



MANUAL

OF

Paycorp Investments (PTY) LIMITED  
and all subsidiaries

Prepared in accordance with Section 51 of the  
Promotion of Access to Information Act, No. 2 of 2000

## 1. INTRODUCTION

The Promotion of Access to Information Act, No. 2 of 2000 (“the Act”) was enacted on 3<sup>rd</sup> February 2000, giving effect to the constitutional right of access to information held by the State and any information that is held by another person that is required for the exercise or protection of any rights. Where a request is made in terms of the Act, the body to which the request is made is obliged to release the information, **except where the Act expressly provides that the information may or must not be released.** The Act sets out the requisite procedural issues attached to such requests.

## 2. INTRODUCTION TO Paycorp Investments (PTY) LTD

Paycorp Investments (Pty) Ltd (“the Group”) is a juristic person incorporated as a private company in terms of the company laws of the Republic of South Africa. The Group and its subsidiaries are classified as “private body” within the definition of Section 1 of the Act, and conducts business as payments services providers. Hereinafter “the Group” shall refer to Paycorp Investments (Pty) Ltd and its subsidiaries interchangeably.

## 3. PURPOSE OF THE MANUAL

This manual is intended to foster a culture of transparency and accountability in our environment by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the members of the public have effective access to information to enable them to more fully exercise and protect their rights.

In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act in order for them to exercise their rights in relation to public and private bodies.

Section 9 of the Act recognises that such right to access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy;
- Commercial confidentiality; and
- Effective, efficient and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

This manual sets out to provide for the manner in which requests to Paycorp Investments and its subsidiaries are to be made which will ensure that requesters obtain the records to which they are entitled to in a quick, easy and accessible manner. This manual is drafted in accordance with the generic manual made available by the South African Human rights Commission.

## PART I

### 1. CONTACT DETAILS

Full name:	Paycorp Investments (Pty) Ltd
Street address:	Sandhaven Office Park 14 Pongola Crescent Eastgate Extension 17 Sandton 2199
Postal Address:	P O Box 76651 Wendywood 2144
Telephone number:	011 531 5300
Designated Information Officer:	Quintin de Boer Email: quintind@paycorp.co.za
Website address:	<a href="http://www.paycorp.co.za">www.paycorp.co.za</a>

### 2. GROUP COMPANY STRUCTURE

This PAIA manual is applicable to the following companies –

- Paycorp Investments (Pty) Ltd.;
- Paycorp Holdings (Pty) Ltd.;
- Paycorp Group (Pty) Ltd.;
- Paycorp Corporate Support (Pty) Ltd.;
- Paycorp International (Pty) Ltd.;
- ATM Solutions (Pty) Ltd.;
- ATM Solutions Hungury;
- ATM Solutions Namibia;

- ATM Solutions Zambia;
- Drawcard (Pty) Ltd.;
- EFTPOS (Pty) Ltd.;
- Kazang (Pty) Ltd.; and
- Tutuka Software (Pty) Ltd.

## PART II

### 3. THE SECTION 10 GUIDE ON HOW TO USE THE ACT (Section 51(1)(b))

- 3.1 A Guide has been compiled in terms of Section 10 of the Act by the South African Human Rights Commission. It contains such information as may be reasonably required by a person wishing to exercise any right contemplated by the Act. It is available in all of the official languages.
- 3.2 The Guide is available for inspection, *inter alia*, at the offices of the South African Human Rights Commission at 29 Princess of Wales Terrace, Corner York and St. Andrews Street, Parktown and on its website at [www.sahrc.org.za](http://www.sahrc.org.za) . Any queries regarding this guide should be directed to:

The South African Human Rights Commission  
PAIA Unit, The Research and Documentation Department  
Private Bag X2700  
Houghton  
2041

Telephone: 011 484-8300

Facsimile: 011 484-7149

Email: PAIA@sahrc.org.za

## PART III

### 4. THE MOST RECENT NOTICE IN TERMS OF SECTION 52(2) (Section 51(1)(c))

At this stage, no notice has been published regarding categories of records that are automatically available without a person having to request access in terms of the Act.

## PART IV

### 5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(d))

5.1 Where applicable to our operations, information is available in terms of certain provisions of the following statutes:

- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and diseases Act 130 of 1993
- Companies Act 61 of 1973
- Companies Act 71 of 2008
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991
- Income Tax Act 58 of 1962
- Skills Development Act 9 of 1999
- Banks Act 94 of 1990
- National Payment System Act
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Occupational Health and Safety Act 85 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Trade Mark Act 194 of 1993

## PART V

### 6. SUBJECT AND CATEGORIES OF RECORDS HELD BY THE GROUP AND ITS SUBSIDIARIES (Section 51(1)(e))

#### 6.1 RECORDS THAT MAY BE REQUESTED

The information is classified and grouped according to records relating to the following subjects and categories:

##### 6.1.1 PERSONNEL DOCUMENTS AND RECORDS

- Personal records provided by personnel;
- Records provided by third parties relating to personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records and other internal records;
- Correspondence relating to personnel;
- Disciplinary Records

- Salary Records
- SETA Records
- Disciplinary Code
- Leave Records
- Training schedules and records

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

#### 6.1.2 CLIENT RELATED RECORDS

- Records provided by clients in respect of the business of the clients, and in terms of contractual arrangements between the Group and clients;
- Records provided by a third-party;
- Records generated by or within the Group relating to its clients, including transactional records;
- Records pertaining to third parties provided by clients
- Records provided by third parties in the course and business of the Group.

A “client” refers to any natural or juristic entity that receives services from the Group.

#### 6.1.3 STATUTORY COMPANY RECORDS

- Documents of Incorporation
- Memorandum and Articles of Association
- Minutes of Board of Directors’ Meetings
- Records relating to the Appointment of Directors/ Auditors/ Secretaries/ Public Officers and Other Officers
- Share Register and other Statutory Registers

#### 6.1.4 PRIVATE BODY RECORDS

- Financial records
- Operational records
- Databases
- Marketing records
- Internal correspondence
- External correspondence
- Product records

- Statutory records
- Internal policies and procedures
- Legal agreements and records
- Records held by officials of the Group

These records include, but are not limited to, the records which pertain to the Group's own affairs.

#### 6.1.5 WEBSITE

The group's website address is [www.paycorp.co.za](http://www.paycorp.co.za) and is accessible to anyone who has access to the Internet. The website contains various categories of information relating to the Group.

#### 6.1.6 OTHER PARTY RECORDS

- Personnel, customer or private body records which are held by another party, as opposed to the records held by the Group itself;
- Records held by the group pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about contractors/suppliers.

The Group may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies and service providers. Alternatively, such other parties may possess records that can be said to belong to the Group.

## 6.2 PROCEDURE FOR REQUESTING ACCESS TO INFORMATION (Section 51(1)(e))

### 6.2.1 ACCESS TO RECORDS HELD BY COMPANY

6.2.1.1 Records held by the company may be accessed by requests *only* once the prerequisite requirements for access have been met.

6.2.1.2 A requester is any person making a request for access to a record of the Group.

6.2.1.3 There are two types of requesters:

- **Personal Requester:** a personal requester is a requester who seeks access to a record containing personal information about the requester. The Group will voluntarily provide the requested information, or give access to any record with regard to the requester's *personal information*. 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. However, the Group is not obliged to grant access. The requester must fulfil the prerequisite

requirements for access in terms of the Act (including the payment of fees and other procedural requirements).

## 6.2.2 FORM OF REQUEST

The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.

6.2.2.1 The requester must use the prescribed form (Annexure "A" of this manual) to make the request for access to a record. The request should be made to the Information Officer at the address, fax number or electronic mail address as stated in Part I above;

6.2.2.2 The prescribed form must be filled in with sufficient detail to enable the Information Officer to identify the following:

- The record or records requested;
- The identity of the requester;
- Which form of access is required;
- The postal address or fax number of the requester;
- The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right;

6.2.2.3 The Group will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Group Head/ Information Officer that circumstances dictate that the above time period not be complied with.

6.2.2.4 The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester must state the manner and the particulars so required.

6.2.2.5 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

6.2.2.6 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

6.2.2.7 The requester must pay the prescribed fee, before any further processing can take place.

## 6.2.3 FEES

6.2.3.1 The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and

- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.
- 6.2.3.2 When the Information Officer receives the request, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing of the request.
- 6.2.3.3 If the search for the record has been made and the preparation of the record for disclosure, including arrangements to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay a deposit (that is, the prescribed portion of the access fee which would be payable if the request is granted).
- 6.2.3.4 The Information Officer may withhold a record until the requester has paid the fees as indicated in Annexure “B” hereto.
- 6.2.3.5 A requester, whose request for access to a record has been granted, must pay an access fee for reproduction, search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the requested form.
- 6.2.3.6 If a deposit has been paid in respect of a request for access, which is refused, then the Group head/ Information officer concerned must repay the deposit to the requester.
- 6.2.4 DECISION
- 6.2.4.1 The Group will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 6.2.4.2 The 30 day period within which the Group is to decide whether to grant or refuse the request may be extended for a further period of not more than 30 days if the request is for a large amount of information or the request requires a search for information held at another office of the Group and the information cannot reasonably be obtained within the original 30 day period. The group will notify the requester in writing should an extension be sought.

## 7. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The main grounds for the Group to refuse a request for information relates to the-

- 7.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- 7.2 mandatory protection of the commercial information of a third party, if the record contains
  - 7.2.1 trade secrets of that third party

- 7.2.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
- 7.2.3 information disclosed in confidence by a third party to the Group, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- 7.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 7.4 mandatory protection of the safety of individuals and the protection of property;
- 7.5 mandatory protection of records which would be regarded as privileged in legal proceedings;
- 7.6 the commercial activities of the Group, which may include-
  - 7.6.1 trade secrets of the Group;
  - 7.6.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the Group;
  - 7.6.3 information which, if it is disclosed could put the Group at a disadvantage in negotiations or commercial competition;
  - 7.6.4 a computer programme which is owned by the Group, and which is protected by copyright.
- 7.7 The research information of the group or a third party, if its disclosure would disclose the identity of the Group, the researcher or the subject matter of the research and would place the research at a serious disadvantage;

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

## 8. REMEDIES AVAILABLE WHEN THE GROUP REFUSES A REQUEST FOR INFORMATION

### 8.1 Internal Remedies

The Group does not have internal appeal procedures. As such, the decision made by the information officer is final, and requesters will have to exercise such external remedies at their disposal if the request for information is refused and the requester is not satisfied with the answer supplied by the information officer.

### 8.2 External Remedies

A requester that is dissatisfied with the information officer's refusal to disclose information may, within 30 days of notification of the decision, apply to a Court for relief.

Likewise, a third party dissatisfied with the information officer's decision to grant a request for information may, within 30 days of notification of the decision, apply to a Court for relief. For the purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another Court of similar status.

## 9. AVAILABILITY OF THIS MANUAL

9.1 This manual is available for inspection by the general public, upon request, during office hours and free of charge at the offices of Paycorp Investments (Pty) Ltd.

9.2 Copies may also be requested from the South African Human Rights Commission.

9.3 This manual is also published on Paycorp Investments Ltd's website referred to in Part 1, paragraph 1 above.

## ANNEXURE "A"

**Form C**  
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY  
(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)

[Regulation 10]

### A. Particulars of private body

The Head:

.....  
.....  
.....

### B. Particulars of person requesting access to the record

<p>(a) <i>The particulars of the person who requests access to the record must be given below.</i></p> <p>(b) <i>The address and/or fax number in the Republic to which the information is to be sent must be given.</i></p> <p>(c) <i>Proof of the capacity in which the request is made, if applicable, must be attached.</i></p>
---

Full names and surname: .....

Identity number: .....

Postal address: .....

..... Fax number: .....

Telephone number: ..... E-mail address: .....

Capacity in which request is made when made on behalf of another person: .....

### C. Particulars of person on whose behalf request is made

<p><i>This section must be completed ONLY if a request for information is made on behalf of another person.</i></p>
---

Full names and surname: .....

Identity number: .....

D. Particulars of record

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

- 1. Description of record or relevant part of the record: .....  
.....  
.....  
.....  
.....
- 2. Reference number, if available: .....
- 3. Any further particulars of record: .....  
.....  
.....  
.....

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees: .....  
.....  
.....

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 for in 1 to 4 hereunder, state your disability and indicate in which from the record is required.

Disability: ..... .....	Form in which record is required: ..... ..... .....
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.....	
<p>Mark the appropriate box with an <b>X</b>.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>	

<b>1. If the record is in written or printed from:</b>			
copy of record*		inspection of record	
<b>2. If record consists of visual images</b> (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
view the images		copy of the images*	transcription of the images*
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>			
listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed documents)	
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>			
printed copy of record*		printed copy of information derived from the record*	copy in computer readable form* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?			YES
			NO

**G. Particulars of right to be exercised or protected**

<p><i>If the provided space is inadequate, please continue on a separate folio and attach it to this form. <b>The requester must sign all the additional folios.</b></i></p>
--

1. Indicate which right is to be exercised or protected: .....
2. Explain why the record requested is required for the exercise or protection of the aforementioned right: .....

.....  
.....

**H. Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved/ denied. If you wish to be informed 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? .....

.....  
.....

Signed at ..... this ..... day of ..... 20 .....

.....  
SIGNATURE OF REQUESTER/ PERSON ON WHOSE BEHALF

REQUEST IS MADE

**ANNEXURE “B”**

**GENERAL: VALUE-ADDED TAX**

Private bodies registered under the Value-Added Tax Act, 1991 (Act 89 of 1991, as vendors may add value-added tax to all fees prescribed in this annexure.

### PART III

#### FEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
  
2. The fees for reproduction referred to in regulation 11(1) are as follows:
 

	R
(a) For every photocopy of an A4-size page or page thereof .....	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form .....	0,75
(c) For a copy in a computer-readable form on-	
(i) stifty disc .....	7,50
(ii) compact disc .....	70,00
(d) (i) For a transcription of visual images , for an A4-size page or part thereof .....	40,00
(ii) For a copy of visual images .....	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof .....	20,00
(ii) For a copy of an audio record .....	30,00
  
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
  
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:
  - (1)
    - (a) For every photocopy of an A4-size page or part thereof ..... 1,10
    - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form ..... 0,75
    - (c) For a copy in a computer-readable form on-
    - (iii) stifty disc ..... 7,50
    - (iv) compact disc ..... 70,00
    - (d) (i) For a transcription of visual images , for an A4-size page or part thereof ..... 40,00
    - (ii) For a copy of visual images ..... 60,00
    - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof ..... 20,00
    - (ii) For a copy of an audio record ..... 30,00
    - (f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
  
  - (2) For the purposes of section 54(2) of the Act, the following applies:
    - (a) six hours as the hours to be exceeded before a deposit is payable; and
    - (b) one third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.