PAIA Manual

Revisions control

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1 Purpose

The purpose of this Manual is to comply with the requirements of the Promotion of Access to Information Act, 2 of 2000 (PAIA), by describing the records held by the Company, the manner in which access to such records may be requested, and how personal information is processed in accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA).

2 Scope

This Manual applies to all records held by the Company, regardless of format, that fall within the scope of PAIA and POPIA. It applies to all employees, contractors, service providers and other persons acting on behalf of the Company.

3 Roles and Responsibilities

Role	Responsibility
Information Officer	Overall responsibility for PAIA compliance, approval of requests and maintenance of this Manual.
Department Managers	Ensure records are maintained and made available where appropriate.
All Employees	Protect information assets and comply with this Manual and related policies.

4 Acronyms and Abbreviations

Acronym	Description
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
MNO	Mobile Network Operator
PAIA	Promotion of Access to Information Act, 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act, 4 of 2013
ISMS	Information Security Management System
Information Regulator	Information Regulator (South Africa)

5 Key Contact Details

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6 PAIA Guide
6.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
6.2 The Guide is available for inspection in English, Afrikaans, Xhosa & Zulu.
6.3 The aforesaid Guide contains the description of the ***PAIA Manual***

7 Categories of Records Automatically Available

Category	Website	Available on Request
PAIA Manual	✓	✓
POPIA Privacy Notice	✓	✓
Company Profile	✓	✓
Terms and Conditions	✓	✓
Contact Information	✓	✓

8 Records Available in Terms of Other Legislation

Record Category	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act
Privacy Documentation	Protection of Personal Information Act
Company Registration Records	Companies Act
Tax Records	Income Tax Act; VAT Act
Employment Records	Basic Conditions of Employment Act
Employment Equity Records	Employment Equity Act
Health & Safety Records	Occupational Health and Safety Act
Electronic Communications Records	Electronic Communications Act
Consumer Records (where applicable)	Consumer Protection Act
Financial Records	Companies Act

9 Description of Records Held

Subject	Categories of Records
Corporate Governance	Policies, procedures, governance documents, strategic records
Human Resources	Employee records, recruitment, payroll, training, leave, disciplinary records
Finance	Invoices, payments, accounting records, tax documentation
Customers	Recharge transaction records, customer enquiries and complaints (where applicable)
Dealers	Dealer agreements, onboarding documents, account records, support records
Suppliers	Supplier agreements, due diligence, procurement documentation
Mobile Telecommunications Services	Wholesale prepaid SIM distribution records, recharge transaction records, provisioning records, service activation records, dealer records

Information Technology	Asset registers, network documentation, system configurations, backups, access logs
Information Security	ISMS documentation, risk assessments, security incidents, audit reports, KPI registers
Legal & Compliance	Contracts, PAIA requests, POPIA records, complaints, regulatory correspondence
Operations	Operational procedures, service delivery documentation, project documentation

10 Processing of Personal Information

10.1 Purpose

The Company processes personal information only where necessary to:

- provide telecommunications products and services;
- manage customer and supplier relationships;
- administer contracts and service agreements;
- process prepaid SIM distribution and electronic recharge services;
- comply with legal and regulatory obligations;
- administer employment relationships;
- maintain information security;
- detect and prevent fraud; and
- support business operations.

10.2 Categories of Data Subjects

Data Subject	Information Processed
Customers	Recharge transaction records
Dealers	Contact details, company information, account information, billing information
Employees	Identification, employment, payroll and human resources information
Suppliers	Company information, banking details, contact information
Contractors	Contractual information, contracts, access records
Website Users	Technical information, cookies, website logs

10.3 Recipients

- Banks
- Payment processors
- Mobile Network Operators
- Regulatory authorities
- Auditors
- Professional advisers
- Service providers acting under contract
- Government departments where legally required

10.4 Cross-border Transfers

The Company does not routinely transfer or process personal information outside the Republic of South Africa in the course of its business operations.

The Company's core operational systems and customer data are hosted within South Africa. Email services may be provided through a cloud-based service provider and, where applicable, may involve incidental processing in accordance with the provider's global infrastructure and contractual commitments.
In accordance with contractual obligations agreed with the Mobile Network Operators (MNOs), customer and operational data relating to MNO services is not transferred outside the Republic of South Africa.
Should any cross-border transfer of personal information become necessary in the future, the Company will ensure that such transfers are undertaken in compliance with the Protection of Personal Information Act, 4 of 2013 (POPIA), and that appropriate contractual and organisational safeguards are in place.

10.5 Information Security Measures

The Company maintains an Information Security Management System designed to protect the confidentiality, integrity and availability of information. Security measures include governance policies, access control, authentication, endpoint protection, encryption where appropriate, vulnerability management, backup and disaster recovery procedures, incident management, supplier security assessments, security awareness training and periodic review of information security controls. Security measures are reviewed regularly to ensure their continued effectiveness and alignment with applicable legal and regulatory requirements.

11 Availability of the Manual

A copy of the Manual is available
11.1 on www.afrisell.co.za: **PAIA Manual PM-001**
11.2 to any person upon request and upon the payment of a reasonable prescribed fee; and
11.3 to the Information Regulator upon request.

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.

12 Review and Maintenance

This Manual shall be reviewed at least annually, or sooner where required due to changes in legislation, regulatory requirements, business operations or information processing activities.
The Information Officer is responsible for ensuring that this Manual remains accurate and up to date.

Related Documents

- Information Security Policy
- Privacy Policy
- Information Classification Policy
- Records Retention Policy
- Risk Management Policy
- Acceptable Use Policy
- Incident Response Procedure
- POPIA Compliance Framework (where applicable)