



PROMOTION OF ACCESS TO INFORMATION MANUAL

1. PREAMBLE

The Promotion of Access to Information Act, 2 of 2000 (“**PAIA**”) came into operation on 9 March, 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual has to comply with.

This document constitutes the PAIA manual (“**Manual**”) in respect of Eftsure Africa Proprietary Limited (“**eftsure**”). This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 4 of 2013 (“**POPI**”), which gives effect to everyone’s Constitutional right to privacy and largely commenced on 1 July 2020. POPI promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPI amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPI and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This Manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPI.

VERSION	POLICY OWNER	DATE
1	Brett Chait	1 July 2021

2. ABOUT EFTSURE

eftsure offers a web-based SaaS software solution that provides real-time verification of payee (supplier, vendor, payroll, etc.) details throughout the entire journey from onboarding through to point of payment, ultimately ensuring that payments are being released to the intended recipient.

3. CONTACT DETAILS

Eftsure Africa Proprietary Limited

(Registration Number: 2018/515630/07)

Information Officer:

Brett Chait

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E-Mail: legal@eftsure.co.za

Physical address

The Link
173 Oxford Road
Rosebank 2196
Johannesburg
Gauteng
South Africa

Postal address

The Link 173 Oxford Road Rosebank, Johannesburg GP 2196

4. 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 POPI. This Guide is made available by the Information Regulator (established in terms of POPI). Copies of the updated Guide are available from Information Regulator in the manner prescribed. Any enquiries regarding the Guide should be directed to:

Postal Address:	33 Hoofd Street Forum III, 3 rd Floor Braampark Braamfontein, Johannesburg
Telephone Number:	(010) 023 5207
Fax Number:	(086) 500 3351
E-mail Address:	inforeg@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/>

5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- to provide a list of all records held by the legal entity;
- to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- to define the manner and form in which a request for information must be submitted; and
- to comply with the additional requirements imposed by POPI.

6. ENTRY POINT FOR REQUESTS

PAIA provides that a person may only make a request for information if the information is required for the exercise or protection of a legitimate right.

Information will, therefore, not be furnished unless a person provides sufficient particulars to enable eftsure to identify the right that the requester is seeking to protect, as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an data subject's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.

The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPI.

The Information Officer will facilitate the liaison with the internal legal team on all of these requests.

All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

7. RECORDS HELD BY EFTSURE

Customer Information:

These records include contact details and other identifying particulars (including banking details) of eftsure customers and their respective users, suppliers and payees.

Personnel Information:

These records include employment contracts of all eftsure employees, employment policies and remuneration details.

Business records of eftsure:

These records include:

- financial records;
- minutes of meetings of the executive committee, departmental meetings and staff meetings;
- strategic plans and other operational policies;
- annual reports and other statutory reports; and
- newsletters, press releases and other publications.

8. AUTOMATICALLY AVAILABLE INFORMATION

Information that is obtainable via eftsure’s website about eftsure is automatically available and need not be formally requested in terms of this Manual.

DISCLOSURES ON REQUEST

Communications	Press releases
Human resources	eftsure Code of Ethics Employment Equity reports HR Reports Training Reports
Financial management	Budgets Strategic plans
	Annual performance plans Financial statements Auditor’s reports

9. INFORMATION AVAILABLE IN TERMS OF POPI

9.1. Categories of personal information collected by eftsure

Depending on the context, eftsure may collect information relating to an identifiable, living, natural person and, where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

9.2. The purpose of processing personal information

In terms of POPI, personal information must be processed for a specified purpose. The purpose for which personal information is processed by eftsure will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

In general, personal information is processed for purposes of providing eftsure's web-based payee verification solution, performing customer relationship management, dealing with complaints under the CPA, procurement purposes, records management, security, employment and related matters.

9.3. A description of the categories of data subjects

eftsure holds information and records on the following categories of data subjects:

- customers of eftsure and their respective users, suppliers and payees;
- employees/personnel of eftsure;
- distributors/resellers/agents of eftsure;
- any third party with whom eftsure conducts business;
- contractors of eftsure; and
- suppliers of eftsure.

(This list of categories of data subjects is non-exhaustive.)

9.4. The recipients or categories of recipients to whom the personal information may be supplied

Depending on the nature of the personal information, eftsure may supply information or records to the following categories of recipients:

- registered South African banks for purposes of verifying payees of and providing services to eftsure's customers;
- service providers who assist eftsure in providing or enriching its payee verification solution;
- statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;
- anyone making a successful application for access in terms of PAIA or POPI; and
- subject to the provisions of POPI and other relevant legislation, eftsure may share information about a customer's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which eftsure operates.

9.5. Planned transborder flows of personal information

If a data subject visits eftsure's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.

eftsure may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will fully comply with applicable data protection legislation.

These countries may not have data protection laws which are similar to those of South Africa.

9.6. A general description of information security measures to be implemented by eftsure

eftsure takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in our possession. eftsure takes appropriate technical

and organisational measures designed to ensure that personal information remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

10. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- Banks Act, 94 of 1990
- Basic Conditions of Employment Act, 75 of 1997
- Companies Act, 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act, 130 of 1993
- Consumer Protection Act, 68 of 2008
- Copyright Act, 98 of 1978
- Employment Equity Act, 55 of 1998
- Financial Advisory and Intermediary Services Act, 37 of 2002
- Financial Intelligence Centre Act, 38 of 2001
- Income Tax Act, 58 of 1962
- Insolvency Act, 24 of 1936
- Labour Relations Act, 66 of 1995
- Occupational Health and Safety Act, 85 of 1993
- Pension Funds Act, 24 of 1956
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 9 of 1999
- Stock Exchanges Control Act, 1 of 1985 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- Trade Marks Act, 194 of 1993
- Unemployment Contributions Act, 4 of 2002
- Unemployment Insurance Act, 63 of 2001
- Value-Added Tax Act, 89 of 1991

11. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

eftsure maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records will be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

Please note, further, that many of the records held by eftsure are those of third parties, such as customers and employees, and eftsure takes the protection of third-party confidential information very seriously. For further information on the grounds of refusal of access to a record please see paragraph

12.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

Category of records	Records
<p>Internal records</p> <p>The records listed pertain to eftsures own affairs</p>	<ul style="list-style-type: none"> • Memoranda and Articles of Association • Financial records • Operational records • Intellectual property • Marketing records • Internal correspondence • Service records • Statutory records • Internal policies and procedures • Minutes of meetings
<p>Personnel records</p> <p>For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of eftsures and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of eftsures. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers</p>	<ul style="list-style-type: none"> • Any personal records provided to us by our personnel • Any records a third party has provided to us about any of their personnel • Conditions of employment and other personnel-related contractual and quasi-legal records • Employment policies and procedures; • Internal evaluation and disciplinary records • Other internal records and correspondence
<p>Customer-related records</p>	<ul style="list-style-type: none"> • Contracts with the customer and between the customer and other persons;
<p>Other third party records</p> <p>Records are kept in respect of other parties, including, without limitation, joint ventures and consortia to which eftsures is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to eftsures.</p>	<ul style="list-style-type: none"> • Personnel, customer, or eftsures records which are held by another party as opposed to being held by eftsures • Records held by eftsures pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers
<p>Other records</p>	<ul style="list-style-type: none"> • Information relating to eftsures

Category of records	Records
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- Research information belonging to eftsure or carried out on behalf of a third party

12. REQUEST PROCEDURE

12.1. Completion of the prescribed form

Any request for access to a record from a public body in terms of PAIA must substantially correspond with the form included in Appendix A hereto.

A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

POPI provides that a data subject may, upon proof of identity, request eftsure to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.

POPI also provides that where the data subject is required to pay a fee for services provided to him/her, eftsure must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.

Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.

POPI provides that a data subject may object, at any time, to the processing of personal information by eftsure, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Appendix C and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

A data subject may also request eftsure to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or destroy or delete a record of personal information about the data subject that eftsure is no longer authorised to retain records in terms of POPI's retention and restriction of records provisions.

A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as Appendix D.

12.2. Proof of identity

Proof of identity is required to authenticate your identity and the request. In addition to the prescribed form, you will be required to submit acceptable proof of identity, such as a certified copy of your identity document or other legal forms of identity.

12.3. Payment of the prescribed fees

There are two categories of fees which are payable:

- **The request fee:** R50
- **The access fee:** This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Appendix B.

Section 54 of PAIA entitles eftsure to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

12.4. Timelines for consideration of a request for access

Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

12.5. Grounds for refusal of access and protection of information

There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example, trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;

- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put eftsure at a disadvantage in negotiations or prejudice it in commercial competition; and
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by eftsure.

Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with, the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

13. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to apply to the Information Regulator or a court of competent jurisdiction to take the matter further.

Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

14. AVAILABILITY OF THIS MANUAL

Copies of this Manual are available for inspection, free of charge, at the offices of eftsure and at <https://insights.eftsure.co.za/legal>.

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

.....
.....
.....
.....

2. Reference number, if available:

.....
.....
.....
.....

3. Any further particulars of record:

.....
.....
.....
.....

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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.

Reason for exemption from payment of fees:

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.....
.....
.....
.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
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G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

.....

.....

.....

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

.....

.....

.....

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....

Signed at this day of year

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE

Appendix B: FEES IN RESPECT OF PRIVATE BODIES

1. The “request fee” payable by a requester, other than a personal requester, referred to in section 54(1) of the Act, is R50.
2. The “fees for reproduction” referred to in section 52(3) and “access fees” payable by a requester referred to in section 54(7), unless exempted under section 54(8) of the Act, are as follows:
 - (i) for every photocopy of an A4-size page or part thereof: R1–R10;
 - (ii) for every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form: R0–R75;
 - (iii) for a copy in a computer-readable form on: (a) optical media: R70; or (b) solid-state media: R200;
 - (iv) for a transcription of visual images, (a) for an A4-size page or part thereof: R40; or (b) for a copy of visual images: R60;
 - (v) for transcription of an audio record, (a) for an A4-size page or part thereof: R20; or (b) for a copy of an audio record R30;
 - (vi) to search for the record for disclosure: R30 for each hour or part of an hour reasonably required for such search; and
 - (vii) when a copy of a record must be posted to a requester, the actual postal fee is payable.
3. The following person or persons are exempted from paying access fees:
 - (i) a single person whose annual income does not exceed R14,712.00; and
 - (ii) married persons or a person and his/her life partner whose annual income does not exceed R27,192.00.

Appendix C: OBJECTION FORM TO THE PROCESSING OF PERSONAL INFORMATION

**FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]**

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at this day of20.....

.....
Signature of data subject/designated person

Appendix D: REQUEST FORM FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

FORM 2

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF
SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	

Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED

Signed at this day of20.....

.....
Signature of data subject/ designated person

DATA SUBJECT ACCESS REQUEST POLICY AND FORM

1. RECEIPT OF SUBJECT ACCESS REQUESTS

- 1.1. A Subject Access Request may be received by eftsure in any of a number of different forms, including a telephone call, e-mail or letter requesting access to personal information. Subject Access Requests generally tend to originate from current or past employees, job applicants, customers or third parties acting on their behalf (particularly where criminal or civil proceedings are involved).
- 1.2. In the first instance, it may not always be clear that a data subject is making a Subject Access Request. Therefore, it is important to be familiar with this policy to be able to identify a Subject Access Request.
- 1.3. If you receive what you believe to be a Subject Access Request in any form, then it is important that you forward a copy of the request to the Information Officer immediately, who will manage the Subject Access Request.
- 1.4. In the case of a telephone call, it is best practice to inform the data subject that his/her/its request for information must be made in writing and cannot be processed otherwise. You should also notify the Information Officer that the phone call has taken place.
- 1.5. Once you have passed the request on to the Information Officer and have received an acknowledgement that it has been received, responsibility for processing the Subject Access Request will be managed by the Information Officer and individuals from the relevant department within eftsure (as applicable).

2. TIME PERIOD FOR THE RESPONSE

- 2.1. eftsure must respond to a valid Subject Access Request within a reasonable period, but always within 30 (thirty) days.
- 2.2. Where a Subject Access Request is missing any of its required elements, it is essential that a prompt request for the missing part(s) be sent back to the data subject asking for the missing elements.
- 2.3. Once all of the requirements set out above have been met and the request has become a valid Subject Access Request, the stated period for providing a formal response must be complied with.

3. WHO IS ENTITLED TO MAKE A SUBJECT ACCESS REQUEST?

- 3.1. Any data subject is entitled to make a Subject Access Request to eftsure. eftsure will typically receive Subject Access Requests:

- 3.1.1. from its employees or former employees or job applicants;
 - 3.1.2. from an individual working for a supplier or a supplier;
 - 3.1.3. from a customer who is an individual or a customer; or
 - 3.1.4. from an individual that has used eftsure website.
- 3.2. These individuals and entities have a right to be informed by eftsure whether personal information about them is being processed. If personal information is being processed in almost any way by eftsure then the data subject is entitled to be given any of the following information:
- 3.2.1. a description of the personal information held; and
 - 3.2.2. an indication of all the third parties or categories of third parties who have or have had of access to the information.

Validity of a Subject Access Request

- 3.3. It is necessary to confirm that the Subject Access Request is valid. The validity of a Subject Access Request will depend on the format and content of the Request. A valid Subject Access Request:
- 3.3.1. is in writing to eftsure physical or postal address, fax number or e-mail address;
 - 3.3.2. provides sufficient information to allow the identification of the data subject in requesting the personal information and the information requested;
 - 3.3.3. indicates the form in which the information should be provided;
 - 3.3.4. specifies an address, fax number or e-mail address of the data subject in South Africa; and
 - 3.3.5. includes sufficient identification of the data subject to which the Subject Access Request relates.

4. WHICH INFORMATION THAT IS FOUND IN THE SEARCH MUST BE DISCLOSED AND WHAT CAN EFTSURE REFUSE TO DISCLOSE?

- 4.1. A Subject Access Request only entitles the data subject to access personal information about himself/herself. In general, personal information about an data subject is required to be disclosed if it identifies that data subject.

4.2. However there are important exemptions which may apply. These exemptions apply to very specific information and are complex in its interpretation. The Information Officer will analyse the retrieved personal information and shall apply any relevant exemption.

4.3. Such exemptions are set out in our PAIA manual and may, for example, include information:

4.3.1. That is subject to legal professional privilege; or

4.3.2. That reveals the identity of a third party data subject.

5. OTHER INFORMATION TO BE INCLUDED IN THE RESPONSE

The data subject is also entitled to information about the third parties or categories of third parties who have or have had access to his/her personal information.

[Name and address of the organisation]

[Your name and full postal address]

[Your contact number]

[Your e-mail address]

[The date]

Eftsure Africa Proprietary Limited
The Link
173 Oxford Road
Rosebank 2196
Johannesburg
Gauteng
South Africa

Dear Sir or Madam

Data Subject access request form

[Include your full name, company details and other relevant details to help identify you].

Please supply the personal information which you hold about me, which I am entitled to receive under the Protection of Personal Information Act, 2013, held in:

[Give specific details of where to search for the personal data you want, for example:

- *my personnel file;*
- *e-mails between 'person A' and 'person B' (from 1 June 2017 to 1 Sept 2017)*
- *my medical records (between 2014 and 2017) held by 'Dr C' at 'hospital D';*
- *the CCTV camera situated at ('location E') on 23 May 2017 between 11am and 5pm; and*
- *financial statements (between 2013 and 2017) held in account number xxxxx.]*

If you need any more information, please let me know as soon as possible.

[If relevant, state whether you would prefer to receive the data in a particular electronic format, or printed out].

Yours faithfully

[Signature]