



MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (the Act)

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1. INTRODUCTION

- 1.1. This manual is based on the blueprint issued by the Information Regulator.
- 1.2. Debt Movement South Africa and its subsidiaries provide global Business Process Outsourcing services to companies involved in Telecommunications, Insolvency, Debt Management, Financial Services, Accountancy, Legal, and Software Development.
- 1.3. This PAIA Manual is useful for the public to:
 - 1.3.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
 - 1.3.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
 - 1.3.3. know the description of the records of the body which are available in accordance with any other legislation;
 - 1.3.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
 - 1.3.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 1.3.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 1.3.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 1.3.8. know the recipients or categories of recipients to whom the personal information may be supplied;
 - 1.3.9. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
 - 1.3.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. CONTACT DETAILS

- 2.1. The company details are as follows and applicable for all subsidiaries as contained within Debt Movement South Africa structure:

- 2.1.1. Company Name: Debt Movement South Africa
- 2.1.2. Directors: Andrew Portmann and Ryan Hartslielief
- 2.1.3. Deputy Information Officer: Jared Laljit
- 2.1.4. Postal Address: 2 Park Lane, Umhlanga, Durban, South Africa, 4051
- 2.1.5. Physical Address: 2 Park Lane, Umhlanga, Durban, South Africa, 4051
- 2.1.6. Telephone Number: +27 31 816 9070
- 2.1.7. Email: info@alphabpo.co.za
- 2.1.8. Website: <https://www.alphabpo.co.za/>

3. SECTION 10 GUIDE ON HOW TO USE ACT

- 3.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act (POPIA).
- 3.2. The Guide is available in each of the official languages and in braille.
- 3.3. The aforesaid Guide contains the description of:
 - 3.3.1. the objects of PAIA and POPIA;
 - 3.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:
 - 3.3.2.1. the Information Officer of every public body; and
 - 3.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 3.3.3. the manner and form of a request for:
 - 3.3.3.1. access to a record of a public body contemplated in section 11 of PAIA; and
 - 3.3.3.2. access to a record of a private body contemplated in section 50 of PAIA;
 - 3.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 3.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 3.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - 3.3.6.1. an internal appeal;
 - 3.3.6.2. a complaint to the Regulator; and
 - 3.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 3.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

- 3.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 3.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 3.3.10. the regulations made in terms of section 92.
- 3.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 3.5. The Guide can also be obtained:
 - 3.5.1. upon request to the Information Officer;
 - 3.5.2. from the website of the Regulator (<https://info regulator.org.za/>).
- 3.6. A copy of the Guide is also available for public inspection during normal office hours.

4. RECORDS AVAILABLE IN TERMS OF LEGISLATION

- 4.1. Records are available in accordance with the following legislation:
 - 4.1.1. Basic Conditions of Employment Act No.75 of 1997
 - 4.1.2. Broad-Based Black Economic Empowerment Act No. 75 of 1997
 - 4.1.3. Companies Act No.71 of 2008
 - 4.1.4. Consumer Protection Act No.68 of 2008
 - 4.1.5. Copyright Act No. 98 of 1978
 - 4.1.6. Debt Collectors Act No.114 of 1998
 - 4.1.7. Electronic Communications Act No. 36 of 2005
 - 4.1.8. Electronic Communications and Transactions Act No. 25 of 2002
 - 4.1.9. Employment Equity Act No. 55 of 1998
 - 4.1.10. Financial Intelligence Centre Act No. 38 of 2001
 - 4.1.11. Income Tax Act No. 58 of 1962
 - 4.1.12. Labour Relations Act No. 66 of 1995
 - 4.1.13. National Credit Act No. 34 of 2005
 - 4.1.14. Non-Profit Organisations Act No. 71 of 1997
 - 4.1.15. Occupational Health and Safety Act No. 85 of 1993
 - 4.1.16. Prevention of Organised Crimes Act No. 121 of 1998
 - 4.1.17. Protection of Personal Information Act No. 4 of 2013
 - 4.1.18. Skills Development Levies Act No. 9 of 1999
 - 4.1.19. Short-Term Insurance Act No. 53 of 1998
 - 4.1.20. Unemployment Insurance Act No. 63 of 2001
 - 4.1.21. Value Added Tax Act No. 89 of 1991

5. ACCESS TO RECORDS HELD BY DEBT MOVEMENT SOUTH AFRICA

- 5.1. The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of the Act, in terms of Section 52(2) and Section 51(1)(c) is none, save for the notices and documents found on Debt Movement South Africa websites:
 - 5.1.1. <https://theaffinitygroup.co.za/>

- 5.1.2. <https://openbooksco.com>
- 5.1.3. <https://affinityafrica.co.za>
- 5.1.4. <https://affinitysolutions.co>
- 5.1.5. <https://alphabpo.co.za>

5.2. The subjects on which the private body holds records and the categories on each subject in terms of Section 51(1)(e) are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act.

5.3. HUMAN RESOURCES DEPARTMENT

- 5.3.1. Administration policies and procedures
- 5.3.2. List of contractors / sub-contractors
- 5.3.3. Registrations with Department of Labour: UIF, COIDA and Skills Development Levies Act
- 5.3.4. Address lists and internal telephone lists
- 5.3.5. Personnel files
- 5.3.6. Letters of appointment
- 5.3.7. Fringe benefit breakdown
- 5.3.8. Leave forms
- 5.3.9. Employee contracts of employment
- 5.3.10. List of employees
- 5.3.11. Payroll records
- 5.3.12. Recruitment records
- 5.3.13. Training records, manuals, materials and reports
- 5.3.14. UIF returns
- 5.3.15. CCMA records
- 5.3.16. Disciplinary hearings
- 5.3.17. Salary packages
- 5.3.18. Employment equity records and reports

5.4. SECRETARIAL AND LEGAL

- 5.4.1. Company statutory records
- 5.4.2. Powers of attorney / proxies
- 5.4.3. Central contracts register
- 5.4.4. Record of major litigation / arbitration proceedings
- 5.4.5. Insurance policies
- 5.4.6. Title deeds
- 5.4.7. Mortgage bonds
- 5.4.8. Trademark, copyright, patent, service mark certificates and registrations

5.5. FINANCIAL ACCOUNTS

- 5.5.1. Audited financial statements
- 5.5.2. Accounting records
- 5.5.3. Debtors and creditors information
- 5.5.4. Assets registers
- 5.5.5. Public utility accounts

5.6. TREASURY

- 5.6.1. Banking information and mandates
- 5.6.2. VAT registration certificate
- 5.6.3. Income tax records
- 5.6.4. Tax records
- 5.6.5. Monthly receipts from SARS

5.7. SAFETY, HEALTH AND ENVIRONMENT

- 5.7.1. Complete Safety, Health and Environment Risk Assessment
- 5.7.2. Environmental Managements Plans
- 5.7.3. Inquiries, inspections, examinations by environmental authorities

5.8. MARKETING DEPARTMENTS

- 5.8.1. Advertising and promotional material

5.9. SALES DEPARTMENTS

- 5.9.1. Customer details
- 5.9.2. Credit application information
- 5.9.3. Information and records provided by a third-party

5.10. IT DEPARTMENT

- 5.10.1. Information technology systems and user manuals

5.11. CORPORATE AFFAIRS

- 5.11.1. Records of all donations to education and society

6. PROCESSING OF PERSONAL INFORMATION

6.1. OVERVIEW

- 6.1.1. Debt Movement South Africa takes the privacy and protection of personal information seriously and processes this information in accordance with the current National and International privacy legislation, including the Protection of Personal Information Act No. 4 of 2013 (POPIA) or any other applicable legislation which deals with privacy rights in South Africa. All relevant privacy conditions and requirements relating to the processing of personal information (including, but not limited to the collection, handling, transfer, sharing, correction, storage, archiving and deletion of personal information) will be applied to any processed by Debt Movement South Africa.

6.2. PURPOSE FOR PROCESSING

- 6.2.1. Debt Movement South Africa processes personal information for a variety of purposes that are in accordance with lawful processing requirements and contemplated in Section 4 of POPIA.

6.2.2. All processing of personal information is undertaken in accordance with applicable legislation which forms the foundation for and allows for such processing.

6.3. CATAGORIES OF DATA SUBJECTS AND INFORMATION

6.3.1. Categories of data subjects and personal information processed by Debt Movement South Africa include the following:

6.3.1.1. Shareholders

- Shareholder personal information

6.3.1.2. Customers (prospective, current and past)

- Customer personal information, e.g. name, identity number, address, phone numbers, email etc.
- Customer bank details, e.g. account number, products, etc.
- Customer contracts and agreements
- Customer location information
- Customer financial details
- Customer beneficiary information
- Customer dependants' information (may include children)
- Customer medical history
- Customer third-party information, such as from credit bureaux and the Companies and Intellectual Property Commission (CIPC).

6.3.1.3. Suppliers

- Supplier personal information
- Supplier contracts and agreements
- Supplier bank details
- Supplier representatives' personal information
- Surveillance information of supplier representatives (e.g. CCTV footage)

6.3.1.4. Employees (prospective, current and past)

- Employee personal information e.g. name, identity number, address, phone numbers, email etc.
- Employee education and psychometrics records
- Employee biometric information
- Employee pension and provident fund information
- Employee bank details
- Employee tax and financial information
- Employee contracts
- Employee next of kin information
- Employee vehicle registration
- Employee performance records
- Payroll records
- Electronic access records
- Physical access records
- Surveillance records
- Health and safety records
- Training records

- Background checks
- Criminal checks
- Employment history

6.3.1.5. Job Applicants

- Curriculum vitae and application forms
- Criminal checks
- Background checks

6.3.1.6. Visitors

- Physical access records
- Electronic access records, scans and photographs
- Surveillance records (e.g. CCTV footage)
- Biometric information

6.4. RECIPIENTS OR CATEGORIES WITH WHOM PERSONAL INFORMATION MAY BE SUPPLIED

6.4.1. Debt Movement South Africa may share personal information of its data subjects, where legally justified to do so in accordance with paragraphs 6.1 and 6.2, with the Group's service providers or operators who perform services on the Group's behalf, in order to fulfil the purpose of processing.

6.4.2. Debt Movement South Africa does not share the personal information of its data subjects with any third parties, except if:

6.4.2.1. it is obliged to provide such information for legal or regulatory purposes;

6.4.2.2. it is required to do so for purposes of existing or future legal proceedings;

6.4.2.3. it is selling one or more of its businesses or part of its businesses to a third party to whom it may transfer its rights under any agreement it may have with data subjects;

6.4.2.4. it is involved in the prevention of fraud, loss, bribery or corruption;

6.4.2.5. the third party performs services and processes personal information on the Group's behalf as its operator; or

6.4.2.6. it is required to provide or manage any information, products and/or services to data subjects;

6.4.3. Appropriate communications will be sent to data subjects relating to processing if obliged to do so by law, or in terms of its contractual relationship with data subjects.

6.4.4. Personal information will only be disclosed to government authorities if required to do so by law.

6.4.5. All Debt Movement South Africa employees and suppliers are required to adhere to legislation relating to privacy and confidentiality principles.

6.5. TRANSBORDER FLOWS OF PERSONAL INFORMATION

6.5.1. Debt Movement South Africa will only transfer personal information across South African borders if the relevant transactions or circumstance requires trans-border processing. Any such transfer will be carried out in accordance with South African legislative requirements, or if

the data subject consents to the transfer of their personal information to third parties in foreign countries.

- 6.5.2. All measures will be taken to ensure that operators (suppliers and third parties) 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 principles for reasonable and lawful processing of personal information that is in accordance with POPIA, together with appropriate security safeguards.

6.6. INFORMATION SECURITY MEASURES

- 6.6.1. Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Debt Movement South Africa and its operators.
- 6.6.2. Technical and organisational security measures are continuously implemented and monitored in order to protect the personal information against unauthorised access, accidental or wilful manipulation, loss, damage, or destruction.
- 6.6.3. All reasonable steps are taken to ensure that operators that process personal information on the Group's behalf, have adequate safeguards in place.

7. REQUEST PROCEDURES

- 7.1. The form of request shall be as follows:

- 7.1.1. The requester must use the prescribed form (Form C) to make the request for access to a record. This must be made to the designated head. This request must be made to the address, fax number or electronic mail address of the body concerned [Section 53(1)].
- 7.1.2. The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.
- 7.1.3. The requester should indicate which form of access is required.
- 7.1.4. The requester should indicate if there is any other manner to be used to inform the requester and state the necessary particulars to be so informed [Section 53(2)(a), (b) and (c)].
- 7.1.5. The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [Section 53(2)(d)].
- 7.1.6. If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of the private body [Section 53(2)(f)].
- 7.1.7. A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 7.1.8. Every other requester, who is not a personal requester, must pay the required request fee.

- 7.1.9. The designated head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [Section 54(1)].
- 7.1.10. The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees [Section 54(3)(b)].
- 7.1.11. After the designated head of the private body has made a decision on the request, the requester must be notified in the required form.
- 7.1.12. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [Section 54(6)].

8. REFUSAL OF ACCESS TO RECORDS

- 8.1. As a Private Body, Debt Movement South Africa is entitled to refuse a request for information. The main grounds for Debt Movement South Africa to refuse a request for information pertain to:
 - 8.1.1. mandatory protection of the privacy of a third party who is a natural person or a deceased person or a juristic person, as contained in the Protection of Personal Information Act No. 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person [Section 63];
 - 8.1.2. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of the Protection of Personal Information Act No. 4 of 2013 [Section 63];
 - 8.1.3. mandatory protection of the commercial information of third-party records containing financial, commercial, scientific or technical information, as well as trade secrets, which the disclosure thereof could likely cause harm to the interest of the third party or cause a disadvantage in negotiations or commercial competitions [Section 64];
 - 8.1.4. mandatory protection of confidential information of third parties if it is protected in terms of any agreement [Section 65];
 - 8.1.5. mandatory protection of the safety of individuals and the protection of property [Section 66];
 - 8.1.6. mandatory protection of records which would be regarded as privileged in legal proceedings [Section 67].
 - 8.1.7. commercial activities of Debt Movement South Africa which may include financial, commercial, scientific or technical information, as well as trade secrets, research information, intellectual property and computer programmes, which the disclosure thereof could likely cause harm to Debt Movement South Africa or cause a disadvantage in negotiations or commercial competitions [Sections 68 and 69];

- 8.1.8. requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused;
- 8.2. Where Debt Movement South Africa is an Operator as defined in terms of the POPIA, which processes information on behalf of a Responsible Party, requests for information and authorisation thereof must be made with the Responsible Party and not Debt Movement South Africa, unless determined otherwise.
- 8.3. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

9. AVAILABILITY OF THE MANNUAL

- 9.1. This Manual will be available:
- 9.1.1. On the website of Debt Movement South Africa.
 - 9.1.2. To a person upon request and payment of the prescribed fee.
 - 9.1.3. To the Information Regulator upon request.
 - 9.1.4. At the principal place of business of Debt Movement South Africa's head office during normal business hours.

10. PRESCRIBED FEES

- 10.1. The fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

This Manual was last updated in May 2023.