

ANNEXURE D

PAIA MANUAL

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000 ("THE ACT")

A. INTRODUCTION TO INTERBET INTERNATIONAL (PTY) LTD

Interbet International (Pty) Ltd ("Interbet") is a private company operating in the licensed online betting sector in the Western Cape Province of South Africa. INTERBET is the holder of a bookmaker licence issued by the Western Cape Gambling and Racing Board, which authorises it to pay and place fixed odds and open bets on any contingency.

B. PURPOSE OF MANUAL

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. PARTICULARS OF SECTION 51 MANUAL

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

Interbet has authorised its Head of Operations to act as its head for the purpose of the compilation of this Manual and to address all requests for access to information from Interbet made in terms of the Act.

Interbet International (Pty) Ltd

The Head : **Attention: Head Of Operations**

Street Address : **Unit 16, Roeland Square, Roeland Street, CAPE TOWN**

Telephone : **0214657340**

E-mail : io@interbet.co.za

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

The Promotion of Access to Information Act grants a requester access to records of a company if the record is required for the exercise or protection of any rights. 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.

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))

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):

- **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
- **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
- **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

- **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))

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

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)

ii. Records held by INTERBET [Section 51(1)(b)(iv)]

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.

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]

COMPANIES ACT RECORDS

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

FINANCIAL RECORDS

- Annual Financial Statements
- Tax Returns
- Accounting Records

- Banking Records
- Bank Statements
- Paid Cheques
- Electronic banking records
- Asset Register
- Rental Agreements
- Other contracts
- Invoices

TAX-RELATED RECORDS

- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory taxes, levies and contributions:
 - i. VAT
 - ii. Regional Services Levies
 - iii. Skills Development Levies
 - iv. UIF
 - v. Workmen's Compensation

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

INDUSTRY STAKEHOLDER RECORDS

“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 licence or certificate of suitability required in relation to the bookmaking business of the private body
- Shareholders of the private body

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

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

iii. The request procedure

To facilitate the processing of your request, kindly:

- Use the prescribed form.
- 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.
- Address your request to the Chief Operating Officer.

- Provide sufficient details to enable INTERBET to identify the following:
 - (a) record(s) requested;
 - (b) requester (and if an agent is lodging the request, proof of capacity);
 - (c) 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;
 - (d) 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.

iv. **Notification**

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.

v. **Prescribed Fees**

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

- A requester is required to pay the prescribed fees (if any) before a request will be processed (See Annexure A for the prescribed fees);
- 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);
- A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 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)]:

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

- (i) Monitoring compliance with contractual obligations;
- (ii) Monitoring and ensuring compliance with applicable legislation;

- (iii) Monitoring and ensuring compliance with licence conditions, and
- (iv) 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)]:**

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:

- **Identity Data** includes: first name, last name, identity number, username or similar identifier, title, date of birth and gender of the data subject.
- **Contact Data** includes: address, email address and telephone numbers.
- **Financial Data** includes: bank account and payment card details.
- **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.
- **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.
- **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.
- **Usage Data** includes information about how the data subject uses our website/app, bets placed, products and games played.
- **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:

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(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

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| (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. | |