

## Promotion of Access to Information Act (“PAIA”) Manual

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# Manual in terms of the Promotion of Access to Information Act No. 2 of 2000 and the Protection of Personal Information Act No. 4 of 2013

## 1 Introduction

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Netcash (Pty) Ltd operates as the payment services provider and is registered as a for-profit South African company in terms of the Companies Act No. 71 of 2008. Netcash (Pty) Ltd is a Private Body for the purposes of the Promotion of Access to Information Act No. 2 of 2000 (PAIA) and the Protection of Personal Information Act No. 4 of 2013 (POPIA) and accordingly has produced this Manual in compliance of both the PAIA and the POPIA.

## 2 Contact Details<sup>1</sup>

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### 2.1 General contact details:

- ☒ Postal address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- ☒ Physical address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- ☒ E-mail address: [legal@netcash.co.za](mailto:legal@netcash.co.za)
- ☒ Telephone number: 0861338338
- ☒ Internet site address: [www.netcash.co.za](http://www.netcash.co.za)

### 2.2 Contact details of the Information Officer:

- ☒ Name of Information Officer: Lisanne Pienaar-De Gouveia
- ☒ Role: Head of Risk, Legal and Compliance
- ☒ Postal address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- ☒ Physical address: Netcash Square, 64 Parklands Main Road, Parklands, Cape Town, 7441
- ☒ E-mail address: [informationofficer@netcash.co.za](mailto:informationofficer@netcash.co.za) and [legal@netcash.co.za](mailto:legal@netcash.co.za)
- ☒ Telephone number: 0215218657
- ☒ Internet site address: [www.netcash.co.za](http://www.netcash.co.za)

## 3 Corporate Structure

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Netcash (Pty) Ltd is 95% owned by Netcash Corporate (Pty) Ltd, Registration nr. 2000/002001/07 and 5% owned by MyNetcash (Pty) Ltd, Registration nr. 2010/001959/07

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<sup>1</sup> In terms of s51(1)(a) of the Promotion of Access to Information Act No. 2 of 2000.

## 4 PAIA

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### 4.1 The Promotion of Access to Information Act<sup>2</sup>

The PAIA grants a requester 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 PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in Sections 6 and 7 of the PAIA.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission (SAHRC), which will contain information for the purposes of exercising Constitutional Rights and is available at <https://www.sahrc.org.za/index.php/understanding-paia>.

The Guide may be replaced by the Information Regulator which assumes the duties of the SAHRC from the 01<sup>st</sup> July 2021. It will be available at <https://justice.gov.za/inforeg/docs1-gn.html>

#### The contact details of the South African Information Regulator are:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P. O. Box 31533, Braamfontein, Johannesburg, 2001

General enquiries email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

Complaints email: [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za) - should your PAIA request be denied or there is no response from a public or private bodies for access to records you may use this email address to lodge a complaint. (Complete PAIA form 5).

[POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za) – should you feel that your personal information has been violated, you may use this e-mail address to lodge a complaint. (Complete POPIA form 5).

Website: <https://justice.gov.za/inforeg/>

### 4.2 Availability of this Manual

This Manual is made available in terms of Regulation R.187 of 15 February 2002 to the PAIA, as amended in 2021 and Section 4 of the Regulations to the POPIA.

This Manual is also available on the website of Netcash (Pty) Ltd: [www.netcash.co.za](http://www.netcash.co.za)

This Manual is further available at the offices of Netcash (Pty) Ltd for inspection during normal business hours. Copies of the Manual can be obtained from the Information Officer.

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<sup>2</sup> In terms of s51(1)(b) of the Promotion of Access to Information Act No. 2 of 2000. This must be reproduced as set out in this section.

#### **4.3 Applicable legislation<sup>3</sup>**

The list of applicable legislation that affects Netcash (Pty) Ltd can be found in appendix 7.1.

#### **4.4 Schedule of Records<sup>4</sup>**

The schedule of records that affects Netcash (Pty) Ltd can be found in appendix 7.2.

#### **4.5 Procedure for a request for access in terms of the PAIA**

A Requester must comply with all the procedural requirements as contained in Section 53 of the PAIA relating to a Request for Access to a Record.

A Requester must complete the prescribed Request for Access form attached as Form 1 and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in above.

**The Request for Access form must be specific enough to enable the Information Officer to identify the following:**

- a) The Record/s requested;
- b) The identity of the Requester;
- c) The form of access that is required, if the request is granted;
- d) The postal address or email address of the Requester; and
- e) The right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.

Netcash (Pty) Ltd will process the Request for Access within 30 (thirty) days of receipt of the Request for Access, unless the Request for Access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of the PAIA.

If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requester must state the manner and the particulars so required.

If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer and complete Form 3.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

Netcash (Pty) Ltd will voluntarily provide the requested Records to a request for personal information by the data subject (as defined in section 1 of the POPIA). The prescribed fee for reproduction of the Record requested by a Personal Requester will be charged in accordance with section 54(6) of the PAIA.

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<sup>3</sup> In terms of s51(1)(c) of the Promotion of Access to Information Act No. 2 of 2000.

<sup>4</sup> In terms of s51(1)(d) of the Promotion of Access to Information Act No. 2 of 2000.



#### **4.6 Fees payable**

The Act provides for two types of fees, namely:

- a) A request fee, payable by a Requester (other than a request by the Data Subject) and
- b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postage costs.

When the Request for Access is received by the Information Officer, the Information Officer will require the Requester, other than a Data Subject, to pay the prescribed request fee (if any), before further processing of the Request for Access.

If the search for a Record requires more than the prescribed hours for this purpose, the Information Officer shall notify the Requester to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.

The Information Officer shall withhold a Record until the Requester has paid the fees set out in Appendix 2.

A Requester whose Request for Access to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure including making arrangements to make it available in a requested form provided for in section 29(2) (a) and (b)(i) and (ii) of the PAIA.

If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer must repay the deposit to the Requester.

#### **4.7 Grounds for Refusal of Access to Records in terms of the PAIA**

The following are the grounds on which Netcash (Pty) Ltd may, subject to the exceptions contained in Chapter 4 of the PAIA, refuse a Request for Access in accordance with Chapter 4 of the PAIA:

1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
2. Mandatory protection of the commercial information of a third party, if the Records contain:
  - a) Trade secrets of that third party;
  - b) Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
  - c) Information disclosed in confidence by a third party to Netcash (Pty) Ltd, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition
3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
4. Mandatory protection of the safety of individuals and the protection of property;
5. Mandatory protection of Records that would be regarded as privileged in legal proceedings;
6. Protection of the commercial information of Netcash (Pty) Ltd, which may include:
  - a) Trade secrets;

- b) Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Netcash (Pty) Ltd;
  - c) Information which, if disclosed, could put Netcash (Pty) Ltd at a disadvantage in contractual or other negotiations or prejudice Netcash (Pty) Ltd in commercial competition; and/or
  - d) Computer programs which are owned by Netcash (Pty) Ltd, and which are protected by copyright and intellectual property laws.
- 7. Research information of Netcash (Pty) Ltd, or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
  - 8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

#### **4.8 Decision to grant access to records**

Netcash (Pty) Ltd, shall decide whether to grant or decline the Request for Access within 30 (thirty) days of receipt of the Request for Access and must give notice to the Requester with reasons (if required) to that effect.

The period referred to above may be extended for a further period of not more than 30 (thirty) days if the Request for Access is for a large number of Records or the Request for Access requires a search for Records held at another office of Netcash (Pty) Ltd, and the Records cannot reasonably be obtained within the original 30 (thirty) day period.

Netcash (Pty) Ltd, will notify the Requester in writing should an extension of time as be required.

#### **4.9 Remedies available to requestor if the PAIA request is refused**

##### **4.9.1 Internal remedies**

Netcash (Pty) Ltd, does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

##### **4.9.2 External remedies**

In accordance with sections 56(3) (c) and 78 of the PAIA, a Requester may apply to a court for relief within 180 (one hundred and eighty) days of notification of the decision for appropriate relief.

## 5 The POPIA

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The Protection of Personal Information Act No. 4 of 2013 provides that data subjects have the right to know what personal information Netcash (Pty) Ltd has about them, what it is used for, recipients or categories of recipients, whether it is transferred overseas. These are set out in Appendix 4 below.

If you are a data subject you have the right to access personal information (form 1), Object to the use of your Personal information (form 2) and to request a deletion of correction of your records (form 3).

You also have a right to know what security measures we have in place at Netcash (Pty) Ltd (Appendix 5).

## 6 Definitions

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- ☒ “Data” includes both personal information and other information.
- ☒ “Data Subject” means the person to whom Personal Information relates.
- ☒ “Information Officer” means the head of a private body as contemplated in section 1, of the PAIA.
- ☒ “Minister” means the Cabinet member responsible for the administration of justice.
- ☒ “PAIA” means the Promotion of Access to Information Act No. 2 of 2000.
- ☒ “Personal Information” or “PI” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including :
  - information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - information relating to the education or the medical, financial, criminal or employment history of the person;
  - any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
  - the blood type or any other biometric
    - information of the person;
  - the personal opinions, views or preferences of the person;
  - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - the views or opinions of another individual about the person; and
  - the name of the person if it appears with other
    - Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.
    - Personal Information excludes information of about an individual who has been dead for more than 20 (twenty) years (PAIA), and excludes information about a person who is dead (POPIA).
- ☒ “POPIA” means the Protection of Personal Information Act No. 4 of 2013
- ☒ “Private body” means:
  - a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
  - a partnership which carries or has carried on any trade, business or profession; or
  - any former or existing juristic person, but excludes a public body
- ☒ “Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
  - the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
  - dissemination by means of transmission, distribution or making available in any other form; or



- merging, linking, as well as blocking, degradation, erasure or destruction of information;
- ☒ “Public Body” Means:
  - any department or state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
  - Any other functionary or institution when-
    - exercising a power of performing a duty in terms of the Constitution or a provincial constitution; or
    - exercising a public power or performing a public function on terms of any legislation;
- ☒ “Record” in relation to a private body means any recorded information regardless of form or medium in the possession or under the control of that public or private body, respectively and whether or not it was created by the public or private body respectively
- ☒ “Responsible Party” or a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information
- ☒ “Requester” means a person or legal persons seeking access to information
- ☒ “Third Parties” means any natural or juristic person other than the Requester or, such party acting on behalf of the Requester or Netcash (Pty) Ltd.

## 7 Appendixes

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### 7.1 Appendix 1: List of applicable legislation

1. Basic Conditions of Employment Act No. 75 of 1997
2. Broad-Based Black Economic Empowerment Act No. 53 of 2003
3. Companies Act No. 71 of 2008
4. Competition Act No. 89 of 1998
5. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
6. Constitution of the Republic of South Africa, Act No. 108 of 1996
7. Consumer Protection Act No. 68 of 2008
8. Copyright Act No. 98 of 1978
9. Cybercrimes Act No. 19 of 2020
10. Electronic Communications and Transactions Act No. 25 of 2002
11. Employment Equity Act No. 55 of 1998
12. Employment Tax Incentive Act No. 26 of 2013
13. Financial Advisory and Intermediary Services Act No.37 of 2002
14. Financial Intelligence Centre Act No. 38 of 2001
15. Financial Sector and Deposit Insurance Levies Act No. 11 of 2022
16. Financial Sector Regulation Act No. 9 of 2017
17. Income Tax Act No. 58 of 1962
18. Insolvency Act No. 24 of 1936
19. Inspection of Financial Institutions Act No.80 of 1998
20. Labour Relations Act No. 66 of 1995
21. National Minimum Wage Act No. 9 of 2018
22. National Payment System Act No. 78 of 1998
23. Occupational Health and Safety Act No. 85 of 1993
24. Prevention and Combating of Corrupt Activities Act No. 12 of 2004
25. Prevention of Organised Crime Act No. 121 of 1998
26. Promotion of Access to Information Act No. 2 of 2000
27. Protection of Personal Information Act No. 4 of 2013
28. Protected Disclosures Act No. 26 of 2000
29. Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004
30. Skills Development Act. No. 97 of 1998
31. Skills Development Levies Act No. 9 of 1999
32. Trade Marks Act No. 194 of 1993
33. Unemployment Insurance Act No. 30 of 1996
34. Unemployment Insurance Contributions Act No. 4 of 2002
35. Value-added Tax Act No. 89 of 1991

## 7.2 Appendix 2: Available records

The list of available records for Netcash (Pty) Ltd is as follows:

Category	Subject of Record	Availability (see Key below)
<b>Employees</b>	Personal records provided by employees	12
	Records provided by a third party relating to employees	12
	Conditions of employment and other employee-related contractual and quasi-legal records	12
	Internal evaluation records and other internal records	12
	Correspondence relating to employees	12
	Training schedules and material	12
<b>Customers</b>	Records provided by a Customer to a third party acting for, or on behalf of Netcash (Pty) Ltd	12
	Records provided by a third party to Netcash (Pty) Ltd	12
	Records generated by, or within Netcash (Pty) Ltd relating to its Customers, including transactional Records	12
	Records provided by a Customer to Netcash (Pty) Ltd	12
<b>Netcash (Pty) Ltd</b>	Incorporation Information	1
	Executive (board) records and decisions	1, 12
	Trademark information	1
	Databases	12
	Operational records	12
	Information technology	12
	Marketing records	2, 12, 13
	Media releases	1
	Internal correspondence	12
	Product records	12

	Statutory records	12
	Internal policies and procedures	12
	SARS-related records (VAT, Tax and PAYE)	12
	Securities and equities	12
	Records held by officials of Netcash (Pty) Ltd	1, 12
<b>Third party</b>	Employee, Customer or Netcash (Pty) Ltd Records which are held by another party	12
	Records held by Netcash (Pty) Ltd relating to other parties, including financial Records, correspondence and contractual Information	12
	Records provided by other parties and Records that third parties have provided which relate to contractors and suppliers.	12
	Netcash (Pty) Ltd may possess Records, pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess Records that can be said to belong to Netcash (Pty) Ltd.	12

#### 7.2.1 Key to reasons for disclosure / refusal to disclose

#	Type of disclosure	Degree of disclosure
1.	May be disclosed	Publicly accessible
2.	May not be disclosed	Request after the commencement of criminal or civil proceedings <b>[Section 7]</b>
3.	May be disclosed	Subject to copyright
4.	Limited disclosure	Personal information that belongs to the Requester of information <b>[Section 61]</b>
5.	May not be disclosed	Unreasonable disclosure
6.	May not be disclosed	Likely to harm the commercial or financial interest of third parties <b>[Section 64(a)(b)]</b>
7.	May not be disclosed	Likely to harm the company or Third Party in contract or other negotiations <b>[Section 64(c)]</b>
8.	May not be disclosed	Would breach a duty of confidence to a Third Party in terms of an agreement <b>[Section 65]</b>
9.	May not be disclosed	Likely to compromise the safety of individuals or protection of private property <b>[Section 66]</b>



10.	May not be disclosed	Legally privileged documents <b>[Section 67]</b>
11.	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks <b>[Section 64 and 68(2)]</b>
12.	May not be disclosed	Commercial information of Private Body <b>[Section 68]</b>
13.	May not be disclosed	Likely to prejudice research and development information of the company or a Third Party <b>[Section 69]</b>
14.	May not be refused	Disclosure in public interest <b>[Section 70]</b>

### 7.3 Appendix 3: Applicable fees for Private Bodies

1. The fee for a copy of the manual as contemplated in regulation 9 (2) (c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11 (1) are as follows:

Artefact	R
(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on—	
i. stiffy disc	R7,50
ii. compact disc	R70,00
(d) For a transcription of visual images, for an A4size page or part thereof	R40,00
ii. For a copy of visual images	R60,00
(e) For a transcription of an audio record, for an A4size page or part thereof	R20,00
ii. For a copy of an audio record	R30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11 (3) are as follows:

Artefact	R
(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on—	
i. stiffy disc	R7,50
ii. compact disc	R70,00
(d) For a transcription of visual images, for an A4size page or part thereof	R40,00
ii. For a copy of visual images	R60,00
(e) For a transcription of an audio record, for an A4size page or part thereof	R20,00
ii. For a copy of an audio record	R30,00

- (2) For purposes of section 54 (2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) one third of the access fee is payable as a deposit by the requester.

- (3) The actual postage is payable when a copy of a record must be posted to a requester.

## 7.4 Appendix 4: The POPIA records

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Prospective Employees** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Employee recruitment	Section 11 - It is in our organisation's legitimate interest (Employment data processing)	Upon conclusion of the service, event or promotion
Risk Report Services	Section 11 - It is in our organisation's legitimate interest (Employment data processing)	Upon conclusion of the service, event or promotion

From our **Clients** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Debit Order Service	Section 11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Payments Service	Section 11 - We have the data subject's consent	Until no longer needed for purposes of proof
Pay Now Solutions	Section 11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Risk Report Services	Section 11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof

From our **Service Providers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis..

Processing purpose	Lawful basis	Retention period
Purchase to Pay	Section 11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Processing Support	Section 11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof

### What personal information do we collect?

We only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services. If you visit our website, your browser transmits some data automatically, such as your browsing times, the data transmitted and your IP address.

If you use our services, personal information is required to fulfill the requirements of that service.

Generally, we collect the following personal information. If there is any *specific* personal information to collect, we will indicate as such, at or near the time of collection.

- ☒ Online identifier
- ☒ Physical address
- ☒ Telephone number
- ☒ Confidential Correspondence
- ☒ Email address
- ☒ Financial & banking details
- ☒ Location information
- ☒ Identification Number
- ☒ Education history
- ☒ Employment history
- ☒ Name, together with other identifying information
- ☒ Special personal information could be about your health, your racial or ethnic origin, your trade union membership etc. We collect the following special personal information, under the appropriate lawful basis.:
  - ☒ Criminal behaviour - allegations
  - ☒ Section 33 - We comply with provisions concerning a data subject's criminal behaviour or biometric information
  - ☒ Race or ethnic origin
  - ☒ Section 29 - We comply with provisions concerning a data subject's race or ethnic origin



We collect your personal information from the following indirect sources

<b>Data subject type</b>	<b>Personal information type</b>	<b>Indirect source name</b>
Prospective Employees	Physical address	Recruitment Agency
Clients	Physical address	Public domain
Clients	Identification Number	CIPC
Prospective Employees	Identification Number	Recruitment Agency
Clients	Telephone number	Public domain
Prospective Employees	Telephone number	Recruitment Agency
Prospective Employees	Education history	Recruitment Agency
Prospective Employees	Employment history	Recruitment Agency
Prospective Employees	Email address	Recruitment Agency
Prospective Employees	Name, together with other identifying information	Recruitment Agency
Clients	Name, together with other identifying information	CIPC
Data subject type	Special personal information type	Indirect source name
Prospective Employees	Race or ethnic origin	Recruitment Agency

## 7.5 Appendix 5: Security Measures

Netcash (Pty) Ltd undertakes to institute and maintain the data protection measures to accomplish the objectives outlined in numbers 1 to 8. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Netcash (Pty) Ltd may use other measures and adapt to technological security development, as needed, provided that a similar level of data protection is achieved. "Data" includes both personal information and other information.

### 1. Access Control of Persons

Netcash (Pty) Ltd will implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

### 2. Data Media Control

Netcash (Pty) Ltd undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Netcash (Pty) Ltd and containing personal information of data subjects and disaster recovery.

### 3. Data Memory Control

Netcash (Pty) Ltd undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration or deletion of stored data of the Netcash (Pty) Ltd customers.

### 4. User Control

Netcash (Pty) Ltd implements suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

### 5. Access Control to Data

Netcash (Pty) Ltd warrants that the persons entitled to use Netcash (Pty) Ltd's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

### 6. Transmission Control

Netcash (Pty) Ltd enables the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of Netcash (Pty) Ltd's data communication equipment / devices.

### 7. Transport Control

Netcash (Pty) Ltd implements measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

### 8. Organization Control

Netcash (Pty) Ltd will maintain its internal organization in a manner that meets the requirements of this PAIA manual, which includes appropriate training for staff.

### 9. Risk Management

Netcash (Pty) Ltd maintains and regularly reviews its security measures in order to assess for new security risks and constantly updates its security measures accordingly.

## 8 Forms

### 8.1 FORM 1: Request for access to a Record in terms of the PAIA

#### REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53 (1) of the Promotion of Access to Information Act No. 2 of 2000 [Regulation 10]

**Name of Information Officer:** Lisanne Pienaar-De Gouveia  
**Role:** Head of Risk, Legal and Compliance  
**Physical and Postal address:** Netcash Square, 64 Parklands Main Road,  
Parklands, Cape Town, 7441  
**E-mail address:** [informationofficer@netcash.co.za](mailto:informationofficer@netcash.co.za) and [Legal@netcash.co.za](mailto:Legal@netcash.co.za)  
**Telephone number:** 021 521 8657  
**Internet site address:** [www.netcash.co.za](http://www.netcash.co.za)

**B. Particulars of person requesting access to the record** - The particulars of the person who requests access to the record must be given below - The address and /or email address in the Republic to which the information is to be sent must be given -Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
E-mail address:	

#### C. Capacity in which request is made, when made on behalf of another person:

This section must be completed ONLY if a request for information is made on behalf of another person

Full names and Surname / Company:	
Identity Number/Registration Number:	

#### D. Particulars of record

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located; -If the provided space is inadequate, please continue on a separate page and attach it to this form. The Requester must sign all the additional pages.

Description of record or relevant part of the record:

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Reference number, if available:

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3. Any further particulars of record:

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#### E. Fees

**A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid. You will be notified of the amount required to be paid as the request fee. The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare such record. If you qualify for exemption of the payment of any fee, please state the reason for exemption.**

Reason for exemption from payment of fees:

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#### F. Form of access to record

**If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.**

Disability:	
Form in which record is required:	

Mark the appropriate box with an X.

#### Notes:

- ☒ *Compliance with your request in the specified form may depend on the form in which the record is available.*
- ☒ *Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.*
- ☒ *The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.*



<b>If the record is in written or printed form:</b>		
Copy of Record		Inspection of Record
<b>If record consists of visual images</b>		
View images   Copy of images   Transcription of images		
<b>If record consists of recorded words or information which can be reproduced in sound:</b>		
listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)
<b>If record is held on computer or in an electronic or machine-readable form:</b>		
printed copy of record*	printed copy of information derived from the record*	copy in computer readable form* (memory stick or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable	Yes	No

### G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate page and attach it to this form.  
The Requester must sign all the additional pages

Indicate which right is to be exercised or protected:

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Explain why the record requested is required for the exercise or protection of the aforementioned right:

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**H. Notice of decision regarding request for access** You will be notified in writing whether your request has been approved/ denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request

How would you prefer to be informed of the decision regarding your request for access to the record?

---

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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

---

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF THE REQUEST IS MADE

**AFFIDAVIT**

I, the undersigned,

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do hereby make oath and say:

1. I am an adult male / female residing at

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I am the Requester in terms of the Promotion of Access to Information Act, No. 2 of 2000.

**PART: A (Applicant)**

2. The facts herein mentioned are within my personal knowledge, unless indicated to the contrary, and are in all respects true and correct.

3. My Identity/passport number is \_\_\_\_\_ and I attach hereby a certified copy of my identity/passport document.

4. PART: B (Third Party Permission – if applicable)

5. I also declare that I am aware that

\_\_\_\_\_ requires information pertaining to cellular number

\_\_\_\_\_ .

I hereby give permission to \_\_\_\_\_ to obtain the required information.

6. I know and understand the contents of this statement I have no objection in taking the prescribed oath

I consider the oath to be binding on my conscience.

\_\_\_\_\_  
DEPONENT

I certify that the above statement was taken by me and that the deponent has acknowledged that he/she knows and understands the contents of this statement. The statement was sworn to/affirmed to before me and deponents

Signature / mark / thumb print was placed thereon in my presence at

\_\_\_\_\_ on \_\_\_\_\_ at \_\_\_\_\_ h \_\_\_\_\_ .

SIGNATURE Commissioner of Oaths

\_\_\_\_\_

Full First Names and Surname

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Business Address (Street Address)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\*\*\* END OF FORM 1 \*\*\*

## 8.2 FORM 2: Objection to processing of personal information in terms of POPIA

### OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT NO. 4 OF 2013, REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION 2017 [Regulation 3(2)]

**Note:**

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number \_\_\_\_\_

A) DETAILS OF DATA SUBJECT	
Name and surname of data subject:	
Residential, postal or business address:	
	Code (     )
Contact number(s):	
Fax number:	
E-mail address:	
B) DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural):	
Residential, postal or business address:	
	Code (     )
Contact number(s):	
Fax number:	





### 8.3 FORM 3: Form for the Request to Delete or Correct Personal Information in Terms of POPIA

#### 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 NO. 4 OF 2013, REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017 [Regulation 3(2)]

**Note:**

- 1) Affidavits or other documentary evidence in support of the request must be attached.
- 2) If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number Mark the appropriate box with an "x".

**Request for:**

Reference number:

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A) DETAILS OF THE DATA SUBJECT	
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number:	
E-mail address:	
B) DETAILS OF RESPONSIBLE PARTY	



*\* Delete whichever is not applicable*

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20  
\_\_\_\_\_ .

Signature of Data subject \_\_\_\_\_ .

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**\*\*\* END OF FORM 3 \*\*\***



## 8.4 FORM SCN1

### NOTIFICATION OF A SECURITY COMPROMISE IN TERMS OF SECTION 22 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

*Note:*

1. Attach documents in support of the notification.
2. Complete the form in full as applicable.
3. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

A	DETAILS OF RESPONSIBLE PARTY
Name(s) and Surname / Registered name of responsible party	Netcash (Pty) Ltd
Address:	Netcash Square, 64 Parklands Main Road Parklands Code (7441)
Contact Number(s):	0861 338 338
E-mail Address:	Legal@netcash.co.za
B	DETAILS OF THE INFORMATION OFFICER
Full names of information officer	Charles Pittaway
Registration number of information officer	
Contact Number(s)	0861 338 338
E-mail address:	
C	DETAILS OF SECURITY COMPROMISE
Date of Incident:	
Date incident reported to Information Regulator	
Explanation for delay in notification to the Regulator, if applicable	
Kindly tick applicable box <input checked="" type="checkbox"/>	

### NOTIFICATION OF SECURITY COMPROMISE

<b>Type of Security Compromise</b>	Loss of personal information			
	Damage to personal information			
	Unauthorised destruction of personal information			
	Unlawful access to personal information			
	Unlawful processing of personal information			
	Other			
	If other, please explain_____			
<b>Description of Incident</b>				
<b>Kindly tick applicable box</b> √				
<b>Type of personal information compromised</b>	<b>Personal information of children</b>		<b>Unique identifiers</b>	
	<b>Special personal information</b>		<b>Other</b>	
	If other, please explain_____			
<b>Number of data subjects affected</b>				

### NOTIFICATION OF SECURITY COMPROMISE

<b>Method of notification to data subjects</b>	Mail to the data subject's last known physical or postal address		
	Sent by e-mail to the data subject's last known e-mail address		
	Placed in a prominent position on the website of the responsible party		
	Published in the news media		
<b>Does the notification provide sufficient information to allow the data subject to take protective measures against the potential consequences of the compromise, including:</b>	A description of the possible consequences of the security compromise		
	A description of the measures that the responsible party intends to take or has taken to address the security compromise		
	A recommendation with regards to the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise		
	If known, the identity of the unauthorised person who may have accessed or acquired the personal information		
<b>Status of the compromise</b>	Confirmed:		Alleged:
<b>D</b>	Description of the measures that the responsible party intends to take or has taken to address the security compromise and to protect the personal information of the data subjects from further unauthorised access or use.		
<b>E</b>	<b>DECLARATION</b>		
I declare the information contained herein is true, correct, and accurate.			
SIGNED at _____ on this the ____ day of _____ 20__			
_____ Signature			
Name: Charles Pittaway		Designation: Information Officer and Managing Director	