

POPI & PAIA MANUAL

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The basis of the POPI Act is that organisations need to conduct themselves responsibly - responsible corporate citizenship. Organisations should not only be responsible, but should be seen to be responsible corporate citizens. Part of this responsibility is to protect the information inside the organisation, to be responsible when it comes to the process of storing and sharing personal information.

Genar8 uses and maintains its data responsibly. Our full POPI manual is listed below and our complaints line and opt-out features are readily available.

GENAR8 (PTY) LTD

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT

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INTRODUCTION

Genar8 (Pty) Ltd ("Genar8") is a private company with registration number 2014/095777/07 and registered address at Physical Address: V&A Waterfront, Cape Town, 8001, South Africa. We

are a digital lead generation and branding company that utilises a range of digital channels and strategies to create brand awareness and generate leads as well as increasing sales revenue of our clients.

The objective of the Promotion of Access to Information Act, 2000 ("PAIA") is to give effect to the constitutional right to access to information, which is held by a public or private body and which is required for the exercise or protection of any rights. PAIA recognises the right entrenched in Section 32 of the Constitution of the Republic of South Africa, 1996, and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

This manual is published in terms of Section 51 of PAIA and provides an outline of the type of records and personal information which we hold. The manual also explains how to submit requests for access to these records, and explains how to access, or object to, personal information held by us, or request correction of the personal information, in terms of the Protection of Personal Information Act, 2013 ("POPIA").

This manual further describes how we use your information when you utilise our software and services and sets out the requirements with which we undertake to comply when processing personal information pursuant to undertaking our operations.

AVAILABILITY OF MANUAL

This manual is available at our place of business at: Physical Address: V&A Waterfront, Cape Town, 8001, and to view on our website at www.genar8.co.za.

CONTACT DETAILS

Genar8:

Call: +27 21 140 3222

Physical Address: V&A Waterfront, Cape Town, 8001

Postal Address: V&A Waterfront, Cape Town, 8001

Website: www.genar8.co.za

Information Officer: Name: Ian Kinsey

Email address: ian@genar8.co.za

Call: +27 21 140 3222

We are a private body and as such our Head of Body, Ian Kinsey, is our information officer. We have appointed Ian Kinsey as a deputy information officer to whom the responsibilities in terms of PAIA and POPIA have been delegated.

GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

The South African Human Rights Commission has compiled the Guide as required in terms of Section 10 of PAIA. The Guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and accordingly it contains information on understanding and how to use PAIA and includes the objectives of PAIA, the particulars of every public and private body, the manner and form for requests, and contents of the Regulations promulgated under PAIA.

The Guide is available in all the official languages of the Republic of South Africa and can be obtained from the South African Human Rights Commission, at:

PAIA Unit (The Research and Documentation Department)

29 Princess of Wales Terrace, corner York and St. Andrews Street, Parktown, Johannesburg

Private Bag X2700, Houghton, 2041

Telephone Number: +27 21 140 3222

Facsimile Number: 011 403-0625

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

E-mail Address: section51.paia@sahrc.org.za

INFORMATION REGULATOR

The Information Regulator has jurisdiction over PAIA and POPIA to educate, guide, monitor and enforce PAIA and POPIA.

Queries and complaints can be directed to the Office of the Information Regulator at:

The Office of the Information Regulator

Braampark Forum, 33 Hoofd Street, Braamfontein, Johannesburg

PO Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number: 021 140 7069 / 010 023 5207

Website: sahrc.org.za

Email: infoereg@justice.gov.za

NOTICE ITO SECTION 52(2) OF PAIA

At this stage, no notice(s) has/have been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

Records Available with a Request to Access

The following records are held by us and available only on a request to access in terms of this PAIA manual. The information is classified and grouped according to records relating to the following subjects and categories:

Personnel Records

- Information provided by personnel
- Information provided by third parties relating to personnel
- Conditions of employment
- Internal evaluation records
- Correspondence
- Training schedules and material
- Other personnel and consultant-related records

Contractor / Consultant Records

- Information provided by contractors / consultants
- Information provided by third parties relating to contractors / consultants
- Conditions of service level agreements with contractors / consultants
- Internal evaluation records
- Correspondence
- Other contractor/consultant-related records

Client Records

- Records provided by a client
- Records provided by a third party related to a client
- Records generated within Genar8 related to a client
- Records generated within Genar8 in execution of Genar8's contract with their clients
- Other client-related records

Potential Customer Records

- Records provided by potential customers
- Recordings
- Correspondence
- Other potential customer-related records

Customer Records

- Records provided by customers

- Recordings
- Correspondence
- Records generated within Genar8 in execution of Genar8's contract with their customers
- Other customer-related records

Company Records

- Financial records
- Operational records
- Databases
- Information technology
- Statutory records
- Internal policies and procedures
- Correspondence
- Other company-related records

How to Request Access to a Record

Records held by us may be accessed by requests only once the prerequisite requirements for access have been met. A requester is any person making a request for access to a record.

There are two types of requesters:

Personal Requester

- A requester who is seeking access to a record containing personal information about the requester. We will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. We will not charge a request fee, however, the prescribed fee for reproduction of the information requested will be charged.

Other Requester

- This requester (other than a personal requester) is entitled to request access to information on third parties. The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record. In considering such a request, we will adhere to the provisions of PAIA and the Information Officer will take all reasonable steps to inform a third party to whom the requested record relates of the request, informing the third party that they may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information. We are not obliged to voluntarily grant access to such records. The requester must fulfil the prerequisite requirements as stated herein. The prescribed fees will be charged.

The requester must complete the prescribed form – refer to Annexure 1 – Request for access to record of a private body. A requester may need to pay a fee to enable us to respond to a request. These fees will be charged in terms of PAIA. Refer to paragraph 10 below – Prescribed

Fees. Where these fees are applicable, the requester will be given a written estimate of the fee before providing the services.

Prescribed Fees

- Requesting access to a record: R50.00
- Copy per A4 page: R1.10
- Printing per A4 page: R0.70
- Copy on a CD: R70.00
- Transcript of visual images per A4 page: R40.00
- Copy of a visual image: R60.00
- Transcription of an audio recording per A4 page: R20.00
- Copy of an audio recording: R30.00
- Search & preparation of the record for disclosure, per hour or part thereof (excluding the first hour): R30.00
- Postage: Actual cost of postage

Refusal of a Request to Access Records

There are certain circumstances under which access to a record may be refused. These include, but are not limited to:

- Protection of personal information
- Protection of confidential information
- Protection of privileged communication
- Protection of the company's commercial interests
- Protection of trade secrets
- Protection of the safety of a person

If the request is refused, the requester will be informed of the grounds of refusal in writing, and the requester may request a review of the decision.

Remedies Available when a Request is Refused

In the case of refusal to access records, a requester has the right to appeal the decision.

Processing of Personal Information

We comply with the Protection of Personal Information Act (POPIA) and apply a fair process in the collection and use of personal information. For the purpose of providing our services, we collect and process the following categories of personal data:

- Identification data (name, surname, ID number, passport number, etc.)
- Contact details (email, phone number)
- Financial information (banking details, payment history)
- Customer history (purchases, preferences)

We will never sell or trade your personal information to third parties without consent. We may, however, share your personal information in the case of legal requirements, with our third-party service providers, or as part of necessary business operations.