

GONDWANA PLUS (PTY) LTD

(Registration Number: 2018/399310/07)

SEBENZA

PAIA MANUAL

PUBLISHED FOR GONDWANA PLUS (PTY) LTD AS A PRIVATE BODY
IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT 2 OF 2000

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1 INTRODUCTION

Gondwana Plus (Pty) Ltd ("the **Company**") is a digital media company.

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (the "**PAIA** ") (the "**Manual**") and provides an outline of the type of records and personal information which the Company holds and processes. The Manual also explains how to submit requests for access to these records in terms of the PAIA. In addition to explaining how to access, or object to personal information held by the Company, or request correction of the personal information, in terms of sections' 23 and 24 of the Protection of Personal Information Act 4 of 2013 (the "POPI Act"), the Manual also explains how to submit requests for access to these records in terms of the PAIA .

The objective of the PAIA is to give effect to the constitutional right to access to information, which information is held by a public or private body and which information is required for the exercise or protection of any rights. The PAIA Act recognises the right entrenched in section 32 of the Constitution of the Republic of South Africa, 1996 and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

Accordingly, this PAIA Manual aims to establish and foster a culture of compliance with prevailing data protection legislation, which in turn gives rise to an environment within which the rights to access to information are actively protected and promoted.

Section 9 of the PAIA dictates that the right to access to information is not an unlimited right and is subject to certain limitations, which include limitations which balance the rights which data subjects have to access information against other rights which data subjects and interested parties have, whether it be in terms of the Constitution of the Republic of South Africa, 1996 or otherwise. Some of these rights which the right to access to information are weighed up against are aimed at protecting the fundamental right to privacy and maintaining the confidentiality (whether it be commercial or individual confidentiality) of interested parties so as to maintain acceptable levels of governance.

1.1 Availability and Purpose of this PAIA Manual

This PAIA Manual is available at the Company's principal place of business. A copy can also be requested from the Information Officer, which copy may be inspected during normal business hours at the Company's physical address set out in paragraph 2 below.

The primary purpose of this PAIA Manual is to facilitate requests for access

to information held by the Company, which requests shall be made in accordance with the prescribed procedures and at the rates provided for in section 5 of this PAIA Manual. In addition to the above, the further purposes of this PAIA Manual, are to describe the records held by the Company and to clearly articulate the grounds upon which access to any such records may be refused.

1.2 Availability of guides to the PAIA and POPI Acts

The Information Regulator publishes a Guide on how to use PAIA (available in all official languages). Any person may request a copy from the Regulator or our Information Officer using PAIA Form 1.

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

The office of the Information Regulator:	
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, Gauteng
Postal Address:	PO Box 31533, Braamfontein Johannesburg, 2017
Phone no.	+27 10 023 5200
Work no.	+27 10 023 5207
E-mail:	enquiries@info regulator.org.za
Website:	https://info regulator.org.za/

Note: A Braille version of the PAIA Guide may be obtained directly from the Information Regulator upon request. Requests for Braille or other accessible formats may be submitted to the Information Regulator at the details mentioned above

2 CONTACT DETAILS

Contact details in terms of Section 51 of PAIA:

Information Officer	
Name:	Wesley Dorning(registered with the Regulator via the eServices portal)
Telephone:	072 900 3886
E-mail:	Wesley.dorning@sebenza.taxi
Physical address:	3021 Winnie Mandela Drive, Bryanston, 2191
Postal address:	3021 Winnie Mandela Drive, Bryanston, 2191

Deputy Information Officer	
Name:	Oliver Parkinson (registered with the Regulator via the eServices portal)
Telephone:	+27 010 446 5787
E-mail:	Oliver.parkinson@sebenza.taxi
Physical address:	3021 Winnie Mandela Drive, Bryanston, 2191
Postal address:	3021 Winnie Mandela Drive, Bryanston, 2191

General Information:

Name of private body:	Gondwana Plus (Pty) Ltd T/A Sebenza
Industry:	Digital Marketing
Registration number:	2018/399310/07
VAT registration number:	4140294085
Postal address:	3021 Winnie Mandela Drive, Bryanston, 2191
Physical address / Place of business:	3021 Winnie Mandela Drive, Bryanston, 2191
Telephone:	011 100 3800
E-mail address:	info@sebenza.taxi

Applicable Legislation:

The Company complies with the following legislation, among others, which may become applicable from time to time, including any subsequent amendments. This compliance is observed in the course of its day-to-day operations.

The table below outlines the categories and subcategories of records processed by the Company. Each category and subcategory may be subject to one or more grounds for refusal of access, as provided for in Chapter 4 of the Promotion of

Access to Information Act (PAIA). These grounds for refusal are also described in the table under Clause 3.3 below.

:

Item No:	Legislative Reference:	Records:
1	The Basic Conditions of Employment Act No. 75 of 1997	<ul style="list-style-type: none"> • Employee details • Labour relations reports. • Information regarding dismissals. • Information on disability, race and religion. • Employee next of kin or emergency contact details. • Conflict-of-interest declarations. • Education information. • Health and safety records. • Pension fund records. • Leave records. • Internal evaluations and performance records. • Disciplinary records. • Training records. • Background checks.
2	The Broad-Based Black Economic Empowerment Act No. 53 of 2003	<ul style="list-style-type: none"> • BBBEE status • BBBEE status of suppliers. • Where relevant, supplier / service provider employee information. • Contractor and supplier agreements. • List of suppliers, products, services and distributors. •
3	The Companies Act No. 71 of 2008	<ul style="list-style-type: none"> • MOI; • Minutes of meetings; and • Other records and correspondence.
4	Compensation for Occupational Injuries and Diseases Act No. 130 of 1993	<ul style="list-style-type: none"> • Record of the earnings and other prescribed particulars of all employees.
5	The Electronic Communications and Transactions Act No. 25 of 2002	<ul style="list-style-type: none"> • Electronic Communications <ul style="list-style-type: none"> ○ Records of data messages (e.g. emails, system notifications) ○ Logs of dispatch and receipt of electronic communications ○ Acknowledgements of receipt of data messages • Electronic Transactions <ul style="list-style-type: none"> ○ Contracts and agreements concluded electronically ○ Records of automated transactions ○ Electronic signatures and authentication records

		<ul style="list-style-type: none"> ● Information Security and Integrity <ul style="list-style-type: none"> ○ Records ensuring integrity and accessibility of electronic documents ○ Backup logs and audit trails ○ Where relevant, encryption and/or authentication protocols ● Personal Information and Privacy <ul style="list-style-type: none"> ○ Records of personal data collected electronically ○ Consent records and privacy notices ● E-Government Interactions <ul style="list-style-type: none"> ○ Electronic filings with government entities ○ Records of compliance with e-government service requirements
6	<p>The Employment Equity Act No. 55 of 1998</p>	<ul style="list-style-type: none"> ● Demographic and Designated Group Data <ul style="list-style-type: none"> ○ Records of race, gender, disability status, and occupational levels of employees ○ Records of designated groups (Black people, women, and people with disabilities) ● Training and Development Records <ul style="list-style-type: none"> ○ Records of training provided to designated groups ○ Skills development initiatives linked to employment equity ● Declarations <ul style="list-style-type: none"> ○ EEA declarations

7	The Income Tax Act No. 58 of 1962	<ul style="list-style-type: none"> ● Tax Registration and Compliance <ul style="list-style-type: none"> ○ Income Tax Registration Documents ○ Tax Clearance Certificates ○ VAT Registration and Compliance Records ● Employee Tax Records <ul style="list-style-type: none"> ○ PAYE (Pay-As-You-Earn) Records ○ IRP5 Certificates ○ UIF and SDL Contributions ○ Employee Tax Directives ● Company Financial Records <ul style="list-style-type: none"> ○ Annual Financial Statements ○ Income Tax Returns (ITR14) ○ Supporting Schedules and Calculations ○ Provisional Tax Returns ● Transactional Records <ul style="list-style-type: none"> ○ Invoices and Receipts ○ Bank Statements ○ Expense Records ○ Asset Registers ● Third-Party Tax Records <ul style="list-style-type: none"> ○ Records of payments to contractors (e.g. IT3 certificates) ○ Withholding tax documentation ● Correspondence with SARS <ul style="list-style-type: none"> ○ Notices of Assessment ○ Objections and Appeals ○ Audit and Verification Correspondence ● Retirement and Benefit Records <ul style="list-style-type: none"> ○ Pension Fund Contributions ○ Medical Aid Contributions (for tax deduction purposes) ● Donations and Deductions <ul style="list-style-type: none"> ○ Records of Donations (e.g. Section 18A certificates) ○ Other deductible expenses and supporting documentation
8	The Labour Relations Act No. 66 of 1995	<ul style="list-style-type: none"> ● Employee Relations Records <ul style="list-style-type: none"> ○ Disciplinary Records ○ Grievance Records ○ Records of Dispute Resolution Processes (e.g. CCMA referrals) ○ Records of Incapacity Hearings ● Employment Contracts & Conditions <ul style="list-style-type: none"> ○ Employment Contracts

		<ul style="list-style-type: none"> ○ Amendments to Terms and Conditions ○ Retrenchment Documentation ● Dismissal and Termination Records <ul style="list-style-type: none"> ○ Records of Dismissals ○ Exit Interviews ○ Settlement Agreements ● Correspondence and Legal Proceedings <ul style="list-style-type: none"> ○ Correspondence with Employees ○ Legal Opinions and Case Files ● Litigation Records
9	The Occupational Health and Safety Act	<ul style="list-style-type: none"> ● Policies and Management Framework <ul style="list-style-type: none"> ○ Health and safety policy documents adopted by the Company ○ Risk assessment reports for workplaces, processes, and tasks ● Incident, Accident and Injury Records <ul style="list-style-type: none"> ○ Accident and incident register, detailing all workplace injuries, dangerous occurrences and/or occupational diseases ○ Individual accident report forms and investigation findings ○ Notices of injury or occupational disease submitted to the Department of Labour (Form 6) and proof of submission ● Appointments, Committees and Training <ul style="list-style-type: none"> ○ Written appointments of health and safety representatives and members of the health and safety committee (Section 17) ○ Minutes and attendance registers of health and safety committee meetings ○ Records of mandatory safety training sessions, including induction, refresher courses and specialist training certificates ● Correspondence and Reports <ul style="list-style-type: none"> ○ Correspondence with and reports from external safety bodies and approved inspection authorities ● Displayed Information and Internal Communications <ul style="list-style-type: none"> ○ Proof of display of the OHS Act, regulations and approved codes of practice at conspicuous locations (Section 19)

		<ul style="list-style-type: none"> ○ Safety bulletins, newsletters or circulars issued to employees regarding OSHA compliance
10	The Promotion of Access to Information Act No. 2 of 2000	<ul style="list-style-type: none"> ● Governance and Policy Documents <ul style="list-style-type: none"> ○ PAIA Manual ○ Appointment letters of the Information Officer and Deputy Information Officer ● Request Handling and Access Records ● Training and Awareness Materials ● Regulatory Compliance and Reporting <ul style="list-style-type: none"> ○ Annual returns and compliance reports submitted to the Information Regulator (Section 32) ● Communication and Publication Records
11	The Protection of Personal Information Act	<ul style="list-style-type: none"> ● Governance and Policy Documents <ul style="list-style-type: none"> ○ Data protection policy and procedural guidelines ○ Appointment letters of the Information Officer and Deputy Information Officer ○ Privacy governance framework ● Request Handling and Access Records ● Training and Awareness Records ● Regulatory Compliance and Reporting <ul style="list-style-type: none"> ○ Records of processing operations and processing activity ○ Data Protection Impact Assessments ○ Data breach incident reports and breach-notification logs ○ Copies of breach notifications sent to the Information Regulator and affected data subjects ○ IT audit reports ● Communication and Publication Records <ul style="list-style-type: none"> ○ Privacy notices and policy statements for employees, clients, and third parties
12	Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000	<ul style="list-style-type: none"> ● Governance and Policy Documents <ul style="list-style-type: none"> ○ Equality policies and procedures ● Complaint Handling and Resolution Records ● Training and Awareness Materials ● Workforce demographic statistics and employment equity data

13	Regulation of Interception of Communications and Provision of Communication-Related Information Act No. 70 of 2002	<ul style="list-style-type: none"> ● Governance and Policy Documents ● Security and Incident Records
14	The Skills Development Act No. 97 of 1998	<ul style="list-style-type: none"> ● Governance and Policy Documents ● Learnership and Skills Programme Records ● Sector Education and Training Authority (SETA) Records ● Training and Development Records ● Employment Services Records
15	The Skills Development Levies Act No. 9 of 1999	<ul style="list-style-type: none"> ● Governance and Policy Documents ● Financial and Levy Payment Records ● Regulatory Compliance and Reporting Records ● Employment and Payroll Records
16	The Unemployment Insurance Act No. 63 of 2001	<ul style="list-style-type: none"> ● Governance and Policy Documents ● Employee and Contributor Records ● UIF Contribution and Payment Records ● Claim and Benefit Records <p>Regulatory Compliance and Reporting Records</p>
17	The Value Added Tax Act No. 89 of 1991	<ul style="list-style-type: none"> ● Governance and Policy Documents ● Financial and Tax Records ● Regulatory Compliance and Reporting Records ● Supplier and Client Records ● E-filing and System Records ● Communication Records

3 COMPANY RECORDS

3.1 Availability of the Company's Records

The provisions of the PAIA , specifically the provisions of Section 50 of the Act, dictate that a requester for access to information must be afforded access to any record of the Company if the following requirements are met:

- where a particular record is required for the exercise or protection of any rights (Section 50(1)(a) of PAIA);
-
- where a requester complies with the procedural requirements set forth in the PAIA relating to a request for access to particular records (Section 50(1)(b) of PAIA); and
-
- where access to that particular record is not refused in terms of any

of the grounds for refusal to access contemplated in terms of Chapter 4 of the PAIA (Section 50(1)(c) of PAIA).

The below table sets forth the categories and subcategories of records which the Company processes. Each category and subcategory of records set out below may be subject to any one (or a number) of the grounds upon which the Company may refuse access to records. These grounds for refusal are set out in Chapter 4 of the PAIA , as well as described in the table under Clause 3.3 below.

Data Subject Categories	Personal information that may be processed
<p>Personnel (including directors, executive directors, non-executive directors, permanent, temporary, part-time staff, and contract workers)</p>	<p>Basic Identifiers Name, Surname, Identity Number, Date of Birth, Place of Birth, Gender, Marital Status, Nationality</p> <p>Contact Information Address (including proof of address), Email Address, Telephone Number</p> <p>Employment Information Employer, Job Title, Conditions of Employment, Contracts and Agreements, Personnel Files, Statutory Employee Records, Retirement Fund Records, Employee Payments and Benefits (statutory and contractual), Employee Leave Records, Budget Projections in Respect of Staff</p> <p>Performance & Conduct Internal Evaluation Records, Performance Management Records, Disciplinary Records, Records of Disciplinary Hearings and Findings, Records of Incapacity Proceedings Training & Development</p> <p>Training Schedules and Materials</p> <p>Third-Party Records</p>

	<p>Records provided by third parties about employees (e.g. references, background checks)</p> <p>Background Checks Qualification Checks, Credit Checks, Criminal Record Checks</p> <p>Health & Safety Medical Aid Records, Medical Information (related to incapacity proceedings), Records of Occupational Injuries and Diseases</p> <p>Compliance & Legal Employee Declarations in Terms of the Employment Equity Act (EEA), Employee-Related Contractual and Quasi-Legal Records</p> <p>Organisational Information Organisational Structure, Employment Policies and Procedures</p> <p>Correspondence Internal Records and Correspondence, Correspondence With or About Employees</p>
<p>Client / Customer-Related Records</p> <p>Please motivate any request for client / customer information very carefully, having regard to Sections 63 to 67 of the Act.</p>	<p>Any records a client / customer has provided to the Company or a third party acting for or on behalf of the Company</p> <p>Contractual information</p> <p>Client / customer needs assessments</p> <p>Personal records of clients / customers</p> <p>Credit information and</p>

	<p>other research conducted in respect of clients / customers</p> <p>Any records a third party has provided to the Company about clients / customers</p> <p>Confidential, privileged, contractual and quasi legal records of clients / customers</p> <p>Client / customer evaluation/review records</p> <p>Client / customer profiling</p> <p>Performance research conducted on behalf of clients / customers or about clients / customers</p> <p>Any records a third party has provided to the Company either directly or indirectly</p> <p>Records generated by or within the Company pertaining to clients / customers, including transactional records</p>
<p>Technical Records</p>	<p>Technical reports</p> <p>Technical data</p> <p>Plans, brands and trademarks forming part of the intellectual property rights of the Company.</p>
<p>Third-Party</p>	<p>Records Held by Third Parties About the Company, Employees, or Clients:</p> <p>Personnel, Client/Customer, or Company Records held by third parties</p> <p>Records provided by third parties about</p>

	<p>contractors, suppliers, or clients/customers Employee, Client, or Company Records held externally (e.g., payroll service providers, outsourced HR or IT systems)</p> <p>Records Held by the Company Pertaining to Third Parties</p> <ul style="list-style-type: none"> • VAT Numbers, Banking Details, Names • Financial Records • Correspondence • Contractual Records • Electronic Mail, Logs • Records provided by third parties Service Level Agreements (SLAs) • Contact Details of Suppliers • Details of Customers/Clients (e.g., contact details, transaction history) • Licences and General Conditions for Conducting Business • Agreements with Stakeholders
Other Records	Information relating to the Company's own business activities
Internal Records	<p>Basic Identifiers Name, Surname, Address (including proof of address), Email Address, Telephone Number, Gender, Marital Status, Date and Place of Birth, Nationality</p> <p>Professional Information Employer, Job Title, Registration Number</p> <p>Governance & Statutory Records Records relating to incorporation, Statutory Records, Minutes of Meetings (including Executive</p>

	Committee and subcommittees), Resolutions and Directives Financial Records Financial Records, Company Pension Fund Records and Rules, Insurance Records (e.g. professional indemnity, group life assurance, disability income protection) Operational Records Intellectual Property Records Marketing Records BBBEE Information Internal Documentation Internal Correspondence, Internal Investigation Reports, Policies, Procedures, and Codes Information Technology IT Records including Computer Software, Support and Maintenance Agreements
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In terms of Section 52 of the PAIA, the Company makes some records automatically available, without the need to request access to them:

Type of record	How you can access it
Memorandum of incorporation (MOI)	The Companies and Intellectual Property Commission
Directors' names	BizPortal
Documents of incorporation and other registration documents	The Companies and Intellectual Property Commission
Banking details	By e-mail
Company Overview	www.sebenza.tech

No additional categories have been submitted to the Information Regulator for automatic availability in terms of Section 52(2) of PAIA. Only the categories listed above are automatically available and shall be updated as required.

3.2 Access to Health or Other Records

If a request for access to health or other records provided by a health practitioner, in their capacity as such, relates to the physical, mental health, or well-being of the requester, or if the request has been made on behalf of the person to whom the record relates (“the relevant person”), and the Company’s Information Officer is of the opinion that the disclosure of the record to the relevant person might cause harm to his or her physical, mental health or well-being, the Company’s Information Officer may, before giving access to such record consult with a health practitioner who has been nominated by the relevant person.

If the relevant person is below the age of 16 years, a person having parental responsibilities for the relevant person must make the above nomination and if the relevant person is incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.

If, after being given access to the relevant record, the health practitioner consulted is of the opinion that the disclosure of the record to the relevant person, would be likely to cause serious harm to his or her physical, mental health or well-being, the Information Officer may only grant access to the relevant record if the requester proves that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm to the relevant person. Before access to the record is given to a requester, the person responsible for such counselling or arrangement must be given access to the record.

3.3 Grounds for Refusal of Access to the Company’s Record

Upon receipt of a request for access to information, the Company will be required to consider such a request in light of the provisions of Section 50 of the PAIA . Subject to such consideration, the Company will be required to either grant such a request or refuse such a request. If the Company elects to refuse access to a particular record, such refusal will be subject to the Company’s interpretation of the various prescribed grounds for refusal as set forth in Chapter 4 of the PAIA and in the table below:

Ground(s) For Refusal	Description and Explanation of Ground(s) for Refusal
Mandatory protection of privacy of third party	The Company may refuse access to a record if the disclosure of that record would involve the unreasonable disclosure of personal information relating to a third party, including a deceased

<p>who is a natural person [Section 63 of PAIA]</p>	<p>individual.</p>
<p>Mandatory protection of commercial information of third party [Section 64 of PAIA]</p>	<p>The Company may refuse a request for access to a record if the record comprises of or is constituted by the following information relating to a third party –</p> <p>Trade secrets of a third party;</p> <p>Financial, commercial, scientific or technical information, other than trade secrets, of a third party, which if disclosed is likely to cause harm to the commercial or financial interests of the third party;</p> <p>Information which has been supplied in confidence by a third party, the disclosure of which could reasonably be expected to place the third party at a disadvantage in contractual or other negotiations or is likely to prejudice the third party in commercial competition.</p>
<p>Mandatory protection of certain confidential information of a third party [Section 65]</p>	<p>The Company may refuse access to a record which if disclosed would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement or contractual relationship.</p>
<p>Mandatory protection of safety of individuals and protection of property [Section 66 of PAIA]</p>	<ul style="list-style-type: none"> • The Company may refuse a request for access to a record if its disclosure could reasonably be expected to endanger the life or physical safety of an individual, or if its disclosure would be likely to prejudice or impair the security of: <ul style="list-style-type: none"> • a building, structure or system, including but not limited to a computer or communication system, a means of transport or any other property; • method(s), system(s), plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public or the security of property.
<p>Commercial information of Private Body [Section 68 of PAIA]</p>	<ul style="list-style-type: none"> • The Company may refuse a request for access to a record if the record contains (or comprises of): <ul style="list-style-type: none"> • Trade secrets of the Private Body; • Financial, commercial, scientific or technical information, other than trade secrets of the Private Body, the disclosure of which would be likely to cause harm to the commercial or financial interests of the

	<p>Private Body;</p> <ul style="list-style-type: none"> • • Information, the disclosure of which could reasonably be expected to put the Private Body at a disadvantage in contractual or other negotiations or prejudice the Private Body in commercial competition; • • A computer programme (as defined in Section 1(1) of the Copyright Act 98 of 1978 as amended) owned by the Private Body, except insofar as it is required to give access to a record to which access is granted in terms of the PAIA .
<p>Mandatory protection of research information of third party, and protection of research information of private body [Section 69 of PAIA]</p>	<p>The Company may refuse a request for access to a record if the record contains information about research being or to be carried out by or on behalf of a third party/private body, the disclosure of which would be likely to expose the third party/private body, a person that is (or will be) carrying out the research on behalf of the third party/private body, or the subject matter of the research to serious disadvantage.</p>

4 PROCESSING OF PERSONAL INFORMATION

Data Subject Information at Collection (Section 18 of the POPI Act)

The Company takes any activities relating to the protection and processing of personal information (as defined in terms of the provisions of Section 1 of the POPI Act) very seriously. To promote the constitutional right to privacy, as well as to play its part in promoting the rights protected in terms of the POPI Act, the Company undertakes to, in so far as is required of it, observe the requirements and conditions for the lawful processing of personal information.

When collecting personal information, the Company takes reasonably practicable steps to make data subjects aware of: (a) the information collected and, where not collected directly, the source; (b) our name and address; (c) the purposes of collection; (d) whether the supply is mandatory or voluntary; (e) the consequences of not providing it; (f) any particular law authorising collection; (g) any intended transfers to foreign countries and the protection there; and (h) further information necessary to ensure reasonable processing, such as recipients or categories of recipients, the nature of the information, the rights of access/correction/objection, and the right to complain to the Information Regulator (with contact details)..

4.1 The purposes for which the Company processes personal information

The Company may process personal information for a variety of purposes, which may include, but is not limited to, the following purposes:

- to provide or manage any information, products and/or services requested by or delivered to data subjects in general;
-
- to establish a data subject's needs, wants and preferences in relation to the products and/or services provided by us and/or any affiliate of the Company;
-
- to help the Company identify data subjects when they engage with the Company;
-
- to facilitate the delivery of products and/or services to clients / customers;
-
- to facilitate registration of the Company's offerings;
-
- to verify information provided by a data subject;
-
- to allocate unique identifiers to data subjects for the purpose of securely storing, retaining and recalling their personal information/personal data from time to time;
-
- to maintain records of data subjects (including client / customer records);
-
- to maintain third party records;
-
- for recruitment purposes;
-
- for employment purposes;
-
- for general administration purposes;
-
- for legal and/or contractual purposes;
-
- for health and safety purposes;
-
- to monitor access, secure and manage any facilities operated by the Company regardless of location;
-
- to transact with data subjects;
-
- to improve the quality of the Company's services;
-
- to transfer personal information/personal data to third party service providers to enable the Company to deliver services to its clients / customers and/or participants in its various offerings;
-
- to transfer personal information/personal data to any affiliate of

the Company so as to enable the relevant affiliate of the Company to market its products and/or services to data subjects;

-
- to analyse the personal information / personal data collected for research and statistical purposes;
-
- to help recover bad debts;
-
- to transfer personal information/personal data across the borders of South Africa to other jurisdictions if it is required;
-
- to identify other products and/or services which might be of interest to the Company's clients / customers and data subjects in general, and to inform them of such products and/or services.
-
- to identify any products and services offered by any affiliates of the Company which might be of interest to data subjects in general, as well as to inform them of such products and/or services;
-
- to comply with any laws applicable to the Company and in some instances affiliates of the Company.

4.2 Categories of data subjects and personal information processed by the Company

The categories of data subjects may include, but are not limited to, the following:

- Employees, sales personnel, client's / customer's staff and/or clients, any persons who deal with the company;
-
- any affiliate of the Company;
-
- service providers;
-
- independent contractors;
- agents;
-
- consultants;
-
- users of the Company's platforms; and
-
- users of any of the Company's digital application interfaces.

The categories of personal information processed by the Company may include, but are not limited to, the following –

- full names (name and surname);
-
- identity or passport numbers;
-
- e-mail, physical and postal addresses;

-
- telephone numbers;
-
- information relating to the data subject's occupation;
-
- gender;
-
- date of birth;
-
- registration numbers;
-
- financial information, including banking account information;
-
- statutory information;
-
- unique identifiers; and
-
- personal information submitted that forms part of onboarding/registration/employment documentation from time to time.
-

4.3 The processing of personal information and categories of recipients with whom personal information is shared

Subject to any relevant terms and conditions of use which may be applicable when a data subject engages with the Company, we may share the personal information of any data subject we process for any of the purposes outlined in Clause 4.1 above, with the following third parties, whether such third parties qualify as "responsible parties" in terms of Section 1 of the POPI Act or not:

- any affiliate of the Company from time to time;
- any relevant service providers and suppliers;
- any relevant regulatory authorities who may govern the Company in undertaking its operations;
- any approved service provider, contractor or supplier with whom the Company has an agreement;
- any approved business partners who provide products and services to the Company; and
- any approved service providers or authorised agents who perform services on the Company's behalf.

The Company processes personal information to facilitate and enhance the delivery of products and services to its clients / customers, foster a legally compliant workplace environment, as well as safeguard the personal information relating to any data subjects which it in fact holds. We undertake to process any personal information in a manner which promotes the constitutional right to privacy, retains accountability and data subject participation. In any circumstances where we process the personal information of data subjects, the Company maintains appropriate privacy notices where the purposes of the processing of any personal information and the processing takes place, is recorded and communicated to data subjects.

We conclude operator agreements with all processors in terms of Sections 20 to 21 of POPI Act and retain oversight of security, confidentiality and sub processing.

4.4 Information security measures to protect personal information

We have, and continue to, implement reasonable, technical and organisational measures for the protection of personal information processed by the Company. We at all times take reasonable and appropriate security measures to secure the integrity and confidentiality of personal information in our possession in order to guard against:

the loss of, damage to or unauthorised destruction of personal information;
the unlawful access or processing of personal information; or
the wilful manipulation of personal information.

We will take steps to ensure that any third-party process operators (as defined in terms of Section 1 of the POPI Act) who process personal information on behalf of the Company apply adequate safeguards as outlined above.

In the event of a security compromise, we will notify the Information Regulator and affected data subjects as soon as reasonably possible, using the Regulator's required notification template (SCN1), with the content specified in the Guidelines.

4.5 Trans-border flows of personal information

We transfer personal information cross border only if one of Section 72 of the POPI Act safeguards applies: (i) the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection (including onward transfer limits); (ii) the data subject consents; (iii) the transfer is necessary for a contract with, or in the interest of, the data subject; or (iv) the transfer benefits the data subject where consent can't practicably be obtained but would likely be given. We assess recipient protections and seek to keep records of reliance.

4.6 Personal information received from third parties

When the Company receives personal information from any third party on behalf of a data subject, we require confirmation that such a third party has written consent from the data subject indicating that said data subject is aware of the contents of this PAIA Manual and the Company's Privacy Policy, and do not have any objection to our processing their personal information accordingly.

4.7 Data Subject Requests Sections 23 - 24 POPI Act

On adequate proof of identity, data subjects can request confirmation of whether we hold their personal information and access to a record/description thereof (including recipients), within a reasonable time and in an understandable form (fees may apply). They may also request correction or deletion where information is inaccurate or no longer authorised to be retained. Requests can be made using POPI Act Form 1 and Form 2 on the Regulator's site or via our Information Officer as contemplated at Clause 5 below.

5 PRESCRIBED REQUEST FORMS AND FEES

5.1 How to gain access to records held by the Company

Records which are held by the Company may be accessed by requests for such access to information and documentation in the prescribed manner and subject to certain requirements being met. In this regard, a requester is any person making a request for access to a record held by the Company. There are two types of requesters:

- A Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester. The Company will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. In this regard, the prescribed fees for the reproduction of this information requested may be charged.

- Other Requester

This requester (other than a personal requester) is entitled to request access to information on third parties. The Company is, however, not obliged to voluntarily grant access and the requester must fulfil the procedural requirements for access in terms of the PAIA , including the payment of a request and access fee.

Requests for access to records must be made by completing the prescribed Form A and paying the requester's fee. Where such access is granted in terms of this PAIA Manual, the information and documentation will be made available at the offices of the Company (the particulars of which appear in Section 2 above) or in the manner requested, should this be reasonable and possible. The manner of access will include:

- Perusal with copying of material, if needed, and at the prescribed fee for copies;

- Access to visual, audio-visual material with a transcription, dubbing, copying or both, if required.

To facilitate the processing of any request by a requester for information or documentation in terms of this PAIA Manual, requesters are required to follow the procedure set forth herein below:

- Use the prescribed Form 2 attached hereto as Annexure B.
- Address your request to the Information Officer.
- Provide sufficient detail to enable the Company or any authorised person dealing with a request to identify:

The record(s) requested;

The requestor (and, if an agent is lodging the request on behalf of someone, proof of capacity and authorisation);

The South African postal address, email address or fax number of the requestor;

The form of access required;

If the requester wishes to be informed of the decision in any manner (in addition to being informed in writing), the manner and particulars thereof;

The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required in order to exercise or protect the right.

5.2 Prescribed fees

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

- A requestor is required to pay the prescribed fees before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (calculated on one third of total amount per request).
- A requestor 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.

The detailed Fee Structure as prescribed in terms of Section 54 of the PAIA Act is reflected in the prescribed form 3 attached hereto as **Annexure C**.

5.3 Access to prescribed forms and fees

Prescribed forms and fees are attached as annexures to this manual. Copies can also be requested from the Information Officer (see contact details in Clause 2).

6 REMEDIES & DECISION

6.1 Remedies

The Company does not have an internal appeal procedure regarding PAIA and POPI Act requests for access to information. As such, the decision made by the Information Officer is final.

If a request is denied and the requester is dissatisfied with the Information Officer's decision, the requestor will be required to exercise such external remedies at their disposal if a request for information is refused.

In terms of Section 77A of the PAIA Act, if a request is denied by the head of a private body, the requester is entitled to lodge a complaint with the Information Regulator within 180 days of the decision, in the prescribed manner and form for appropriate relief.

A requester is further entitled in terms of Section 78(2)(b) to apply to a court with appropriate jurisdiction within 180 days for appropriate relief.

6.2 Time Afforded to the Company

The Company is required to, within 30 (thirty) days of receipt of a request, decide whether to grant or decline the request and, if required, provide the requester with reasons to that effect.

The 30 (thirty) day period stipulated in the Clause above above, may be extended for a further period of not more than 30 (thirty) days if the request is for a large amount of information, or the request requires an extensive search for information which cannot reasonably be obtained within the originally stipulated 30 (thirty) day period.

In the circumstances contemplated in the Clause the Company will notify the requester in writing should an extension be sought.

COMPILED BY GONDWANA PLUS (PTY) LTD

DATE:

**ANNEXURE A | FORM 1
REQUEST FOR A COPY OF THE GUIDE**

FORM 1

[Regulation 2]

I,

Full names:			
In my capacity as (mark with "x"):	Information officer		Other
Name of *public/private body (if applicable)			
Postal Address:			
Street Address:			
E-mail Address:			
Facsimile:			
Contact numbers:	Tel.(B):		Cellular:

hereby request the following copy(ies) of the Guide:

Language (mark with "X")	No of copies	Language (mark with "X")	No of copies
<input type="checkbox"/> Sepedi		<input type="checkbox"/> Sesotho	
<input type="checkbox"/> Setswana		<input type="checkbox"/> siSwati	
<input type="checkbox"/> Tshivenda		<input type="checkbox"/> Xitsonga	
<input type="checkbox"/> Afrikaans		<input type="checkbox"/> English	
<input type="checkbox"/> isiNdebele		<input type="checkbox"/> isiXhosa	
<input type="checkbox"/> isiZulu			

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

ANNEXURE B | 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

Information Officer:	Deputy Information Officer:
Address:	Address:
Email:	Email:
Telephone Number:	Telephone 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 (<i>when made on behalf of another person</i>)	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	Tel:
	Facsimile:
	Cellular:
Full names of person on whose behalf request is made (<i>if applicable</i>)	
Identity Number	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	Tel:
	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	
<i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____
20____.

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number</i>	
<i>Request received by: (State rank, Name and Surname of Information Officer)</i>	
<i>Date received</i>	

ANNEXURE C | 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 (<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>) 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 C.	
---	--

OR

2. You requested:

Printed copies of the information (<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 information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
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 (<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>	

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 <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
ii) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced.		
Copy of visual images	Will depend on the quotation of the service provider		
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record:			
iii) Flash drive <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
iv) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R60.00		
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 <i>(calculated on one third of total amount per request)</i>	
-----------------------	--	---	--

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____.

Signature of Information Officer

ANNEXURE D | PRIVACY POLICY

Gondwana Plus (Pty) Ltd t/a Sebenza

Sebenza Privacy Policy / Privacy Notice

1. Introduction

This Privacy Policy / Privacy Notice (“**Privacy Policy**”) explains how Sebenza collects, uses, stores, shares and otherwise processes personal information when you interact with Sebenza’s website, captive portal, commuter connectivity platform, engagement features, rewards features, and related services.

This Privacy Policy is intended to help you understand:

- What information Sebenza collects;
- How Sebenza collects it;
- Why Sebenza uses it;
- When Sebenza shares it;
- How long Sebenza keeps it;
- What choices and rights you have; and
- How to contact Sebenza about privacy matters.

This Privacy Policy applies together with any other notices, terms, rules or disclosures made available to you from time to time, including:

- Sebenza’s Platform Terms of Use;
- Sebenza Bucks Terms, where rewards or redemption features apply;
- Any legal disclosures made available in relation to electronic transactions or redemption features; and
- Any point-of-collection or feature-specific notices shown to you at registration, login, verification, survey, lead-capture, redirect or similar stages.

This Privacy Policy is Sebenza’s main full-form privacy notice. It does not replace shorter notices or disclosures shown to you at specific collection or interaction points on the Platform.

2. Who Sebenza Is and How the Platform Works

Sebenza operates a commuter connectivity, engagement and rewards platform.

Depending on the context, location, campaign, feature availability and your interaction with the Platform, Sebenza’s services may include:

- Website and captive portal access;
- Wi-Fi and connectivity-related access features;
- Account registration, login and verification features;
- Profile and engagement features;
- Advertising, promotional and branded content;
- Surveys, questionnaires and insight-gathering features;
- Rewards and redemption features, including Sebenza Bucks;
- Lead-generation forms and offer interactions; and
- Links, redirects or interactions involving third-party offers or services.

Sebenza’s platform is built around a value-exchange model in which users may access connectivity-related services and engagement features, participate in content, surveys and campaigns, and earn or redeem rewards, depending on the feature and applicable terms.

3. Who and What This Privacy Policy Covers

This Privacy Policy applies to personal information relating to:

- Visitors to Sebenza’s website;
- Users who enter the captive portal or Wi-Fi access environment;
- Registered or recognised platform users;
- Users who verify a mobile number or create an account;
- Users who complete profiles or preferences;
- Users who engage with content, campaigns, promotions or surveys;
- Users who earn, hold or redeem Sebenza Bucks;
- Users who submit details in response to a third-party offer or lead-generation opportunity; and
- Users who interact with Sebenza through support, complaints or other communications.

This Privacy Policy is aimed primarily at the user-facing Sebenza environment. If Sebenza has separate privacy notices for employees, suppliers, business customers or other categories of stakeholders, those may apply separately.

4. The Information We Collect

Sebenza may collect different categories of personal information depending on how you interact with the Platform.

4.1 Information You Give Us Directly

This may include:

- Your mobile number;
- Your name and surname;

- Your date of birth or age-related information;
- Your Identity Number;
- Your gender;
- Profile information you choose to provide;
- Contact details such as your email address;
- Details you submit through forms, surveys, questionnaires, promotions or competitions;
- Lead information you choose to provide in response to an offer, such as your name, email address and phone number;
- Marketing or communications preferences; and
- Support, complaint or query information.

4.2 Information We Collect When You Use The Platform

This may include:

- Account registration, login and verification information;
- Session, device or platform interaction information;
- Location, of your engagement on the platform;
- Information about how you engage with platform features;
- Records of surveys, forms, promotions, rewards or offers you interact with;
- Sebenza Bucks accrual, redemption and related account records; and
- Platform usage logs relevant to security, administration and fraud prevention.

4.3 Information We Generate or Infer

Sebenza may generate or infer information from your use of the Platform, including:

- Account status or eligibility status;
- Segment or audience grouping information;
- Engagement indicators;
- Campaign interaction signals; and
- Behavioural or audience insights derived from platform activity.

4.4 Information From Service Providers or Third parties

Sebenza may receive limited information from service providers or other third parties who support verification, hosting, communications, security, analytics, campaign administration, rewards functionality or other platform operations.

Sebenza may also receive information relating to a redirect or external interaction where this is necessary for campaign administration, audit, fraud prevention, support, compliance or similar purposes.

Quick guide to the types of information we talk about in this Privacy Policy

To make this Privacy Policy easier to understand, Sebenza generally works with the following broad types of information:

Information you give us directly

This is information you actively provide, such as your mobile number, name, profile details, survey answers, lead details or preferences.

Information we collect when you use the Platform

This is information created by your use of the website, captive portal, account, rewards features, surveys, campaigns or other platform functions.

Information we generate or infer

This is information Sebenza develops from platform activity, such as engagement indicators, audience segments, profile completeness, account status or similar insights.

Aggregated or de-identified information

This is information that has been grouped, anonymised, de-linked or otherwise processed so that it is not used to identify you directly.

5. Special Personal Information and Younger Users

Sebenza does not intentionally collect special personal information unless:

- A lawful basis exists to do so;
- The collection is clearly explained; and
- An appropriate notice, permission or other lawful mechanism is used where required.

Sebenza does not intend to collect special personal information simply as part of ordinary platform access.

Where a survey, campaign, research or other feature may involve higher-risk or more sensitive categories of information, Sebenza may use more specific notices, more limited question sets, or more specific permissions.

Certain platform features, offers or campaigns may be limited based on age or eligibility. Where Sebenza permits access by younger users to general platform features, specific content, advertisements, offers or interactions may still be restricted or excluded.

6. How We Collect Information

Sebenza may collect personal information:

- Directly from you when you visit the website;
- When you submit an enquiry or complete a form;
- When you enter or use the captive portal or Wi-Fi environment;
- When you register, log in, verify your number or activate an account;
- When you complete or update your profile;
- When you interact with content, advertisements, campaigns or promotions;
- When you participate in a survey, questionnaire, competition or similar engagement feature;
- When you earn, hold or redeem Sebenza Bucks;
- When you submit your details in response to a lead-generation or third-party offer;
- When you contact Sebenza for support or complaints;
- Through cookies, tracking technologies or similar tools where these are used; and
- From service providers or other third parties supporting Sebenza's platform operations.

7. Why We Use Your Information

Sebenza uses personal information for different reasons depending on how you interact with the Platform.

7.1 Core platform, access and account management

Sebenza uses personal information to:

- Register and manage user accounts;
- Verify and recognise users;
- Provide access to the Platform and related services;
- Manage captive portal and connectivity-related features;
- Support logins, authentication and account continuity;
- Apply age-related or eligibility-related rules where relevant;
- Provide user support and respond to platform requests; and
- Maintain, administer and improve the Platform.

7.2 Profile Completion and Platform Personalisation

Sebenza may use profile information to:

- Complete or maintain user profiles;
- Improve the relevance of the user experience;
- Better understand audiences and user needs;
- Support platform segmentation and platform-level personalisation; and
- Administer engagement, rewards and survey features.

7.3 Advertising, Engagement and Campaign Analytics

Sebenza may use personal information and engagement data to:

- Present content, campaigns, promotions or advertisements;
- Understand how users engage with content or campaigns;
- Measure campaign performance and engagement;
- Create audience, behavioural or performance insights; and
- Improve the relevance, design and effectiveness of the Platform and related content.

7.4 Surveys and insight generation

Sebenza may use information collected through surveys, questionnaires and similar tools to:

- gather user feedback and preferences;
- understand market, audience or behavioural trends;
- improve the Platform;
- support internal analysis; and
- generate aggregated or non-identifying insights for reporting or campaign purposes.

7.5 Sebenza Bucks and Rewards Administration

Sebenza may use information to:

- Award, credit, administer and track Sebenza Bucks;
- Enable and record redemption activity;
- Prevent fraud, abuse or misuse of rewards features;
- Investigate and resolve reward or redemption issues; and
- Support related transaction and compliance processes.

7.6 Lead Generation and Advertiser Handoff

Where you choose to respond to an offer and submit identifiable contact details, Sebenza may use that information to:

- Capture your lead request;
- Record the fact that you chose to be contacted;
- Transfer your details to the relevant advertiser or third party;
- Maintain an audit trail of the lead handoff or consent event; and
- Support complaints handling, verification or compliance relating to that handoff.

7.7 Third-Party Redirects and External Interactions

Sebenza may use limited information relating to redirects or external interactions to:

- Facilitate the redirect or interaction;
- Support campaign administration;
- Record traffic, click or redirect events;
- Manage fraud, abuse or misuse risk;
- Maintain compliance and audit records; and

- Improve platform design and user flow.

7.8 Compliance, Legal Protection and Platform Governance

Sebenza may also use personal information to:

- Comply with legal and regulatory obligations;
- Protect the Platform, its users and third parties;
- Investigate fraud, misuse, abuse, suspicious activity or complaints;
- Establish, exercise or defend legal rights; and
- Enforce platform rules, terms and related controls.

8. Why Sebenza is Allowed to Use Your Information

Sebenza uses different legal justifications for different types of processing, depending on how you interact with the Platform.

These justifications may include:

- Where processing is necessary to provide, operate, maintain or administer the Platform or a feature you have chosen to use;
- Where processing is necessary to take steps at your request or to perform obligations arising from your use of the Platform and related services;
- Where processing is necessary to comply with legal or regulatory obligations;
- Where processing is necessary to protect or promote your legitimate interests as a user or commuter, including account continuity, platform safety, fraud prevention, age-appropriate access controls, support, and the integrity of rewards or offer-related interactions;
- Where processing is necessary for Sebenza's legitimate operational, security, support, analytics, platform-governance, campaign-administration or fraud-prevention interests, or those of a relevant third party, balanced against your rights and expectations; and
- Where you have given a specific permission, election or opt-in, for example in relation to certain communications, lead handoff, or another optional interaction.

Sebenza does not treat all processing on the Platform as based on one blanket consent.

Sebenza also does not treat refusal of optional marketing permissions, by itself, as a reason to deny ordinary core platform access, although some optional features may depend on separate permissions, eligibility rules or feature-specific conditions. POPIA recognises several lawful grounds for processing, including consent, steps taken at the data subject's request, legal obligations, protection of the data subject's legitimate interests, and the legitimate interests of the responsible party or a third party.

9. Profiling, Segmentation and Analytics

Sebenza may use profile information, engagement information, platform activity and related data signals to better understand how the Platform is used and to improve relevance, campaign performance, user experience and audience understanding.

This may include:

- Grouping users into audience or behavioural segments;
- Identifying patterns in content, survey or campaign engagement;
- Generating internal engagement or audience insights;
- Improving campaign targeting logic, exclusions or relevance;
- Refining how platform experiences are delivered; and
- Helping ensure that certain content, offers or experiences are more appropriate to the user context.

Not all profiling or segmentation leads to a decision with legal or similarly significant effect. Much of this activity is used to understand audiences, improve the Platform, administer engagement features, protect user experience, and produce performance or insight outputs.

Where a particular feature involves a more specific form of profiling, additional notices, permissions or choices may be presented to you.

10. Marketing and Communications

Sebenza may send you communications relating to:

- Account or platform administration;
- Verification or security matters;
- Support, service or operational updates; and
- Rewards, redemption or account-related notifications.

Where Sebenza offers promotional or marketing communications, these may be managed through separate channel-based choices, depending on the context.

These channels may include:

- SMS;
- WhatsApp;
- Email;
- Calls; and
- In-platform promotions or messages.

Advertiser contact following a lead-generation interaction is separate from ordinary Sebenza platform communications. If you choose to submit your details in response to an advertiser offer, that advertiser may contact you directly in line with the notice and choice presented at that time. The Information Regulator's guidance on direct marketing

supports separating promotional permissions from other processing contexts and treating marketing choices carefully.

11. When We Share Your Information

Sebenza may share personal information with third parties where this is appropriate to operate the Platform, provide services, administer rewards, support campaigns, facilitate advertiser or partner interactions, process lead-generation requests, enable third-party redirects, comply with legal obligations, protect the Platform, or otherwise give effect to a feature or interaction you choose to use.

The third parties with whom information may be shared include service providers, hosting and technology providers, messaging and verification providers, analytics and reporting providers, advertisers, clients, campaign partners, rewards and redemption partners, lead recipients, external platform operators, professional advisers, regulators and other parties involved in the relevant service, campaign, offer, reward, redirect or interaction.

The type of information shared will depend on the context. It may include information you provide directly, account or verification information, profile or eligibility information, campaign or survey interaction information, rewards or redemption information, lead information, redirect or click information, device or session information, and audit, fraud-prevention or compliance records.

11.1 Service Providers and Platform Support Parties

Sebenza may share information with service providers, operators or support partners who help Sebenza:

- Host, secure or maintain the Platform;
- Support authentication, messaging or verification;
- Support analytics, reporting or campaign operations;
- Administer rewards or redemption features; and
- Provide customer support, fraud-prevention or compliance assistance.

These parties are expected to use the information only for the functions they perform for Sebenza and subject to appropriate controls.

11.2 Advertisers and Clients

Sebenza may share information with advertisers, clients and campaign partners where this is relevant to a campaign, offer, survey, promotion, lead-generation opportunity,

reward feature or other commercial interaction on the Platform. Depending on the context, this may include:

- aggregated or non-identifying reporting;
- segmented or analytical campaign results;
- performance and engagement insights;
- campaign interaction records; and
- where you have chosen to submit your details or engage with a specific offer, identifiable information necessary to give effect to that interaction

Sebenza does not treat all advertiser-facing outputs as identical. Not every advertiser interaction involves identifiable user data, and where identifiable information is shared, Sebenza will seek to make this clear through the relevant notice, form, offer journey or point-of-collection disclosure.

11.3 Identifiable Lead Handoff

Where you choose to submit your personal information in response to a specific offer, campaign promotion, lead-generation opportunity, callback request, quotation request, sign-up opportunity or similar third-party interaction, Sebenza may share the information you provide with the relevant advertiser, client, campaign partner or third party so that they can contact you directly.

This may include your name, mobile number, email address, offer selection, campaign reference, consent or permission record, time and date of submission, and other information reasonably necessary to verify, administer or evidence the handoff.

The relevant third party may then contact you directly and may process your information as a responsible party in accordance with its own privacy notice and applicable law. Sebenza may retain records of the handoff and related permission, audit, compliance, complaint-handling and fraud-prevention information.

11.4 Redirects and External Partner Interactions

Where the Platform facilitates a redirect or external interaction, Sebenza may share limited information necessary to support that interaction, campaign administration, compliance, fraud prevention or related platform functions, depending on the structure of the interaction.

11.5 Legal, Safety and Compliance Disclosures

Sebenza may disclose personal information where reasonably necessary:

- To comply with law or regulatory requirements;
- To respond to court orders, lawful requests or official processes;

- To protect Sebenza, its users, service providers or third parties;
- To investigate fraud, abuse, unlawful conduct or security incidents; and
- To enforce rights or platform rules.

11.6 Business Change or Restructuring

If Sebenza undergoes a merger, acquisition, restructuring, sale of assets or similar business transaction, personal information may be disclosed as part of that process, subject to appropriate safeguards and lawful requirements.

12. Lead Generation and Advertiser Contact

Some campaigns or offers may allow you to indicate that you want to hear from a particular advertiser or third party. A key feature of the Platform is that users may be presented with third-party offers, campaigns or opportunities and may choose to share their details so that a third party can contact them directly.

Where you choose to submit your details in response to such an offer:

- Sebenza may collect the identifying information you provide;
- Sebenza may record the context of the interaction and the fact that you chose to proceed;
- Sebenza may transfer your information to the relevant advertiser or third party; and
- That advertiser or third party may then contact you directly as its own responsible party for that downstream communication.

Sebenza may retain records of the lead handoff, related permissions and related audit information for compliance, complaints handling, fraud prevention and dispute resolution.

By submitting your details in response to such an offer, you understand that Sebenza will share those details with the relevant advertiser or third party identified in the offer journey or point-of-collection notice.

13. Third-Party Links, Redirects and External Environments

The Platform may include buttons, links, calls to action, partner offers, promotions or redirects that take you to an external website, platform or service.

Where that happens:

- You may be leaving the Sebenza environment;
- The external party's own terms, privacy practices and notices may apply to information you provide on that site or platform; and
- Sebenza's role may be limited to facilitating the redirect, offer or campaign journey, unless clearly stated otherwise.

Sebenza may use external-link notices, warnings or other disclosures before redirecting you.

14. Cookies, Tracking Technologies and Online Tools

Sebenza may use cookies, pixels, tags, SDKs or similar online tools on the website, captive portal or platform, depending on the feature and technology environment.

These tools may be used for purposes such as:

- Enabling essential platform functionality;
- Remembering preferences or session state;
- Understanding website or platform performance;
- Measuring engagement; and
- Supporting campaign or content analysis.

Where non-essential tracking tools are used, Sebenza may provide a separate cookie notice, cookie policy, consent tool or banner.

15. How Long We Keep Information

Sebenza keeps different categories of personal information for different periods depending on why the information was collected, how the Platform operates, legal obligations, fraud prevention needs, dispute handling, compliance requirements and whether the information has been deleted, de-linked or de-identified.

Retention may therefore vary depending on whether the information relates to account administration, verification, profile data, surveys, campaign or engagement activity, rewards and redemption, lead handoff records, support records, legal records or de-identified analytical information.

Sebenza does not rely on one single generic retention rule for all information. Instead, Sebenza applies retention logic according to the function the information performs in the Platform and the relevant legal, operational and compliance context.

16. Deletion, De-Identification and Account Closure

Where platform functionality allows, you may request deletion or closure of your profile or account.

When an account or profile is deleted or closed, Sebenza may remove, deactivate, de-link, hash, anonymise or otherwise de-identify certain information where appropriate.

Sebenza will generally stop using deleted-account information for identifiable advertising or external sharing, subject to lawful retention needs. Some information may

still be retained where necessary for compliance, fraud prevention, disputes, legal claims, audit records, operational integrity or de-identified analytical purposes.

Deletion does not necessarily mean immediate or universal erasure from every system, backup, archive or compliance record.

17. Cross-Border Transfers and Cloud Storage

Sebenza may use service providers, infrastructure providers, cloud environments, messaging tools, analytics tools or other support services that process or store information outside South Africa.

Where cross-border processing or storage occurs, Sebenza will take steps appropriate under applicable law and the relevant transfer context.

Sebenza does not rely on one single transfer model for all processing. Transfer and hosting arrangements may vary depending on the service provider, infrastructure environment and feature involved.

18. Security Safeguards

Sebenza uses reasonable technical and organisational measures to help protect personal information against loss, misuse, unauthorised access, disclosure, alteration or destruction.

These measures may include, where appropriate:

- Access controls;
- Authentication controls;
- Role-based restrictions;
- Secure transmission methods;
- Monitoring and fraud-prevention controls; and
- Service-provider and confidentiality controls.

No system, network or digital service is completely risk-free, and Sebenza cannot guarantee absolute security at all times. If Sebenza becomes aware of a material security issue requiring action under applicable law, Sebenza will respond in accordance with its legal and operational obligations.

19. Your Rights

Subject to applicable law, you may have the right to:

- Be informed about how your personal information is processed;
- Request access to personal information held about you;

- Request correction of inaccurate or incomplete information;
- Request deletion, destruction or de-identification of information in appropriate circumstances;
- Object to certain processing in appropriate circumstances;
- Withdraw a permission or opt-in where processing depends on that choice;
- Lodge a complaint with Sebenza; and
- Lodge a complaint with the Information Regulator.

These rights are not always absolute and may depend on the legal basis for processing, the nature of the information, the function of the Platform, and Sebenza's legal or compliance obligations.

20. How to Contact Us and How to Complain

If you have a privacy query, want to exercise a right, or want to submit a complaint, you may contact Sebenza using the contact details made available on the website, platform or legal disclosures.

Privacy and information-access requests may also be directed to Sebenza's Information Officer using the contact details Sebenza makes available for that purpose.

If you believe Sebenza is not processing your personal information lawfully, you may also lodge a complaint with the Information Regulator of South Africa. POPIA provides data-subject rights such as access, correction, objection in appropriate circumstances, and complaint mechanisms, including to the Information Regulator.

21. Changes to this Privacy Policy

Sebenza may update this Privacy Policy from time to time.

An updated version may be published on the website, captive portal or Platform, together with an updated effective date or version reference where appropriate.

Where reasonably appropriate, Sebenza may draw material changes to your attention more prominently.