

MINIT MONEY (PTY) LTD

PAIA AND POPIA MANUAL

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000, to address the requirements of the Protection of Personal Information Act, 2013.

1. INTERPRETATION

- 1.1. In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates otherwise.
- 1.2. An expression which denotes:
 - 1.2.1. any gender includes the other genders;
 - 1.2.2. natural person includes an artificial or juristic person and *vice versa*; and
 - 1.2.3. the singular includes the plural and *vice versa*.
- 1.3. Any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation, or other legislation as at the signature date, and as amended or substituted from time to time.
- 1.4. If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this document.
- 1.5. Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day, which is a business day.

- 1.6. Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months, or years, as the case may be.
- 1.7. The use of the word “*including*” followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it, and the *eiusdem generis* rule shall not be applied in the interpretation of such general wording or such specific example/s.
- 1.8. Insofar as there is a conflict in the interpretation of or application of this document and the Act, the Act shall prevail.
- 1.9. This document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A person or party requesting access to information is advised to familiarise him/her/itself with the provisions of the Act before lodging any request with the Company.

2. DEFINITIONS

The following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings:

- 2.1. “**Act**” – means the Promotion of Access to Information Act 2 of 2000, as amended from time to time, and any regulations, as may be amended or replaced from time to time;
- 2.2. “**Company**” – means Minit Money (Pty) Ltd, a company duly incorporated under the laws of the Republic of South Africa under registration number 2017/014560/07 and with registered address at Workshop 17 The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196;

- 2.3. **“Data Subject”** – means the person or party to whom the Personal Information relates;
- 2.4. **“Deputy Information Officer”** – means, if and where applicable, a person appointed by the Company to assist the Information Officer carry out his/her duties, powers and functions, and **“Deputy”** shall have a corresponding meaning;
- 2.5. **“Guide”** – means the guide compiled by the South African Human Rights Commission containing information which may reasonably be required by a person who wishes to exercise any right contemplated in the Act and POPIA;
- 2.6. **“Information Officer”** – means the person authorised to handle requests for information in terms of the Act and that is identified in clause 8 of this document;
- 2.7. **“Information Regulator”** – means the entity established in terms of section 39 of POPIA to monitor and ensure compliance by public and private bodies with the Act and POPIA;
- 2.8. **“PAIA Manual”** – means this document, together with any annexures, as amended from time to time;
- 2.4. **“Personal Information”** – means information relating to an identifiable, living, natural person, or an identifiable, existing juristic person, as defined in POPIA;
- 2.5. **“POPIA”** – means the Protection of Personal Information Act 4 of 2013, as amended from time to time, and any regulations, as may be amended or replaced from time to time;

2.6. **“Processing”** – means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including but not limited to:

2.6.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use thereof;

2.6.2. dissemination of Personal Information by means of transmission, distribution or making available to any party, whether electronically or otherwise;

2.6.3. degradation, erasure, merging or destruction of Personal information; and

2.7. **“SAHRC”** – means the South African Human Rights Commission.

3. **BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT**

3.1. The Act was enacted on 3 February 2000 to give effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, 1996 (the **“Constitution”**) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.

3.2. In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (**“PAIA Manual”**).

3.3. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that such information is protected from disclosure.

4. AIM OF THE MANUAL

- 4.1. The purpose of this PAIA Manual is to ensure that the Company complies with the Act and promotes the right of access to information, fosters a culture of transparency and accountability within the Company by giving the right to information required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 4.2. To promote effective governance of private bodies, it is necessary to ensure that all persons are empowered and educated so that they may understand their rights in relation to public and private bodies.
- 4.3. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
 - 4.3.1. the reasonable protection of privacy;
 - 4.3.2. commercial confidentiality; and
 - 4.3.3. effective, efficient, and good governance,in a manner which balances that right with any other rights, including rights contained in the Bill of Rights in the Constitution.
- 4.4. This PAIA Manual shall be updated on a regular basis, as and when required, as per Section 51(2) of the Act.

5. ACCESS TO THE MANUAL

This PAIA Manual is available:

- 5.1. at the registered address of the Company, at Workshop 17, The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196; and
- 5.2. on the website of the Company at the following address:
<https://www.minitmoney.com/>; and
- 5.3. on request, which request shall be made on the prescribed form, a copy of which is attached hereto as Form 2 (Request for Access to Record).

6. CONTACT DETAILS OF THE MANAGING DIRECTOR (SECTION 51(1)(a))

| | |
|----------------------------|---|
| Managing Director: | Angus Brown |
| Registered Address: | Workshop 17 The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196 |
| Postal Address: | Workshop 17 The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196 |
| Contact Number: | 086-076-6960 |
| Email Address: | angus@minitmoney.com |

7. THE INFORMATION OFFICER (SECTION 51(1)(a))

- 7.1. The Act prescribes the appointment of an Information Officer for private bodies where such Information Officer is responsible to, *inter alia*, assess requests for access to information. The head of a private body, or his/her chosen representative, fulfils such a function in terms of section 51. The Company has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.
- 7.2. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in POPIA. After registering with the Information Regulator, the Information Officer oversees the functions and responsibilities as required in terms of both the Act and the duties and responsibilities imposed in terms of section 55 of POPIA.
- 7.3. The Information Officer may appoint, where necessary, a Deputy Information Officer(s) in terms of Section 17 of the Act as well as Section 56 of the POPIA. This affords the Company the opportunity to be as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities in terms of section 55 of the POPIA.
- 7.4. All requests for information in terms of the Act and POPIA must be addressed to the Information Officer, the details of which are below.

8. CONTACT DETAILS OF THE INFORMATION OFFICER

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|-----------------------------|---|
| Information Officer: | Angus Brown |
| Registered Address: | Workshop 17 The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196 |
| Postal Address: | Workshop 17 The Bank, corner Tyrwhitt and 24 Cradock Avenue, Rosebank, Johannesburg, 2196 |
| Contact Number: | 086-076-6960 |
| Email address: | angus@minitmoney.com |

9. GUIDE OF SOUTH AFRICAN HUMAN RIGHTS COMMISSION (SECTION 51(1) (b))

- 9.1. The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights.
- 9.2. Requests in terms of the Act shall be made in accordance with the prescribed procedures and at the rates provided for in the Act.
- 9.3. Requesters are referred to the Guide in terms of Section 10 of the Act which has been compiled by the SAHRC.
- 9.4. The Guide contains such information as may reasonably be required by a person exercising any right contemplated in the Act and accordingly includes:

- 9.4.1. its objectives and the particulars of every public and private body;
 - 9.4.2. information for the purposes of exercising and protecting rights;
 - 9.4.3. information on how to understand and make use of the Act;
 - 9.4.4. information on the manner and form of how to make requests; and
 - 9.4.5. contents of the regulations promulgated under the Act.
- 9.5. Any person or party who wishes to exercise any right contemplated in the Act and POPIA and who requires guidance to do so may request a copy of the Guide directly from the Information Regulator using Form 1 “Request for a copy of the Guide”. Form 1 is available at:
- <https://info regulator.org.za/wp-content/uploads/2020/07/InfoReqSA-PAIA-Form01-Req2.pdf>.
- 9.6. The Guide is available in all the official languages of the Republic of South Africa and shall be updated every 2 (two) years.
- 9.7. Any enquiries regarding the Guide should be directed to the SAHRC on the contact details below:

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|--------------------------|--|
| Contact Body: | The South African Human Rights Commission |
| Physical Address: | 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |

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|-------------------------|---|
| Postal Address: | 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |
| Telephone Number | 011 877 3600 |
| Email address: | <u>GautengComplaints@sahrc.org.za</u> |
| Website | <u>https://www.sahrc.org.za/</u> |

10. DISCLOSURE IN TERMS OF SECTION 52 OF THE ACT

10.1. At this time, no notice has been published on the categories of records that are automatically available without a person having to request access in terms of Section 52(2) of the Act.

10.2. Should such notice be published in future, the only fee payable, if any, for access to a record in terms of Section 52(2) of the Act is a fee for reproduction.

11. SUBJECTS AND CATEGORIES OF RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT (SECTION 52(1)(c))

11.1. Records held by the Company

11.1.1. For the purposes of this clause 11.1, "Personnel" refers to any person who works for or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the

Company. This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers.

11.1.2. This clause serves as a reference to the categories of information the Company holds. The information is classified and grouped according to records relating to the following subjects and categories:

| SUBJECT | CATEGORY |
|-----------------------|--|
| Companies Act Records | <ul style="list-style-type: none"> • documents of incorporation; • index of names of directors; • memorandum of incorporation; • minutes of meetings of the board of directors; • minutes of meetings of shareholders; • proxy forms; • register of directors' shareholdings; • share certificates; • share register and other statutory registers and/or records and/or documents; • resolutions passed at general and class meetings; and • records relating to the appointment of: <ul style="list-style-type: none"> ○ auditors; ○ directors; ○ prescribed officer(s); ○ public officer; and ○ company secretary. |

| | |
|--|---|
| <p>Financial Records</p> | <ul style="list-style-type: none"> • accounting records; • annual financial reports; • annual financial statements; • asset registers; • bank statements; • banking details and bank accounts; • banking records; • debtors and creditors statements and invoices; • general ledgers and subsidiary ledgers; • general reconciliation; • invoices; • policies and procedures; • rental agreements; and • tax returns. |
| <p>Personnel Documents and Records</p> | <ul style="list-style-type: none"> • address lists; • policies and related documents; • employment contracts and service level agreements; • employment equity plan; • forms and applications; • grievance procedures; • leave records; • medical aid records; • payroll reports/wage register; • safety, health and environmental records; • salary records; • SETA records; • standard letters and notices; |

| | |
|---------------|---|
| | <ul style="list-style-type: none"> • training manuals; and • training records. |
| IT Department | <ul style="list-style-type: none"> • computer or mobile device usage policy documentation; • disaster recovery plans; • hardware asset registers; • information/security policies/standards/procedures; • information technology systems and user manuals; • information usage policy documentation; • project implementation plans; • software licensing; and • system documentation and manuals. |

11.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in clause 18. Documents which are deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before the Company will consider access.

12. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF THE ACT

12.1. Records of a public nature, typically those disclosed on the Company's website, may be accessed without the need to submit a formal application.

12.2. Other non-confidential records, such as statutory records maintained at the Companies and Intellectual Properties Commission which are publicly accessible and available, may also be accessed without the need to submit a formal application.

12.3. In both instances referred to in clauses 12.1 and 12.2 above, although a formal application may not necessarily be required, a request to the Information Officer is still required for purpose of making an appointment to view such records.

13. INFORMATION OR DOCUMENTS HELD IN TERMS OF OTHER SOUTH AFRICAN LEGISLATION

13.1. Where applicable to its operations, the Company may also retain records and documents in terms of the following legislation:

- 13.1.1. Basic Conditions of Employment Act, 1997
- 13.1.2. Companies Act, 2008
- 13.1.3. Competition Act, 1998
- 13.1.4. Compensation for Occupational Injuries and Diseases Act, 1993
- 13.1.5. Constitution of South Africa Act, 1996
- 13.1.6. Copyright Act, 1987
- 13.1.7. Criminal Procedure Act, 1977
- 13.1.8. Debt Collectors Act, 1998
- 13.1.9. Electronic Communications and Transactions Act, 2002
- 13.1.10. Employment Equity Act, 1998
- 13.1.11. Financial Intelligence Centre Act 38 of 2001
- 13.1.12. Financial Sector Regulation Act 9 of 2017
- 13.1.13. General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act, 22 of 2022
- 13.1.14. Income Tax Act, 1962
- 13.1.15. Insolvency Act, 1936
- 13.1.16. Labour Relations Act, 1995
- 13.1.17. Occupational Health and Safety Act, 1993
- 13.1.18. Prevention and Combatting of Corrupt Activities Act, 12 of 2004
- 13.1.19. Prevention of Organised Crime Act, 1998

- 13.1.20. Protection of Constitutional Democracy against Terrorism and Related Activities Amendment Act, 23 of 2022
- 13.1.21. Unemployment Contributions Act, 2002
- 13.1.22. Unemployment Insurance Act, 2001
- 13.1.23. Skills Development Act, 1998
- 13.1.24. Skills Development Levies Act, 1999
- 13.1.25. Value-Added Tax Act, 1991

13.2. Unless the disclosure thereof is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of the above legislation shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act.

13.3. A request to access must be done in accordance with the prescriptions of the Act. The accessibility of such records may be withheld and refused in terms of clause 18 of this PAIA Manual.

14. PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

14.1. Unless otherwise provided in terms of this PAIA Manual, records will only be made available subject to the provisions of the Act.

14.2. A request shall be made on the prescribed form (Request for Access to Record) attached hereto and marked Form 2. The prescribed form is also available on the website of the Information Regulator at:

<https://inforegulator.org.za/paia-forms/>

- 14.3. The prescribed form, and any applicable access fees, shall be submitted to the Information Officer or his/her Deputy using the contact details provided in this PAIA Manual.
- 14.4. The Information Officer, or his/her Deputy, shall handle any request(s) for information as per the terms and conditions of this PAIA Manual.
- 14.5. The prescribed form must comply with section 53(2)(a) of the Act and contain sufficient information so that the Information Officer, or his/her Deputy, can properly identify:
 - 14.5.1. the specific record(s) requested; and
 - 14.5.2. the requester of the information.
- 14.6. The same procedure as set out in this clause 14 shall apply if the requester is requesting information on behalf of another person or on behalf of a permanent employee of the Company.
- 14.7. The requester should indicate which form of access is required and submit a postal or email address so that the outcome of the request can be provided as per Section 53(2)(b) and (c) of the Act.
- 14.8. The requester must state that the reason for the request to information relates to the exercise or protection of a specific right and clearly state the nature of the right and why the information is necessary to exercise or protect such right as per Section 53(2)(d) of the Act.
- 14.9. Should the requester wish to be informed of the decision made by the Information Officer, and/or his Deputy, in addition to a written reply, the requester must state the manner and the necessary particulars to be so informed as per Section 53(2)(e) of the Act.

- 14.10. If the request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request and the Information Officer, or his/her Deputy, shall decide whether such proof is sufficient to continue with the request, as per Section 53(2)(f) of the Act.
- 14.11. If an individual is unable to complete any of the prescribed forms due to illiteracy or disability, such a request may be made orally.
- 14.12. The requester must pay the prescribed access fee prior to any information being disclosed.
- 14.13. The Information Officer, or his/her Deputy, shall, unless the requester has stated special reasons which have been accepted by the Information Officer, or his/her Deputy, as to why such time periods should not be complied with, as soon as reasonably possible and within 30 (thirty) days after the request has been received, decide whether or not to grant the request.
- 14.14. The requester will be notified of the decision of the Information Officer, or his/her Deputy, in the manner indicated by the requester and on the prescribed form (Outcome of request and of fees payable) attached hereto and marked Form 3.
- 14.15. If the request is granted, the requester shall be informed by the Information Officer, or his/her Deputy, in the manner indicated by the requester in the prescribed form.
- 14.16. Notwithstanding the above-mentioned, the Company will advise the requester in the manner stipulated by the requester in the prescribed form of:
- 14.16.1. the access fee to be paid for the information;

- 14.16.2. the format in which access will be given; and
 - 14.16.3. the fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or the format in which access is to be granted.
- 14.17. After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 14.18. If the request for access is refused, the Information Officer, or his/her Deputy, shall advise the requester in writing of the refusal. The notice of refusal will state:
- 14.18.1. adequate reasons for the refusal; and
 - 14.18.2. that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request.
- 14.19. Upon the refusal by the Information Officer, or his/her Deputy, any deposit paid by the requester will be refunded.
- 14.20. Should the Information Officer or his/her Deputy fails to respond within 30 (thirty) days after a request has been received, such request is deemed, in terms of section 58 read together with section 56(1) of POPIA, that the request has been refused.
- 14.21. The Information Officer, or his/her Deputy, is entitled to extend the period of 30 (thirty) days for another period of not more than 30 (thirty) days if:
- 14.21.1. the request is for a large number of records;

14.21.2. the search for the records is to be conducted at a premises not situated in the same town or city as the head office of the Company;

14.21.3. consultation among divisions or departments, as the case may be, of the Company is required;

14.21.4. the requester consents to such an extension in writing; and

14.21.5. the parties agree in any other manner to such an extension,

in accordance with Section 57(1) of POPIA.

14.22. Should the Company require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.

14.23. The requester may lodge an appeal with a court of competent jurisdiction against any extension or against any procedure set out in this section.

15. ACCESS FEES

15.1. The fees payable for the production of records are contained in Form 3 (Outcome of request and of fees payable) as attached hereto and are as follows:

15.1.1. the request fee payable by every requester, R140.00 (one hundred and forty Rand);

15.1.2. for every photocopy/printed black and white copy of A4-size page, R2.00 (two Rand) per page or part thereof;

15.1.3. for a copy in a computer-readable form on a:

15.1.3.1. flash drive (to be provided by the requester), R40.00 (forty Rand); or

15.1.3.2. compact disc:

15.1.3.2.1. if provided by the requester, R40.00 (forty Rand);

15.1.3.2.2. if provided to the requester, R60.00 (sixty Rand);

15.1.4. for the transcription and copies of visual images, per A4-size page, the service will be outsourced. Accordingly, the aforementioned costs will be as quoted by the relevant service provider;

15.1.5. for the transcription of an audio record, per A-4 size page, R24.00 (twenty-four Rand);

15.1.6. for a copy of an audio record on a:

15.1.6.1. flash drive (to be provided by the requestor), R40.00 (forty Rand);

15.1.6.2. compact disc:

15.1.6.2.1. if provided by the requester, R40.00 (forty Rand);

15.1.6.2.2. if provided to the requester, R60.00 (sixty Rand);

- 15.1.7. for any postage, e-mail or any other electronic transfer, the actual expense incurred; and
- 15.1.8. the cost to search for and prepare the record for disclosure, per hour or part thereof but specifically excluding the first hour, reasonably required for such search and preparation to take place, R145.00 (one hundred and forty-five Rand). The total cost shall not exceed R435.00 (four hundred and thirty-five Rand).
- 15.2. Where a requester submits a request for access to information held by the Company on a person other than the requester himself/herself, the request fee detailed in clause 15.1.1 is payable up-front before the Company will process the request received by it.
- 15.3. Where the Company receives a request for access to information and the Information Officer, upon receipt of the request, is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester. The amount of the deposit is equal to 1/3 (one-third) of the amount of the applicable access fee(s).
- 15.4. The initial "request fee" of R140,00 (one hundred and forty Rand) should be deposited into a bank account nominated by the Company, in writing, and a copy of the deposit slip, application form and other correspondence or documents, forwarded to the Information Officer's email address detailed in clause 8 of this PAIA Manual.

16. INFORMATION OR RECORDS NOT FOUND

- 16.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the Information Officer, or

his/her Deputy, shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

- 16.2. The affidavit or affirmation shall provide a full and reasonable account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the Information Officer, or his/her Deputy, with every person who conducted the search.
- 16.3. The notice, as set out in 16.1, shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.
- 16.4. If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by the Information Officer, in such event, the process relating to a refusal of access to a record as detailed in this PAIA Manual shall apply.
- 16.5. The attention of the requester is drawn to the provisions of Chapter 4 of Part 3 of the Act in terms of which the Company may refuse, on certain specified grounds, to provide information to a requester.

17. INFORMATION REQUESTED ABOUT A THIRD PARTY

- 17.1. Section 71 of the Act makes provision for a request for information or records about a third party.
- 17.2. In considering such a request, the Company will adhere to the provisions of sections 71 to 74 of the Act.
- 17.3. The attention of the requester is drawn to the provisions of Chapter 5 of Part 3 of the Act in terms of which the Company is obliged, in certain circumstances,

to advise third parties of requests lodged in respect of information applicable to or concerning such third parties.

- 17.4. In addition, the provisions of Chapter 2 of Part 4 of the Act entitles third parties to dispute the decisions of the head of the Company, the Information Officer or his/her Deputy, by referring the matter to the High Court of South Africa.

18. GROUNDS FOR REFUSAL

- 18.1. The Information Officer, or his/her Deputy, may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Company may refuse access include:

- 18.1.1. protecting Personal Information that the Company holds about a third person (who is a natural person) including a deceased person, from unreasonable disclosure;
- 18.1.2. protecting commercial information that the Company holds about a third party or the Company (for example trade secrets, financial, commercial, scientific, or technical information that may harm the commercial or financial interests of the organization or the third party);
- 18.1.3. if disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- 18.1.4. if disclosure of the record would endanger the life or physical safety of an individual;
- 18.1.5. if disclosure of the record would prejudice or impair the security of property or means of transport;

- 18.1.6. if disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
 - 18.1.7. if disclosure of the record would prejudice or impair the protection of the safety of the public;
 - 18.1.8. the record is privileged from production in legal proceedings, unless the legal privilege has been waived;
 - 18.1.9. disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Company;
 - 18.1.10. disclosure of the record would put the Company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
 - 18.1.11. the record is a computer programme; and
 - 18.1.12. the record contains information about research being carried out or about to be carried out on behalf of a third party or the Company.
- 18.2. Any request for information which is clearly frivolous or vexatious or which involves an unreasonable number of resources be spent in obtaining such records, shall be refused.
- 18.3. All requests for information shall be decided on their own merits and in terms of the Act, POPIA and other applicable legislation.

19. REMEDIES

- 19.1. The Company does not have internal appeal procedures regarding the refusal of any requests. As such, the decision made by Information Officer or his/her Deputy is final.
- 19.2. If a request is denied, the requestor is entitled, within 30 (thirty) days after receiving the decision of refusal, to apply to a court with appropriate jurisdiction, for relief.
- 19.3. Should a third party be aggrieved by a decision to grant a request for information under the Act, such person may, within 30 (thirty) days after receiving the decision to grant the request, to apply to a court with appropriate jurisdiction, for relief.
- 19.4. A requester is entitled to lodge a complaint with the Information Regulator, should he/she wish to do so.

20. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

- 20.1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.
- 20.2. The Company requires Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions and provide a service to its customers. The manner in which this information is processed and the purpose for which it is processed is determined by the Company. The Company is accordingly a Responsible Party, as defined, for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- 20.2.1. is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. The Company must also have a legal basis (for example, consent) to process Personal Information;
- 20.2.2. is processed only for the purposes for which it was collected;
- 20.2.3. will not be processed for a secondary purpose unless that Processing is compatible with the original purpose;
- 20.2.4. is adequate, relevant, and not excessive for the purposes for which it was collected;
- 20.2.5. is accurate and kept up to date;
- 20.2.6. will not be kept for longer than necessary;
- 20.2.7. is processed in accordance with integrity and confidentiality principles; including physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Company, in order to protect against access and acquisition by unauthorized persons and accidental loss, destruction or damage;
- 20.2.8. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:

- 20.2.8.1. be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data breach;
- 20.2.8.2. know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
- 20.2.8.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained Personal Information;
- 20.2.8.4. object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Company's record-keeping requirements);
- 20.2.8.5. object to the Processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- 20.2.8.6. lodge a complaint with the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal Information.

21. CATEGORIES OF DATA SUBJECTS AND THEIR PERSONAL INFORMATION

The company may possess records relating to suppliers, members, partners, contractors, service providers, staff, and clients (i.e. beneficiaries) which may be in connection with the following:

| ENTITY TYPE | PERSONAL INFORMATION PROCESSED |
|----------------------------|--|
| Clients – Natural Persons | <ul style="list-style-type: none"> • names; • physical and postal addresses; • date of birth; • ID number; • tax-related information; • nationality; • gender; • confidential correspondence; and • any identifying number, symbol, email address, telephone number, location information, online identifier, or other particular assignment to the person. |
| Clients – Juristic Persons | <ul style="list-style-type: none"> • names of contact persons; • name of legal entity; • registration number; • physical and postal address; • contact details; • financial information; • founding documents; • tax-related information; • shareholding related information; • authorised signatories; |

| | |
|---------------------------------------|---|
| | <ul style="list-style-type: none"> • beneficiaries; and • ultimate beneficial owners. |
| Clients – Foreign Persons or Entities | <ul style="list-style-type: none"> • names; • contact details; • physical and postal addresses; • date of birth; • ID number; • tax-related information; • shareholding related information; • nationality; • gender; • confidential correspondence; and • identifying number, symbol, email address, telephone number, location information, online identifier, or other particular assignment to the person. |
| Contracted Service Providers | <ul style="list-style-type: none"> • names of contact persons; • name of legal entity; • registration number; • physical and postal address; • contact details; • founding documents; and • tax-related information. |
| Employees or Directors | <ul style="list-style-type: none"> • biometric information; • information relating to the education and/or medical, financial, criminal or employment history of the Data Subject; • information relating to the race, gender, marital status, national origin, age, |

| | |
|--|--|
| | <p>disability, language, and birth of the Data Subject;</p> <ul style="list-style-type: none"> • the personal opinions, views, or preferences of the Data Subject; and • the views or opinions of another individual about the Data Subject. |
|--|--|

22. THE COMPANY MAY SUPPLY PERSONAL INFORMATION TO THE FOLLOWING RECIPIENTS

- 22.1. Regulatory, statutory and government bodies;
- 22.2. Employees of the Company;
- 22.3. Suppliers, service providers, vendors, agents, and representatives of the Company;
- 22.4. The Company's members and other stakeholders;
- 22.5. Third party verification agencies and the credit bureau;
- 22.6. Collection agencies; and
- 22.7. Banks and other financial institutions.

23. CROSS-BORDER FLOWS OF PERSONAL INFORMATION

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- 23.1. recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the conditions for lawful processing as contained in POPIA; or
- 23.2. the Data Subject consents to the transfer of their Personal Information; or
- 23.3. the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or

- 23.4. the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- 23.5. the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

24. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

24.1. The Company employs up-to-date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. The measures include:

24.1.1. firewalls;

24.1.2. anti-virus protection software and update protocols;

24.1.3. logical and physical access control;

24.1.4. secure setup of hardware and software making up the IT infrastructure; and

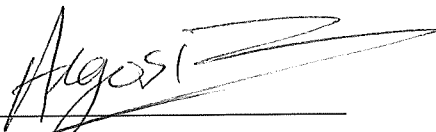
24.1.5. outsourced service providers who process Personal Information on behalf of the company are contracted to implement security controls.

25. SECURITY MEASURES IMPLEMENTED OR TO BE IMPLEMENTED BY THE COMPANY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY FOR THE PERSONAL INFORMATION WHICH MAY BE OR IS BEING PROCESSED BY THE COMPANY:

25.1. The Company continuously establishes and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the Personal Information which may be in its possession or under its control is secure.

25.2. The Company further ensures that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, or access, by having regard to the requirements set forth in law, in industry practice, and generally accepted information security practices and procedures which apply to the Company.

THIS DOCUMENT IS APPROVED AND SIGNED BY THE MANAGING DIRECTOR OF THE COMPANY ON THIS 15 DAY OF AUGUST 2024.



**ANGUS BROWN
MANAGING DIRECTOR
MINIT MONEY (PTY) LTD**

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

 (Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

- Request is made in my own name Request is made on behalf of another person.

| PERSONAL INFORMATION | | | |
|---|-----------|--|------------|
| Full Names | | | |
| Identity Number | | | |
| Capacity in which request is made <i>(when made on behalf of another person)</i> | | | |
| Postal Address | | | |
| Street Address | | | |
| E-mail Address | | | |
| Contact Numbers | Tel. (B): | | Facsimile: |
| | Cellular: | | |
| Full names of person on whose behalf request is made <i>(if applicable)</i> : | | | |
| Identity Number | | | |
| Postal Address | | | |

| | | | |
|--|----------|--|-----------|
| Street Address | | | |
| E-mail Address | | | |
| Contact Numbers | Tel. (B) | | Facsimile |
| | Cellular | | |
| PARTICULARS OF RECORD REQUESTED | | | |
| <i>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. All additional pages must be signed.)</i> | | | |
| Description of record or relevant part of the record: | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Reference number, if available | | | |
| Any further particulars of record | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| TYPE OF RECORD <i>(Mark the applicable box with an "X")</i> | | | |
| Record is in written or printed form | | | |
| Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | | | |
| Record consists of recorded words or information which can be reproduced in sound | | | |
| Record is held on a computer or in an electronic, or machine-readable form | | | |

| FORM OF ACCESS <i>(Mark the applicable box with an "X")</i> | |
|--|--|
| Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i> | |
| Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | |
| Transcription of soundtrack <i>(written or printed document)</i> | |
| Copy of record on flash drive <i>(including virtual images and soundtracks)</i> | |
| Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i> | |
| Copy of record saved on cloud storage server | |

| MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i> | |
|---|--|
| Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i> | |
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format <i>(including transcriptions)</i> | |
| E-mail of information <i>(including soundtracks if possible)</i> | |
| Cloud share/file transfer | |
| Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i> | |

| PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED | |
|--|--|
| <i>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.</i> | |
| Indicate which right is to be exercised or protected | |
| | |
| | |

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

| FEES | |
|--------|--|
| a) | <i>A request fee must be paid before the request will be considered.</i> |
| b) | <i>You will be notified of the amount of the access fee to be paid.</i> |
| c) | <i>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 a record.</i> |
| d) | <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i> |
| Reason | |
| | |
| | |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication <i>(Please specify)</i> |
|----------------|-----------|---|
| | | |

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

| | |
|---|--|
| <i>Reference number:</i> | |
| <i>Request received by: (State Rank, Name And Surname of Information Officer)</i> | |
| <i>Date received:</i> | |
| <i>Access fees:</i> | |
| <i>Deposit (if any):</i> | |

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

TO: _____

Reference number: _____

Your request dated _____, refers.

1. You requested:

| | |
|--|--|
| Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B. | |
|--|--|

OR

2. You requested:

| | |
|--|--|
| Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form) | |
| Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc) | |
| Transcription of soundtrack (written or printed document) | |
| Copy of information on flash drive (including virtual images and soundtracks) | |
| Copy of information on compact disc drive (including virtual images and soundtracks) | |
| Copy of record saved on cloud storage server | |

3. To be submitted:

| | |
|--|--|
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format (including transcriptions) | |
| E-mail of information (including soundtracks if possible) | |
| Cloud share/file transfer | |
| Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available) | |

Kindly note that your request has been:

Approved

Denied, for the following reasons:

| |
|--|
| |
|--|

4. Fees payable with regards to your request:

| Item | Cost per A4-size page or part thereof/item | Number of pages/items | Total |
|---|--|-----------------------|-------|
| Photocopy | | | |
| Printed copy | | | |
| For a copy in a computer-readable form on: | | | |
| (i) Flash drive | R40.00 | | |
| • To be provided by requestor | | | |
| (ii) Compact disc | R40.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | R60.00 | | |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on the quotation of the service provider | | |
| Copy of visual images | | | |
| Transcription of an audio record, per A4-size | R24.00 | | |
| Copy of an audio record | | | |
| (i) Flash drive | R40.00 | | |
| • To be provided by requestor | | | |
| (ii) Compact disc | R40.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | R60.00 | | |
| Postage, e-mail or any other electronic transfer: | Actual costs | | |
| TOTAL: | | | |

5. Deposit payable (if search exceeds six hours):

Yes

No

| Hours of search | Amount of deposit (calculated on one third of total amount per request) |
|-----------------|--|
| | |

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer

