

ACCESS TO INFORMATION MANUAL

CSH GROUP (PTY) LTD

This manual guides the reader to the type of information held as well as the process to access information held by Compuscan Holdings and the following subsidiaries, divisions or interests in companies for which it has management responsibility:

Name	Registration Number	Nature of business
Compuscan Holdings (Pty) Ltd	1999/000701/07	Investment Company
Compuscan Holdings International (Pty) Ltd	2014/031757/07	Investment Company
Compuscan Holdings South Africa (Pty) Ltd	2014/031789/07	Investment Company
Compuscan Information Technologies (Pty) Ltd	1998/021744/07	In the business of being a credit bureau
Compuscan Academy (Pty) Ltd	1998/018091/07	Training Institute
Techtonic Information Technology (Pty) Ltd	1999/018588/07	The development of computer software products and related services
Prolinx (Pty) Ltd	2010/006341/07	Value added services for credit providers, staff outsourcing and related services
PCubed Analytical Intelligence (Pty) Ltd	2014/208467/07	Data analytics, customer acquisition and loyalty and rewards offering
Scoressharp (Pty) Ltd	2007/015134/07	Data analytics and advisory services
Encentivize (Pty) Ltd	2015/280378/07	Software provider, loyalty and rewards services, customer acquisition
Encentivize Rewards (Pty) Ltd	2015/280386/07	Loyalty and rewards and related services

CSH GROUP (PTY) LTD

Compuscan House, 3 Neutron Avenue, Techno Park, Stellenbosch South Africa, 7600. P.O. Box 1028, Stellenbosch, South Africa, 7599

T: +27 (21) 888 6000 | F: +27 (21) 413 2424 | E: info@compuscan.za | National Number: 0861 51 41 31

www.compuscan.co.za | Directors: RM Lenisa, AH Mazanderani, DR Cooke, PWJ van Heerden, M Jordaan (Chairman); Co. Reg: 1999/000701/07



A GUIDE TO ACCESSING OUR INFORMATION

Manual prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000.

I. INTRODUCTION

The purpose of this manual is to assist potential requestors with the procedure to be followed when requesting access to information / documents from the company as contemplated in terms of the Promotion of Access to Information Act 2 of 2000 ("the Act").

The manual may be amended from time to time and the latest version that has been published on our website will apply.

Any requestor is advised to contact the Information Officer at paia@compuscan.co.za in the event of requiring assistance in respect of this manual.

Name: Compuscan Holdings (Pty) Ltd

Registration number: 1999/000701/07

Physical address: Compuscan House
3 Neutron Avenue
Techno Park
Stellenbosch
7600

Postal address: PO Box 1028
Stellenbosch
South Africa
7599

Directors: A H Mazanderani
R M Lenisa
D Cooke
P W J van Heerden
M Jordaan (Chairman)

Should a requestor be uncertain of the procedure for the request for information, please contact the below contact person for assistance:

Contact Person: Legal & Compliance Officer



III. THE SECTION 10 GUIDE ON HOW TO USE THE ACT [Section 51(1)(b)]

If you need guidance on the processes to access our information, kindly also contact the Human Rights Commission:

Postal Address: Private Bag 2700
Houghton
2041

Telephone: +27 11 484 8300

Fax: +27 11 484 0582

Website: www.sahrc.org.za

Email: PAIA@sahrc.org.za

IV. AVAILABILITY OF RECORDS

(i) Voluntary Disclosures

To date no notice(s) have been published in terms of section 52(2) of the Act. Those documents that are however readily available may be obtained from the websites as detailed under (II) in this manual. Further information in the form of marketing brochures, advertising material and other public communication is made available from time to time.

(ii) Records available in terms of any other legislation (section 51(1)(d))

The Company holds records available in terms of any other legislation (section 51(1)(d))

- 3.1 Companies Act No 71 of 2008
- 3.2 Income Tax Act No 95 of 1967
- 3.3 Regional Services Councils Act No 109 of 1985
- 3.4 Skills Development Act No 97 of 1998
- 3.5 Broad-Based Black Economic Empowerment Act No 53 of 2003
- 3.6 Compensation for Occupational Injuries and Diseases Act No 130 of 1993
- 3.7 Trademarks Act No 194 of 1993
- 3.8 Customs and Excise Act No 91 of 1964
- 3.9 Skills Development Levies Act No 97 of 1998
- 3.10 Value Added Tax Act No 89 of 1991
- 3.11 Basic Conditions of Employment No. 75 of 1997
- 3.12 Employment Equity Act No. 55 of 1998
- 3.13 Unemployment Insurance Act 63 of 2001
- 3.14 Labour Relations Act 66 of 1995
- 3.15 Pension Funds Act 24 of 1956
- 3.16 Medical Schemes Act 131 of 1998



- 3.17 Copyright Act 98 of 1978
- 3.18 National Credit Act 32 of 2005
- 3.19 Consumer Protection Act 68 of 2008
- 3.20 Occupational Health and Safety Amendment Act No 85 of 1993
- 3.21 Protection of Personal Information Act 4 of 2013.

(iii) The Company holds various types of information (as per section 51(1)(e)).

The Company will keep records on the below mentioned categories:

Statutory Company Information

- Accounting records
- Taxation
- Human Resources
- Training and Development
- Credit Services
- Analytics
- Marketing
- Legal and Compliance
- Trademark, trade name and domain name registrations

Internal Records

- Memorandum of Incorporation
- Financial records
- Operational records
- Intellectual property
- Marketing records
- Product records
- Statutory records
- Internal policies and procedures

Personnel Records

Personnel refer to the body of persons employed by or active within the organisation, business, or service. This includes but without limitation, all directors, executive and non – executive directors, and permanent staff. Personal records include:

- Any records provided by personnel to the company
- Any records regarding personal provided by a third party to the company
- Conditions of Employment
- Employment agreements
- Disciplinary records
- Evaluation records
- Other internal records



Customer Records

Compuscan Holdings (Pty) Ltd, Compuscan Holdings International (Pty) Ltd, Compuscan Holdings South Africa (Pty) Ltd, Compuscan Information Technologies (Pty) Ltd, Compuscan Academy (Pty) Ltd and Techtonic Information Technologies (Pty) Ltd, Prolinx (Pty) Ltd, PCubed Analytical Intelligence (Pty) Ltd, Scoresharp (Pty) Ltd, Encentivize (Pty) Ltd, Encentivize Rewards (Pty) Ltd considers its customers' privacy as of the utmost importance and any request for information regarding our customers, needs to be motivated in terms of section 63 to 67 of the Act.

Customer information includes the following:

- Personal records of consumers
- Consumer credit information
- Any records provided by a customer to the company
- Any records provided by a third party to the company that relates to a customer.
- Confidential records of customers.

Technical Records

- Technical records produced by the company relating to the customer.

Other Parties

- Information relating to other parties, including but not limited to contractors, suppliers, joint ventures and service providers are also kept.

Other Records

Further records are held during:

- Information concerning the company's own commercial activities
- Research carried out on behalf of a client by the Company.
- Any other research information that belongs to the Company.

Kindly note that the documents under (ii) and (iii) are not readily available and may be subject to the grounds of refusal set out in this manual. Every request for access to these documents will be reviewed on a case by case basis and the Company reserves the right to decline to grant access to records in accordance with the provisions of the Act.

V. AVAILABILITY OF THIS MANUAL

The manual is available for inspection by the general public upon request, during office hours and free of charge at the office, Compuscan House, 3 Neutron Avenue, Techno Park, Stellenbosch, 7600, South Africa, of Compuscan Academy (Pty) Ltd, copies are available with the South African Human Rights Commission.



VI. THE REQUEST PROCEDURES

The requester must use the prescribed form to make the request for access to a record. The request form is available at <http://www.compuscan.global> or from our offices. This request must be made to the Information Officer at the address, fax number or electronic mail address of the company.

The requester must provide sufficient detail on the request form to enable the head of the private body 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.

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.

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 the private body.

We will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied. Please note that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record.

Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right;
- The requestor complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

VII. REASONS FOR REFUSAL OF INFORMATION

A private institution like Compuscan is only allowed to decline a request for access to information based on the following grounds:

- Section 63 provides for the mandatory protection of the privacy of a third party who is a natural person.
- Section 64 provides for the mandatory protection of the commercial information of a third party, if the record contains:
 - trade secrets of that third party financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;



- information supplied in confidence by a third party to the Company, which if such information is disclosed it could put the third party at a disadvantage in negotiations or commercial competition;
- Section 65 provides for the mandatory protection of certain confidential information of third parties. If such disclosure would constitute a breach of a duty of confidence owed to such third party in terms of an agreement;
- Section 66 provides for the mandatory protection of the safety of individuals, and the protection of property;
- Section 67 provides for the mandatory protection of records privileged from production in legal proceedings.
- Section 68 provides for protection of the commercial information of a private institution such as Compuscan, which may include:
 - trade secrets of Compuscan;
 - financial, commercial, scientific or technical information which disclosure could likely cause harm or damage to the financial or commercial interests of Compuscan;
 - information which, if disclosed, could put Compuscan at a disadvantage in negotiations or commercial competition;
 - a software program which is owned by Compuscan and which is protected by copyright
- Section 69 provides for the mandatory protection of research information of Compuscan or a third party, if its disclosure would place Compuscan, the third party or the subject matter of the research at a serious disadvantage;

All requests will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

VIII. Records that do not exist or cannot be found:

- If records cannot be found or do not exist, the Information Officer by way of affidavit or affirmation needs to notify the requestor that it is not possible to give access to the specific record requested
- The affidavit must give full account of all steps taken to find the record that has been requested to try and determine whether or not it actually exists. It also needs to include all communications with every person who conducted the search.
- Records that do not exist or cannot be found as per section 55 are regarded as a decision to refuse a request.
- If after notice is given regarding the record that cannot be found, and the record in question is found, the requestor concerned must be given access to the record unless access is refused on grounds for refusal contemplated in Chapter 4 of the Act in which the Company may refuse access on certain specified grounds.



IX. FEES:

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- The head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- The fee that the requester must pay to a private body is as indicated below. The requester may lodge an application to the court against the tender or payment of the request fee [s 54(3)(b)].
- After the head of the private body has made a decision on the request, the requester must be notified in the required form.
- 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 [s 54(6)].

The following fees is payable in terms of Section 11(1)	
Document	Fee
a copy of the manual as contemplated in regulation 9(2)(c)	R1.10 for every photocopy of an A4-size page or part thereof
For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75
For a copy in a computer-readable form on stiffer disc	R7.50
For a copy in a computer-readable form on compact disk	R70.00
For a transcription of visual images, for an A4-size page or part thereof 40,00	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof 20,00	R20.00
For a transcription of an audio record, for a copy of the audio record	R30.00

The following fees is payable in terms of Section 11(2)	
Document	Fee
The request fee payable by a requester, other than a personal requester, referred to in regulation	R50.00



The following fees is payable in terms of Section 11(3)	
Document	Fee
For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on stiffy disk	R7.50
For a copy in a computer-readable form on compact disc	R70.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
To search for the record for disclosure	R30.00 for each hour or part of an hour reasonably required for such search and operation
For purposes of section 54(2) of the Act, the following applies:	a) Six hours as the hours to be exceeded before a deposit is payable; and b) One third of the access fee is payable as a deposit by the requester.
Postage	The actual postage is payable when a copy of record must be posted to a requester.

X. OTHER INFORMATION AS MAY BE PRESCRIBED

The Minister of Justice and Constitutional Development has not made any regulations in this regard.



ANNEXURE A:

COMPUSCAN HOLDINGS AND ITS SUBSIDIARIES

Name	Directors	Contact details:
CSH Group (Pty) Ltd	AH Mazanderani RM Lenisa D Cooke PWJ Van Heerden M Jordaan (Chairman)	Physical Address: Compuscan House, 3 Neutron Avenue, Techno Park, Stellenbosch, 7600
Compuscan Holdings International (Pty) Ltd	RM Lenisa	Postal Address: PO Box 1028, Stellenbosch, 7600
Compuscan Holdings South Africa (Pty) Ltd	RM Lenisa T Hermanus M Parsons (Non Exec Director)	Tel no: 021 888 6000
Compuscan Information Technologies (Pty) Ltd	RM Lenisa	Fax no: 021 413 2424
Compuscan Academy (Pty) Ltd	FO Lenisa	
Tectonic Information Technology (Pty) Ltd	RM Lenisa	
Prolinx (Pty) Ltd	RM Lenisa	Physical address: Lebombo Place B, 38 Lebombo Road, Ashlea Gardens, Pretoria, 0081 Postal address: PO Box 35555, Menlo Park, Pretoria, 0102
PCubed Analytical Intelligence (Pty) Ltd	MJ Reilly	Physical address: Building 5, 1 st Floor, Culross Main Office, 34 Culross Road, Bryanston
Scoressharp (Pty) Ltd	PWJ Van Heerden	
Encentivize (Pty) Ltd	RM Lenisa A De Oliveira	Postal address: Building 5, 1 st Floor, Culross Main Office, 34 Culross Road, Bryanston
Encentivize Rewards (Pty) Ltd	RM Lenisa Anita De Oliveira	Tel no: 011 463 8575



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14 July 2003	V1.0	Drafted	Michael Ginsberg
14 June 2010	V2.0	Redrafted and Updated Address	Annelene Dippenaar
22 May 2013	V2.1	Revised and Updated	Melissa De Lange
08 Dec 2015	V2.2	Revised and Updated	Melissa De Lange
15 Feb 2018	V3.0	Revised and Updated	Annelene Dippenaar