



INTERBET INTERNATIONAL

(PTY) LTD

PAIA MANUAL

**Prepared in terms of Section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

A. INTRODUCTION

1. The Promotion of Access to Information Act, 2000 ("PAIA") gives effect to the constitutional right of access to information. PAIA provides a framework through which a person may request access to records held by the government, as well as records held by a private body, where such records are required for the exercise or protection of any right.
2. Interbet International (Pty) Ltd ("Interbet") is a private company operating the licensed online betting sector in the Western Cape Province of South Africa. Interbet is the holder of a bookmaker license issued by the Western Cape Gambling and Racing Board, which authorises it to pay and place fixed odds and open bets on any contingency.
3. As a private company, Interbet is regarded as a "private body" for purposes of PAIA. This Manual has therefore been prepared to assist requesters who wish to request access to records held by Interbet in accordance with PAIA.

B. PURPOSE

1. The purpose of this manual is to facilitate requests for access to information on Interbet.
2. This manual does not comprehensively deal with every procedure provided for in the Act.
3. Requesters of information are advised to familiarise themselves with the provisions of the Act before making any requests to Interbet in terms of the Act.
4. Interbet makes no representation and gives no undertaking or warranty that the information provided by it to a requester is complete or accurate, or that such information is fit for any purpose. All users of such information shall use such information entirely at their own risk, and Interbet shall not be liable for any loss, expense, liability or claims, howsoever arising, resulting from the use of this manual or any information provided by INTERBET or any error therein.

C. SECTION 51

1. Contact Details (section 51(1)(a))

Information Officer	Name: Mr. Gary Piha Tel: +27 21 137 8274 Email: PAIA@interbet.co.za Fax number: 086 669 9579
Deputy Information Officer	Name: Mrs. Krishantha Moodley Tel: +27 21 137 8274 Email: PAIA@interbet.co.za Fax number: 086 669 9579
Access to information general contacts	Email: PAIA@interbet.co.za
Postal Address:	Suite 20-202 The Waverley Wycroft Road Mowbray 7700
Physical Address:	Suite 304 & 305 Buitenkloof Studios 8 Kloof Street Gardens, Cape Town 8001
Website:	www.interbet.co.za

2. Guide on how to use the Act (section 51(1)(b)(i))

2.1. The Promotion of Access to Information Act provides that a requester may request access to a record held by a private body if the record is required for the exercise or protection of any right. If a public body lodges a request, the public body must be acting in the public interest. Requests in terms of the Act are required to be made in accordance with the prescribed procedures, at the rates provided.

2.2. This Guide is available from the South African Human Rights Commission : PAIA unit, Research and Documentation Department, Postal Address: Private Bag 2700,

Houghton, 2041; Telephone : +27 11 484 8300; Fax : +27 11 484 0582; Website : www.sahrc.org.za; e-mail: paia@sahrc.org.za.

3. Records available in terms of any other legislation (section 51(1)(b)(iii))

3.1. Records are kept and are available upon specified conditions (and in certain instances only to specified persons) in accordance with such other legislation as is applicable to Interbet, including (and as amended from time to time):

3.1.1. Company Secretarial & Legal

- I. Companies Act 71 of 2008;
- II. Copyright Act 98 of 1978;
- III. Competition Act 89 of 1998;
- IV. Consumer Protection Act 68 of 2008

3.1.2. Accounting and Finance

- I. Income Tax Act 58 of 1962;
- II. Revenue Laws Amendment Act 60 of 2008;
- III. Value Added Tax Act 89 of 1991;
- IV. Financial Intelligence Centre Act 38 of 2001;
- V. South African Reserve Bank Act 90 of 1989;
- VI. National Credit Act 34 of 2005

3.1.3. Human Resources

- I. Broad-Based Black Economic Empowerment Act, 53 of 2003;
- II. Labour Relations Act 66 of 1995;
- III. Basic Conditions of Employment Act 75 of 1997;
- IV. Employment Equity Act 55 of 1998;
- V. Skills Development Levies Act 9 of 1999;
- VI. Pension Funds Act 24 of 1956;

- VII. Medical Schemes Act 131 of 1998;
- VIII. Compensation for Occupational Injuries and Health Diseases Act 130 of 1993;
- IX. Occupational Health and Safety Act 85 of 1993;
- X. Unemployment Insurance Act 63 of 2001;
- XI. Environmental Health and Safety Act 1989

3.1.4. Gambling Legislation

- I. National Gambling Act of 7 of 2004, and the regulations made thereunder;
- II. Western Cape Gambling and Racing Act 4 of 1996, and the regulations made thereunder

4. Access to the records held by Interbet (sections 51(1)(c) & (e))

4.1. The categories of records which are available without a person having to request access in terms of the Act

- 4.1.1. Information already available in the public domain including information that is available in terms of the latest notice regarding the categories of records in terms of section 52(2)

4.2. Records held by Interbet [Section 51(1)(b)(iv)]

- 4.2.1. The following is a list of the subjects on which Interbet holds records and the categories into which these fall. The procedure in terms of which such records may be requested is set out in sections 4(iii) to (v) below.
- 4.2.2. Kindly note that this does not mean that the information and records listed below will automatically be made available as there are a number of grounds for refusal of access, *[Sections 7, 61 and 63 to 70]*

4.2.3. COMPANIES ACT RECORDS

- a. Documents of incorporation
- b. Memoranda of Incorporation and Articles of Association
- c. Minutes of Board of Directors meetings
- d. Records relating to the appointment of directors/ auditor/ secretary/public officer and other officers
- e. Share Register and other statutory registers

4.2.4. FINANCIAL RECORDS

- a. Annual Financial Statements
- b. Tax Returns
- c. Accounting Records
- d. Banking Records
- e. Bank Statements
- f. Paid Cheques
- g. Electronic banking records
- h. Asset Register
- i. Rental Agreements
- j. Other contracts
- k. Invoices

4.2.5. TAX-RELATED RECORDS

- a. PAYE Records
- b. Documents issued to employees for income tax purposes
- c. Records of payments made to SARS on behalf of employees
- d. All other statutory taxes, levies and contributions:
 - VAT
 - Regional Services Levies
 - Skills Development Levies;
 - UIF

- Workmen's Compensation

4.2.6. PERSONNEL DOCUMENTS AND RECORDS

- Employment contracts
- Employment Equity Plan (if applicable)
- Medical Aid records
- Pension Fund records
- Disciplinary records
- Salary records
- SETA records
- Disciplinary code
- Internal Policies
- Internal Rules
- Leave records
- Training records
- Training Manuals
-

4.2.7. INDUSTRY STAKEHOLDER RECORDS

4.2.7.1. "Industry Stakeholders" include –

- The Western Cape Gambling and Racing Board and its personnel
- The National Gambling Board of South Africa and its personnel
- The Financial Intelligence Centre
- The Standing Committee of the Western Cape Provincial Legislature responsible for the gambling portfolio
- The Portfolio Committee on Trade and Industry (National Parliament)
- Applicants for or holders of any license or certificate of suitability required in relation to the bookmaking business of the private body
- Shareholders of the private body

4.2.8. Industry Stakeholder Records include hard and/or soft copies of the following –

- a. All national and provincial licenses issued to the private body
- b. All certificates of suitability issued to Industry Stakeholders
- c. License application documentation in respect of Industry Stakeholders
- d. Any documentary records provided to the private body by Industry Stakeholders
- e. Records, reports, submissions, tax returns, invoices, payment confirmation records, correspondence, circulars, opinions and/or memoranda prepared for, addressed to or received from Industry Stakeholders

4.3. The request procedure

4.3.1. To facilitate the processing of your request, kindly:

4.3.1.1. Use the prescribed form.

4.3.1.2. Provide proof of identity to authenticate the request and the requester.

Therefore, in addition to the prescribed form, requesters will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.

4.3.1.3. Address your request to the Chief Operating Officer.

4.3.1.4. Provide sufficient details to enable INTERBET to identify the following:

4.3.1.5. record(s) requested;

4.3.1.6. requester (and if an agent is lodging the request, proof of capacity);

4.3.1.7. the form of access required;

- postal address or electronic mail address of the requester in the Republic;

- if the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
- I. the right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect that right.

4.4. Notification

- 4.4.1. Requesters will be informed within 30 days if Interbet's decision is to refuse access to the information requested based on any of the grounds for refusal as contemplated in Sections 7, 61 and 63 to 70 of the Act. Take note that the 30-day period may be extended for a further 30-day period should more time be required to gather the requested information. The requester will, however, be notified if the initial 30-day notice period is to be extended for a further 30 days.

4.5. Prescribed Fees

The following applies to requests (other than personal requests):

- 4.5.1. A requester is required to pay the prescribed fees (if any) before a request will be processed (See Annexure A for the prescribed fees);
- 4.5.2. If the preparation of the record requested requires more than the prescribed number of hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 4.5.3. A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 4.5.4. Records may be withheld until the fees have been paid.

5. Information regarding the Protection of Personal Information Act ("POPIA")

[Section 51(1)(c)]:

5.1. Purpose of the processing *[Section 51(1)(c)(i)]:*

5.1.1. Personal information, as defined in POPIA, is processed by Interbet for the purposes of:

5.1.1.1. Monitoring compliance with contractual obligations;

5.1.1.2. Monitoring and ensuring compliance with applicable legislation;

5.1.1.3. Monitoring and ensuring compliance with license conditions, and

5.1.1.4. Due diligence and enhanced due diligence monitoring in respect of customers

5.2. Categories of data subjects and information relating thereto [Section 51(1)(c)(ii)]:

5.2.1. The personal information specified in the Table below is held and processed by Interbet in respect of the categories of data subjects listed in the Table below:

DATA SUBJECTS	PERSONAL INFORMATION
Customers	Identity data, contact data, financial data, transaction data, technical data, profile data, usage data, marketing and communication data
Employees	Identifying data, contact data, banking details, pension details, tax numbers, medical aid details
Suppliers, & contractors creditors	Company name, company registration number, contact details, bank details, tax number and/or VAT number

For the purposes of the above table, the following definitions apply:

5.2.2. **Identity Data** includes: first name, last name, identity number, username or similar identifier, title, date of birth and gender of the data subject.

5.2.3. **Contact Data** includes: address, email address and telephone numbers.

5.2.4. **Financial Data** includes: bank account and payment card details.

- 5.2.5. **Transaction Data** includes: details about payments to and from the data subject and other details of bets placed, games played, and products purchased from us.
- 5.2.6. **Technical Data** includes: internet protocol (IP) address, the data subject's login data, browser type and version, time zone setting and location, browser plug-in types and versions and other technology on the devices used by the data subject to access the products and games offered by the entity.
- 5.2.7. **Profile Data** includes the username and password of the data subject, purchases or orders made by the data subject, and his/her interests, preferences, feedback and survey responses.
- 5.2.8. **Usage Data** includes information about how the data subject uses our website/app, bets placed, products and games played.
- 5.2.9. **Marketing and Communication Data** includes the preferences of the data subject in receiving marketing from the entity and our third parties and communication preferences.

5.3. **Categories of recipients to whom personal information may be supplied [Section 51(1)(c)(iii)]:**

The personal information held by Interbet may be supplied to –

- (i) the relevant data subject;
- (ii) any governmental and/or regulatory authority which requires such information for the proper performance of a statutory function;
- (iii) other persons, with the consent of the data subject, and only for a purpose consistent with the purpose for which the relevant personal information was collected, and/or
- (iv) where the personal information is anonymous (i.e. does not enable the recipient to identify the data subject).

5.4. Planned transborder flows of personal information [Section 51(1)(c)(iv)]:

None.

5.5. Information security measures [Section 51(1)(c)(v)]:

The confidentiality, security and integrity of the personal information held and processed by Interbet is promoted and assured by means of –

- (i) Password protection for log-in access;
- (ii) Detailed Password Policy;
- (iii) Encryption;
- (iv) Access controls to personal information;
- (v) Firewalls;
- (vi) 2-factor Authentication;
- (vii) Platform Privacy Policy;
- (viii) Personal Information Sharing Policy;
- (ix) Subject Access Request Policy;
- (x) Data Retention Policy, and (xii) Internal Privacy Policy.

6. Availability of the Manual (section 51(3))

This Manual is available for inspection at the offices of Interbet free of charge and copies are available with the SAHRC, and on the Interbet website referred to above.

ANNEXURE A

PRESCRIBED FEES

Prescribed Fees for Private Bodies

1. The fee for a copy of the Manual as contemplated in regulation (9)(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

2. The fees for reproduction referred to in regulation 11(1) are as follows:

	R
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) compact disc	70,00
(ii) flash drive	70,00
(d) For a transcription of visual images,	
(i) for an A4-size page or part thereof	40,00
(ii) for a copy of visual images	60,00
(e) For a transcription of an audio record,	
(i) for an A4-size page or part thereof	20,00
(ii) for a copy of an audio record	30,00
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.	

4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

- | | | |
|--------|---|-------|
| (1)(a) | For every photocopy of an A4-size page or part thereof | R1,10 |
| (b) | For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | 0,75 |
| (c) | For a copy in a computer-readable form on – | |
| | (i) compact disc | 70,00 |
| | (ii) flash drive | 70,00 |
| (d) | For a transcription of visual images, | |
| | (i) for an A4-size page or part thereof | 40,00 |
| | (ii) for a copy of visual images | 60,00 |
| (e) | For a transcription of an audio record, | |
| | (i) for an A4-size page or part thereof | 20,00 |
| | (ii) for a copy of an audio record | 30,00 |
| (f) | To search for and prepare the record for disclosure, R30,00 for each part of an hour reasonably required for such search and preparation. | |
- (2) For purposes of section 54(2) of the Act, the following applies:
- (a) six hours as the hours to be exceeded before a deposit is payable; and
- (b) one third of the access fee is payable as a deposit by the requester.
- (3) The actual postage is payable when a copy of a record must be posted to a requester.

FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests 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				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
--	--

OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

--

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐

Yes

☐

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer