



PAIA MANUAL

for

Mobitainment (Pty) Ltd
(Registration Number: 2006/003392/07)
("The Company")

We respect your right to access information. This manual will help you (the requester of information) to exercise that right and help you know how you may get access to our records. The Promotion of Access to Information Act 2 of 2000 as amended from time to time (known as PAIA) requires us to draft and make this manual available to you to:

- Know what types of information we have
- Know how to request access to it

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PAIA Manual - Mobitainment (Pty) Ltd

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1. List of Acronyms and Abbreviations

1.1.	“IO”	–	Information Officer
1.2.	“DIO”	–	Deputy Information Officer
1.3.	“PAIA”	–	Promotion of Access to Information Act No. 2 of 2000
1.4.	“POPIA”	–	Protection of Personal Information Act No. 4 of 2013
1.5.	“REGULATOR”	–	Information Regulator
1.6.	“PR”	–	Personal Requester

2. Introduction

The **Manual** has been compiled in accordance with the requirements of PAIA, read with the relevant sections of POPIA.

The **Company** is a private body as defined in PAIA, and this Manual contains the information specified in section 51 of PAIA, which is applicable to such a private body.

The **Company** is a technology enabler, translating technology into business solutions and marketing results. Not only focusing on the device-specific solutions but on the relevant and rewarding experiences enabled through an array of content around various mobile strategies that are custom-built.

3. Purpose of the Manual

The purpose of a PAIA Manual, as required by Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (PAIA), is to promote transparency, accountability, and access to information held by both public and private bodies in South Africa. In more detail, the PAIA Manual serves the following purposes:

- 3.1. Understand how to make a request for access
- 3.2. Know the records available without a formal request
- 3.3. Access contact details of the Information and Deputy Information Officers
- 3.4. Know how to use the PAIA guide
- 3.5. Understand personal information processing
- 3.6. Identify categories of data subjects and data processed
- 3.7. Know potential recipients of personal information
- 3.8. Understand cross-border data transfers
- 3.9. Confirm the Company's data security measures

4. Key Contact Details for Access to Information

Information Officer: Errol Goodman

Tel: 011 783 4172

Email: info@mobitainment.co.za

Deputy Information Officer: Candice-Hayley Goodman

Tel: 010 506 0281

Email: info@mobitainment.co.za

General Contact: info@mobitainment.co.za

Head Office:

Postal Address: PO Box 650912, Benmore 2010

Physical Address: 1 Heyneke Place, Benmore Gardens, Sandton, Gauteng, 2196

Telephone: 011 783 4172

Website: www.mobitainment.co.za

5. Guide on How to Use PAIA

PAIA grants a personal requester (PR) access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request for information from the Company, the public body must be acting in public interest. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided.

The Information Regulator has compiled a PAIA Guide in terms of Section 10 of PAIA. The Guide is available from the Information Regulator's website or directly from the Information Regulator:

With effect from 1 July 2021, enforcement of PAIA will fall under the jurisdiction of the Information Regulator established in terms of POPIA. This Manual will be updated, as necessary, to include details of any amended guide that may be made available by the Information Regulator in terms of section 10 of PAIA.

The contact details for the Information Regulator are (at present) as follows:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Telephone number: +27 (0)10 023-5200 / +27 (0)82 746-4173

Website: <https://www.justice.gov.za/inforeg/index.html>

E-mail: inforeg@justice.gov.za / complaints.IR@justice.gov.za

6. Records We Hold to Comply with the Law

We hold records that all organisations are required by law to hold. We also hold records that the law specifically requires organisations like ours to retain. Please ask our information officer for more details.

Below are a couple of the records we keep:

Legislation	Categories of Records
Promotion of Access to Information Act 2 of 2000	PAIA Manual, access requests, request registers, correspondence relating to requests
Protection of Personal Information Act 4 of 2013	Privacy policies, consent records, operator agreements, data subject requests, information security incident records
Electronic Communications and Transactions Act 25 of 2002	Electronic agreements, electronic communications, website terms and conditions
Consumer Protection Act 68 of 2008 (where applicable)	Consumer complaints, promotional competition entry and winner records, marketing and service-related records

Mobitainment also maintains the below operational records for its business activities:

- Service agreements and client contracts
- Supplier agreements
- Marketing campaign records
- IT security records
- System access logs
- Data backup records
- Information security incident registers

7. Records Available Without Request

In accordance with Section 52 of the Promotion of Access to Information Act (PAIA), certain records are available to the public without a formal request for access. These records are freely accessible and can be obtained via the company's website, email, or at its offices upon request. These include, but are not limited to, the following categories:

- Company profile and contact information
- Product and service brochures
- Public policies and procedures (e.g. PAIA Manual, POPIA Policy, Privacy Policy)

- Company registration documents (e.g. CIPC certificate, Memorandum of Incorporation)
- Promotional material and price lists
- Media releases and press statements
- Tender notices and procurement opportunities
- Recruitment advertisements and job application forms

These records are available at the discretion of the Company and may be accessed without the need to complete the prescribed PAIA request form. For access to other types of records, a formal request in accordance with PAIA may still be required.

8. Subjects and Categories of Records Held

In accordance with the requirements of the Promotion of Access to Information Act (PAIA), the following is a description of the subjects on which the Company holds records, along with the categories of records held under each subject. These records may be accessed in accordance with applicable legislation and the Company's access procedures:

Subject	Categories of Records
Company Administration	Company registration documents, Memorandum of Incorporation, Board and shareholder resolutions, Company structure
Human Resources	Employment contracts, Payroll records, Leave registers
Finance and Tax	Annual financial statements, Budgets, Invoices, Tax returns, VAT records, PAYE records
Legal and Compliance	Contracts, Licenses, Permits, Compliance records, PAIA Manual, POPIA documentation
Operations and Projects	Project files, Operational procedures
Sales and Marketing	Marketing strategies, Advertising material, Product catalogues
Information Technology	IT policies, System access logs, Data backup schedules
Procurement and Suppliers	Supplier contracts, Purchase orders
Customer Service	Client correspondence
Public and Corporate Affairs	Press releases
B-BBEE and Transformation	B-BBEE certificates

9. Processing of Personal Information

Mobitainment processes personal information in accordance with the Protection of Personal Information Act, 2013 (POPIA) for purposes including the provision of services, management of client and supplier relationships, employment administration, compliance with legal obligations, and business operations.

The Company may process personal information relating to employees, clients, suppliers, contractors, and other business contacts. Such information may include contact details, identification information, employment records, financial information, and other information necessary for the Company's legitimate business activities.

Personal information may be shared with authorised service providers, professional advisors, regulators, and other parties where required by law or for legitimate business purposes. Where personal information is transferred outside South Africa, the Company will take reasonable steps to ensure that appropriate safeguards are in place.

The Company implements reasonable technical and organisational security measures to protect personal information against loss, unauthorised access, disclosure, alteration, or destruction.

For any more information please refer to our Privacy Policy on our website:

<https://mobitainment.co.za/privacy-policy/>

10. How to Request Access

A requester who wishes to obtain access to records must:

1. Complete Form 2 (available on the Information Regulator's website: <https://inforegulator.org.za/paia-forms/>) or email the Information Officer to get the Mobitainment Data Subject Request Form to complete.
2. Submit the completed form to the Information Officer at errol@mobitainment.co.za
3. Pay the prescribed access fee (if applicable).

The Information Officer shall notify the requester of the outcome of the request within 30 days of receipt, unless an extension is permitted in terms of PAIA

11. Data Subjects Rights (POPIA)

In addition to access rights under PAIA, data subjects have the following rights under POPIA:

- Right to be informed.
- Right of access.
- Right to correction or deletion.
- Right to object to processing.
- Right to erase personal information.
- Right to restriction of processing.
- Right to lodge a complaint with the Information Regulator.

Requests to exercise these rights must be submitted in writing using Form 2 of the POPIA Regulations, or the Company's Data Subject Request Form, and directed to the Information Officer at:

- Email: info@mobitainment.co.za

The Company will acknowledge requests within 7 business days and provide a response within 21 business days, unless an extension is required. If a request cannot be granted, written reasons will be provided with reference to the relevant provisions of POPIA.

Grounds for Refusal of Access

The Company may refuse a request for access to information where such refusal is permitted or required by PAIA, including but not limited to the following circumstances:

- The record contains personal information of a third party.
- The record contains confidential commercial information.
- The record contains information protected by legal professional privilege.
- Disclosure could reasonably be expected to prejudice commercial interests.
- Disclosure could endanger the life or physical safety of an individual.
- Disclosure is prohibited by law.
- The request is unreasonable, repetitive, or intended to cause unnecessary disruption.

Where access is refused, the requester will be provided with written reasons for the refusal and information regarding available remedies.

12. Fees

Request fees, access fees, copy fees and deposits may be payable in accordance with the fees prescribed under PAIA. The applicable fees are available from the Information Regulator and may be provided to a requester upon request.

13. Remedies Available

If we deny your request for access, you may:

- apply to a court (Section 78(1) of PAIA) with appropriate jurisdiction, or
- complain to the Information Regulator, PAIAComplaints@inforegulator.org.za

14. Availability of the Manual

14.1 A copy of this Manual is available in English format-

14.1.1 On our website: www.mobitainment.co.za

14.1.2 At our head office (see Section 4.4)

14.1.3 to any person upon request and upon the payment of a reasonable prescribed fee

14.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

15. Updating of the Manual

This Manual will be updated as necessary to reflect changes in legislation, Company structure, or policy.

Issued by

Errol Goodman

Chief Information Officer