

A young woman with voluminous curly brown hair is smiling broadly, looking off to the side. She is wearing a white t-shirt, a gold chain necklace, and a gold hoop earring. She holds a white smartphone in her left hand and points with her right index finger towards the left. The background is white with a large teal circle behind her head and a smaller teal circle in the bottom left corner.

NOW CASH

PAIA MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION
ACT 2 OF 2000

TERMS AND CONDITIONS OF USE

Use of all the Company policies and procedures constitutes your agreement to the following:

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2. The content is protected by South African and international copyright laws. All rights in this regard are reserved.
3. This document is for the use of the Company's employees and stakeholders, approved by the Head of GRC Fides.
4. This document may not be modified, copied, distributed, transmitted, reproduced, published, transferred, or sold by any employee or stakeholder to any other natural person or juristic entity.
5. Use of this document is conditional on acceptance by the user of these terms and conditions and the information contained herein.
6. Where the context so indicates, the masculine pronoun shall include the feminine and the neuter, and the singular shall include the plural.
7. The terms "natural person" and "juristic entity" can be utilised interchangeably, with their intended meaning determined by the context in which they are applied.
8. External stakeholder requests for access to internal Policies, Procedures, Frameworks, Charters, or other relevant documents must be addressed through the Head of GRC Fides as the nominated Chief Information Officer of the Company.

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1. INTRODUCTION

1.1 PURPOSE AND OBJECTIVES

The purpose of this Manual is to provide the public with a guide to the information and records held by the Company and to outline the procedures for accessing these records in compliance with the Promotion of Access to Information Act, 2 of 2000 (PAIA).

The primary objectives of this Manual are to help individuals understand which categories of records are available without a formal PAIA request; to provide a clear process for requesting access to a record; to describe the categories of data subjects that the Company holds records on; and to help individuals identify available records.

Lastly, this Manual provides the relevant contact information of the Company's appointed Information Officer and Deputy Information Officer(s); guidance on how to access the Information Regulator's (the Regulator) guide on how to use PAIA and the prescribed forms required when requesting access to a record.

1.2 AVAILABILITY

This PAIA Manual is accessible on the Company's website, ensuring that all stakeholders and the general public have access to it.

2. POLICY

COMPANY DETAILS	
Postal Address	Postnet Suite 124, Private Bag X101, Farrarmere, Benoni, 1501
Physical Address	4 Ellis Street, Block E, Valley Office Park, Constantia Kloof, Roodepoort, 1709
Contact number	0861 333 733
Email address	info@nowcash.co.za
Website	www.nowcash.co.za
INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER(S) DETAILS	
Information Officer	Hannelie Botha
Deputy Information Officer	Neill Lötter
Email Address	compliance@grcfides.co.za
Contact Number	010 020 3199
Postal Address	Postnet Suite 124, Private Bag X101, Farrarmere, Gauteng, 1518
Physical Address	2 Davidson Street, Rynfield, Benoni, 1501

2.1 KEY CONTACT INFORMATION OF THE COMPANY

2.2 REGULATORY GUIDE ON THE USE OF PAIA

The Regulator provides a guide (the Guide) to assist any person in exercising their rights contemplated in both PAIA and the Protection of Personal Information Act, 4 of 2013 (POPI). The guide is available on the Regulator's website, provided below:

INFORMATION REGULATOR DETAILS	
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Contact number	010 023 5200
Email address	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

The Guide contains information relating to:

- 2.2.1 the objective of PAIA and POPI;
- 2.2.2 the postal and street address, phone and fax number and, if available, electronic mail address of —
 - i. the Information Officer of every public body, and
 - ii. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- 2.2.3 the manner and form of a request for:
 - i. access to a record of a public body contemplated in section 11; and
 - ii. access to a record of a private body contemplated in section 50;
- 2.2.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 2.2.5 the assistance available from the Regulator in terms of PAIA and POPIA
- 2.2.6 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:
 - i. an internal appeal;
 - ii. a complaint to the Regulator; and
 - iii. an application with a court against a decision by the information officer 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;
- 2.2.7 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;
- 2.2.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;
- 2.2.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 2.2.10 the regulations made in terms of section 92.

2.3 RECORDS AVAILABLE WITHOUT REQUESTING ACCESS

CATEGORY OF RECORDS	TYPE OF RECORDS	AVAILABLE ON WEBSITE	AVAILABLE UPON REQUEST
Privacy and Information	Privacy Policy, PAIA Manual, PAIA Form 2, PAIA Form 3	✓	✓
Handelsinligting	Publications, Media Releases, and Website Information	✓	✓

2.4 DESCRIPTION OF RECORDS HELD BY THE COMPANY AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

A person may request access to other records outside of this process in terms of other legislation in accordance with the particular compliance obligations attached thereto.

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Personal Information or Privacy Records	Protection of Personal Information Act 4 of 2023
Employment Information	Employment Equity Act 55 of 1998
Health and Safety Information	Occupational Health and Safety Act 85 of 1993

2.5 DATA SUBJECTS AND CATEGORIES OF RECORDS HELD AT THE COMPANY

The following is not an exhaustive list of records held by the Company.

CATEGORY OF DATA SUBJECT	PERSONAL INFORMATION THAT MAY BE PROCESSED
Employer	Names, registration numbers, identity numbers of key person(s), VAT number, nature of the business, contact information, contracting information, address, banking details, financial statements, annual reports, tax information, audit reports, creditworthiness information, details of directors and shareholders, members, trustees, partners including appointment and removal, and minutes of meetings and resolutions.
Employees	Employment records including names, identity numbers, qualifications and training records, CVs, payroll information, tax records, disciplinary and labour relation records, recruitment records, biometric information, demographic information, physical or mental health, well-being, medical history, and criminal records.
Service Providers, Contractors, and Suppliers	Names, registration numbers, identity numbers of key person(s), VAT number, contact information, contracting information, address, and banking details, service level agreements, procurement records.

2.6 PURPOSE OF PROCESSING INFORMATION

The Company collects and processes personal information strictly for the purposes of providing, managing, and improving its services, ensuring compliance, and managing its financial obligations. For more information on the exact processing parties, may refer to the Company's Privacy, PAIA and Data Protection Notice available on its Website.

- 2.6.1 Personal Information of clients is processed to deliver the services offered by the Company and to provide up-to-date information on products and offerings.
- 2.6.2 Information on employees is processed to meet compliance obligations under labour legislation, for recruitment purposes, and to enable the employee/employer relationship.
- 2.6.3 Information on service providers and contractors is processed to meet contractual obligations and service level agreements as outlined between the Company and third parties.
- 2.6.4 Information collected and processed shall be used:
 - i. for the purpose for which it was collected;
 - ii. to develop and improve the Company's processes, systems and communications;
 - iii. to resolve complaints, investigate claims against the Company and settle disputes;
 - iv. meet the Company's compliance obligations in the sharing of information with specific regulatory bodies as required;

2.7 THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

CATEGORY OF PERSONAL INFORMATION	RECIPIENT OR CATEGORY OF RECIPIENT
Identification and other recruitment information as related to employees or prospective employees.	Verification Agencies and regulatory bodies.
Demographic information	Regulatory Bodies.
Communication, identification, financial and transactional information.	Regulatory Bodies, enforcement agencies, law enforcement, courts and any other judicial forum, arbitration committees and ombuds.
Tax residency information	Local and international tax authorities.
Banking and payment information	Banks, third-party payment providers, and clearing participants.
Financial Information	
Employee medical and personal information	Insurance companies, benefit providers, pension or provident funds.

2.8 PLANNED TRANS-BORDER FLOW OF PERSONAL INFORMATION

The Company stores no personal information outside the Republic of South Africa.

2.9 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE COMPANY TO ENSURE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF INFORMATION

The Company implements comprehensive security measures designed to protect personal information against unauthorised or unlawful processing, and accidental loss, destruction, or damage. Personal information is stored on servers and personal computers, and the information is safeguarded with the required technical expertise and controls. This generally includes the following measures:

- i. Access control through the implementation of strict policies and technical controls to limit access to personal information on a "need-to-know" basis to authorised personnel.
- ii. Secure storage and the implementation of up-to-date firewalls and cybersecurity measures against external threats.
- iii. Ongoing training and education across stakeholders regarding cybersecurity requirements, privacy measures and compliance obligations in relation to processing information.
- iv. Regular back-ups of all stored information to ensure redundancy.
- v. Employees and service providers are informed of and bound to the Company's Data Protection Policy; and
- vi. Regular reviews and testing of controls for compliance with internal policies.

2.10 AVAILABILITY

A copy of the manual is available on:

- 2.10.1 The Company's website www.nowcash.co.za;
- 2.10.2 The Company's head office for public inspection during normal business hours;
- 2.10.3 To any person upon request and upon payment of the prescribed fee ;
- 2.10.4 To the Information Regulator upon request.

A prescribed fee for a copy of this Manual, as contemplated in Annexure A, shall be payable for each A4-size photocopy made.

3. REFERENCES

This Manual should be read in conjunction with the following documents:

- i. Companies Act 71 of 2008
- ii. Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- iii. Constitution of the Republic of South Africa, 1996
- iv. Employment Equity Act 55 of 1998
- v. Financial Intelligence Centre Act 38 of 2001
- vi. Income Tax Act 58 of 1962

- vii. Labour Relations Act 66 of 1995
- viii. National Credit Act 34 of 2005
- ix. Occupational Health and Safety Act 85 of 1993
- x. Pension Funds Act 24 of 1956
- xi. Promotion of Access to Information Act 2 of 2000
- xii. Protected Disclosures Act 26 of 2000
- xiii. Protection of Personal Information Act 4 of 2013
- xiv. Regulation of Interception of Communications Act 70 of 2002
- xv. Skills Development Act 97 of 1998
- xvi. Skills Development Levies Act 9 of 1999
- xvii. Unemployment Insurance Act 63 of 2001
- xviii. Unemployment Insurance Contributions Act 4 of 2002
- xix. Value Added Tax Act 89 of 1991

4. AMENDMENTS AND PROPOSED CHANGES

GRC Fides is the owner of this Manual and is therefore responsible for ensuring that the information in this Manual is kept up to date. Any required amendments, adjustments and proposed changes must be channelled through the Head of GRC Fides for review prior to approval.

GRC Fides is responsible for the administration of all company policies and supporting documentation. Only the latest approved version of company policies, available from GRC Fides, may be used by employees and stakeholders.

5. APPROVAL AND REVIEW

This policy is approved by the Information Officer.

It will be reviewed, at a minimum, every 2 (two) years, as well as in line with applicable changes to legislation or foundational documentation.

ANNEXURE A - PRESCRIBED FEES IN RESPECT OF PRIVATE BODIES

ITEM	AMOUNT
Request fee payable by every requester.	R140.00
Photocopy or printed black and white copy of A4-size page (per page or part thereof).	R2.00
For a copy in a computer-readable form on a Flashdrive provided by the requestor.	R40.00
For a copy in a computer-readable form on a Compact Disc provided by the requestor.	R40.00
For a copy in a computer-readable form on a Compact Disc provided to the requestor.	R60.00
Transcription of visual images per A4-size page	Based on quotation
Transcription of an audio record per A4-size page	R24.00
For a copy of an audio record on a Flashdrive provided by the requestor.	R40.00
For a copy of an audio recording on a Compact Disc provided by the requestor.	R40.00
For a copy of an audio recording on a Compact Disc provided to the requestor.	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00 (But not exceeding R435.00)
Deposit if search exceeds 6 hours.	One third of amount
Postage, email or any other electronic transfer.	Actual expense if any