

Promotion of Access to Information (PAIA) Manual

LESAKA MERCHANT DIVISION

(hereinafter referred to as "the Lesaka Merchant Division")

Manual prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) ("the Manual") for the Lesaka Merchant Division.

Entities comprising the Lesaka Merchant Division:

Entity Name	Registration No.
Cash Connect Management Solutions (Pty) Ltd	2006/010530/07
Cash Connect Rentals (Pty) Ltd	2009/007139/07
Cash Connect Capital (Pty) Ltd	2007/092430/07
Deposit Manager (Pty) Ltd	2010/016889/07
Cash Connect Collateral Holdings Trust	IT 525/2010
Cash Connect Rentals Collateral Holdings Trust	IT3206/2011
Main Street 1723 (Pty) Ltd, which encompasses the Kazang Connect and Card Connect business divisions	2019/300711/07
Sandulela Technology (Pty) Ltd	2002/021487/07
K2020263969 (SOUTH AFRICA) (Pty) Ltd	2020/263969/07
EasyPay (Pty) Ltd	1983/008597/07
Net1 Universal Electronic Technological Solutions (Pty) Ltd	2009/001034/07

1. Definitions

- 1.1. "CEO" means Chief Executive Officer;
- 1.2. "IO" means Information Officer;
- 1.3. "PAIA" means Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.4. "POPIA" means Protection of Personal Information Act No.4 of 2013;
- 1.5. "Regulator" means Information Regulator; and
- 1.6. "Republic" means Republic of South Africa

2. Introduction

- 2.1. PAIA, 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.
- 2.2. 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 PAIA.
- 2.3. This PAIA Manual is useful for the public to-
 - 2.3.1. check the categories of records held by the Lesaka Merchant Division which are available without a person having to submit a formal PAIA request;
 - 2.3.2. have a sufficient understanding of how to make a request for access to a record of the Lesaka Merchant Division, by providing a description of the subjects on which the Lesaka Merchant Division holds records and the categories of records held on each subject;
 - 2.3.3. know the description of the records of the Lesaka Merchant Division which are available in accordance with any other legislation;
 - 2.3.4. access all the relevant contact details of the IO who will assist the public with the records they intend to access;



- 2.3.5. know the description of the guide on how to use PAIA as required in terms of section 10 of PAIA (“the Guide”), as updated by the Regulator and how to obtain access to it;
- 2.3.6. know if the Lesaka Merchant Division will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.3.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.3.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.3.9. know if the Lesaka Merchant Division has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.3.10. know whether the Lesaka Merchant Division has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Overview of the Lesaka Merchant Division

- 3.1. The Lesaka Merchant Division 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.

4. Information required in terms of section 51(1)(a) of PAIA

Main entity within the Lesaka Merchant Division:

Company name: Cash Connect Management Solutions (Pty) Ltd

Registration number: 2006/010530/07

Registered address/ 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
Email:	info@connected.co.za
Website:	https://connected.co.za/
CEO:	Steven Heilbron
IO NAME	Grant Carter for: Main Street 1723 (Pty) Ltd Kevin Mudaly for: EasyPay (Pty) Ltd Louis van Heerden for: Net1 Universal Electronic Technological Solutions (Pty) Ltd Nkululeko Mvulana for: Sandulela Technologies (Pty) Ltd Revasan Reddy for:

	Cash Connect Management Solutions (Pty) Ltd Cash Connect Rentals (Pty) Ltd Cash Connect Capital (Pty) Ltd Deposit Manager (Pty) Ltd Cash Connect Collateral Holdings Trust Cash Connect Rentals Collateral Holdings Trust Steven Heilbron for: K2020263969 (SOUTH AFRICA) (Pty) Ltd
TITLE	Information Officer(s)
EMAIL ADDRESS	popi@connected.co.za
CONTACT NUMBER	0861697263
POSTAL ADDRESS	P.O. Box 377 Century City 7446
PHYSICAL ADDRESS	Innesfree View, Cnr Katherine & Harris, Sandown Ext 20, Sandton, 2196, South Africa
WEBSITE	www.connected.co.za

5. How to Use and Obtain Access to PAIA Section 10 Guide

- 5.1. PAIA 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.
- 5.2. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided.
- 5.3. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission and updated by the Regulator, which will contain information for the purposes of exercising any right contemplated in PAIA and POPIA.
- 5.4. The Guide is available in each of the official languages and in braille.
- 5.5. The aforesaid Guide contains the description of:
 - 5.5.1. the objects of PAIA and POPIA;
 - 5.5.2. the postal and street address, phone, and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 5.5.3. the manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA and access to a record of a private body contemplated in section 50 of PAIA;
 - 5.5.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 5.5.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.5.6. 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 an internal appeal, a complaint to the Regulator, and 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.
 - 5.5.7. the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a Manual, and how to obtain access to a Manual;
 - 5.5.8. the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 5.5.9. the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
 - 5.5.10. the regulations made in terms of section 92 of PAIA.
- 5.6. 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.

- 5.7. The Guide can also be obtained:
- 5.7.1. Upon request to the IO;
- 5.7.2. From the website of the Regulator (<https://www.justice.gov.za/inforeg/>);
- 5.7.3. From the Lesaka Merchant Division's offices during normal office hours in the either English or isiZulu.

6. Applicable Legislation

Records are kept in terms of the following legislation:

- 6.1. Basic Conditions of Employment Act 75 of 1997
- 6.2. Broad-Based Black Economic Empowerment Act 53 of 2003
- 6.3. Companies Act 71 of 2008
- 6.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 6.5. Competition Act 89 of 1998
- 6.6. Consumer Protection Act 68 of 2008
- 6.7. Copyright Act 98 of 1978
- 6.8. Criminal Procedure Act 51 of 1977
- 6.9. Customs and Excise Act 91 of 1964
- 6.10. Customs Duty Act 30 of 2014
- 6.11. Debt Collectors Act 114 of 1998
- 6.12. Domicile Act 3 of 1992
- 6.13. Employment Equity Act 55 of 1998
- 6.14. Electronic Communications and Transactions Act 25 of 2002
- 6.15. Electronic Communications Act, 36 of 2005
- 6.16. Financial Advisory and Intermediary Services Act 37 of 2002
- 6.17. Financial Intelligence Centre Act 38 of 2001
- 6.18. Financial Markets Act 19 of 2012
- 6.19. Johannesburg Stock Exchange listing requirements
- 6.20. Income Tax Act 58 of 1962
- 6.21. Intellectual Property Laws Amendments Act 38 of 1997
- 6.22. Labour Relations Act 66 of 1995
- 6.23. Merchandise Marks Act 17 of 1941
- 6.24. National Credit Act 34 of 2005
- 6.25. National Payment System Act 78 of 1998
- 6.26. Occupational Health and Safety Act 85 of 1993
- 6.27. Pension Fund Act 24 of 1956
- 6.28. Prevention of Organised Crime Act 121 of 1998
- 6.29. Prevention and Combating of Corrupt Activities Act 12 of 2004
- 6.30. Protection of Personal Information Act 4 of 2013
- 6.31. Promotion of Access to Information Act 2 of 2000
- 6.32. Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- 6.33. Protected Disclosures Act 26 of 2000
- 6.34. Skill Development Levies Act 9 of 1999
- 6.35. Skills Development Act 97 of 1998
- 6.36. Tax Administration Act 28 of 2011
- 6.37. Tax Administration Laws Amendment Act 44 of 2014
- 6.38. Trade Marks Act 194 of 1993
- 6.39. Unemployment Insurance Act 63 of 2001
- 6.40. Unemployment Insurance Contributions Act 4 of 2002
- 6.41. Value Added Tax Act 89 of 1991
- 6.42. Such other legislation as may from time to time be applicable

7. Categories of Data Subjects and the Information the Lesaka Merchant Division may Collect

- 7.1. Employees:
 - 7.1.1. Name and contact details
 - 7.1.2. Identity number and identity documents including passports
 - 7.1.3. Employment history and references
 - 7.1.4. Banking and financial details
 - 7.1.5. Details of payments to third parties (deductions from salary)
 - 7.1.6. Employment contracts
 - 7.1.7. Employment equity plans
 - 7.1.8. Medical aid records
 - 7.1.9. Pension Fund records
 - 7.1.10. Remuneration/salary records
 - 7.1.11. Performance appraisals
 - 7.1.12. Disciplinary records
 - 7.1.13. Leave records
 - 7.1.14. Training records
- 7.2. Consumers and prospective consumers:
 - 7.2.1. Postal and/or street address
 - 7.2.2. title and name
 - 7.2.3. contact numbers and/or e-mail address
 - 7.2.4. ethnic group
 - 7.2.5. employment history
 - 7.2.6. age
 - 7.2.7. gender
 - 7.2.8. marital status
 - 7.2.9. nationality
 - 7.2.10. language
 - 7.2.11. financial information
 - 7.2.12. identity or passport number
 - 7.2.13. browsing habits and click patterns on Websites (as defined in the Lesaka Merchant Division Privacy Policy).
- 7.3. Vendors /suppliers /other businesses:
 - 7.3.1. Name and contact details
 - 7.3.2. Identity and/or company information and directors' information
 - 7.3.3. Banking and financial information
 - 7.3.4. Information about products or services
 - 7.3.5. Other information not specified, reasonably required to be processed for business operations

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

- 8.1. For employees:
 - 8.1.1. Verification of applicant employees' information during recruitment process
 - 8.1.2. General matters relating to employee's pension, medical aid, payroll, disciplinary action, training
 - 8.1.3. Any other reasonably required purpose relating to the employment or possible employment relationship
 - 8.1.4. Communicating with employees by email, SMS, letter, telephone or in any other way
 - 8.1.5. Performing other administrative and operational purposes including the testing of systems
 - 8.1.6. Complying with the Lesaka Merchant Division's regulatory and other obligations
 - 8.1.7. Any other reasonably required purpose relating to the Lesaka Merchant Division business
 - 8.1.8. Verifying and updating information

- 8.2. For consumers and prospective consumers:
- 8.2.1. Performing duties in terms of any agreement with consumers
- 8.2.2. Make, or assist in making, credit decisions about consumers
- 8.2.3. Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with the Lesaka Merchant Division
- 8.2.4. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about the Lesaka Merchant Division's products and services, unless consumers indicate otherwise
- 8.2.5. To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers
- 8.2.6. Carrying out market research, business, and statistical analysis
- 8.2.7. Performing other administrative and operational purposes including the testing of systems
- 8.2.8. Recovering any debt consumers may owe the Lesaka Merchant Division
- 8.2.9. Complying with the Lesaka Merchant Division's regulatory and other obligations
- 8.2.10. Any other reasonably required purpose relating to the Lesaka Merchant Division business
- 8.2.11. Verifying and updating information
- 8.2.12. Pre-scoring
- 8.2.13. Direct Marketing
- 8.3. For vendors /suppliers /other businesses:
- 8.3.1. Verifying information and performing checks;
- 8.3.2. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- 8.3.3. Payment of invoices;
- 8.3.4. Complying with the Lesaka Merchant Division's regulatory and other obligations; and
- 8.3.5. Any other reasonably required purpose relating to the Lesaka Merchant Division's business

9. Recipients to Whom the Personal Information may be Supplied

- 9.1. Any firm, organisation, or person that the Lesaka Merchant Division uses to collect payments and recover debts or to provide a service on its behalf;
- 9.2. Any firm, organisation, or person that/who provides the Lesaka Merchant Division with products or services;
- 9.3. Any person who the Lesaka Merchant Division 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;
- 9.4. Any payment system the Lesaka Merchant Division uses;
- 9.5. Regulator and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Lesaka Merchant Division has a duty to share information;
- 9.6. Credit bureau;
- 9.7. Third parties to whom payments are made on behalf of employees;
- 9.8. Financial institutions from whom payments are received on behalf of data subjects;
- 9.9. Any other operator not specified;
- 9.10. Employees, contractors, and temporary staff; and
- 9.11. Agents.

10. Planned transborder flows of Personal Information

- 10.1. The Lesaka Merchant Division stores and shares certain Personal Information with third party operators outside the Republic for various purposes as specified in the Lesaka Merchant Division Privacy Policy which is available on the Websites (as defined in the Lesaka Merchant

Division Privacy Policy and which includes inter alia www.connected.co.za and www.kazang.com).

11. Information Security Measures

- 11.1. The Lesaka Merchant Division implements various security safeguards to ensure the confidentiality and integrity of the Personal Information. Such safeguards include, inter alia, password and/or biometric protection for electronic files, securing paper files and physical access restrictions and access control to our buildings and servers.
- 11.2. The security safeguards are more fully described in the Lesaka Merchant Division Privacy Policy which is available on the Websites (as defined in the Lesaka Merchant Division Privacy Policy and which includes inter alia www.connected.co.za and www.kazang.com).

12. Record Classification

The Lesaka Merchant Division has implemented a system in accordance with which all of the companies' 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

13. Schedule of Records

The Lesaka Merchant Division has the following records which are not automatically available to requesters as determined in the previous paragraph:

- 13.1. Employee Records
- 13.2. Employment Contracts
- 13.3. Personnel Guidelines
- 13.4. Policies and Procedures
- 13.5. Financial Information
- 13.6. Public Corporate Records
- 13.7. Client Information
- 13.8. General Contract Documentation
- 13.9. Marketing Material
- 13.10. Close Corporation Guidelines
- 13.11. Policies and Procedures
- 13.12. Trademarks
- 13.13. Statutory Records
- 13.14. General Operational Information
- 13.15. Internal and external correspondence

14. Procedure for Request for Access (Sections 53 to 57 and 60 of PAIA)

To facilitate the processing of your request, kindly:

- 14.1. Use the prescribed form available on request or on the website of the South African Human Rights Commission at www.sahrc.org.za.
- 14.2. Address your request to the IO.
- 14.3. Provide sufficient details to enable the Lesaka Merchant Division to identify:
 - 14.3.1. The record(s) requested
 - 14.3.2. The requester's details (and if an agent is lodging the request, proof of capacity)
 - 14.3.3. The form of access required
 - 14.3.3.1. The postal address or fax number of the requester in the Republic
 - 14.3.3.2. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof
 - 14.3.4. 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
- 14.4. The IO 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.
- 14.5. Should the request be refused, the notice will state adequate reasons for the refusal.
- 14.6. If the Lesaka Merchant Division has searched for a record and believes that it either does not exist or cannot be found, the Lesaka Merchant Division 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 Lesaka Merchant Division will also provide the requester with details on the steps that were taken to try to locate the record.

15. Grounds for Refusal of Access to Records (Sections 63 to 69 of PAIA 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 PAIA. This includes:

- 15.1. Mandatory protection of privacy of a third party who is a natural person;
- 15.2. Mandatory protection of commercial information of third party;
- 15.3. Mandatory protection of certain confidential information of third party;
- 15.4. Mandatory protection of safety of individuals, and protection of property;
- 15.5. Mandatory protection of records privileged from production in legal proceedings;

- 15.6. Commercial information of private body;
- 15.7. Mandatory protection of research information of third party, and protection of research information of privacy body.

16. Prescribed Fees

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

- 16.1. A requestor is required to pay the prescribed fees (R140.00) before a request will be processed.
- 16.2. 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).
- 16.3. A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit.
- 16.4. Records may be withheld until the fees have been paid.
- 16.5. The fee structure is available on request as well as in the PAIA Regulations Annexure B.

17. Availability of the PAIA Manual

- 17.1. Copies of this Manual are available:
 - 17.1.1. for inspection, free of charge, at the registered offices of the Lesaka Merchant Division during normal business hours;
 - 17.1.2. on the Websites (as defined in the Lesaka Merchant Division Privacy Policy and which includes inter alia www.connected.co.za and www.kazang.com);
 - 17.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 17.1.4. to the Information Regulator upon request.
- 17.2. 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.

18. Updating of the PAIA Manual

- 18.1. The head of the Lesaka Merchant Division will on a regular basis update this Manual.