



25 Bergzicht Circle, Tokai,
Cape Town, 7945, South Africa
www.gdt.co.za



Go Digital Technologies

PAIA MANUAL

[PUBLIC DOCUMENT]



Go Digital Technologies (PTY) Ltd, CK / Registration # 2024/815655/07
Directors: Mr H. van Aarde, Mr J. Lightfoot, Mr J. Erasmus & Mr M. McCormick



1. Introduction

Go Digital Technologies ("GDT") is a digital distribution disruptor redefining African financial services.

2. Purpose, scope and objectives

This manual was drafted in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and is applicable to GDT and is intended to give effect to the provisions of section 32 of PAIA, which provides that any person has the right to gain access to information held by a private body, when that information is required for the protection of any rights. This manual serves to provide a guideline on which information is available and the manner in which such information may be requested from GDT.

3. Definitions

3.1. "Commercial information" means information which –

- contains trade secrets of a private body;
- contains financial, commercial, scientific or technical information, other than trade secrets, of a private body, the disclosure of which would be likely to cause harm to the commercial or financial interests of such private body;
- is a computer program, owned by a private body, except insofar as it is required to give access to a record to which access is granted in terms of PAIA;
- contains information, the disclosure of which could reasonably be expected –
 - to put a private body at a disadvantage in contractual or other negotiations; or
 - to prejudice such private body in commercial competition.

3.2. **"head"** of, or in relation to a private body, means –

8.2.1 in the case of a juristic person –

- the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer, or the person who is acting as such or any person duly authorised by such acting person.

3.3. **"Personal requester"** means a requester seeking access to a record containing personal information about the requester (in other words, the information is about the requester in his or her or its personal capacity).

3.4. "Private body" means –

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

3.5. "**Record**" of, or in relation to, a public or private body, means any recorded information –

- regardless of form or medium;
- in the possession or under the control of that public or private body, as the case may be; and
- whether or not it was created by that public or private body.



4. Contact particulars

Name of Business: Go Digital Technologies

Company Registration number: 2024/815655/07

Physical address: 25 Bergzicht Circle, Tokai, Cape Town, 7945

Telephone number: +27 21 137 8195

Designated person: James Erasmus

Email address: james.erasmus@gdt.co.za

Website address: www.gdt.co.za

5. Guide on how to use PAIA

A guide on how to use PAIA, as provided for in section 10 of PAA, is available from the

Information Regulator, as well as at the following link: https://infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

This guide is available in all official languages and may be obtained free of charge from the Information Regulator.

Information Regulator:

Website: <https://inforegulator.org.za/>

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

Physical Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Telephone: 010 023 5200

Email: enquiries@info regulator.org.za

Should your PAIA request be denied or there is no response for access to records, you may use the following email address to lodge a complaint: PAIAComplaints@inforegulator.org.za

6. Right of Access to a record

A requester of information must be given access to any record of a private body if –

- that record is required for the exercise or protection of any rights of the requester of the information;
- such requester complies with the procedural requirements of PAIA relating to a request for access to that record; and
- access to that record is not refused in terms of any permissible ground for refusal, as contained in par 12 of this manual.

7. Voluntary disclosure and information automatically available

GDT makes certain information available voluntarily, which information is freely accessible via the following means:

- Its website (www.gdt.co.za) and
- Other marketing and/or promotional material.

8. Facilitation of a request for access to information

- 8.1. A request for information may include a request for access to a record containing personal information (as defined in the Protection of Personal Information Act no 4 of 2013 ("POPI")) about the requester or the person on whose behalf the request is made.
- 8.2. Requests made for personal information from GDT have to comply with the provisions of POPI in that GDT has to be made aware of the following:
 - 8.2.1 Specifics of the information requested, including the category of information;
 - 8.2.2 Name and address of the requester/data subject, alternatively if the request is made on behalf of the data subject, proof of representative capacity to the reasonable satisfaction of the designated person;
 - 8.2.3 The purpose for the collection of the information;
 - 8.2.4 Whether the information required is voluntary or mandatory;
 - 8.2.5 Whether there are any consequences of failure to provide information to the requester;
 - 8.2.6 Stipulate any law authorising the collection of information;
 - 8.2.7 The recipients or categories of recipients of the information;
 - 8.2.8 Whether the information will transfer internationally;
 - 8.2.9 A general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed.
- 8.3. Information that is not readily available to immediately access by a private body, may be requested on the prescribed form (form 2 of Annexure A of the PAIA Regulations), as per PAIA (a copy of the latest version thereof being attached to this manual as Annexure A).
- 8.4. In the case of GDT, such request must be addressed to GDT, using the contact details provided in this manual.
- 8.5. The prescribed form 2 of Annexure A on which the request is made must at least contain the following information:
 - Personal information of the requester;
 - Type of record requested;
 - Which form of access is required;
 - The manner of access;
 - Particulars of the right to be exercised or protected; and
 - Fees payable.
- 8.6. A copy of the prescribed form 2 of Annexure A to be completed for submitting a request is available from the Information Regulator (and is attached to this manual as Annexure A).

9. Fees in terms of a request for access to information

- 9.1. The head of GDT to whom a request for access to information is made shall require the requester to pay the prescribed request fee (if any) before processing the request. The prescribed fees payable are as follows:

10. Information available in terms of PAIA

10.1. The requester may apply, on the prescribed form and in accordance with the procedure set out in this manual, for access to the following categories of information, provided that the request for information of these records is for purposes of a trial, investigation, protection of a right or any other legitimate reason which would not prejudice GDT in any way:

- Personnel records, which include employment contracts, disciplinary records and payroll information;
- Customer records, which include contact details, contracts, correspondence and financial records of any service providers of GDT;
- GDT records which include, inter alia, all business, marketing, financial and/or IT records;
- Other party records, which include any record which does not belong to GDT but is in GDT's possession.

10.2. Access to these records may be limited or refused in order to protect any individual's or company's right to privacy (if so required in GDT's discretion), alternatively, access to these records may be refused subject to the grounds of refusal set out in par 12 of this manual.

11. Information available in terms of other information

Certain information or records may be requested from GDT and must be made available in terms of laws other than PAIA, such as the following –

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Occupational Health and Safety Act 85 of 1993
- South African Revenue Services Act 34 of 1997
- Skills Development Levies Act 9 of 1999
- Unemployment Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991
- Financial Intelligence Centre Act 38 of 2001
- Broad-based Black Economic Empowerment Act 53 of 2003

The information or records may include but is not limited to the company tax clearance certificate, memorandum of incorporation (MOI), shareholders' register, B-BBEE certificate, proof of registration in terms of FICA, privacy policy in terms of POPI and VAT number. In making a decision as to whether or not to grant access to the requested information or records, GDT will use its discretion so as to ensure that it protects its right to privacy and does not infringe on any person's rights by providing access. In other words, access will only be provided in the instance that its right to privacy is not infringed, and no one else's right to privacy is infringed.

12. Grounds for refusal to access records

GDT may legitimately, in terms of chapter 4 of PAIA, refuse a request for information on, inter alia, any of the following grounds:

- Protection of personal information, including the right to privacy of GDT, any employee of GDT, or any third party, in order to avoid the unreasonable disclosure of personal information concerning that person. GDT may use its discretion as to whether a person's right to privacy might be affected by granting access to such records;
- Protection of the commercial information of GDT or a third party;
- Protection of confidential information of third parties if disclosure would constitute an action for breach of a duty of confidence owed to that third party in terms of any agreement or legislation;
- Protection of the safety of individuals or the protection of property;
- Protection of records which would be privileged from production in legal proceedings;
- Protection of GDT's commercial activities including but not limited to records that contain trade secrets, financial, commercial, customer, scientific or technical information, the disclosure of which would be likely to cause harm to GDT's commercial or financial interests;
- Protection of research information of GDT or a third party, if disclosure would expose the identity of GDT or the third party, the researcher or the subject matter of the research to serious disadvantage; or
- Requests for information that are, in GDT's reasonable opinion, manifestly frivolous or vexatious or which involve an unreasonable diversion of resources.

13. Records that do not exist or cannot be found

If all reasonable steps have been taken to find a record and such record cannot be found or does not exist, the designated person will notify the requestor in writing by way of written notice that it is not possible to find the requested record. The written notice shall detail the attempts made to find the record. Should the record be found later, the requester shall be given access to the record.

14. Compliance with the Protection of Personal Information Act

GDT will maintain the documentation of all processing operations under its responsibility and in compliance with the Protection of Personal Information Act 4 of 2013 (POPI). Data subjects have the right, at any time and free of charge, to object to the processing of their personal information in terms of section 11(3) of POPI. Such objections may be made using Form 1 of the POPI Regulations or by any accessible method (email, SMS, WhatsApp, telephone). Telephonic objections will be recorded and made available to the data subject upon request

15. Direct Marketing

In terms of section 69 of POPI, GDT will only process personal information for purposes of direct marketing where the data subject has given express prior consent. Such consent must be obtained in writing, substantially in the form of Form 4 of the POPI Regulations, and may be provided by email, SMS, WhatsApp, telephone, or any other accessible method. Opting out shall not constitute consent.



16. Correction, destruction or deletion of personal information

A requester who wishes to correct, destroy or delete his/her personal information held by GDT may submit a request free of charge, at any time, using Form 2 of the POPI Regulations or by any accessible method (hand delivery, fax, post, email, SMS, WhatsApp). Such requests may only be made if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully. GDT must notify the requester in writing within 30 days of the Outcome.

17. Availability of PAIA Manual

A copy of this manual is available for inspection, free of charge, and may be downloaded from GDT's website (www.gdt.co.za)

18. Remedies available

If access to a record is refused, you may:

- lodge a complaint with the Information Regulator by submitting Form 5 of the POPI Regulations (available on the Regulator's website, or at its offices); or
- approach a court for appropriate relief.

Complaints may be made online or using Form 5, in writing, or by email, fax, post, courier, SMS or WhatsApp. The Regulator will assist complainants to reduce oral complaints to writing and will acknowledge receipt of complaints within 14 days.

FORM 2

REQUEST FOR ACCESS TO RECORD

(Regulation 7)

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests are made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

☐ Request is made in my own name

[] Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names:

Identity Number: _____

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

Postal Address:

Street Address:

E-mail Address: _____

[]

[]

[]

[]

[]

[]

[]

[]

[]

[]

[]

[]



- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- 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:

Signed at _____ this _____ day of _____ 20____

Page | 12

FOR OFFICIAL USE

Reference number: _____

Request received by: _____

(State Rank, Name and Surname of Information Officer)

Date received: _____

Access fees: _____

Deposit (if any): _____