Disclosed
10	Legally privileged document [s67]	May not be Disclosed
11	Environmental testing/investigation which reveals public safety/environmental risks [s64(2); s68(2)]	May not be Refused
12	Commercial information of Private Body [s68]	May not be Disclosed
13	Likely to prejudice research and development information of the Close Corporation or a third party [s69]	May not be Disclosed
14	Disclosure in public interest [s70]	May not be Refused

10. Schedule of Records

The Connect Group has the following records which are not automatically available to requesters as determined in the previous paragraph:

- 10.1. Employee Records
- 10.2. Employment Contracts
- 10.3. Personnel Guidelines
- 10.4. Policies and Procedures
- 10.5. Financial Information
- 10.6. Public Corporate Records
- 10.7. Client Information
- 10.8. General Contract Documentation
- 10.9. Marketing Material
- 10.10. Close Corporation Guidelines
- 10.11. Policies and Procedures
- 10.12. Trademarks
- 10.13. Statutory Records
- 10.14. General Operational Information
- 10.15. Internal and external correspondence

11. Procedure for Request for Access (Sections 53 to 57 and 60 of the Act)

To facilitate the processing of your request, kindly:

- 11.1. Use the prescribed form, available on the website of the South African Human Rights Commission at www.sahrc.org.za.
- 11.2. Address your request to the Information Officer.
- 11.3. Provide sufficient details to enable the Company to identify:
 - 11.3.1. The record(s) requested
 - 11.3.2. The requester's details (and if an agent is lodging the request, proof of capacity)
 - 11.3.3. The form of access required
 - 11.3.3.1. The postal address or fax number of the requester in the Republic

- 11.3.3.2. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof
 - 11.3.4. The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right
- 11.4. The Information Officer will process the request and notify the requester of its decision whether or not the request has been granted. Should the request be granted, the notice will state the access fees (if any) that are payable and of the different procedures that must be followed until the request is finalised.
- 11.5. Should the request be refused, the notice will state adequate reasons for the refusal.
- 11.6. If the Company has searched for a record and believes that it either does not exist or cannot be found, the Company will notify the requester by way of an affidavit or affirmation that it is not possible to provide access to the requested record due to its inability to locate it. The Company will also provide the requester with details on the steps that were taken to try to locate the record.

12. Prescribed Fees

The following applies to requests (other than personal requests):

- 12.1. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- 12.2. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- 12.3. A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit.
- 12.4. Records may be withheld until the fees have been paid.
- 12.5. The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

13. Grounds for Refusal of Access to Records (Sections 63 to 69 of the Act and the Protection of Personal Information Act No. 4 of 2013)

Access to certain records may be or must be denied on the grounds set out in the Act. This includes:

- 13.1. Mandatory protection of privacy of a third party who is a natural person;
- 13.2. Mandatory protection of commercial information of third party;
- 13.3. Mandatory protection of certain confidential information of third party;
- 13.4. Mandatory protection of safety of individuals, and protection of property;
- 13.5. Mandatory protection of records privileged from production in legal proceedings;
- 13.6. Commercial information of private body;
- 13.7. Mandatory protection of research information of third party, and protection of research information of privacy body.

14. Availability of the PAIA Manual

- 14.1. Copies of this manual are available for inspection, free of charge, at the registered offices of the Company. Copies are also available from the South African Human Rights Commission and on our website (www.connected.co.za)