



IGNITION[®] GROUP

PAIA MANUAL

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1. INTRODUCTION

The Promotion of Access to Information Act, 2 of 2000 ("PAIA") gives effect to section 32 of the Constitution, which provides for access to information if a person wants to exercise a right or protect a right, subject to the procedural requirements laid down by PAIA.

For this purpose, PAIA requires Ignition Group must implement a manual in terms of Section 51 of PAIA setting out the procedures to be followed to have access to Information. These procedures are set out in this PAIA Manual.

2. SCOPE

The scope of this PAIA Manual relates to Ignition Telecoms Investments Proprietary Limited and all wholly or partially owned subsidiaries and associated juristic persons, hereinafter referred to as "Ignition Group".

(Please Refer to Appendix 7 of this document for a complete list of subsidiaries)

3. PURPOSE

The purpose of the PAIA Manual is to:

- provide details of records and information of Ignition Group that are available and accessible once the requirements for access have been met; and
- sets out the procedures to be followed by a person who wants access to information which is subject to protection and non-disclosure, if such person wants to exercise or protect a right.

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4. AVAILABILITY OF THE PAIA MANUAL

This PAIA Manual is made available in terms of PAIA and Section 4 of the Regulations to the Protection of Personal Information Act ("POPIA") and can be obtained:

- from Ignition Group's website: <https://www.ignitiongroup.co.za/>;
- by contacting the Information Officer. A fee will be levied if copies of the PAIA Manual are required. More specifically provided for in terms of Appendix 3; and/or
- at the offices of Ignition Group for inspection during normal business hours at no cost.

5. COMPANY CONTACT DETAILS (PAIA Section 51(1)(a))

Ignition Telecoms Investments Proprietary Limited:

- **Postal Address:** P.O. Box 1611, Country Club, 4301
- **Physical Address:** Quadrant 4, Centenary Building, 30 Meridian Drive, New Town Centre, Umhlanga, Durban
- **Telephone Number:** +27(0)31 582 8300
- **Website:** www.ignitiongroup.co.za
- **E-mail address:** dataprivacy@ignitiongroup.co.za

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6. THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION (“SAHRC”) GUIDE (“PAIA GUIDE”) (PAIA Section 51(1)(b))

- PAIA grants Requestor 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.
- Requests in terms of PAIA shall be made in accordance with the prescribed procedures and at the rates provided for in terms of the PAIA Regulations.
- Requestors are referred to the PAIA Guide in terms of Section 10 which has been compiled by the SAHRC. It contains information on how to use and apply PAIA for the purposes of exercising Constitutional Rights.
- The PAIA Guide can be obtained by contacting Ignition Group, or by contacting the Information Regulator (South Africa).
- Contact details for the Information Regulator:
 - **Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017
 - **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - **E-mail:** infoereg@justice.gov.za
 - **Website:** <https://www.justice.gov.za/infoereg/docs.html>

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7. PUBLICATION AND AVAILABILITY OF INFORMATION AND RECORDS

7.1 Applicable Legislation:

The legislation applicable to Ignition Group is contained in Appendix 1 of this PAIA Manual. Ignition Group may be required to obtain information and keep records in terms of such legislation, and depending on the relevant legislative requirements, Ignition Group may also be required to make certain information or records publicly available; allow disclosure of information or records subject to certain conditions; or may be prevented to disclose information or records. The Requestor's right of access to information or a record must be dealt with by taking into consideration the applicable legislation requirements.

7.2 Available Records (PAIA Section 51(1)(d))

Examples of available Ignition Group Record Categories are contained in **Appendix 2** of this PAIA Manual – and the inclusion of a category or examples of records does not mean the information and/or records falling within those categories will automatically be made available to a Requestor.

Records may be available as follows:

- Freely and if publicly available e.g., information and records available on Ignition Group's public website;
- Made available but subject to Copyright; and/ or
- Made available but subject to limited disclosure.

Note: A person may only request information from Ignition Group as a Private Body if the requested information is required for the exercise or protection of a right

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recognised in law. Certain grounds of refusal may also apply as indicated below in paragraph 8.4 to a request for such record.

8. FORM OF REQUEST TO ACCESS INFORMATION AND RECORDS (PAIA Section 51(1)(e))

8.1 Requestor

- Personal Requestor:

A Personal Requestor is a Requestor who is seeking access to a record containing Personal Information about the Requestor itself. Access will be granted by Ignition Group – subject to applicable legislation.

- Other Requestor:

If a person other than the Personal Requestor is seeking access to a record containing Personal Information, Ignition Group is not obliged to grant access to such records, unless such person fulfils the requirements for access as provided for in terms of PAIA.

8.2 Request for Access to Record Procedures

The procedures are as follows:

- Requestor must complete and sign the prescribed form enclosed herewith in **Appendix 3** together with payment of the required fee (this applies to “Other Requestors” and not “Personal Requestors” as noted in paragraph 8.1).

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- The completed and signed form, together with proof of payment, must either be posted, submitted per hand or be emailed to the Information Officer at the email address stated above. (Section 5- Company Contact Details)
- If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.
- If a request is made on behalf of another person, the Requestor must submit proof of the capacity in which the Requestor is making the request on behalf of the other person, to the satisfaction of the Information Officer.
- All required information must be provided on the **Appendix 3** form and the information must be true, complete and correct with enough particularity to enable the Information Officer to identify:
 - o the Requestor's identity;
 - o contact details of the Requestor;
 - o the requested record/s, and
 - o the form of access required by the Requestor.
- A Requestor may only request access to a record to exercise or protect a right. In order to do so, the Requestor must:
 - o state what the nature of the right is; and
 - o provide an explanation of why the requested record is required

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for the exercise or protection of that right.

- Ignition Group will process a request to access a record within 30 (thirty) days of receipt of the completed **Appendix 3** form together with proof of payment, if applicable, unless the Requestor has stated exceptional reasons and circumstances together with proof, if applicable, which would satisfy the Information Officer that the time period need not be complied with.
- Ignition Group shall inform the Requestor in writing whether access has been granted or denied together with reasons thereof.
- If the Requestor requires access to the records in another manner, the Requestor must state the manner and the particulars so required.

8.3 Fees Payable

The applicable fees which are prescribed in terms of the PAIA Regulations are as follows:

- A non-refundable prescribed request fee is payable upon submission of any request for access to any record before a request will be processed.
- The above fees do not apply if the request is for personal records of the person requesting – in this instance no fee is payable.
- If the preparation of the record requested requires more than the prescribed hours (currently 6 hours), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).

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- 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 by the Requestor.
- Fees are subject to confirmation by the Regulator in the Government Gazette, and any applicable fees or changes will be disclosed to Requestors.
- A list of the current Fees payable is set out in **Appendix 4**.

8.4 Grounds for refusal of a Request

Chapter 4 of PAIA provides for several grounds on which a request for access to Personal Information must be refused.

The grounds for refusal are set out below:

A: Mandatory Protection of privacy of a third party who is a natural person

Grounds for Refusal:

- The disclosure would involve unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

B: Mandatory Protection of commercial information of a third party

Grounds for Refusal:

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- The record consists of information containing trade secrets of a third party;
- The record consists of information containing financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of the third party; or
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put the third party at a disadvantage in contractual or other negotiations or to prejudice the third party in commercial competition.

C: Mandatory Protection of certain confidential information of a third party

Grounds for Refusal:

- The record consists of information, the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D: Mandatory Protection of safety of individuals and protection of property

Grounds for Refusal:

- The record consists of information that, if disclosed, could reasonably be expected to endanger the life or physical safety of an individual;
- The record consists of information that, if disclosed, would likely

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prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property; or

- The record consists of information that, if disclosed, would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

E: Mandatory Protection of records privileged from production in legal proceedings

Grounds for Refusal:

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

F: Commercial Information of the organisation

Grounds for Refusal:

- The record consists of information containing trade secrets of the organisation;
- The record consists of information containing financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation;

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- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition; or
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the organisation, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.

8.5 Information or records not found

If information or records cannot be found, despite reasonable and diligent searches by Ignition Group, the Information Officer must provide the Requestor with a notice in the form of an affidavit setting out the measures taken to locate the document and the inability to locate it.

8.6 Remedies available to a Requestor if access is refused

The decision made by the Information Officer is final and Requestors must exercise external remedies if the Request for access to information or records is refused. A Requestor may however apply to a court for relief within 180 days of notification of the decision for appropriate relief as provided for in terms of sections 56(3) (c) and 78 of PAIA.

APPENDIX 1: APPLICABLE LEGISLATION

*THE LEGISLATION APPLICABLE TO IGNITION GROUP REFERS:

- Records are held in accordance with the following legislation -
 - Electronic Communications and Transactions Act, 2002
 - Conversion of SASRIA Act, 1998
 - Income Tax Act, 1962
 - Insider Trading Act, 1998
 - National Credit Act, 2005
 - Short Term Insurance Act, 1998
 - Stamp Duties Act, 1968 (repealed)
 - Statistics Act, 1999
 - Value-Added Tax Act, 1991
 - Tobacco Products Control Act, 1993
 - Basic Conditions of Employment Act, 1997
 - Compensation for Occupational Injuries and Diseases Act
 - Employment Equity Act, 1998
 - Labour Relations Act, 1995
 - Manpower Training Act, 1981 (repealed)
 - Occupational Health and Safety Act, 1993
 - Skills Development Act, 1998
 - Skills Development Levies Act, 1999
 - Unemployment Insurance Act, 2001
 - Unemployment Insurance Contributions Act, 2002
 - Regional Services Councils Act, 1985
 - Broad Based Black Economic Empowerment Act, 2003
 - Companies Act, 1973
 - Companies Act, 2008
 - Competition Act, 1998
 - Consumer Affairs Act (Unfair Business Practices) Act, 1988
 - Consumer Protection Act, 2008
 - Consumer Affairs Reports
 - Copyright Act, 1978
 - Trademarks Act, 1993

- Long Term Insurance Act, 1998
- Medical Schemes Act, 1998
- Financial Intelligence Centre Act, 2001
- Financial Advisory and Intermediary Services Act, 2002
- The Promotion of Access to Information Act, No 2 of 2000
- The Protection of Personal Information Act,2013

**Please Note: Although Ignition Group uses its best endeavours to provide a list of the latest applicable legislation, it may not be a complete or updated list due to constant changes in legislation.*

Kindly contact the Information Officer if you have any queries about Applicable Legislation.

APPENDIX 2: AVAILABILITY OF RECORDS

Except for public Records that may be available on our website, the following type of records are available on request in terms of PAIA.

Kindly note the grounds of refusal may apply as referred to in paragraph 8.4 of this PAIA Manual.

2.1 Employee Records
2.1.1 “ Employees ” refers to any person who works for or provides services to or on behalf of IgnitionGroup, and who receives or is entitled to receive remuneration, and any other person who assists in carrying out or conducting Ignition Group’s business and includes, without limitation, directors (executive and non-executive), all permanent, temporary and/or part-time staff as well as contract workers. Employee records include:
<ul style="list-style-type: none">• personal records (provided by Employees themselves);
<ul style="list-style-type: none">• records provided by a third party relating to Employees;
<ul style="list-style-type: none">• conditions of employment and other Employee-related contractual and quasi-legal records;
<ul style="list-style-type: none">• internal evaluation records and other internal records;
<ul style="list-style-type: none">• correspondence relating to Employees; and/or
<ul style="list-style-type: none">• training schedules and material.
2.2 Customer Records
2.2.1 A “ Customer ” refers to any natural or juristic entity receiving products or services from Ignition Group. Customer records include:
<ul style="list-style-type: none">• records pertaining to products sold and/or services provided by Ignition Group;
<ul style="list-style-type: none">• records provided by a customer to a third party acting for or on behalf of Ignition Group;
<ul style="list-style-type: none">• records provided by a third party; and/ or
<ul style="list-style-type: none">• records generated by or within Ignition Group relating to its customers, including transactional data.
2.3 Private Body Records
2.3.1 These are records which include, but are not limited to, records which pertain to Ignition Group’s own affairs including:
<ul style="list-style-type: none">• financial records;
<ul style="list-style-type: none">• operational records;

<ul style="list-style-type: none"> • databases;
<ul style="list-style-type: none"> • information technology systems and documents;
<ul style="list-style-type: none"> • marketing records;
<ul style="list-style-type: none"> • internal correspondence;
<ul style="list-style-type: none"> • product records;
<ul style="list-style-type: none"> • statutory records; and /or
<ul style="list-style-type: none"> • internal policies and procedures.
<p>2.4 Juristic Person Records</p>
<p>2.4.1 A “Juristic Person” is a non-human legal entity authorised by law with duties and rights and is recognised as a legal person and as having a distinct identity. This includes any incorporated organisations including corporations, government agencies, and/or Non-Governmental Organisation.</p> <p>Such records include, but are not limited to:</p>
<ul style="list-style-type: none"> • records pertaining to the provision of goods and services in the ordinary course;
<ul style="list-style-type: none"> • records held by Ignition Group, including without limitation, financial records, correspondence, contractual records, and records about Ignition Group’s contractors/suppliers/service providers.
<p>2.4.2 Records held by Ignition Group pertaining to other parties, including without limitation, financial records, correspondence, contractual records, and records about Ignition Group’s contractors/suppliers/service providers.</p>

**Note that although Ignition Group used its best endeavours to provide a list of records, it may not be a complete or updated list due to constant changes in legislation or business operations.*

Kindly contact the Information Officer if you have any queries about Records.

APPENDIX 3: REQUEST FOR ACCESS TO RECORD

The following proof must be submitted together with this completed and signed Request for Access to Record Form below to the Information Officer with email address:

dataprivacy@ignitiongroup.co.za

1. Proof of payment of fees (if applicable);
2. Certified copy of the Requestor's identity document;
3. If requests made on behalf of another person, proof of such authorisation, must be attached to this form; and/or
4. Supporting documentation (only if applicable).

REQUEST FOR ACCESS TO RECORD			
*Mark the applicable box with an "X"			
Request is made in my own name		Request is made on behalf of another person	
1. PARTICULARS OF PERSON REQUESTING ACCESS TO INFORMATION			
Full Names & Surname:			
Identification Number:		Cell phone no:	
Other contact no:		Fax no:	
Capacity in which request is made (when made on behalf of another person):			
Email address:			
Postal address:		Postal code:	
Street address:		Postal code:	
2. PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE			
*Only complete this section if a request for information is made on behalf of another person.			

Full Names & Surname/ Legal entity name:			
Identification Number:		Cell phone no.:	
Other contact no:		Fax no.:	
Email address:			
Postal address:		Postal code:	
Street address:		Postal code:	
3. PARTICULARS OF RECORD REQUESTED			
<p>*Provide full particulars of the record to which access is requested, including the reference number if it is known to you, to enable the record to be located.</p> <p>(If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</p>			
Description of record or relevant part of the record:			
Ref no. if available:			
Any further particulars of record:			
4. TYPE OF RECORD			
*Mark the applicable box with an "X"			
Records in written or printed form			
Record comprises of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			

Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
5. FORM OF ACCESS	
*Mark the applicable box with an "X"	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
6. MANNER OF ACCESS	
*Mark the applicable box with an "X"	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language	
(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	
7. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
*If the provided space is inadequate, please continue on a separate page and attach it to this Form. The Requestor must sign all the additional pages.	

Indicate which right is to be protected:

**Explain why the record requested is required for the exercise or protection of the
aforementioned right:**

8. FEES

*A request fee must be paid before the request will be considered.

*You will be notified of the amount of the access fee to be paid.

*The fee payable for access to a record depends on the form in which access is required and reasonable time required to search and prepare a record.

*If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason:

9. NOTIFICATION OF OUTCOME OF REQUEST

You will be notified in writing whether your request has been approved or denied - and if approved, the costs relating to your request, if any.

***Please indicate your preferred manner of correspondence with an "X":**

**Postal
address:**

Facsimile:

**Electronic communication
(please specify):**

10. SIGNATURE

Signed at: _____ on this _____ day of _____ 20__

Signature of Requestor/ person on whose behalf request is made

FOR OFFICIAL USE

Reference No.	
Request Received by: (State rank, name and surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	
Signature Information Officer	

APPENDIX 4: FEES PAYABLE

The following Fees are payable in respect of Private Bodies (other than personal requests) in terms of Part III of the PAIA Regulations published in the Government Gazette:

Private Body” means- (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity. (b) a partnership which carries or has carried on any trade, business or profession;
or (c) any former or existing juristic person but excludes a public body.

FEES IN RESPECT OF PRIVATE BODIES		
1.	The request fee payable by every Requestor	R140.00
2.	Photocopy/ printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on:	
	4.1 Flash drive (to be provided by requestor)	R40.00
	4.2 Compact disc	
	- If provided by requestor	R40.00
	- If provided to requestor	R60.00
5.	For a transcription on visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	8.1 Flash drive (to be provided by requestor)	R40.00
	8.2 Compact disc	
	- If provided by requestor	R40.00
	- If provided to requestor	R60.00
9.	To search for and prepare the record for disclosure	R145.00

	for each hour or part of an hour, excluding the 1st hour, reasonably required for such search and preparation. To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	1/3 rd of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

APPENDIX 5: OBJECTION TO PROCESS PERSONAL INFORMATION FORM

The following proof must be submitted together with the completed and signed Objection to Process Personal Information Form to the Information Officer:

- Certified copy of the Requestor's identity document;
- Affidavit and supporting documentation (only if applicable).

1. DETAILS OF DATA SUBJECT	
Name(s) and surname/registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number/ E-mail address:	
2. DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number/E-mail address:	
3. PROVIDE DETAILED REASONS FOR: The objection to process personal information in terms of section 11(1)(d) to (f) of POPIA	

Signed at: _____ on this _____ day of _____ 20__

Signature of Data Subject/ Designated Person _____

APPENDIX 6: REQUEST FOR A) CORRECTION OR DELETION OF PERSONAL INFORMATION OR B) DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION FORM

The following proof must be submitted together with the completed and signed Form to the Information Officer:

- Certified copy of the Requestor’s identity document;
- Affidavit and supporting documentation (only if applicable)

Mark the applicable Request below with an "X":	
1. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION	<input type="checkbox"/>
2. REQUEST FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION	<input type="checkbox"/>
1. DETAILS OF DATA SUBJECT	
Name(s) and surname/registered name of Data Subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number/E-mail address:	
2. DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number/E-mail address:	
3. PROVIDE DETAILED REASONS FOR:	
1. Correction or deletion of the personal information about the data subject in terms of section 24(1)(a) of POPIA, that is in possession or under control of the responsible party; OR	
2. Destruction or deletion of a record of personal information about the data subject in	

terms of section 24(1)(b) of POPIA, which the responsible party is no longer authorised to retain.

Signed at: _____ on this _____ day of _____ 20__

Signature of Data Subject/Designated Person

**APPENDIX 7: WHOLLY OWNED SUBSIDIARIES OF IGNITION TELECOMS INVESTMENTS
(PROPRIETARY) LIMITED**

Wholly Owned Subsidiaries

- All Sevens Trade and Invest (Proprietary) Limited
- CCS Outsourcing (Proprietary) Limited
- Chase Intelligent Tracking (Proprietary) Limited
- Comit Technologies (Proprietary) Limited
- IFS Holdings (Proprietary) Limited
 - Ucingo Administration 321 (Proprietary) Limited
 - Viva Life Insurance Limited
 - Viva Cover (Proprietary) Limited
 - Viva Direct (Proprietary) Limited
- Ignite Training Academy (Proprietary) Limited
- Larto Trade and Invest (Proprietary) Limited
- MVNX (Proprietary Limited)
- Mobius Mobile Telecommunications (Proprietary) Limited
- me and you (Proprietary) Limited
- So Music Industries (Proprietary) Limited