

ACCESS TO INFORMATION MANUAL
ADDENDUM FINANCIAL TECHNOLOGIES (PTY) LTD
("Addendum")

1. PURPOSE OF MANUAL

The Promotion of Access to Information Act 2 of 2000 ("PAIA") obliges private bodies (like Addendum) to compile a manual to enable a person to obtain access to information held by the private body and stipulates the minimum requirements that the manual must comply with.

This manual constitutes Addendum's Access to Information Manual. It is compiled in accordance with section 51 of PAIA read with the Protection of Personal Information Act, 4 of 2013 ("POPIA").

2. AVAILABILITY OF MANUAL

A copy of this manual is available to the public for inspection on the Addendum website at www.addendum.co.za or on request from the designated contact person referred to in this manual. It may also be inspected at Addendum's office during normal business hours.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ADDENDUM FINANCIAL TECHNOLOGIES (PTY) LTD

Directors	Willem Louis du Pré le Roux and Emuel Schoeman
CEO	Willem Louis du Pré le Roux
Information Officer	Willem Louis du Pré le Roux
Deputy Information Officer	Sarie van der Merwe
Physical address	First Floor, Regent House, Vineyards Office Estate, 99 Jip de Jager Drive, Bellville, 7530
Postal address	Same as physical address
Telephone number	021 100 4300
Email	info.officer@addendum.co.za
Website	www.addendum.co.za

4. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

The South African Human Rights Commission ("SAHRC") is mandated under PAIA to promote the right of access to information, monitor the implementation of PAIA, make recommendations to strengthen PAIA and to report annually to Parliament. The SAHRC has compiled a guide that contains information which would be reasonably required of any person wishing to exercise any rights set out in the Act. The guide is available in all the countries' official languages and can be viewed at www.sahrc.org.za.

The Guide can also be obtained upon request to the Information Officer and from the website of the Information Regulator at <https://inforegulator.org.za/>.

5. AUTOMATICALLY AVAILABLE INFORMATION

Information that is obtainable via the Addendum website is automatically available and need not be formally

requested in terms of this manual.

6. STATUTORY RECORDS

Addendum keeps information and records in accordance with the following legislation, which includes, but is not limited to the following:

- Basic Conditions of Employment 75 of 1997
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Companies Act 71 of 2008
- Electronic Communications and Transaction Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 95 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Stamp Duties Act 77 of 1968
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

7. OTHER RECORDS

The following is a list of records that are held at Addendum's office. Addendum does not guarantee that access requests in respect of these records will be approved / granted.

Administration Records

- Correspondence
- Founding documents
- Minutes of meetings
- Shareholder register

Human Resource Records

- Employee records
- Employment contracts
- General correspondence
- Information relating to health and safety regulations
- Payroll records
- Performance appraisals
- Personnel guidelines, policies and procedures
- Remuneration records and policies
- Recruitment policies
- Training records

Operations Records

- Company information and product information documents
- Client lists
- Contracts
- General correspondence
- Information relating to client transactions
- Marketing records
- Strategy documents
- Transactional records

Financial Records

- Annual financial statements
- Asset register
- Banking records
- Budgets
- Contracts
- Financial transactions
- General correspondence
- Insurance information
- Internal audit records
- Management accounts
- Tax records (company and employee)

Information Technology Records

- Central computer repository containing archives, backups, log files etc
- General correspondence
- Information security management policies

8. PROCESSING OF PERSONAL INFORMATION

Insofar as the Protection of Personal Information Act, 2013, concerning –

- the purpose of the processing;
- a description of the categories of data subjects and of the information or categories of information relating thereto;
- the recipients or categories of recipients to whom personal information may be supplied;
- planned transborder flows of personal information; and
- a general description of the information security measures to be implemented by Addendum as a responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed,

please refer to www.addendum.co.za to access our Privacy Policy.

9. HOW TO MAKE REQUESTS FOR ACCESS TO RECORDS HELD BY THE COMPANY

To facilitate your request, please:

- Use the prescribed Form 2 of annexure A to the Regulations, available on the website of the Information Regulator at <https://info regulator.org.za/paia-forms/> or upon request from Addendum at the email address referred to above.
- Address your request to the Information Officer at the address or electronic mail address listed above and make payment of the prescribed fees. Information about the fee structure is available on the website of the Information Regulator. Records may be withheld until the fees have been paid.

Addendum will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate a shorter response time.

10. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The main grounds for refusal of a request for information are:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person.

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- Mandatory protection of the commercial information of a third party, if the record contains trade secrets of that party; financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that party; or information disclosed in confidence by a third party to Addendum if the disclosure could put that third party to a disadvantage in negotiations or commercial competition.
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- Mandatory protection of the safety of individuals and the protection of property.
- Mandatory protection of records which could be regarded as privileged in legal proceedings.
- Disclosures that will put Addendum at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interest of Addendum.

11. REMEDIES AVAILABLE WHEN A REQUEST FOR INFORMATION IS REFUSED

- Appeal: Addendum does not have an internal appeal procedure. The decisions of the Information Officer are thus final. Requesters should exercise the external remedies at their disposal if the request for information is refused and the requester is dissatisfied with the reason provided by Addendum.
- External remedies: A requester or a third party that is dissatisfied with the Information Officer's refusal to disclose information may, within 30 days from the notification of a decision complete Form 5 of annexure A to the Regulations and lodge a complaint to the Information Regulator or apply to a relevant court for relief. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

12. UPDATING OF THE MANUAL

The Information Officer will update this manual on a regular basis.

Issued by:

Willem Louis du Pré le Roux

CEO & Information Officer