

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

IN TERMS OF SECTION 51 FOR FREI ONE DIGITAL (PTY) LTD.

DATE OF COMPILATION: 01/09/2021

DATE OF REVISION: 01/09/2021

1. INTRODUCTION

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000, herein after The Act). The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

The PAIA Manual is a useful document for the public in order to:

- a. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- b. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- c. know the description of the records of the body which are available in accordance with any other legislation;
- d. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- e. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- f. know if the body 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;
- g. know the description of the categories of data subjects and of the information or categories of information relating thereto;

- h. know the recipients or categories of recipients to whom the personal information may be supplied;
- i. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- j. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. FREI ONE DIGITAL OVERVIEW

FREI combines MVNE, FinTech, and Electronic Value Distribution functionality with a mobile application to provide a rich digital experience to customers, with mobile connectivity acting as the conduit through which additional services can be delivered.

Frei One Digital supports the constitutional right of access to information, and we are committed to provide you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of South African law.

3. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available on our website (www.frei.one) or by sending a request for a copy to the Information Officer by email. This Manual will be updated from time to time, as and when required.

4. HOW TO REQUEST ACCESS TO RECORDS HELD BY FREI ONE DIGITAL

Requests for access to records held by Frei One Digital must be made on the request form that is available annexed hereto, or the Department of Justice and Constitutional Development (www.doj.gov.za) (under "regulations"). Note that requests need not be accompanied by payment BUT will only be processed upon payment of the prescribed fees.

Requests for access to records must be made to our Information Officer at the address or electronic mail address provided for below under contact details.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right. If a request is made on behalf of a person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer of Frei One Digital.

The standard form that must be used for the making of requests is attached as annexure 1. Not using this form could cause your request to be refused (if you do not provide sufficient information or otherwise) or delayed.

Kindly note that all requests to Frei One Digital will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by Frei One Digital does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

5. CONTACT DETAILS

Name of Private Body:	Frei One Digital Designated
Information Officer:	Seán Strijdom
Email address of Information Officer:	dataprotection@frei.one
Address:	Kaaimans Building, 5 th Floor Lynnwood Bridge Office Park, 4 Daventry Road, Lynnwood Manor, Pretoria 0081
Telephone number:	+27010040282

6. HOW TO ACCESS THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT

The Guide described in Section 10 of the Act will be available from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission:	PAIA Unit
The Research and Documentation Department Postal address:	Private Bag 2700 Houghton 2041
Telephone:	+27 11 484-8300
Fax:	+27 11 484-0582
Website:	www.sahrc.org.za
E-mail:	paia@sahrc.org.za

7. VOLUNTARY DISCLOSURE

Frei One Digital has not published a notice in terms of Section 52(2) of the Act, however, it should be noted that the information relating to Frei One Digital and its services is freely available on Frei One Digital's website. Certain other information relating to Frei One Digital is also made available on the website from time to time.

Further information in the form of marketing brochures, advertising material and other public communication is made available from time to time.

8. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

- Basic Conditions of Employment No. 75 of 1997
- Companies Act 71 of 2008
- Electronic Communications and Transactions Act 25 of 2002.
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act No. 2 of 2000
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of this Act in terms of section 52(2) Section 51(1)(c): Not applicable

9. RECORDS HELD BY FREI ONE DIGITAL

Frei One Digital maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

Internal Records

- ▼ Memorandum and Articles of Association
- ▼ Financial records
- ▼ Operational records
- ▼ Intellectual property
- ▼ Marketing records
- ▼ Internal correspondence
- ▼ Product records
- ▼ Statutory records
- ▼ Internal policies and procedures

Personnel records

Personnel refers to any person who works for or provides services to or on behalf of Frei One Digital and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Frei One Digital. This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- ▶ Any personal records provided to Frei One Digital by their personnel;
- ▶ Any records a third party has provided to Frei One Digital about any of their personnel;
- ▶ Conditions of employment and other personnel-related contractual and quasi-legal records;
- ▶ Internal evaluation records; and
- ▶ Other internal records and correspondence.

Customer records

Please be aware that Frei One Digital is very concerned about protecting the confidential information of its customers. Please motivate any request for customer information very carefully, having regard to Sections 63 to 67 of the Act.

Customer information includes the following:

- ▶ Any records a customer has provided to Frei One Digital or a third party acting for or on behalf of Frei One Digital;
- ▶ Contractual information;
- ▶ Customer needs assessments;
- ▶ Personal records of customers;
- ▶ Research conducted in respect of customers;
- ▶ Any records a third party has provided to Frei One Digital about customers;
- ▶ Confidential, privileged, contractual and quasi-legal records of customers;
- ▶ Customer evaluation records;
- ▶ Customer profiling;
- ▶ Performance research conducted on behalf of customers or about customers;
- ▶ Any records a third party has provided to Frei One Digital either directly or indirectly; and
- ▶ Records generated by or within Frei One Digital pertaining to customers, including transactional records.

Technical records

Technical records generated by, or within Frei One Digital pertaining to customers.

Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, joint ventures, service providers and general market conditions. In addition, such other parties may possess records, which can be said to belong to Frei One Digital. The following records fall under this category:

- ▶ Personnel, customer or Frei One Digital records which are held by another party as opposed to being held by Frei One Digital; and

- ▶ Records held by Frei One Digital pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, cached information, records provided by the other party, and records third parties have provided about the contractors/suppliers or customer.

Other Records

Further records are held including: -

- ▶ Information relating to Frei One Digital own commercial activities; and
- ▶ Research carried out on behalf of a client by Frei One Digital or commissioned from a third party for a customer;
- ▶ Research information belonging to Frei One Digital, whether carried out itself or commissioned from a third party.

10. REPRODUCTION FEES

Where an institution has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

THE APPLICABLE FEES FOR REPRODUCTION AS REFERRED TO ABOVE ARE:

Description:	Amount in Rands
For every photocopy in black and white of an A4-size page or part thereof	2,00
For every printed copy of an A4-size page or part thereof	2,00
For a copy in a computer – readable form on:	
- Flash Drive (must be provided by the requestor).	40,00
- Optical compact disc:	
o If provided by the requestor	40,00
o If provided to the requester	60,00
A transcription of visual images, for an A4-size page or part thereof	The pricing will depend on a quote we receive from a supplier to do the transcription.
For a copy of visual images	The pricing will depend on a quote we receive from a supplier to do the transcription.

A transcription of an audio record per A4 size page.	24,00
For a copy of an audio record on:	
- Flash Drive (must be provided by the requestor.)	40,00
- Optical compact disc:	40,00
o If provided by the requestor	
o If provided to the requester	60,00
To search for and prepare a record that must be disclosed – this is charged per hour or part of an hour, but the amount may not exceed R435,00. The first hour is not chargeable.	145,00
A deposit can be asked for in the event that the search exceeds 6 hours.	This is calculated per request and is equal to one third of the amount for the items listed above.
Postage, email, or any other means of electronic communication	The actual expense incurred, if any.

Request fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R140,00 is payable up-front before the institution will further process the request received.

Access fees

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act, or an exclusion is determined by the Minister in terms of Section 54 (8). The applicable access fees which will be payable are:

Description:	Amount in Rands
For every photocopy in black and white of an A4-size page or part thereof	2,00
For every printed copy of an A4-size page or part thereof	2,00

For a copy in a computer – readable form on: - Flash Drive (must be provided by the requestor.) - Optical compact disc: o If provided by the requestor o If provided to the requester	40,00 40,00 60,00
A transcription of visual images, for an A4-size page or part thereof	The pricing will depend on a quote we receive from a supplier to do the transcription.
For a copy of visual images	The pricing will depend on a quote we receive from a supplier to do the transcription.
A transcription of an audio record per A4 size page.	24,00
For a copy of an audio record on: - Flash Drive (must be provided by the requestor.) - Optical compact disc: o If provided by the requestor o If provided to the requester	40,00 40,00 60,00
To search for and prepare a record that must be disclosed – this is charged per hour or part of an hour, but the amount may not exceed R 435,00. The first hour is not chargeable.	145,00
A deposit can be asked for in the event that the search exceeds 6 hours.	This is calculated per request and is equal to one third of the amount for the items listed above.
Postage, email, or any other means of electronic communication	The actual expense incurred, if any.

Deposits

Where the institution receives a request for access to information held on a person other than the requester himself/herself 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.

11. CONTACT DETAILS

You can contact FREI in relation to this Privacy policy by writing to us at dataprotection@frei.one or by calling our Customer Contact Centre at +27 012 004 0282.

12. REVISION OF POLICIES

We reserve the right to and may from time to time update this Notice.

Any such revision will be published as an amended version on our website.

Any change to this Policy will be posted as an updated version and readers are advised to visit and re-read this policy on a regular basis.

Issued by

(Seán Strijdom)

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 (if applicable):	
Identity Number	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

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.)

Description of recorder 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, videorecordings, 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>	
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PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

Indicate which right is to be exercised or protected	

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

FEES

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

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