

**PROMOTION OF ACCESS TO INFORMATION MANUAL FOR  
INTEC TELECOM SYSTEMS SOUTH AFRICA (PTY) LTD T/A CSGS  
CSG SA HOLDINGS PROPRIETARY LIMITED  
CSG SA SERVICES PROPRIETARY LIMITED**

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## 1. Introduction and Definitions

This manual is prepared for Intec Telecom Systems South Africa (Pty) Ltd trading as CSGS (**CSG**); CSG SA Holdings Proprietary Limited (**CSG SA Holdings**); and CSG SA Services Proprietary Limited (**CSG SA Services**) (collectively, the **CSG companies**).

CSG is an information technology services and solutions supply company. The business of the company was established to provide services and billing solutions with an initial focus on the telecommunications industry in Africa. CSG SA Holdings and CSG SA Services are both non-trading, investment companies.

The CSG companies are subsidiaries of CSG Systems International, Inc., which is a multinational corporation based in the United States of America and listed on the NASDAQ stock exchange. The CSG companies form part of the CSG group of companies and the operations of the CSG companies are, accordingly, managed and implemented in terms of the group's overall strategy.

This manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act 2 of 2000 (**PAIA**) and the Protection of Personal Information Act 4 of 2013 (**POPIA**).

Each of the CSG companies is a private body as defined in section 1 of PAIA, and this manual contains the information specified in section 51 of PAIA, which is applicable to such a private body. This information is as follows:

- the contact details of the head of the CSG companies (section 51(1)(a)(i) of PAIA);
- a description of the guide referred to in section 10 of PAIA (section 51(1)(b)(i) of PAIA);
- a description of the records of the CSG companies which are available without a requester having to request access in terms of PAIA (section 51(1)(b)(ii));
- a description of the records of the CSG companies which are available in terms of any legislation other than PAIA (section 51(1)(b)(iii) of PAIA); and
- a description of the subjects on which the CSG companies hold records and the categories of records held on each subject in sufficient detail to facilitate a request for access to a record (section 51(1)(b)(iv) of PAIA).

Each of the CSG companies is a responsible party as defined in section 1 of POPIA and this manual contains the information stipulated in section 51(1)(c) of PAIA. This information is as follows:

- the purpose of the Processing (section 51(1)(c)(i) of PAIA);
- a description of the categories of Data Subjects and Personal Information Processed by the CSG companies in relation to these Data Subjects (section 51(1)(c)(ii) of PAIA);
- a description of the categories of recipients to whom that Personal Information is provided (section 51(1)(c)(iii) of PAIA);
- actual and/or planned instances when Personal Information held by the CSG companies may be transferred outside of South Africa (section 51(1)(c)(iv) of PAIA); and

- a description of the information security measures implemented by the CSG companies to ensure the confidentiality, integrity and availability of the Personal Information which is to be or is being Processed (section 51(1)(c)(iv) of PAIA).

The manual will be updated at least every twelve months or at such intervals as may be necessary in accordance with the requirements of section 51(2) of PAIA.

The manual facilitates requests for access to records of the CSG companies as provided for in sections 53 and 54 of PAIA and sets out how to access Personal Information held by the CSG companies in terms of sections 23 and 25 of POPIA.

In this manual, the following words bear the meaning set out below:

|                              |   |
|------------------------------|---|
| “Data Subject”               | means the persons to whom Personal Information applies in terms of section 1 of POPIA. In reference to the CSG companies, this primarily but without limitation means [clients/customers], employees and Operators/suppliers, other persons and third parties;                                      |
| “Deputy Information Officer” | means any person designated by the head of the CSG companies in terms of section 56 of POPIA and as registered with the Information Regulator;  |
| “employee”                   | means any person who works for or provides services to or on behalf of the CSG companies (or any of CSG, CSG SA Holdings, or CSG SA Services), and receives or is entitled to receive remuneration;   |
| “CSG”                        | means Intec Telecom Systems South Africa Proprietary Limited (registration number: 1997/022225/07), a company registered in South Africa in accordance with the Companies Act 71 of 2008, with its registered place of business at Great Westerford, 240 Main Road, Rondebosch, Western Cape, 7700; |
| “CSG SA Holdings”            | means CSG SA Holdings Proprietary Limited (registration number: 2016/202033/07), a company registered in South Africa in accordance with the Companies Act 71 of 2008, with its registered place of business at Great Westerford, First Floor, Rondebosch, Western Cape, 7700;                      |
| “CSG SA Services”            | means CSG SA Services Proprietary Limited (registration number: 2016/282236/07), a company registered in South Africa in accordance with the Companies Act 71 of 2008, with its registered place of business at Great Westerford, First Floor, Rondebosch, Western Cape, 7700;                      |
| “Guide”                      | means the guide published by the SAHRC, and updated and made available by the Information Regulator in terms of section 10 of PAIA;   |

|                         |  |
|-------------------------|--|
| “Information Officer”   | means the head of the CSG companies, registered with the Information Regulator in terms of section 55(2) of POPIA;   |
| “Information Regulator” | means the regulatory body established in terms of section 39 of POPIA;   |
| “Operator”              | means a person who processes Personal Information for the CSG companies (or any of CSG, CSG SA Holdings, or CSG SA Services) in terms of a contract or mandate, without coming under the direct authority of the CSG companies (or any of CSG, CSG SA Holdings, or CSG SA Services, as the case may be), as provided for in section 1 of POPIA, and Operators has a corresponding meaning;   |
| “Personal Information”  | means the meaning ascribe to it in section 1 of POPIA which is personal information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic persons, including, but not limited to: <ul style="list-style-type: none"><li data-bbox="802 898 1431 1088">(a) 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 persons;</li><li data-bbox="802 1093 1431 1182">(b) information relating to the education or the medical, financial, criminal or employment history of the person;</li><li data-bbox="802 1187 1431 1317">(c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li><li data-bbox="802 1321 1267 1344">(d) biometric information of the person;</li><li data-bbox="802 1348 1431 1415">(e) personal opinions, views or preferences of the person;</li><li data-bbox="802 1420 1431 1541">(f) 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;</li><li data-bbox="802 1545 1431 1601">(g) views or opinions of another individual about the persons; and</li><li data-bbox="802 1606 1431 1742">(h) 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;</li></ul> |
| “Processing”            | means the meaning ascribed to it in section 1 of POPIA and includes any operation or activity or any set of operations, whether or not by automatic mean, concerning personal information, including –   |

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

and “Process” and “Processed” have corresponding meanings;

|                                 |   |
|---------------------------------|---|
| “requester”                     | means any person or entity requesting access to a record that is under the control of the CSG companies in terms of PAIA or any Data Subject requesting details of any Personal Information relating to that Data Subject or a copy of the Personal Information in terms of POPIA;  |
| “SAHRC”                         | means the South African Human Rights Commission;  |
| “Special Personal Information”  | means the meaning ascribed to it in section 1 of POPIA and includes any Personal Information of a Data Subject, concerning – <ul style="list-style-type: none"> <li>(a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject; or</li> <li>(b) the criminal behaviour of a Data Subject to the extent that such information relates to – <ul style="list-style-type: none"> <li>i. the alleged commission by a Data Subject of any offence; or</li> <li>ii. any proceedings in respect of any offence allegedly committed by a Data Subject or the disposal of such proceedings</li> </ul> </li> </ul> |
| “the head of the CSG companies” | means the Chief Executive Officer of the CSG companies, or any person duly authorised by him or her to carry out the duties ascribed to the “head” of a private body by PAIA;   |
| “the manual”                    | means this manual which is published in accordance with section 51 of PAIA and “this manual” shall have the same meaning;   |
| “the Minister”                  | means the Cabinet member responsible for the administration of justice, presently the Minister of Justice and Correctional Services.  |

## 2. Contact details (section 51(1)(a)(i) of PAIA)

The Managing Director of the CSG companies is Peter Robert Brandt (**Mr Brandt**) and is the head of the CSG companies for the purposes of PAIA. Mr Brandt is the registered Information Officer for purposes of POPIA.

The Information Officer has designated Vicky Shaw (**Ms Shaw**) to be the Deputy Information Officer for purposes of POPIA.

Requests for access to records or information in terms of either PAIA or POPIA should be addressed to the Information Officer and/or Deputy Information Officer using the following contact details:

Physical address:

Great Westerford  
First Floor  
240 Main Road  
Rondebosch  
Western Cape  
7700

Postal address:

Great Westerford  
First Floor  
240 Main Road  
Rondebosch  
Western Cape  
7700

Telephone: Mr Brandt - 021 658 8019  
Ms Shaw – 021 658 8483

Email: [peter.brandt@csgi.com](mailto:peter.brandt@csgi.com)  
[vicky.shaw@csgi.com](mailto:vicky.shaw@csgi.com)  
with a cc: [dataprivacy@csgi.com](mailto:dataprivacy@csgi.com)

Website: [CSG Data Rights Request Portal](#)

**3. Section 10 Guide on how to use PAIA (section 51(1)(b)(i) of PAIA)**

The Information Regulator must, in terms of section 10 of PAIA, update and make available the Guide compiled by the SAHRC to assist persons wishing to exercise any rights in terms of PAIA.

The Guide may be obtained from the Information Regulator. Any person wishing to obtain the Guide may either access it through the website of the Information Regulator at <https://www.justice.gov.za/inforeg/> or should contact:

## The Information Regulator

Postal address:

P.O. Box 31533  
Braamfontein  
Johannesburg  
2017

Telephone: (012) 406 4818

Fax: (086) 500 3351

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

#### 4. **Records available in terms of any other legislation (section 51(1)(b)(iii) of PAIA)**

Certain records held by the CSG companies are available in terms of legislation other than PAIA. The specific records which are available in terms of such legislation are set out therein and these records may in certain instances only be accessed by the persons specified in the relevant legislation. The legislation is as follows:

- Basic Conditions of Employment Act, Act No. 75 of 1997
- Broad-Based Black Economic Empowerment Act, No. 53 of 2003
- Companies Act, Act No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, Act No. 130 of 1993
- Employment Equity Act, Act No. 55 of 1998
- Income Tax Act, Act No. 58 of 1962
- Immigration Act, No. 13 of 2002
- Labour Relations Act, Act No. 66 of 1995
- Medical Schemes Act, Act No. 131 of 1998
- Occupational Health and Safety Act, Act No. 85 of 1993
- Promotion of Access to Information, Act No. 2 of 2000
- Protection of Personal Information, Act No. 4 of 2013
- Pension Funds Act, Act No. 24 of 1956
- Skills Development Act, Act No. 97 of 1998
- Skills Development Levies Act, Act No. 9 of 1999
- Unemployment Insurance Act, Act No. 63 of 2001
- Unemployment Insurance Contributions Act, Act No. 4 of 2002
- Value Added Tax Act, Act No. 89 of 1991
- Protected Disclosures Act 26 of 2000
- Electronic Communications and Transactions Act 25 of 2002

5. **Description of the subjects on which the CSG companies hold records and the categories of records held on each subject (section 51(1)(b)(iv) of PAIA)**

The following is a list of the subjects on which the CSG companies hold records and the categories into which these fall. The procedure in terms of which such records may be requested from the CSG companies is set out in Section 7 of this manual. The records listed below will not in all instances be provided to a requester who requests them in terms of PAIA. The requester has to show that he or she has the right in terms of PAIA to be given access to the records in question.

| <b>Categories of records</b>  | <b>Description of records held</b>  |
|-------------------------------|---|
| <b><u>Administration</u></b>  | <ul style="list-style-type: none"> <li>• Shareholder Records</li> <li>• Registry Records</li> <li>• Director Meeting Minutes</li> <li>• CSG Incorporation Records</li> <li>• General Corporate Legal Records</li> </ul>   |
| <b><u>Management</u></b>      | <ul style="list-style-type: none"> <li>• Site Management Team Meeting Minutes</li> <li>• Internal correspondence</li> <li>• CSG Director Resolutions</li> </ul>   |
| <b><u>Finance</u></b>         | <ul style="list-style-type: none"> <li>• Accounting records</li> <li>• Tax records</li> <li>• Debtors' records</li> <li>• Creditors' records</li> <li>• Insurance records</li> <li>• Auditors' reports</li> <li>• Annual financial statements</li> <li>• Bank statements and other banking records for business and trust accounts</li> <li>• Invoices issued in respect of debtors and billing information</li> <li>• Records regarding CSG's financial commitments</li> </ul> |
| <b><u>Suppliers</u></b>       | <ul style="list-style-type: none"> <li>• Supplier lists and details of suppliers</li> <li>• BBBEE level</li> <li>• Agreements with suppliers</li> </ul>   |
| <b><u>Property</u></b>        | <ul style="list-style-type: none"> <li>• Asset registers</li> <li>• Lease agreements in respect of immovable property</li> </ul>  |
| <b><u>Human Resources</u></b> | <ul style="list-style-type: none"> <li>• List of employees</li> <li>• Statistics regarding employees</li> <li>• Employment contracts</li> <li>• Conditions of employment</li> </ul>   |

- Information relating to prospective employees
- Personnel records including personal details, disciplinary records, performance and internal evaluation records
- Employee tax information
- Records of Unemployment Insurance Fund contributions
- Records regarding group life assurance and disability income protection
- Provident fund records
- Payroll records
- Health and safety records
- Workplace skills plans
- Codes of conduct
- Disciplinary code and procedure
- Grievance procedure
- Appeal procedure
- Remuneration policy
- Internal policies and procedures regarding dismissals, performance appraisal, recruitment, selection, advertising of positions, appointments, retirement, promotions, leave, extended sick leave, study leave, salaries, overtime, bonuses, medical aid, health and safety, adoption leave and benefits, broad-based black economic empowerment (BBBEE) procurement, loans, black economic empowerment, smoking, use of company resources including telephones, and computers, and sexual harassment, policy.
- Training schedules and material
- Correspondence relating to personnel

**6. Processing of Personal Information by the CSG companies (section 51(1)(c) of PAIA)**

Details about the Processing of Personal Information undertaken by the CSG companies are set out in **Annexure A**.

**7. Categories of records which are available without request (section 51(1)(b)(ii) of PAIA)**

No notices relating to the CSG companies have been published by the Minister in terms of section 52(2) of PAIA.

Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and detailed in Section 7 of this manual. This information may be inspected, collected, purchased

or copied (at the prescribed fee for reproduction) at the offices of the CSG companies. Certain information is also available on the CSG companies' website [www.csgi.com](http://www.csgi.com). The records include:

- services offered by the CSG companies;
- products sold and supported by the CSG companies; and
- CSG's BBBEE level.

#### **8. Request procedure in terms of PAIA (section 51(1)(b)(iv) read with section 53 of PAIA)**

A request for access to records held by the CSG companies in terms of section 50 of PAIA must be made on the form (Form C) contained in the Regulations Regarding the Promotion of Access to Information, 2002 (the **PAIA Regulations**) (section 53(1) of PAIA). A copy of the form is attached as **Annexure B** to this manual. The request must be made to the CSG companies at the address, or email address, specified in Section 2 above.

A requester must provide sufficient detail on the prescribed form to allow the CSG companies to identify the record or records which have been requested and the identity of the requester (section 53(2) of PAIA). If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to the CSG companies (section 53(2)(f) of PAIA). The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa (sections 53(2)(b) and (c) of PAIA).

The requester must identify the right that he, she or it is seeking to exercise by accessing records held by the CSG companies and must explain why the particular record or records requested is or are required for the exercise or protection of that right (section 53(2)(d) of PAIA).

The CSG companies may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA which include: that access would result in the unreasonable disclosure of Personal Information about a third party, that it is necessary to protect the commercial information of a third party or of the CSG companies itself, that it is necessary to protect the confidential information of a third party, that it is necessary to protect the safety of individuals or property, that a record constitutes privileged information for the purpose of legal proceedings, and that it is necessary to protect the research information of a third party or the CSG companies itself. Access to documents may also be refused on the basis of professional privilege.

The CSG companies are required to inform a requester in writing of its decision in relation to a request (section 56 of PAIA). If the requester wishes to be informed of the CSG companies' decision in another manner as well, this must be set out in the request and the relevant details included, to allow the CSG companies to inform the requester in the preferred manner.

The CSG companies will make a decision in relation to a request for records within 30 days of receiving it, unless third parties are required to be notified of the request or the 30 day period is extended as provided for in PAIA. The CSG companies will notify the requester if the 30 day period for processing a request is to be extended.

Where a request is refused, a requester may apply to the High Court within 30 days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The High Court will determine whether the records should be made available or not.

**9. Fees payable (section 54 of PAIA read with Annexure A of the PAIA Regulations)**

A requester has to pay a **request fee** of R50.00. This request fee may be paid at the time a request is made, or the person authorised to deal with such requests on the CSG companies' behalf may notify the requester that he, she or it needs to pay the request fee before processing the request any further. A requester may apply to Court to be exempted from the requirement to pay the request fee.

Where a request for access to a record or records held by the CSG companies is granted, the requester also has to pay an **access fee** for the reproduction of the record or records, and for the search for and the preparation of the records for disclosure. The CSG companies are entitled to withhold a record until the required access fees have been paid. The access fees which are payable are as follows:

|      | <b>Action taken</b>  | <b>Fee</b> |
|------|--|------------|
| i.   | Photocopy of an A4-size page or part thereof   | R1.10      |
| ii.  | Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | R0.75      |
| iii. | For a copy in a computer-readable form on a compact disc   | R70.00     |
| iv.  | Transcription of visual images, for an A4-size page or part thereof  | R40.00     |
| v.   | Copy of visual images  | R60.00     |
| vi.  | Transcription of an audio record, for an A4-size page or part thereof  | R20.00     |
| vii. | Copy of an audio record  | R30.00     |

In addition, if the search for and preparation of the record or records requested takes more than six hours, the CSG companies may charge R30.00 for each hour or part thereof which is required for the search for and preparation of the records.

If the CSG companies are of the opinion that the search for and the preparation of the records requested will require more than six hours, the CSG companies are entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the requester. The requester may make an application to the Court or lodge a complaint with the Information Regulator to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the requester.

**10. Request procedure in terms of POPIA (sections 23 and 25 of POPIA)**

A request for access in terms of section 23 of POPIA must be made in manner and form set out in section 8 of this manual above (section 25 of POPIA).

No fee is payable where a requester asks the CSG companies to confirm whether or not the CSG companies hold his, her or its Personal Information (section 23(1)(a) of POPIA).

A prescribed fee, if any, as set by the Minister after consultation with the Information Regulator may be payable if a requester asks for a copy of the Personal Information held by the CSG companies, or a description of the records held by the CSG companies that contain the requester's Personal Information (section 23(1)(b)(ii) read with section 111(1)(a) of POPIA). The CSG companies must give the requester a written estimate of the fee beforehand and may require the requester to pay a deposit for all or part of the estimated fee (section 23(3) of POPIA).

**11. Information or records not found (section 55 of PAIA)**

If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the CSG companies will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

The affidavit or affirmation will provide a full account, of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the CSG companies with every person who conducted the search.

If the record in question should later be found, the requester will be given access to the record in the manner stipulated by the requester unless access is refused by the CSG companies as permitted by PAIA (as dealt with in Section 8 above).

**12. Information requested about a third party (Chapter 5 of Part 3 of PAIA)**

Where any information that relates to a third party is requested in terms of PAIA from the CSG companies, the CSG companies are required to notify the third party of the request (section 71 of PAIA). The third party has an opportunity to grant their consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the requester (section 72 of PAIA). If the CSG companies decide to grant access to the record, it will notify the affected third party again (section 73 of PAIA). The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by the CSG companies or not.

**13. Other prescribed information (section 51(1)(a)(ii) of PAIA)**

The Minister has not prescribed that any further information must be contained in this manual.

## **ANNEXURE A: PROCESSING OF PERSONAL INFORMATION**

The CSG companies takes the privacy and protection of Personal Information seriously and will only process Personal Information in accordance with POPIA or any other applicable legislation which deals with privacy rights. Accordingly, the relevant Personal Information privacy conditions and requirements relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion of Personal Information) will be applied to any Personal Information processed by the CSG companies.

### **Purpose of Processing Personal Information**

The CSG companies uses the Personal Information under its care in the following ways:

- Staff administration
- Keeping of accounts and records
- Tax and regulatory compliance
- Supplier administration and settlements
- Customer support, administration, invoicing and collection

### **Categories of Data Subjects and their Personal Information**

The CSG companies may possess records relating to suppliers, shareholders, contractors, staff and clients:

#### **Data Subjects**

#### **Personal Information processed**

##### **Clients -**

##### **juristic persons/entities**

- Names of contact persons;
- Name of legal entity;
- Physical and postal address and contact details;
- Financial information, including but not limited to, bank account details;
- Registration number;
- Founding documents;
- Tax related information;
- Authorized signatories;
- Beneficiaries;
- Ultimate beneficial owners

##### **Clients - other**

- Names;
- Registration number;
- Contact details;
- Physical and postal addresses;
- Tax related information;
- Confidential correspondence

**Intermediary/Advisor/ Supplier**

- Names of contact persons;
- Name of legal entity;
- Physical and postal address and contact details;
- Financial information, including, but not limited to, bank account details;
- Registration number;
- Founding documents;
- Tax related information;
- Authorized signatories;
- Beneficiaries;
- Ultimate beneficial owners

**Contractors**

- Names of contact persons;
- Name of legal entity;
- Physical and postal address and contact details;
- Financial information, including, but not limited to, bank account details;
- Registration number;
- Founding documents;
- Tax related information
- Authorized signatories;
- Beneficiaries;
- Ultimate beneficial owners

**Employees/Directors**

- Gender;
- Pregnancy;
- Marital status;
- Race;
- Age;
- Language;
- Education information;
- Financial information, including, but not limited to, bank account details;
- Employment history;
- ID number;
- Physical and postal address;
- Contact details;
- Opinions;
- Criminal behavior;
- Well-being

### Categories of Recipients to whom Personal Information may be supplied

The CSG companies may supply the Personal Information to service providers who render the following services:

- Capturing and organizing data;
- Storing data;
- Sending of emails and other correspondence to clients;
- Conducting due diligence checks;
- Statutory auditors and BBBEE auditors (Compliance)

The CSG companies do not share the Personal Information of its Data Subjects with any third parties, except if:

- It is obliged to provide such information for legal or regulatory purposes;
- It is required to do so for purposes of existing or future legal proceedings;
- It is involved in the prevention of fraud, loss, bribery or corruption; the third party performs services and processes Personal Information on behalf of the CSG companies as its Operator

The CSG companies will send its Data Subjects appropriate notifications or communications of its processing if it is obliged to do so by law, or in terms of its contractual relationship with Data Subjects. The CSG companies will disclose Personal Information to government authorities if it is required to do so by law.

### Actual or planned transfers of Personal Information outside of South Africa

The CSG companies may transfer Personal Information under its control in order to liaise with other organisations within the CSG group of companies (including but not limited to managing employee details on cloud based solutions, for purposes of accounting and finance records, for purposes of the CSG companies' human resources systems, to share customer details within the group), store data with third party cloud storage providers, and/or for purposes of payroll processing.

The CSG companies will take steps to ensure that Operators in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection of Personal Information and uphold the principles for reasonable and lawful processing of Personal Information, in terms of POPIA.

### General description of information security measures implemented by the CSG companies

The CSG companies employ up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Such measures include:

- Firewalls;

- Virus protection software and update protocols;
- Logical and physical access control;
- Secure setup of hardware and software making up the IT infrastructure;
- Encryption of confidential Personal Information at rest and in transit;
- IDS and IPS tools
- Operators who process Personal Information on behalf of the CSG companies (or any of the CSG companies) are contracted to implement security controls
- Security questionnaires in respect of software as a service (SaaS) tools used to manage CSG's BBEE score

**ANNEXURE B**

**FORM C  
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000))

[Regulation 10]

**A. Particulars of private body:**

The Head:

\_\_\_\_\_

\_\_\_\_\_

**B. Particulars of person requesting access to the record**

- (a) *The particulars of the person who requests access to the record must be given below.*  
 (b) *The address and/or fax number in the Republic to which the information is to be sent, must be given.*  
 (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname: \_\_\_\_\_

\_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Attention: \_\_\_\_\_

Fax number: \_\_\_\_\_

Telephone number: \_\_\_\_\_

E-mail address: \_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

**Particulars of person on whose behalf request is made:**

*This section must be completed ONLY if a request for information is made on behalf of another person.*

Full names and surname: \_\_\_\_\_

\_\_\_\_\_

Identity number: \_\_\_\_\_

**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.**

Description of record or relevant part of the record: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Reference number, if available: \_\_\_\_\_

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: \_\_\_\_\_

\_\_\_\_\_

**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. <b>If record consists of recorded words or information which can be reproduced in sound:</b>   |   |  |  |
|   | listen to the soundtrack (audio cassette) |  | transcription of soundtrack* (written or printed document) |
| 4. <b>If record is held on computer or in an electronic or machine-readable form:</b>   |   |  |  |
|   | 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?<br><b>Postage is payable.</b> |   |  | YES      NO  |

**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.***

Indicate which right is to be exercised or protected: \_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

**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 \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
**SIGNATURE OF REQUESTER / PERSON  
 ON WHOSE BEHALF REQUEST IS MADE**