



PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000
(as amended)

This manual applies to

Contactable Proprietary Limited

Registration number:

2012/154640/07

Table of Contents

1. List of acronyms and abbreviations	3
2. Purpose of PAIA Manual	3
3. Key contact details for access to information of Contactable	4
4. Guide on how to use PAIA and how to obtain access to the Guide	5
5. Categories of records of Contactable which are available without a person having to request access	6
6. Description of the records of Contactable held in accordance with other legislation	6
7. Description of the subjects on which Contactable holds records and categories of records held on each subject by Contactable	6
8. Processing of Personal Information	7
9. Availability of the PAIA Manual	9
10. Access Requests	10
11. Updating of the PAIA Manual	11
Annexure A: FORM 2 - REQUEST FOR ACCESS TO RECORD [Regulation 7]	12
Annexure B: FORM 3 - OUTCOME OF REQUEST AND OF FEES PAYABLE [Regulation 8]	16

1. List of acronyms and abbreviations

- | | | |
|------------|-------------------------------|--------------------------------------------------------------------|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “Data Subjects” | As defined in POPIA |
| 1.3 | “DIO” | Deputy Information Officer; |
| 1.4 | “IO” | Information Officer; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.6 | “Personal Information” | As defined in POPIA |
| 1.7 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.8 | “Regulator” | Information Regulator; and |
| 1.9 | “Republic” | Republic of South Africa |

2. Purpose of PAIA Manual

This PAIA Manual is useful for the public to-

- 2.1** Check the categories of records held by Contactable which are available without a person having to submit a formal PAIA request;
- 2.2** Have a sufficient understanding of how to make a request for access to a record of Contactable, by providing a description of the subjects on which Contactable holds records and the categories of records held on each subject;
- 2.3** Know the description of the records of Contactable which are available in accordance with any other applicable legislation;
- 2.4** Access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;
- 2.5** Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6** Know if Contactable 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;

- 2.7 Know the description of the categories of Data Subjects and of the information or categories of information relating thereto;
- 2.8 Know the recipients or categories of recipients to whom the Personal Information may be supplied;
- 2.9 Know if Contactable 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
- 2.10 Know whether Contactable has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

3. ***Key contact details for access to information of Contactable***

3.1. **Information Officer**

Name: S. Strydom, CEO
Tel: +27 10 100 3647
Email: privacy@staycontactable.com

3.2. **Deputy Information Officer**

Name: A du Preez, Chief Legal & Risk Officer
Tel: +27 10 100 3647
Email: privacy@staycontactable.com

3.3 **Access to information general contacts**

Email: privacy@staycontactable.com

3.4 **National or Head Office**

Postal Address: PO BOX 1472, Bedfordview, Johannesburg, Gauteng, 2008
Physical Address: 17 Via Salara Crescent, Irene Corporate Corner, Centurion, 0133
Tel: +27 10 100 3647
Email: privacy@staycontactable.com
Website: www.contactable.co.za

4. Guide on how to use PAIA and how to obtain access to the Guide

- 4.1.** The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2.** The Guide is available in the official languages, as described on the Regulator’s website (please refer to <https://inforegulator.org.za/paia-guidelines/>).
- 4.3.** The aforesaid Guide, *inter alia*, includes the description of the following –
- 4.3.1. The objectives of PAIA and POPIA;
 - 4.3.2. The manner and form of a request for access to a record of a private body contemplated in section 50;
 - 4.3.3. The assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.4. 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:
 - 4.3.4.1. An internal appeal;
 - 4.3.4.2. A complaint to the Regulator; and
 - 4.3.4.3. An application with a court against a decision by the IO 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;
 - 4.3.5. The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.6. The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively; and
 - 4.3.7. The notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access.
- 4.4.** The Guide can also be obtained -

4.4.1. Upon request to the IO;

4.4.2. From the website of the Regulator (<https://info regulator.org.za/paia-guidelines/>).

5. *Categories of records of Contactable which are available without a person having to request access*

Below are the categories of records held by Contactable which are available without a person having to request access.

Category of records	Types of the Record
Public Information	General company information available in the public domain, on the Contactable website and on social media
PAIA Manual	Promotion of Access to Information Act 2 of 2000, as amended

6. *Description of the records of Contactable held in accordance with other legislation*

Below are the records which are created and stored in accordance with applicable South African legislation. To gain access to the records below, a person must follow the Request for Access to Record Procedure, as further described in section 10 of this PAIA Manual.

Category of Records	Applicable Legislation
Memorandum of Incorporation and other statutory information	Companies Act 71 of 2008, as amended
Tax records	Income Tax Act 58 of 1962, as amended. Value-Added Tax Act 89 of 1991, as amended.
Employment records	Basic Conditions of Employment Act 75 of 1997, as amended. Labour Relations Act 66 of 1995
Health and Safety records	Occupational Health and Safety Act 85 of 1993, as amended

7. *Description of the subjects on which Contactable holds records and categories of records held on each subject by Contactable*

Below are the subjects in respect of which Contactable holds records and the categories of

records held on each subject. To gain access to the records below, a person must follow the Request for Access to Record Procedure, as further described in section 10 of this PAIA Manual.

Subjects on which Contactable holds records	Categories of records
Financial Records, Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> - Annual Audited Financial Records and Reports - Strategic Plan - Proposals
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employee records
Insurance	<ul style="list-style-type: none"> - Business Insurance Policies
Information security and data protection	<ul style="list-style-type: none"> - ISO 27001 Certificate and Framework - Pen test results
Intellectual Property	<ul style="list-style-type: none"> - Source code - Trade secrets, processes, designs and plans - Trademarks, etc.
Contracts	<ul style="list-style-type: none"> - Licensing Agreements, Non-Disclosure Agreements and other agreements

8. *Processing of Personal Information*

8.1 Purpose of Processing Personal Information

In general, Personal Information is processed by Contactable for business administration purposes and in the ordinary course of operation, which would include:

- 8.1.1 Provision of our products and services
- 8.1.2 Keeping our Data Subject records up to date
- 8.1.3 Managing our employees in general
- 8.1.4 Managing supplier contracts in general
- 8.1.5 Managing customers in general
- 8.1.6 Enforcing debts

8.1.7 Processing customer requests or complaints

8.1.8 Processing Personal Information of employees for labour law and administrative purposes.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below are the categories of Data Subjects in respect of whom Contactable processes Personal Information and the nature or categories of the Personal Information being processed. To gain access to the records below, a person must follow the Request for Access to Record Procedure, as further described in section 10 of this PAIA Manual.

Categories of Data Subjects	Personal Information that may be processed
Clients	Name, address, registration numbers or identity numbers, contact details, email addresses, correspondence, VAT numbers, transactional information and bank details
Service Providers	Name, address, registration numbers or identity numbers, contact details, email addresses, correspondence, VAT numbers and bank details
Employees	Address, qualifications, salary details, bank details, gender, next of kin information, medical information, correspondence, race and biometric information (for access control purposes)
Data Providers	Name, address, registration numbers or identity numbers, contact details, email addresses, correspondence, VAT numbers and bank details
Channel Partners	Name, address, registration numbers or identity numbers, contact details, email addresses, correspondence, VAT numbers and bank details
Shareholders and Directors	Name, address, registration numbers or identity numbers, contact details, email addresses, correspondence and bank details
Investor Stakeholders	Name, address, registration numbers, correspondence, contact details and email addresses
Customers of Clients*	Identity and Know Your Customer information

** Contactable only processes such Personal Information as Operator and per instruction from its clients (as the Responsible Parties) in accordance with contractual agreements.*

8.3 The recipients or categories of recipients to whom the Personal Information may be supplied

Below are the person or category of persons to whom Contactable may disseminate Personal Information.

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Identity number and names of employees for criminal checks	South African Police Services
Identity and Know Your Customer information	Clients in accordance with their customer contracts, regulatory requirements and consents
Personal or other confidential information	Per request from a regulatory authority
Identity number and names of employees	South African Revenue Services

8.4 Planned transborder flows of Personal Information

The Personal Information collected by Contactable from Data Subjects may be transferred to, processed or stored in the cloud at a General Data Protection Regulations (“GDPR”) country outside the Republic.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Contactable was awarded ISO 27001 certification in June 2023 and Contactable therefore implements the security safeguards described in ISO 27001 to ensure the confidentiality, availability and integrity of the Personal Information under the care of Contactable.

9. Availability of the PAIA Manual

9.1 A copy of the Manual is available-

9.1.1 On www.contactable.co.za;

9.1.2 To any person upon request to the IO and upon the payment of a reasonable prescribed fee; and

9.1.3 To the Regulator upon request.

9.2 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.

10. Access Requests

10.1 Request for Access to Record Procedure

10.1.1 Completion of Request for Access to Record Form

To facilitate a timely response to requests for access, all requesters should take note of the following when seeking to obtain access:

- The Request for Access to Record Form (Form 2) attached hereto as Annexure A and as published on the Regulator's website at <https://info regulator.org.za/paia-forms/> must be completed by the requester.
- Proof of identity is required to authenticate the identity of the requester – in addition to submission of the completed Request for Access to Record Form. Consequently, requesters will be required to supply a certified copy of their identification document or a valid passport document, or if a legal entity, a certified copy of the company registration certificate.
- Please note that the successful completion and submission of a Request for Access to Record Form does not automatically constitute an approval of access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within PAIA and access to records may be refused on reasonable grounds.
- If it is reasonably suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

10.1.2 Submission of Request for Access to Record Form

- The completed Request for Access to Record Form, together with a certified copy of the requestor's identity document, must be addressed to the Information Officer and submitted via the contact details stated in this PAIA Manual.

10.1.3 Payment of Fees and Outcome of Request

- An initial request fee of R57.50 (including VAT), or as otherwise described in Form 3, is payable on submission of the Request for Access to Record Form. This prescribed fee is a legally allowable charge as per PAIA. The charge does not need to be levied but the holder of the records is entitled to levy this fee to compensate

for any administrative effort incurred in order to make the record available to the requester.

- Payment details can be obtained from the IO indicated above and can be made via electronic transfer. Proof of payment must be supplied via the contact details stated in this PAIA Manual.
- The IO will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- This thirty-day period may be extended for a further period of not more than thirty days, if the request is for a large volume of information and the information cannot reasonably be obtained within the original 30 (thirty) day period. The requester will be notified in writing should an extension be sought.
- The Outcome of Request and of Fees Payable Form (Form 3) attached hereto as Annexure B, will be used by the IO to communicate its decision regarding the access request and the prescribed fees payable if the request is granted.

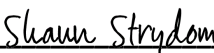
10.1.4 Appeal against refusal to grant access

- If a requester is aggrieved by the refusal of the IO to grant a request for a record, the requester may, upon notification of the IO's decision (or upon deemed refusal in terms of Section 58 of the PAIA), lodge a complaint to the Regulator or apply to court for appropriate relief within the timeframes as prescribed by the PAIA.

11. **Updating of the PAIA Manual**

As required, this manual will be updated and an updated version will be published as set out in section 9. above.

Issued by

DocuSigned by:

53E38C6773F54F7...
S. Strydom

Chief Executive Officer and Information Officer

Contactable Proprietary Limited

Annexure A: 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			
<p><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></p>			
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

Annexure B: 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.

Reference number: _____

TO:

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 or Denied, for the following reasons:

<input type="checkbox"/>	
<input type="checkbox"/>	

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	R60.00		
• If provided to the requestor			
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	R60.00		
• If provided to the requestor			
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