



PAIA MANUAL

OF

SENTIV (PTY) LIMITED

("SENTIV")

Registration number 2009/020638/07 and its business
units

in terms of section 51 of

the Promotion of Access to Information Act No. 2 of 2000

as amended ("PAIA")

and section 55 of the Protection of Personal Information Act No. 4 of 2013 as
amended ("POPIA")

Updated: August 2024

Table of Contents

1.	Introduction	5
1.1	Objective	5
1.2	Application and Responsibilities	5
2.	Company contact details: PAIA section 51(1)(a)	6
3.	Information Regulator's guide	7
4.	PAIA: section 51 (1)(b)	7
5.	Applicable legislation: PAIA section 51(1)(c)	8
6.	Schedule of records available: PAIA section 51(1)(d)	9
7.	Form of request: PAIA section 18 and 53 (1) (also applicable to POPI Act section 23)	14
8.	Prescribed fees and procedure: PAIA section 54	14
9.	Third party information	16



1. Introduction

1.1 Objective

The Promotion of Access to Information Act No.2 of 2000 (“PAIA”) aims to give effect to the Constitutional right of access to any information held by the State or by any other entity or person where such information is required for the exercise or protection of any right. It gives entities and persons the right to access records held by private or public bodies.

The Protection of Personal Information Act No.4 of 2013, (“POPIA”) promotes the protection of Personal Information processed by public and private entities.

Where a request is made under PAIA to a private entity, that private entity must disclose the information if the requestor is able to demonstrate that the record is necessary for the exercise or protection of any rights, and provided that no grounds of refusal under PAIA apply.

Section 51 of PAIA requires private entities like Sentiv to compile a PAIA Manual that enables a person to obtain access to information held by the private entity. This document serves as Sentiv’s PAIA Manual as required by section 51 of PAIA.

This PAIA Manual provides a reference to the records held by Sentiv and the procedures that need to be followed to request access to such records.

Sentiv respects the privacy of personal information as referred to in the Sentiv Privacy Statement ([Privacy Statement| Sentiv](#)). For details on how Sentiv collects and uses personal information, with whom it is shared, and data subject choices and rights in relation to their personal information see Sentiv’s Privacy Statement.

1.2 Application and responsibilities

This PAIA Manual sets out the responsibilities of the Sentiv appointed Information Officers who will take up the duties mandated in PAIA and POPIA to ensure compliance.

Sentiv (Pty) Ltd, together with Sentiv’s business units will be referred to as “Sentiv” in this PAIA Manual. Generally speaking, Sentiv conducts business in the information and communications technology (“ICT”) industry.

2. Company contact details: PAIA section 51(1)(a)

The Chief Executive Officer of Sentiv, as Head of Sentiv as defined in PAIA and in accordance with a resolution of the Sentiv Board has duly authorised the contact person below to ensure that PAIA is complied with:



Contact Person Louis Du Toit

Designation Sentiv Chief Executive Officer

Physical Address Altron Warehouse

Corner Ronald & Clulee Road
Linbro Park AH
Sandton
2090
South Africa

Website address www.Sentiv.com.

3. Information Regulator's guide

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator. Copies of the updated Guide are available from the Information Regulator in the manner prescribed (<https://info regulator.org.za/paia-guidelines/>). Any request for public inspection of the Guide from the Information Officer or a request for a copy of the Guide from the Information Regulator must substantially correspond with Form 1 of Annexure A to Government Notice No. R,757 dated 27 August 2021 promulgated under the PAIA Regulations.

Any enquiries regarding the Guide should be directed to the Information Officer, or the Information Regulator using the following contact details:

Postal Address: JD House
27 Stiemens Street
Braamfontein, Johannesburg

General enquiries: +27(0)10 023 5200

E-mail Address: www.info regulator.org.za

4. PAIA: section 51 (1)(b)

PAIA grants a requester 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, the public body must be acting in the public interest. For purposes of PAIA, Sentiv and all its subsidiaries and business units are private bodies.

Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with below.

Section 23 of POPIA (read with sections 18 and 53 of PAIA), grants a data subject (a customer, employee or third party) a right to request confirmation of records containing their personal information being held by Sentiv, which confirmation shall be provided free of charge. The requester can subsequently request a copy of the record or a description of the personal information contained within the record, subject to the fees prescribed by PAIA.

5. Applicable legislation: PAIA section 51(1)(c)

Records are available in accordance with the following current South African legislation and any amendments thereof and regulations thereto (only to the extent that the relevant Act is applicable, and makes disclosure of records compulsory):

No	Reference	Act
1	No 26 of 2005	Auditing Professions Act
2	No. 75 of 1997	Basic Conditions of Employment Act
3	No. 53 of 2003	Broad-Based Black Economic Empowerment Act
4	No. 71 of 2008	Companies Act
5	No. 130 of 1993	Compensation for Occupational Injuries and Diseases Act
6	No. 89 of 1998	Competition Act
7	No 108 of 1996	Constitution of the Republic of South Africa
8	No. 68 of 2008	Consumer Protection Act
9	No 91 of 1964	Customs and Excise Act
10	No 36 of 2005	Electronic Communications Act
11	No. 25 of 2002	Electronic Communications and Transactions Act
12	No. 55 of 1998	Employment Equity Act
13	No. 38 of 2001	Financial Intelligence Centre Act
14	No. 15 of 1973	Hazardous Substances Act
15	No 68 of 1962	Identification Act
16	No. 58 of 1962	Income Tax Act
17	No. 24 of 1936	Insolvency Act
18	No 38 of 1997	Intellectual Property Laws Amendment Act
19	No. 66 of 1995	Labour Relations Act
20	No. 131 of 1998	Medical Schemes Act
21	No. 34 of 2005	National Credit Act
22	No. 107 of 1998	National Environment Management Act

No	Reference	Act
23	No. 39 of 2004	National Environmental Management: Air Quality Act
24	No. 59 of 2008	National Environmental Management: Waste Act
25	No. 61 of 2003	National Health Act
26	No. 36 of 1998	National Water Act
27	No. 85 of 1993	Occupational Health and Safety Act
28	No. 24 of 1956	Pension Funds Act
29	No. 4 of 2013	Protection of Personal Information Act
28	No. 68 of 1969	Prescription Act
29	No. 2 of 2000	Promotion of Access to Information Act
30	No. 26 of 2000	Protected Disclosures Act
31	No. 70 of 2002	Regulation of Interception of Communications and Provision of Communication – Related Information Act
32	No. 36 of 2004	Securities Services Act
33	No. 97 of 1998	Skills Development Act
34	No. 9 of 1999	Skills Development Levies Act
35	No. 4 of 2002	Unemployment Insurance Contributions Act
36	No. 89 of 1991	Value Added Tax Act

6. Schedule of records available: PAIA section 51(1)(d)

The following categories of records are automatically available without a person having to request access in terms of PAIA:

Category	Records
Listed company records available for inspection	<p><i>Share register</i> Monthly download from STRATE</p> <p><i>Dividend register</i> Annual register as supplied by the transfer secretaries</p> <p><i>Financial statements</i> Integrated annual report Interim report and results Annual financial results announcement Trading statements and business updates published (including where appropriate profit forecasts)</p> <p><i>JSE news (SENS)</i> Appointments/resignation of directors Share dealings of directors</p>

Category	Records
	Dividend declarations <i>Announcements</i> Rights offers Mergers and acquisitions Share placing Claw-back offers Schemes of arrangement Prelisting statements <i>Corporate transactions</i> Circulars to shareholders Notices of general meetings <i>Shareholders' meeting minutes (For shareholders only)</i> Special and general meetings of the company Annual general meeting of the company
Auditors	PricewaterhouseCoopers Inc. Waterfall City Heliport 4 Lisbon Lane Jukskei View Midrand 2090 South Africa

Records are subject to the Sentiv Record Management Policy, procedures and processes, and will be access controlled depending on the classification.

Sentiv has in its possession the following categories of records on the subject matters referred to below and for which a request for access needs to be made in terms of PAIA or the POPIA:

Category	Records
Finance	Finance maintains financial and management accounts for the Sentiv and provides back-office activities that support Treasury and Corporate Finance. Corporate Account records comprise the following main categories: <ul style="list-style-type: none"> • Accounting Records • Consolidation Records • General Correspondence • Internal Reports and Communications • Investment Records • Management Reports • PAYE Records • Tax Records • Transactional Records • Treasury Dealing and Settlement Records • VAT Records

Category	Records
Chief Executive Officer's office	<p>The Chief Executive's office records comprise the following main categories:</p> <ul style="list-style-type: none"> • Administration Records • Financial Reports • Internal Reports and Communications • Research Records • Sponsorship Records • Statutory Records
Company Investments	List of subsidiary companies, associates and joint ventures
Company Secretary	<p>The Company Secretary provides company secretarial services to Sentiv. Company Secretary records comprise of the following main categories:</p> <ul style="list-style-type: none"> • Relevant Contracts and Agreements • General Correspondence • Internal Reports and Communications • Investment Records • Minute Books • Proxy forms • Records relating to appointment of Directors • Records of resolutions • Share Registration Records • Statutory Records • Long-term share based incentive schemes. • Copies of the relevant trust deeds and rules.
Marketing and Corporate Communications	<p>The Marketing and Corporate Communications team provide marketing and communications services to Sentiv. Corporate Communications records consist of the following main categories:</p> <ul style="list-style-type: none"> • Advertising and promotional material • Analyst presentations • Corporate mission statement • Corporate video • Memos from the Chairman • Press releases • Staff magazine • Updates to staff
Tax	<p>Tax provides advice to Sentiv on all aspects of taxation. Tax records comprise the following main categories:</p> <ul style="list-style-type: none"> • Administrative Records • Corporate, Subject and Country Records • Internal Reports and Communications • Tax Records
Human Capital (HC)	<p>Human Capital's primary objective is to develop and implement a competitive human resource strategy that will support Sentiv. Human Resource records comprise the following main categories:</p> <ul style="list-style-type: none"> • Relevant Contracts • Disciplinary records • Employee benefit Records • Employee Records • Employee tax records (IRP 5's) • Employment Equity Records • Employment Equity returns to the Department of Labour

Category	Records
	<ul style="list-style-type: none"> • General Correspondence • General HR Policies and Procedures • Health and Safety records • Labour Relations Records • Leave records • Medical Aid records • Payroll reports • Pension Records • Salary records • SETA records • Skills development levies • Standard Terms and Conditions of Employment applicable to all Staff • Statutory Records • Training Records • UIF • Workmen's Compensation • Work skills development plan submitted to the Finance and Accounting Services Sector Education and Training Authority (FASSET)
Risk and Compliance	<p>Risk and Compliance's purpose is to provide the Corporate Offices and Operations held through Sentiv with assurance that risks and compliance issues are being appropriately managed across Sentiv. Risk and Compliance records the following main categories:</p> <ul style="list-style-type: none"> • Audit reports • General Administration Records • General Correspondence • Risk Management Records • Compliance related Records • Insurance Records
IT Governance Committee	<p>The IT Governance Committee is responsible for developing, supporting and providing assurance on the implementation of IT policies, procedures, standards and best practice in Sentiv. IT governance committee records comprise the following main categories:</p> <ul style="list-style-type: none"> • Disaster Recovery Plans • General Correspondence • Sentiv wide Contracts and Agreements • Policy Records • Software Licensing • AI Ethics

Category	Records
Legal	<p>Legal provides assistance with all corporate legal matters material to Sentiv. Legal records comprise the following main categories:</p> <ul style="list-style-type: none"> • Copies of Agreements • General Correspondence • Immovable Property Records • Internal Reports and Communications • Legal Records • Litigation Records • Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright) • Statutory Records • Working Files
Medical and Occupational Health Service	<p>Certain Sentiv subsidiaries provide general clinic services to their employees. Medical records comprise the following main categories:</p> <ul style="list-style-type: none"> • Accounting Records • Clinic Policies • Relevant Contracts and Agreements • Employee Records • General Correspondence • Medical Policies • Medical Records • Medical Reference material • Minutes of Meetings

A person (customer, employee or third party) has the right to request access in terms of section 23 of POPIA:

Category	Records
Personal Information	<ul style="list-style-type: none"> • any recorded piece of information relevant to a data subject, including but not limited to the following, which can be in either hard copy or electronic format: • race, gender, sex, pregnancy, marital status, nationality, ethnicity, or social origin; sexual orientation; age; physical or mental health and well-being • belief, religion, conscience, culture, language and birth, education, medical information, financial information, criminal or employment history • an identifying number or symbol • disability, personal opinions, blood type, biometric information • views or preferences of a person, correspondence of private or confidential nature, views, or opinions of another person • name of a person if it appears with other personal information • consumer or purchasing pattern • e-mail address and physical address, location information or online identifier and telephone number and mobile number.
Special Personal Information	<ul style="list-style-type: none"> • a special category of personal information - is religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sex life, criminal behaviour and biometric information. Where personal information is referenced, it will automatically include special personal information unless otherwise indicated.

7. Form of request: PAIA section 18 and 53 (1) (also applicable to POPI Act section 23)

To facilitate the processing of your request, kindly:

- Use the prescribed form (Form 2 – when a request is made to a private body or business), available on the Sentiv website and the website of the Information Regulator at [PAIA Form 2 - Request for access to record](#).
- Address your request to Sentiv Group Information Officer.
- Provide sufficient details to enable Sentiv to identify:
 - The record(s) requested;
 - The requester (and if an agent is lodging the request, proof of capacity);
 - The form of access required:
 - The postal address, email address or fax number of the requester in the Republic;
 - If the requester wishes to be informed of the decision in any manner (in addition to written) and the manner and particulars thereof;
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

8. Prescribed fees and procedure: PAIA section 54

The following applies to requests:

- A requestor is required to pay the prescribed fees before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid.
- The fees are available on the Sentiv website and the website of the Information Regulator at [PAIA Form 3 - Outcome of request and of fees payable](#).

Please note that the correct completion and submission of a PAIA Form 3 – Request for access to record does not automatically entitle or allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a category as specified in section 23 (4)(a) of the POPIA read with chapter 4 of PAIA.

Please further note that if it is reasonably suspected that a requester has obtained access to a record based on the submission of materially incorrect, false or misleading information, legal proceedings may be instituted against such requester.

If a request for access is successful an access fee will be payable for the search, reproduction and/or preparation of records and which will be calculated based on the fee prescribed under PAIA, an extract of the details of which is attached at the end of this PAIA Manual.

8.1 Completion of request for Access Form

All requesters should take note of the following guidelines when completing the PAIA Form 2 – Request for access to record.

- The form must be completed by filling in all lines and spaces;
- Proof of the identity, in the form of a copy of the requester's identity document, is required to be submitted with the application;



- If the requester is a body corporate, the authority of the person submitting the application on behalf of such body corporate must be proven on the basis of a written authority to be attached;
- Type or print in a clear eligible manner, if a question does not apply indicate so by inserting “N/A” in response to that question, and if there is nothing to disclose in response to a particular question write “NIL” in response thereto;
- If there is insufficient space in the form, add additional folios on which the additional information is provided, clearly indicating to which question this relates.

Request for information will be evaluated and the requester will be notified within 30 days after receipt of the request in the prescribed format of the following:

8.2 Notification of extension period (if required)

Requesters must take note that in terms of PAIA, the 30 days period mentioned above may be extended for a further period of not more than 30 days under certain circumstances (details will be provided together with the notification of such extension).

8.3 The access fees and/or deposit

The requester will be informed of the access fee or deposit (if any) which is payable for having access to the records and for the search, reproduction and/or preparation work involved, the account details and of the methods in which payment may be made. In addition, a deposit may be requested which is fully refundable if the application is ultimately refused.

8.4 Decision on request

The requester will be informed whether or not the application for access has been denied, or granted. In the event that the application is refused, the requester will be given adequate reasons for the refusal and will be informed that the requester may lodge an application with a Court (if a PAIA request) or the Information Regulator (if a POPIA) against the refusal of the application, as well as the procedure (including the period) for lodging such application.

8.5 Sentiv’s grounds for refusal

Sentiv may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which Sentiv may refuse include:

- Protecting personal information that Sentiv holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- Protecting commercial information that Sentiv holds about a third party or Sentiv (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of Sentiv or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;



- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Sentiv;
- Disclosure of the record would put the Sentiv at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer program which is owned by Sentiv and protected by copyright;
- The record contains information about research being carried out or about to be carried out on behalf of a third party of Sentiv and/or
- Information not yet in the public domain

8.6 Records that cannot be found or do not exist

Sentiv has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try and locate the record.

9. Third party information

If access is requested to a record that contains information about a third party, Sentiv is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated Sentiv Information Officer will consider these reasons in determining whether access should be granted, or not.

