

PROMOTION OF ACCESS TO INFORMATION ACT, 2000

(PAIA) S51 Manual

THE REWARDSCO GROUP

Prepared by: Fathima Dildar

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, Number 2 of 2000 (the "Act") and the Protection of Personal Information Act, Act No 4 of 2013 ("POPI").

Version Date From: 1 January 2021

What is the purpose of this Manual?

1. Under the Promotion of Access to Information Act 2000 ("PAIA"), The Rewardsco Group is required to grant individuals access to records held by The Rewardsco Group if that record is required by the individual to exercise or protect any legal right that individual enjoys under the law.
2. Additionally, under the Protection of Personal Information 2013 ("POPI"), The Rewardsco Group is required to be open and transparent about how The Rewardsco Group handles personal information and allow individuals to access and correct their personal information.
3. The purpose of this Manual is to set out the information which The Rewardsco Group is legally required to disclose under PAIA and POPI, and to explain how You can exercise Your statutory rights under PAIA and POPI with respect to records and personal information handled by The Rewardsco Group.

What is the status and scope of this Manual?

This Manual was last updated on 01 January 2021 and may be revised from time to time to reflect changes in laws and regulations, or changes in The Rewardsco Group's business operation.

This Manual applies only in respect to records and personal information held by The Rewardsco Group companies that operate in South Africa.

Who is The Rewardsco Group?

The Rewardsco Group consists of Rewardsco Investments (Pty) Ltd, registration number 1996/009032/07 as the holding company and its subsidiaries:

Rewardsco Sales (Pty) Ltd, registration number 2007/006416/07;

Mondo Connect (Pty) Ltd, registration number 2014/125576/07;

Jika (Pty) Ltd, registration number 2017/542571/07; and
Vuka Money (Pty) Ltd, registration number 2014/077231/07.

Compliance Officer: Financial Services

Moonstone Compliance and Risk Management

25 Quantum Street, Technopark,

Stellenbosch,

7600

South Africa

Tel: +27 21 883 8000

Email: cpayne@moonstonecompliance.co.za

What are my rights under PAIA?

Under PAIA, everyone has the right to access to:

- (1) any information held by the state; and
- (2) any information that is held by another person and that is required for the exercise or protection of any rights.

A public body may make a request for information under PAIA only if, in making the request, the public body is acting in the public interest.

If You wish to make a request under PAIA to The Rewardsco Group, please follow the procedure described below of this Manual.

Please note that Your request will be subject to the applicable charges set out in Section B5.

You can learn more about Your rights under PAIA by contacting the South African Human Rights Commission ("SAHRC") at:

South African Human Rights Commission

Braampark Forum 3

33 Hoofd Street Braamfontein

South Africa

Email: info@sahrc.org.za

Web: <http://www.sahrc.org.za>

Tel: +27 11 877 3600

SAHRC has produced a detailed guidance on how to exercise Your rights under PAIA. This guidance (known as PAIA Section 10 Guide) is available from SAHRC and can be accessed on SAHRC's website.

What are my rights under POPI?

Under POPI, everyone has various rights in respect of his/her own personal information.

Your rights under POPI include Your right to ask The Rewardsco Group to:

- (1) confirm whether or not The Rewardsco Group handles Your personal information;
- (2) grant access to Your own personal information;
- (3) correct, destroy, or delete Your personal information, if Your personal information held by The Rewardsco Group is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or was obtained illegally; or
- (4) stop using Your personal information in particular ways, for example by asking The Rewardsco Group to stop using Your personal information for direct marketing purpose.

Further information regarding why and how The Rewardsco Group handles personal can also be downloaded separately from:

Rewardsco Investments (Pty) Ltd: <https://rewardscoinvestments.com/>

Rewardsco Sales (Pty) Ltd: <https://rewardsco.com/>

Vuka Money (Pty) Ltd: <https://vuka.online/legal-policies/privacy-policy/>

Jika (Pty) Ltd: <https://www.jikaconnect.co.za/privacy-policy/>

Mondo Connect (Pty) Ltd: <https://www.mondo.co.za/privacy-policy>

If You wish to make a request to The Rewardsco Group under POPI in respect of Your personal information, please follow the procedure described in this Manual. Please note that Your request will be subject to the applicable charges set out below.

POPI establishes a new regulator called the Information Regulator. Should you wish to contact the Information Regulator, you may do so in one of the following ways:

The Information Regulator (South Africa)

Salu Building

316 Thabo Sehume Street

Pretoria

Tel: +27 12 406 4818

Email: inforeg@justice.gov.za

Procedure for making a request under PAIA / POPI

How can I make a request to The Rewardsco Group under PAIA/POPI?

If You wish to access records held by The Rewardsco Group or wish to access/correct Your personal information, You will need to:

- (1) complete the Request Form (Annexure A)

(2) submit the completed Request Form by:

(a) emailing a scanned PDF of the completed Request Form to:

Rewardsco Investments (Pty) Ltd: privacy@rewardsco.co.za

Rewardsco Sales (Pty) Ltd: privacy@rewardsco.co.za

Vuka Money (Pty) Ltd: privacy@vuka.co.za

Mondo Connect (Pty) Ltd: privacy@mondo.co.za

Jika (Pty) Ltd: privacy@jika.co.za

(b) posting the completed Request Form to:

(i) Compliance Officer

The Rewardsco Group

2 Ncondo Place

Umhlanga

4319

KwaZulu-Natal

South Africa

(c) pay the applicable Request Fee described in below. Payment can be made via:

(i) bank guaranteed cheque or postal order

written to the relevant company within The Rewardsco Group; or

(ii) EFT (direct bank transfer). If You wish to pay the applicable Request Fee via EFT, You will need to send the proof of payment together with Your request. You can obtain the details required for EFT by contacting the company within The Rewardsco Group as applicable (see Section above for contact details).

Unfortunately, The Rewardsco Group cannot accept payment via credit card or debit card.

Please note that Your request will not be processed until the applicable Request Fee is paid (see amounts below).

If You are unable to complete the Request Form (e.g. if You don't know how to write/type or if You have disability that prevents You from completing the Request Form), please contact The Rewardsco Group by telephone at : +27 31 533 3000

When You complete the Request Form, please be sure to complete the form as fully as You can. Please note that The Rewardsco Group will not be able to process Your request unless You provide:

(1) sufficient particulars to enable The Rewardsco Group to:

(a) identify You;

(b) identify the records/personal information in question; and

- (c) ascertain the nature of Your request and the form or manner in which You require access;
- (2) if You are making a request under PAIA, sufficient explanation regarding the right You seek to exercise or protect, including a clear explanation as to why You feel that the records You request is required to exercise or protect that right; and
- (3) if You are making a request on behalf of another person, proof of the capacity in which You are making the request.

How will my PAIA/POPI request be processed by The Rewardsco Group?

The Rewardsco Group will process Your request when the completed Request Form is received and any applicable Request Fee is paid. Your request will normally be processed within 30 days of receipt of the completed Request Form, provided that all of the required details are properly set out in the completed Request Form.

If it turns out that it will take more than 30 days to process Your request (e.g. due to the volume of records/personal information that must be processed, or difficulty in accessing the relevant record/personal information), The Rewardsco Group may extend the aforementioned 30 day period in processing Your request. Should this become necessary, The Rewardsco Group will notify You.

Once a decision on Your request is reached, The Rewardsco Group will notify You in writing.

Where The Rewardsco Group decides to:

- (1) grant access to the record/personal information requested, The Rewardsco Group will notify You how the access will be granted and what Access Fees are payable, and release the requested record/personal information upon receipt of the applicable Access Fee;
- (2) deny access to the record/personal information requested, The Rewardsco Group will notify You of the reasons why access is denied;
- (3) comply with Your request to correct or delete Your personal information, confirm how Your request has been or will be actioned; and
- (4) deny Your request to correct or delete Your personal information, confirm why Your request has been denied.

Please note that if You wish to make an application to the court, You will need to do so within 180 days of receiving the relevant decision made by The Rewardsco Group.

What are the charges applicable to my PAIA/POPI request?

There are two types of fees which are payable under PAIA, namely Request Fee, and Access Fee.

Request Fee is payable upon making a request to access records/personal information, and it is R50.00 (inclusive of VAT) for each request. You do not have to pay a Request Fee if:

- (1) You are a private individual requesting access to Your own records/personal information;
- (2) You are single and earning less than R14,812 p/a; or
- (3) You are married (or in a life partnership), and earning less than R27,192 p/a.

Access Fee is payable in respect of records/ personal information which are produced in response to Your request. Access Fee is payable by everyone who makes a request. The rate of Access Fees are as follows:

Type of activity involved in producing the record or personal information Rate (inc. VAT)

For every photocopy of an A4-size page or part thereof. R1,10

For every printed copy of an A4-size page or part thereof. Held on a computer or in electronic or machine readable form. R0.75

For a copy in a computer-readable form on CD. R70.00

For a transcription of visual images, for an A4-size page or part thereof. R40.00

For a copy of visual images. R60.00

For a transcription of an audio record, for an A4-size page or part thereof. R20.00

For a copy of an audio record. R30.00

Each hour or part of an hour (excluding the first hour) reasonably required to search for and prepare the record/personal information for disclosure. R30.00

For posting the record/personal information. Actual postage incurred

For confirming whether or not The Rewardsco Group handles personal information of the requestor (POPI s23(1)(a) request): Free of charge

Please note that:

- (1) where Request Fee is payable, Your request will not be processed until You pay the Request Fee;
- (2) where Access Fee is payable, the record/ personal information You requested will not be released until the Access Fee is paid; and

Please also note that if You are not a private individual and if the search for and preparation of the record requested is in The Rewardsco Group's view likely to require more than 6 hours of work, The Rewardsco Group reserves the right to require You to pay 1/3rd of the Access Fee up front as a deposit.

Records The Rewardsco Group makes available under PAIA

What records does The Rewardsco Group make available under PAIA?

You can request access to different types of records maintained by The Rewardsco Group, including the following:

- (1) Personnel Records, including (but not limited to):
 - (a) training schedules and material;
 - (b) personal records provided by personnel;
 - (c) conditions of employment and other personnel related records; and
 - (d) correspondence relating to personnel.

NB: "Personnel" refers to any person who works for or provides services to or on behalf of The Rewardsco Group and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of The Rewardsco Group, including directors, all permanent, temporary and part-time staff, as well as contract workers.

- (2) Client Records, including (but not limited to):
- (a) records generated by or within The Rewardsco Group relating to its clients;
 - (b) records provided by a third party (typically insurer) in respect of the client; and
 - (c) records provided by a client to a third party acting for or on behalf of The Rewardsco Group.

NB: A “client” refers to any natural or juristic entity that The Rewardsco Group performs services for and by whom The Rewardsco Group receives remuneration from by virtue of performing those services.

- (3) Company Records, including (but not limited to):
- (a) financial records;
 - (b) operational records;
 - (c) IT-related records;
 - (d) communication;
 - (e) administrative records;
 - (f) internal Policies and Procedures;
 - (g) statutory records; and
 - (h) HR records (not being Personnel Records).

NB: Company Records typically encompass records which pertain to The Rewardsco Group’s own internal business affairs.

- (4) Third Party Records — records held by The Rewardsco Group pertaining to other parties (not being Personnel Records or Client Records), including (but not limited to):
- (a) Financial records, correspondence, contractual records and records provided by the other party.
 - (b) Personnel, customer or company records which are held by another party, as opposed to the records held by The Rewardsco Group itself.
- (5) Records available in accordance with various legislation, including (but not limited to):
- (a) The Financial Advisory and Intermediary Service Act 37 of 2002;
 - (b) Short-Term Insurance Act 53 of 1998;
 - (c) Companies Act 71 of 2008;
 - (d) The Employment Equity Act;
 - (e) The Basic Conditions of Employment Act 75 of 1997;
 - (f) The Labour Relations Act 66 of 1995;
 - (g) Promotion of Access to Information Act 2 of 2000; and
 - (h) Protection of Personal Information Act 4 of 2013.
-

ANNEXURE A

REQUEST PROCEDURE

To facilitate the processing of your request, kindly complete and submit the form to the e-mail address of the Compliance/Information Officer/s for the entity within The Rewardsco Group indicated above.

The Compliance/Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer the Manual for a full breakdown of fees payable.

Once the request has been processed, the Compliance/Information Officer/s will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

A. Particulars of Private Body
The Head:
B. Particulars of person requesting access to the record

- (i) The particulars of the person who requests access to the record must be recorded below
- (ii) Furnish an address and/or fax number in the Republic to which information must be sent
- (iii) Proof of the capacity in which the request is made, if applicable, must be attached

Full names & surname:

Identity number:

Postal address:

Fax number:

Telephone number:

Email address:

Capacity:

C. Particulars of person on whose behalf request is made

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

Full names & surname:

Identity number:

D. Particulars of Record

- (i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you
- (ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages

Description of record:

Reference number:

Any further particulars:

E. Fees

- (i) A request for access to a record, other than a record containing personal information about yourself, will be processed
- (ii) only after a request fee has been paid
- (ii) You will be notified of the amount required to be paid as the request fee
- (iii) 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
- (iv) If you qualify for exemption of the payment of any fee, please state the reason therefor

Reason for exemption:

F. Form of access to record

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

Disability:

Form in which required:

Mark the appropriate box with an "X"

- (i) Your indication as to the required form of access depends on the form in which the record is available
- (ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form
- (iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1) If the record is in written or printed form:

- copy of record
- inspection of record

2) If record consists of visual images:

- view the images
- copy of the images
- transcription of the images

3) If the record consists of recorded words or information which can be reproduced in sound:

- listen to the soundtrack
- transcription of the soundtrack

4) If the record is held on computer or in an electronic or machine-readable form:

- printed copy of record
- copy in computer readable form

Please indicate the preferred method of delivery

- By hand
- Email
- Post
- Fax

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign additional folios.

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:

H. Notice of decision regarding the request for access

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

I. Signature page

Signed at:

Date:

Signature of Requester / Person on whose behalf request is made:

--

