



## PAIA AND POPI MANUAL

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 AND TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT NO. 04 OF 2013.**

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## Content Revision History

Date	Revision Number	Author	Comments – Note sections that changed
04 February 2019	1.0	Nithin Parmanand	Final
08 May 2020	2.0	Chief Legal and Compliance Officer	Updated template, remove reference to JM, added reference documents table
01 June 2021	3.0	Chief Legal and Compliance Officer	Integrated POPI requirements (added sections 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 5.1, 5.2, 5.3, 5.4, 5.5 of the manual) into the PAIA Manual – uploaded to the IMS.
21 June 2021	4.0	Chief Legal and Compliance Officer	Updated reference document to add hyperlink.
12 October 2021	5.0	Legal and Compliance Associate	Updated manual in accordance with the Promotion of Access to Information Amendment Act, 2019 (Act No. 31 of 2019) and the Regulations relating to the Promotion of Access to Information, 2021 (GNR.757).
31 October 2022	6.0	Legal and Compliance Manager	Annual Review: <ul style="list-style-type: none"> <li>- Updated 4.2.8 “our details” with AC new surname.</li> <li>- Updated 4.2.8 to amend NPs name to Chief Legal and Compliance Officer title as per his request.</li> </ul> No other changes were required as no

			legislative updates
31 October 2023	7.0	Legal and Compliance Manager	<p>Annual Review:</p> <ul style="list-style-type: none"> <li>- GNR.757: Regulations relating to the Promotion of Access to Information, 2021 (PAIA Regulations) contains a Form 3 applicable to the response by RM when a request is received, this manual only intended to cover the request procedure and forms required by the public, however, it is now necessary to add the response form.</li> <li>- Form 3 was added under the Forms Section</li> <li>- Section was added in which is now section 4.9 to account for response to requests.</li> </ul>

### RACI Model

Responsible	Accountable	Consulted	Informed
Chief Legal and Compliance Officer Legal and Compliance Manager Legal and Compliance Admin Staff	Chief Executive Officer	All HOD's	All RM Staff

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## 1. GLOSSARY OF TERMS

PAIA	The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [as amended] together with its regulations
Availability	Characteristic of the information by which it can be accessed by authorized persons when it is needed
Customer	Customers' at Route Monitoring refers to the following: <ul style="list-style-type: none"> <li>• National Gambling Board ("NGB")</li> <li>• Provincial Licensing Authority ("PLA")</li> <li>• Route Operator ("RO")</li> </ul>
Data Subject	the person to whom personal information relates
Confidentiality	Characteristic of the information by which it is available only to authorised persons or systems
Information security	Preservation of confidentiality, integrity and availability of information
Manual	This manual together with all annexures
National Gambling Act ("NGA")	(Act no 7 of 2004) read together with the Gambling Regulations. [NCEMS Service Level Contract]
National Gambling Board ("NGB")	is the National Gambling Board of South Africa constituted in terms of National Gambling Act (Act no 7 of 2004) and is a Schedule 3A listed Public Entity in terms of the Public Finance Management Act (Act no 1 of 1999) as amended from time to time
Office Hours	09:00 to 16:00 Monday to Friday, excluding any day declared as a public holiday in South Africa
Personal Information	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—  (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social

	<p>origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;</p> <p>(b) information relating to the education or the medical, financial, criminal or employment history of the person;</p> <p>(c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</p> <p>(d) the biometric information of the person;</p> <p>(e) the personal opinions, views or preferences of the person;</p> <p>(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</p> <p>(g) the views or opinions of another individual about the person; and</p> <p>(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.</p> <p>[Protection of Personal Information Act, 2013 (Act No. 4 of 2013)]</p>
Protection of Personal Information (POPI) Act	The Protection of Personal Information Act, 2013 (Act No. 4 of 2013) [as amended] together with its regulations
Request	A request for access to a record in terms of Section 53 of the PAIA
Requester	A person making a request for access to a record as defined in Section 1 of the PAIA
Route Monitoring ("RM")	Is Route Monitoring (RF) (PTY) Limited constituted in terms

	of the Companies Act, Act no. 71 of 2008 as amended from time to time
SAHRC	The South African Human Rights Commission

## 2. PURPOSE

Route Monitoring (RF)(PTY) Limited ("Route Monitoring") is the National Central Electronic Monitoring System ("NCEMS") Operator, monitoring all Limited Pay-out Machines within the South African gambling industry on behalf of the National Gambling Board ("NGB").

On a national level, the data generated from the NCEMS is the property of the NGB. Provincial regulators have access to information relevant to each jurisdiction whilst gambling operators exchange and have access to information relevant to their respective estates.

As such, Route Monitoring has daily access to third party trade secrets, intellectual property, personal and confidential information. Due to prevailing privacy regulation in South Africa, Route Monitoring is under regulatory duty to ensure the safe and proper use, storage and dissemination of such information.

The purpose of this Manual is to provide assistance, as envisaged in the PAIA, to potential Requesters with regard to the procedure to be followed when requesting access to records held by Route Monitoring. This Manual gives effect to the constitutional right to privacy, by safeguarding personal information when processed and requested by a responsible party, subject to justifiable limitations that are aimed at balancing the right to privacy against other rights, particularly the right of access to information and protecting important interests, including the free flow of information within the Republic and across international borders.

This manual aims to define the responsibilities and duties of Route Monitoring and Requesters.

The records held by Route Monitoring are available by means of a Request as set out in Clause 4.

Route Monitoring reserves the right to refuse providing information where such information falls under a specified exemption as set out in Chapter 4 of the PAIA.

### 3. SCOPE

This PAIA and POPI Manual is applicable to all employees of Route Monitoring, all requesters whose information is held by Route Monitoring and all external parties who conduct business with Route Monitoring.

### 4. ACCESS TO INFORMATION

#### 4.1 SECTION 39 OF THE POPI ACT - INFORMATION REGULATOR

4.1.1 The Information Regulator of South Africa is an independent body established in terms of section 39 of the POPI Act. The Information Regulator is subject only to the law and the constitution, and it is accountable to the National Assembly.

4.1.2 As of the 30<sup>th</sup> of June 2021, the Information Regulator took over the regulatory mandate functions relating to the PAIA which was previously handled by the South African Human Rights Commission ("SAHRC").

4.1.3 The Information Regulator is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of the PAIA and the POPI Act.

#### 4.2 SECTION 51(1)(a) OF THE PAIA – OUR DETAILS

4.2.1 Name of Body: Route monitoring (RF) (Pty) Limited with registration number 2016/440500/07

4.2.2 Head of Body: Virindra Parmanand

4.2.3 Physical Address: 178 Cumberland Avenue, Turnberry Office Park, Bryanpark Place, Bryanston, 2191

4.2.4 Postal Address: P O Box 67494, Bryanston, 2021

4.2.5 Telephone Number: 010 900 2442

4.2.6 Facsimile Number: 010 900 2444

4.2.7 Website Address: [www.routemonitoring.co.za](http://www.routemonitoring.co.za)

4.2.8 Deputy Information Officers: Chief Legal and Compliance Officer (email address: [NVP@routemonitoring.co.za](mailto:NVP@routemonitoring.co.za)); Alecia Culverwell (email address: [AleciaM@routemonitoring.co.za](mailto:AleciaM@routemonitoring.co.za))

#### 4.3 SECTION 51(1)(b)(i) OF THE PAIA – THE GUIDE ON HOW TO USE THE PAIA

4.3.1 The Information Regulator has updated and made available the guide compiled by the SAHRC in terms of Section 10 of the PAIA. The guide contains information required by a person wishing to exercise or protect any right in terms of the PAIA and the POPI Act.



- 4.3.2 The PAIA grants a Requester access to records of a private body, if the record is required for the exercise or protection of any right. If a public body lodges a request, the public body must be acting in the public interest.
- 4.3.3 Requesters are referred to the guide, which will contain information for the purposes of exercising Constitutional Rights. The guide is currently available on the Information Regulator's website being: [www.justice.gov.za/infoereg](http://www.justice.gov.za/infoereg). The guide can further be obtained by completing "Form 01: Request for a Guide from the Regulator" and submitting same to the Information Regulator.
- 4.3.4 The guide may also be requested from Route Monitoring by completing **Annexure A** – "Form 1: Request for a Copy of the Guide from an Information Officer". Route Monitoring only has the guide available in the following languages: English and isiZulu. If the guide is required in any other official language same must be requested from the Information Regulator as indicated in clause **Error! Reference source not found.**3 above.
- 4.3.5 The contact details of the Information Regulator are: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, Telephone Number: 010 023 5200.
- 4.3.6 Requests in terms of the PAIA shall be made in accordance with the prescribed procedures, at the rates provided.
- 4.4 SECTION 52 OF THE PAIA – INFORMATION AUTOMATICALLY AVAILABLE
- 4.4.1 No notice has been published in accordance with Section 52 of the PAIA regarding the categories of records freely available without a person having to request access in terms of the PAIA.
- 4.4.2 The following categories of records are however freely available without a person having to request access in terms of the PAIA and may be requested from the Deputy Information Officers:
- 4.4.2.1 Marketing and promotional material published by Route Monitoring;
- 4.4.2.2 Newsletters; and
- 4.4.2.3 Information as published on the website of Route Monitoring.
- 4.5 SECTION 51(1)(b)(iii) OF THE PAIA – OTHER LEGISLATIVE INFORMATION
- 4.5.1 Where applicable to the business of Route Monitoring, records are kept in accordance with the following legislation:
- 4.5.1.1 The National Gambling Act, 2004 (Act No. 7 of 2004) [as amended]

- 4.5.1.2 The Eastern Cape Gambling and Betting Act, 1997 (Act No. 5 of 1997) [as amended]
- 4.5.1.3 The Free State Gambling and Liquor Act, 2010 (Act No. 6 of 2010) [as amended]
- 4.5.1.4 The Gauteng Gambling Act, 1995 (Act No. 4 of 1995) [as amended]
- 4.5.1.5 The Mpumalanga Gambling Act, 1995 (Act No. 5 of 1995) [as amended]
- 4.5.1.6 The KwaZulu-Natal Gambling and Betting Act, 2010 (Act No. 8 of 2010) [as amended]
- 4.5.1.7 The North- West Gambling Act, 2001 (Act No. 2 of 2001) [as amended]
- 4.5.1.8 The Northern Cape Gambling Act, 2008 (Act No. 3 of 2008) [as amended]
- 4.5.1.9 The Northern Province Casino and Gaming Act, 1996 (Act No. 4 of 1996) [as amended]
- 4.5.1.10 The Western Cape Gambling and Racing Act, 1996 (Act No. 4 of 1996) [as amended]
- 4.5.1.11 The Basic Conditions of Employment Act, 1997 (Act No. 75 of 1997) [as amended]
- 4.5.1.12 The Companies Act, 2008 (Act No. 71 of 2008) [as amended]
- 4.5.1.13 The Compensation for Occupational Injuries and Diseases Act, 1993 (Act No. 130 of 1993) [as amended]
- 4.5.1.14 The Employment Equity Act, 1998 (Act No. 55 of 1998) [as amended]
- 4.5.1.15 The Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001) [as amended]
- 4.5.1.16 The Income Tax Act, 1962 (Act No. 58 of 1962) [as amended]
- 4.5.1.17 The Labour Relations Act, 1995 (Act No. 66 of 1995) [as amended]
- 4.5.1.18 The Occupational Health and Safety Act, 1993 (Act No. 85 of 1993) [as amended]
- 4.5.1.19 The Pension Funds Act, 1956 (Act No. 24 of 1956) [as amended]
- 4.5.1.20 The Skills Development Act, 1998 (Act No. 97 of 1998) [as amended]
- 4.5.1.21 The Skills Development Levies Act, 1999 (Act No. 9 of 1999) [as amended]
- 4.5.1.22 The Unemployment Insurance Act, 1966 (Act No. 30 of 1966) [as amended]
- 4.5.1.23 The Valued-Added Tax Act, 1991 (Act No. 89 of 1991) [as amended]
- 4.5.1.24 The Broad-Based Black Economic Empowerment Act, 2003 (Act No. 53 of 2003 [as amended])

#### 4.6 SECTION 51(1)(b)(iv) OF THE PAIA– SUBJECTS AND CATEGORIES OF INFORMATION

4.6.1 Route Monitoring holds the following categories of records:

4.6.2 Statutory Company Information:

- 4.6.2.1 Certificate of Incorporation
- 4.6.2.2 Memorandum of Incorporation
- 4.6.2.3 Minutes, resolutions and proxy forms
- 4.6.2.4 Registers of allotments, meetings, members, mortgages and debentures and fixed assets and directors
- 4.6.3 Financial and Accounting:
  - 4.6.3.1 Audited annual financial statements
  - 4.6.3.2 Ledgers
  - 4.6.3.3 Journals
  - 4.6.3.4 Budgets and business plans
  - 4.6.3.5 Bank account statements
  - 4.6.3.6 Asset register
  - 4.6.3.7 Management accounts
  - 4.6.3.8 Tax records
  - 4.6.3.9 VAT returns
  - 4.6.3.10 Delivery notes, orders, invoices, statements, receipts, vouchers and bills of exchange
- 4.6.4 Legal documents, Agreements and Contracts:
  - 4.6.4.1 Contracts, including finance and lease agreements
  - 4.6.4.2 Material licences, permits and authorisations
  - 4.6.4.3 Material agreements relating to provision of services or materials
  - 4.6.4.4 Agreements with contractors, suppliers and customers/clients such as sale agreements, warranty agreements and letters of engagement
  - 4.6.4.5 Agreements with governmental agencies
- 4.6.5 Insurance:
  - 4.6.5.1 Insurance policies
  - 4.6.5.2 Claim records
  - 4.6.5.3 Details of insurance coverage, limits and insurers
- 4.6.6 Administration:

- 4.6.6.1 Correspondence
- 4.6.6.2 Internal policies and procedures
- 4.6.7 Employee information records:
  - 4.6.7.1 Names, date of birth and occupations
  - 4.6.7.2 Key Employee Licences
  - 4.6.7.3 Personal History Disclosures
  - 4.6.7.4 Hours of work
  - 4.6.7.5 Remuneration
  - 4.6.7.6 Tax returns
  - 4.6.7.7 Employment contracts
  - 4.6.7.8 Policies and procedures
  - 4.6.7.9 Attendance register
  - 4.6.7.10 Expense accounts
  - 4.6.7.11 Incentive schemes
  - 4.6.7.12 Study assistance schemes
  - 4.6.7.13 Employee evaluation and performance records
  - 4.6.7.14 Training and development
  - 4.6.7.15 Payroll records (salaries and wages)
  - 4.6.7.16 UIF, PAYE and SDL returns
  - 4.6.7.17 Medical Aid
  - 4.6.7.18 Group life
  - 4.6.7.19 Group personal accident
  - 4.6.7.20 Disciplinary records
  - 4.6.7.21 Scholarships/bursaries
  - 4.6.7.22 Health and safety records
  - 4.6.7.23 Recruitment and appointments
  - 4.6.7.24 Organisational design

- 4.6.8 Pension and retirement funding records:
  - 4.6.8.1 Provident fund rules
  - 4.6.8.2 Provident fund records
  - 4.6.8.3 Contributions reports
  - 4.6.8.4 Annual records
- 4.6.9 Fixed Property:
  - 4.6.9.1 Leases
  - 4.6.9.2 Building plans
- 4.6.10 Movable Property:
  - 4.6.10.1 Asset register
  - 4.6.10.2 Finance and lease agreements
- 4.6.11 Intellectual property:
  - 4.6.11.1 Designs, trademarks, trade names and protected names
  - 4.6.11.2 Copyrights
  - 4.6.11.3 Agreements relating to intellectual property, inter alia, licence agreements, secrecy agreements, research and development agreements, consulting agreements, use agreements, joint venture agreements, and joint development agreements
- 4.6.12 Clients:
  - 4.6.12.1 Client information, records and correspondence
- 4.6.13 Marketing:
  - 4.6.14 Service and product information
  - 4.6.15 Marketing literature (brochures, newsletters and advertising materials)
  - 4.6.16 Public relations policies and procedures
  - 4.6.17 Media releases
  - 4.6.18 Website
- 4.6.19 Information technology:
  - 4.6.19.1 Agreements
  - 4.6.19.2 Software packages

- 4.6.19.3 Licenses
- 4.6.19.4 Internal systems support and programming/development
- 4.6.19.5 Capacity and utilization of current systems
- 4.6.19.6 Development or investment plans
- 4.6.19.7 Disaster recovery processes and procedures
- 4.6.19.8 Client database
- 4.6.19.9 Hardware
- 4.6.19.10 Internet
- 4.6.19.11 Security
- 4.6.19.12 Operating systems
- 4.6.19.13 Telephone exchange equipment
- 4.6.19.14 Telephone lines, leased lines and data lines
- 4.6.19.15 LAN installations
- 4.6.19.16 Maintenance agreements

#### 4.7 SECTION 54 OF THE PAIA - FEES

- 4.7.1 The following applies to requests (other than personal requests):
  - 4.7.1.1 A Requestor is required to pay the applicable prescribed fee before a Request will be processed.
  - 4.7.1.2 After the head of Route Monitoring has made a decision on the Request, the Requester must be notified in the required form.
  - 4.7.1.3 The head of Route Monitoring 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.
  - 4.7.1.4 If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (of not more than one-third of the access fee which would be payable if the Request were granted).
  - 4.7.1.5 A Requestor may lodge an application with a Court against the tender/payment of the Request fee and/or deposit.
  - 4.7.1.6 The head of a private body may withhold a record until the requester concerned has paid

the applicable fees (if any).

- 4.7.1.7 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.
- 4.7.1.8 Different fees may be prescribed in respect of different categories of responsible parties and data subjects.
- 4.7.1.9 The fee structure is contained in the PAIA Regulations which is currently available on the website of the Information Regulator.

#### 4.8 SECTION 53 OF THE PAIA AND SECTION 23 OF THE POPI ACT – REQUEST PROCEDURE

- 4.8.1 The Requester must use the prescribed form (**Annexure B** – “*Form 2: Request for Access to Record*”) to make the Request for access to a record. The Request must be addressed as provided for in Clause 4 above.
- 4.8.2 The Requester must provide sufficient detail on the Request form to enable the head of Route Monitoring to identify the record and the Requester. The Requester should also indicate which form of access is required. The Requester should also indicate if any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.
- 4.8.3 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.
- 4.8.4 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 head of Route Monitoring.
- 4.8.5 A Requester who seeks access to a record containing personal information about that Requester is not required to pay the Request fee (**Annexure C** – “*Prescribed Fees*”). Every other Requester, who is not a personal Requester, must pay the required Request fee.
- 4.8.6 A Requester has the right to have his, her or its personal information processed in accordance with the conditions for the lawful processing of personal information and to object, on reasonable grounds relating to his, her or its particular situation to the processing of his, her or its personal information.
- 4.8.7 A Requester who wishes to object to the processing of their personal information of personal information must submit a request to Route Monitoring on the prescribed form (**Annexure D** – “*Form 1: Objection to the processing of personal information*”).

- 4.8.8 A requester who wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information in terms of section 24 (1) of the POPI Act, must submit a request to the responsible party on the prescribed form (**Annexure E** – “*Form 2: Request for correction or deletion of personal information or destroying or deletion of record of personal information*”)
- 4.9 RESPONSE TO REQUESTS
- 4.9.1 Route Monitoring must respond to requesters on the prescribed form being **Annexure F** – “*Form 3: Outcome of Request and of Fees Payable*”.
- 4.10 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS (CHAPTER 4 OF THE PAIA)
- 4.10.1 Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person
- 4.10.2 Mandatory protection of the commercial information of a third party, if the record contains:
- 4.10.2.1 Trade secrets of that party
- 4.10.2.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that party
- 4.10.2.3 Information disclosed by a third party to any of the Companies if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- 4.10.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement
- 4.10.3.1 the provisions of the PAIA to apply in relation to the rights of the relevant third parties
- 4.10.4 Mandatory protection of the safety of individuals and the protection of property
- 4.10.5 Mandatory protection of records which could be regarded as privileged in legal proceedings.
- 4.10.6 The commercial activities of Route Monitoring, which may include: Trade secrets of the Companies; and Financial, commercial, scientific or technical information which, if disclosed, would likely cause harm to the financial or commercial interests of Route Monitoring.
- 4.11 APPEAL AGAINST REFUSAL TO GRANT ACCESS
- 4.11.1 If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, upon notification of the Information Officer’s decision (or upon deemed refusal in terms of Section 58 of the PAIA), lodge a complaint to the Information



Regulator or apply to court for appropriate relief within the timeframes as prescribed by the PAIA.

## **5. PERSONAL INFORMATION**

### 5.1 SECTION 13(1)(2) OF THE POPI ACT – PURPOSE OF PROCESSING

5.1.1 The purpose for which personal information is processed by Route Monitoring will depend on the nature of the information. In general, personal information is processed by Route Monitoring for business administration purposes, including:

- 5.1.1.1 to carry out actions for the conclusion or performance of a contract;
- 5.1.1.2 to comply with obligations imposed by law;
- 5.1.1.3 to fulfil duties in terms of law;
- 5.1.1.4 to protect the legitimate interests of the data subjects; or
- 5.1.1.5 where it is necessary for pursuing the legitimate interests of the Company.

### 5.2 SECTION 23 OF THE POPI ACT – CATEGORIES OF DATA SUBJECTS

5.2.1 Route Monitoring processes personal information relating to the following categories of data subjects:

- 5.2.1.1 Personnel / employees;
- 5.2.1.2 Consultants;
- 5.2.1.3 Customers;
- 5.2.1.4 Regulators;
- 5.2.1.5 Service providers;
- 5.2.1.6 Suppliers;
- 5.2.1.7 Operators;
- 5.2.1.8 Other third parties with whom the company conducts business.

### 5.3 SECTION 23 OF THE POPI ACT – CATEGORIES OF INFORMATION

5.3.1 Route Monitoring processes personal information in respect of natural persons:

- 5.3.1.1 Name;
- 5.3.1.2 identifying number (identity or passport number);
- 5.3.1.3 date of birth;

- 5.3.1.4 citizenship;
  - 5.3.1.5 age;
  - 5.3.1.6 gender;
  - 5.3.1.7 race;
  - 5.3.1.8 marital status;
  - 5.3.1.9 language;
  - 5.3.1.10 telephone number(s);
  - 5.3.1.11 email address(es);
  - 5.3.1.12 physical and postal addresses;
  - 5.3.1.13 income tax number;
  - 5.3.1.14 banking information;
  - 5.3.1.15 disability information;
  - 5.3.1.16 employment history;
  - 5.3.1.17 background checks;
  - 5.3.1.18 fingerprints;
  - 5.3.1.19 CVs;
  - 5.3.1.20 education history;
  - 5.3.1.21 remuneration and benefit information;
  - 5.3.1.22 details related to employee performance and disciplinary procedures.
- 5.3.2 Route Monitoring processes personal information in respect of juristic persons:
- 5.3.2.1 name;
  - 5.3.2.2 registration number;
  - 5.3.2.3 tax information;
  - 5.3.2.4 contact details;
  - 5.3.2.5 physical and postal addresses;
  - 5.3.2.6 FICA documentation;
  - 5.3.2.7 B-BBEE certificates;

5.3.2.8 banking and/or account details;

5.3.2.9 invoices;

5.3.2.10 contractual agreements.

5.4 SECTION 11 OF THE POPI ACT – CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

5.4.1 The categories of recipients to whom Route Monitoring may supply the personal information will depend on the nature of the information. In general, such categories of recipients would include:

5.4.1.1 Subsidiary or related companies;

5.4.1.2 Service providers;

5.4.1.3 B-BBEE Consultants;

5.4.1.4 Medical aid, pension or provident funds;

5.4.1.5 Auditing and accounting bodies (internal and external);

5.4.1.6 Third parties with whom Route Monitoring have contracted for the retention of data;

5.4.1.7 Relevant authorities, government departments, statutory bodies or regulators;

5.4.1.8 Provincial Gambling Boards;

5.4.1.9 National Gambling Board;

5.4.1.10 A court, administrative or judicial forum, arbitration or statutory commission making a request in terms of applicable laws or rules.

5.5 SECTION 19 OF THE POPI ACT – INFORMATION SECURITY MEASURES

5.5.1 Route Monitoring strives to take appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession or under its control.

5.5.2 The relevant security measures Route Monitoring implements to safeguard the personal information of its' data subjects are set out in the LC-POL\_Privacy Policy.

5.6 SECTION 72 OF THE POPI ACT – TRANSBORDER INFORMATION FLOWS

5.6.1 Route Monitoring will implement appropriate and reasonable measures to ensure that the Personal information of its Data subject remains protected and secure when it may be transferred outside South Africa.

5.6.2 Any and all transborder flows of personal information shall be done in accordance with the LC-POL\_Privacy Policy.

## 6. AVAILABILITY OF THIS MANUAL

This Manual is available for inspection upon request, during Office Hours and free of charge at Route Monitoring offices. A copy of this Manual is also available on the website of Route Monitoring.

## 7. FORMS

Please refer to Annexures A – E provided hereinbelow.

## 8. REVIEW

This CEO-MN\_PAIA and POPI Manual must be reviewed, at minimum, annually and as and when required or when RM experiences structural changes which significantly affect the organisational structure.

RM reserves the right to amend this CEO-MN\_PAIA and POPI Manual from time to time. Any such modifications shall be automatically effective and shall be deemed to have come to the attention of all employees when posted to the RM "SharePoint". RM will endeavour to advise employees of all changes, however, responsibility rests with RM employees to ensure that they are aware of, and fully understand all company policies and procedures.

## 9. REFERENCE DOCUMENTS

Document Name	Hyperlink
LC-POL_Privacy Policy	<a href="#">LC-POL_Privacy Policy</a>

**ANNEXURE A - FORM 1: REQUEST FOR A COPY OF THE GUIDE FROM AN INFORMATION OFFICER**

**[Regulation 3]**

**TO:** The Information Officer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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)
<input type="checkbox"/>			

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of requester

**ANNEXURE B – FORM 2**  
**REQUEST FOR ACCESS TO RECORD**  
**SECTION 53 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2000)**  
**[Regulation 7]**

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation must be attached to this form.

**TO:** The Information Officer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(Address)

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

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

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

<b>PERSONAL INFORMATION</b>			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p><b>PARTICULARS OF RECORD REQUESTED</b>  <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></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			

<b>TYPE OF RECORD</b> <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	
<b>FORM OF ACCESS</b> <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, videorecordings, 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	
<b>MANNER OF ACCESS</b> <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>	



<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<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:	
<b>FEES</b>	
<p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</p>	
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**

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

\_\_\_\_\_  
**Signature of Information Officer**

### ANNEXURE C – PRESCRIBED FEES

*\*These Fees are subject to change as and when amended in terms of the published PAIA Regulations. In the event of any inconsistency between the fees contained in the PAIA Regulations and this CEO-MN\_PAIA and POPI Manual, the PAIA Regulations shall prevail.*

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requestor)  (iv) Compact disc  • If provided by requestor  • If provided to the requestor	R40.00   R40.00  R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (v) Flash drive (to be provided by requestor)  (vi) Compact disc  • If provided by requestor  • If provided to the requestor	R40.00   R40.00  R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.  To not exceed a total cost of	R145.00  R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."

**ANNEXURE D - FORM 1**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11 (3) OF THE  
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018  
[Regulation 2.]**

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

<b>A     DETAILS OF DATA SUBJECT</b>	
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number / Email address:	
<b>B     DETAILS OF RESPONSIBLE PARTY</b>	
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address	
	Code (    )
Contact number(s):	
Fax number/ Email address:	
<b>C     REASONS FOR OBJECTION IN TERMS OF SECTION 11 (1) (d) to (f) (Please provide detailed reasons for the objection)</b>	
Signed at.....this.....day of ..... 20.....	

**ANNEXURE E - FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
**[Regulation 3]**

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

<b>A     DETAILS OF THE DATA SUBJECT</b>	
Name(s) and surname/ registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
<b>B     DETAILS OF RESPONSIBLE PARTY</b>	
Name(s) and surname / registered name of responsible party:	

Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C    INFORMATION TO BE CORRECTED/DELETED/ DESTRACTED/ DESTROYED</b>	
1.	
2.	
3.	
4.	
5.	
6.	
<b>D</b>	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24 (1) (a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY;</p> <p>and/or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24 (1) (b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN</p> <p>(Please provide detailed reasons for the request)</p>
Signed at .....this .....day of ..... 20.....	
<p>.....</p> <p>Signature of data subject/designated person</p>	

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

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

Reference number: \_\_\_\_\_

**TO:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

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

**OR**

**2. You requested:**

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

**3. To be submitted:**

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

Kindly note that your request has been:

Approved

Denied, for the following reasons:

**4. Fees payable with regards to your request:**

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



**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 \_\_\_\_\_

\_\_\_\_\_  
Information Officer

**END OF DOCUMENT**

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