



# SprintHive PAIA Manual

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 (PAIA) and to address the requirements of the Protection of Personal Information Act, 2013.

**The manual applies to Sprinthive  
Proprietary Limited**  
(Registration number: 2016/199232/07)

**(hereinafter SPRINTHIVE)**

## 1. Introduction

- 1.1 The **Promotion of Access to Information Act, No.2 for 2000 (“the Act”)** was enacted on 3 February 2000, giving effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or/and protection of any rights.
- 1.2 In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (“PAIA Manual”).
- 1.3 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information may or must not be released. The Act sets out the requisite procedural issues to such request.

## 2. Definitions

- 2.1 **Conditions for Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- 2.2 **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 2.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 2.4 **Data Subject** is the natural or juristic person to whom the personal information relates;
- 2.5 **Direct Marketing** means approaching a Data Subject personally for the purpose of selling them a product or service, or to request a donation;
- 2.6 **Manual** means this manual prepared in accordance with section 51 of PAIA and regulation 4(1)(c) of the POPIA Regulations;
- 2.7 **Minister** refers to the Minister of Justice and Correctional Services;
- 2.7 **Personal Information** has the meaning ascribed thereto in section 1 of POPIA;
- 2.8 **Private Body** means the entity to which this manual applies as it appear on the front page of this manual;
- 2.9 **POPIA** means the Protection of Information Act No. 4 of 2013;
- 2.10 **Processing** has the meaning ascribed thereto in section 1 of POPIA;
- 2.11 **Regulator** has the meaning of the Information Regulator;
- 2.12 **Responsible Party** is the entity (in this case SPRINTHIVE) that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information;
- 2.13 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;

## 3. Purpose and Scope of the Manual

- 3.1 To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the PAIA Act in order for them to exercise their rights in relation to public and private bodies.
- 3.2 Section 9 of the PAIA Act however recognises that such rights to access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
  - Limitations aimed at the reasonable protection of privacy;
  - Commercial confidentiality; and
  - Effective, efficient and good governance;

and in a manner which balances the right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

3.3 This PAIA Manual is useful for the public to:

- 3.3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.3.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3.4 Wherever reference is made to a “document” or “record”, it shall include such documents or records that are stored on a computer or in any form of electronic format.

3.5 SPRINTHIVE is an information technology company that offers services for the purpose of automated customer onboarding via cloud-based solutions that integrate with other existing systems.

3.6 This manual and its guiding principles applies to all SPRINTHIVE employees, agents, contractors, service providers and other persons acting on behalf of SPRINTHIVE.

#### 4. Key Contact Details for access to information of: SPRINTHIVE PROPRIETARY LIMITED

Chief Information Officer	
Name	Craig Watters
Tel	+27 83 447 1610
Email	craig.watters@sprinthive.com

## Access to Information: General contacts

Email: [craig.watters@sprinthive.com](mailto:craig.watters@sprinthive.com) or [buzz@sprinthive.com](mailto:buzz@sprinthive.com)

▪ National or Head-office	
Registration number	2016/199232/07
Postal address	Brickfield Canvas Building 35 Brickfield Road WOODSTOCK 7925 Western Cape SOUTH AFRICA
Physical address	Brickfield Canvas Building 35 Brickfield Road WOODSTOCK 7925 Western Cape SOUTH AFRICA
Telephone number	+27 83 447 1610
E-mail address	<a href="mailto:craig.watters@sprinthive.com">craig.watters@sprinthive.com</a>
Website address	<a href="https://sprinthive.com">https://sprinthive.com</a>
Head of Private body	Dirk le Roux

### 5. Guide on how to use PAIA and how to obtain access to the Guide

- 5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of
- 5.3.1 the objects of PAIA and POPIA;
  - 5.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 5.3.3 the manner and form of a request for:
    - 5.3.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and

<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 5.3.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;
- 5.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
  - 5.3.6.1 an internal appeal;
  - 5.3.6.2 a complaint to the Regulator; and
  - 5.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 5.3.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8 the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 5.3.10 the regulations made in terms of section 92<sup>11</sup>.
- 5.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

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<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5.5 The Guide can also be obtained upon request to the Information Officer or from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

## **6. Processing of Personal Information**

6.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

6.2 The processing of Personal Information is only lawful if, given the purpose of processing, the information is adequate, relevant and not excessive. SPRINTHIVE may only process Personal Information if one of the following grounds of lawful processing exists:

- The Data Subject consents to the processing;
- Processing is necessary for the conclusion or performance of a contract with the Data Subject;
- Processing complies with a legal responsibility imposed on SPRINTHIVE;
- Processing protects a legitimate interest of the Data Subject;
- Processing is necessary for pursuance of a legitimate interest of SPRINTHIVE, or a third party to whom the information is supplied;

6.3 Special Personal Information includes:

- Religious, philosophical, or political beliefs;
- Race or ethnic origin;
- Trade union membership;
- Health or sex life;
- Biometric information;
- Criminal behaviour.

6.4 SPRINTHIVE may only process Special Personal Information under the following circumstances:

- The Data Subject has consented to such processing;
- Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- Processing is for historical, statistical, or research reasons;
- The Special Personal Information was deliberately made public by the Data Subject;
- Processing of race or ethnic origin is necessary to comply with affirmative action laws.

6.5 Data Subjects have the right to refuse or withdraw their consent to the processing of their Personal Information. A Data Subject may also object, at any time, to the processing of their Personal Information on any of the above grounds, unless legislation provides for such processing. If the Data subject withdraws consent or objects to processing then SPRINTHIVE shall forthwith refrain from processing the Personal Information.

6.6 SPRINTHIVE needs Personal Information relating to both individual and juristic persons to carry out its operational functions and activities. SPRINTHIVE is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

6.6.1 is collected and processed in such a manner that the conditions and all the measures set out in the Act that give effect to such conditions, are complied with at the time of the determining the purpose and means of the processing.

6.6.2 is processed lawfully, transparently and in a reasonable manner that does not infringe the privacy of the Data Subject. The purpose should be adequate, relevant and not excessive.

6.6.3 is processed only for the purposes for which it was collected and will not be processed for a secondary purpose unless that processing is compatible with the original purpose. The information will be retained for an adequate period.

6.6.4 is adequate, relevant and not excessive for the purposes for which it was collected.

6.6.5 is complete, accurate and kept up to date.

6.6.6 is collected in such a manner that the Data Subject whose information is collected is aware thereof and for what purpose the information will be used.

6.6.7 is kept secure against the risk of loss, unlawful access, interference, modification, unauthorised destruction and disclosure.

6.6.8 is processed in accordance with the rights of Data Subjects, where applicable.

6.7 Data Subjects have the following rights:

- To be notified that their Personal Information is being collected by SPRINTHIVE;
- To be notified in the event of a data breach;
- To establish whether SPRINTHIVE holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
- To request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained Personal Information;
- To object to SPRINTHIVE's processing of their Personal Information and request the deletion of such Personal Information. Deletion would however be subject to SPRINTHIVE's record keeping and retention requirements;
- To object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- To complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal Information.

**7. Categories of records of SPRINTHIVE which are available without a person having to request access**

Category of Record	Types of Record	Available on the Website	Available upon request
Privacy policy	Website Privacy Statement	Yes	Yes
PAIA manual	Privacy manual	Yes	Yes

All information on the website of the business is automatically available without having to request access in terms of PAIA.

**8. Description of the records of SPRINTHIVE which are available in accordance with any other legislation**

Category of Record	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Employee Contracts and employment-related information	<p>Various legislation applies:</p> <ul style="list-style-type: none"> <li>● Basic Conditions of Employment Act, No. 75 of 1997;</li> <li>● Compensation for Occupational Injuries &amp; Diseases Act, No. 130 of 1993;</li> <li>● Employment Equity Act, No. 55 of 1998;</li> <li>● Labour Relations Act, No. 66 of 1995;</li> <li>● Skills Development Levies Act, No. 9 of 1999;</li> <li>● Unemployment Insurance Contributions Act, No. 4 of 2002;</li> <li>● Unemployment Insurance Act No. 63 of 2001;</li> </ul>
BBEEE-related	<ul style="list-style-type: none"> <li>● Broad-Based Black Economic Empowerment Act, No. 53 of 2003;</li> </ul>
Business Operations, Accounting and recordkeeping	<ul style="list-style-type: none"> <li>● Income Tax Act, No. 58 of 1962;</li> <li>● Companies Act, No. 71 of 2008;</li> <li>● Cybercrimes Act, No.19 of 2020;</li> <li>● Prescription Act, No. 68 of 1969;</li> <li>● Short-term Insurance Act, No. 53 of 1998;</li> <li>● South African Reserve Bank Act, No. 90 of 1989;</li> <li>● Tax Administration Act, No. 28 of 2011;</li> <li>● Customs &amp; Excise Act, No. 91 of 1964;</li> <li>● Financial Intelligence Centre Act, No. 38 of 2001;</li> <li>● Identification Act, No. 68 of 1997;</li> </ul>



	<ul style="list-style-type: none"> <li>● Insolvency Act, No. 24 of 1936;</li> <li>● Intellectual Property Laws Amendment Act, No. 38 of 1997;</li> <li>● Prevention of Organised Crime Act, No. 121 of 1998;</li> <li>● Regulation of Interception of Communications and Provision of Communication-Related Information Act, No. 70 of 2002;</li> <li>● Revenue laws Second Amendment Act, No. 61 of 2002;</li> <li>● Value Added Tax Act No. 89 of 1991.</li> </ul>
General	<ul style="list-style-type: none"> <li>● Business Act, No. 71 of 1991;</li> <li>● Constitution of the Republic of South Africa 2008;</li> <li>● Consumer Protection Act, No. 68 for 2008;</li> <li>● Copyright Act, No. 98 of 1978;</li> <li>● Electronic Communications Act, No. 36 of 2005;</li> <li>● Disaster Management Act, No. 57 of 2002;</li> <li>● Electronic Communications and Transactions Act, No. 25 of 2002;</li> <li>● Occupational Health &amp; Safety Act, No. 85 of 1993;</li> <li>● Promotion of Access to Information Act, No. 2 of 2000;</li> <li>● Protection of Personal Information Act, No. 4 of 2013;</li> </ul>
PAIA Manual	Promotion of Access to Information Act 2 of 2000

Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements of PAIA and this manual.

Although SPRINTHIVE has used their best endeavors to provide a list of applicable legislation, it is possible that the list may be incomplete. Should it come to SPRINTHIVE's attention that other or new legislation is also applicable, the list will be updated as such.

**9. Description of the Subjects on which the body holds records and Categories of Records held on each subject by SPRINTHIVE**

Category	Records
Clients/Customers	1. Quotations;

	<ol style="list-style-type: none"> <li>2. Checks on prospective customers (incl. credit checks);</li> <li>3. Service agreements;</li> <li>4. Correspondence;</li> <li>5. Invoices;</li> <li>6. Payment records;</li> <li>7. BBBEE-certificates;</li> <li>8. Payment records and statements.</li> <li>9. Service usage metrics</li> <li>10. End-user application data</li> </ol>
<b>Human Resources</b>	<ol style="list-style-type: none"> <li>1. HR policies and procedures;</li> <li>2. Advertised posts;</li> <li>3. Information provided by job applicants/employees at application stage;</li> <li>4. Employment contracts;</li> <li>5. Letters of appointment;</li> <li>6. Curriculum Vitae;</li> <li>7. Employment-related checks;</li> <li>8. Remuneration records;</li> <li>9. Employee photos and videos;</li> <li>10. BBBEE statistics;</li> <li>11. Career development records;</li> <li>12. Disciplinary records;</li> <li>13. Safety, health and environmental records;</li> <li>14. Training and attendance records;</li> <li>15. Travelling records;</li> <li>16. SETA-records;</li> <li>17. Workplace agreements and records;</li> <li>18. Personnel information;</li> <li>19. Employment equity reports;</li> <li>20. Leave records;</li> <li>21. PAYE records and returns;</li> <li>22. Performance management records and procedures;</li> <li>23. UIF returns;</li> </ol>
<b>Information Management and Technology</b>	<ol style="list-style-type: none"> <li>1. Third party Agreements;</li> <li>2. IT Asset register;</li> <li>3. IT Policies, standards, procedures and guidelines;</li> <li>4. Software licenses, programs and applications;</li> </ol>
<b>Marketing and Communication</b>	<ol style="list-style-type: none"> <li>1. Proposal documents;</li> <li>2. New business development;</li> <li>3. Brand information management;</li> <li>4. Marketing and communication strategies;</li> <li>5. Agreements and communications;</li> <li>6. Marketing publications/newsletters and brochures.</li> </ol>

<b>Operations and Procurement</b>	<ol style="list-style-type: none"> <li>1. Access control/Attendance records;</li> <li>2. Annual reports, strategic plans and budgets;</li> <li>3. Company Act and accounting-related records;</li> <li>4. Asset registers;</li> <li>5. Inventory records;</li> <li>6. Third party agreements;</li> <li>7. Archive and data retention administration;</li> <li>8. General correspondence;</li> <li>9. Internal policies;</li> <li>10. Internal audits, investigations and projects;</li> <li>11. Corporate Responsibility Initiatives;</li> <li>12. Patents and trademark documents;</li> <li>13. Insurance documentation;</li> <li>14. Service level agreements;</li> <li>15. Supplier/procurement - related documents;</li> <li>16. Travel and flight information and documentation; and</li> <li>17. Vehicle registration documents.</li> </ol>

## 10. SPRINTHIVE Personal Information Uses

### 10.1 SPRINTHIVE uses the Personal Information under its care in the following ways:

- To register new customers;
- Preparing Quotations;
- Invoicing;
- For Product development purposes;
- Administration and management of client and service provider relationships and agreements;
- Administration of payments and outstanding balances (customers);
- Staff and Payroll administration as well as employee relationship management;
- The advertising of vacancies, employee recruitment and selection processes;
- Keeping of accounts and records;
- Complying with legal and regulatory requirements;
- In connection with legal proceedings;
- Provide, administer and improve our services including any marketing activities;
- To fulfill requests received from Data Subjects (for support and service delivery);
- To provide Data Subjects with product and service information and alerts which also include payment-related information;
- Detecting and prevention of fraud, crime, money laundering and other malpractice;
- To search for additional information about our Data Subjects that is publicly available.

### 10.2 Description of the categories of Data Subjects and of the Information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients and potential clients	Name, address, registration numbers or identity numbers, contact numbers, employment status and bank details.
Service Providers and suppliers	Names, registration number, vat numbers, address, contact numbers, contract and bank details.
Employees	Names, address, contact details (including next of kin emergency details), qualifications, gender, race, medical information, disability information, contracts, performance records, payroll records, Health and safety records, training records, employment history (including references and checks) and time and attendance records.
Job applicants	Curriculum Vitae, application forms as well as criminal, qualification and background checks.
Visitors	Access records

### 10.3 The recipients or categories of recipients to whom the Personal Information may be supplied

SPRINTHIVE may supply the Personal Information to any party to whom SPRINTHIVE may have assigned or transferred any of its rights or obligations under any agreement, and/or to service providers who render the following services:

- Capturing and organising of data;
- Storing of data;
- Sending of emails and other correspondence to customers;
- Government agencies and law enforcement.

In addition, personal information may also be shared as follows:

<b>Category of personal information</b>	<b>Recipients or Categories of Recipients to whom the personal information may be supplied</b>
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Employee information required to administer employee benefits: Contact details, identity number, family member details, beneficiary details, medical history and records	Medical Aid and Insurers responsible for administering these funds

### 10.4 Actual or Planned Transborder Flows of Personal Information

Some of the entity's external third parties may be based outside the Republic of South Africa ("RSA") so their processing of your Personal Information could involve a transfer of data outside the RSA. Whenever SPRINTHIVE transfers your Personal Information out of the RSA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- SPRINTHIVE will only transfer your Personal Information to countries that have been deemed to provide a similar level of protection for Personal Information as the RSA.
- Where SPRINTHIVE uses certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measurements to protect your Personal Information.
- Where SPRINTHIVE uses providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide protection to Personal Information similar to POPI Act.

By submitting your Personal Information to SPRINTHIVE, you acknowledge and give consent to the transfer of Personal Information outside the borders of the RSA (when required).

### 10.5 Safeguarding of Personal Information

SPRINTHIVE will ensure the integrity and confidentiality of all Personal Information in its possession, by taking appropriate and practical steps to identify risks relating to information security. Reasonable measures will be taken to establish and maintain appropriate safeguards against such risks.

SPRINTHIVE has policies and controls in place for the safe custody, security and backup of information. The safeguarding measures *inter alia* include:

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control (security gate, alarm system, biometric and card access to office building as well as restricted areas);
- Secure setup of hardware and software making up the IT infrastructure;
- Secure communications;
- Investigating and reacting to security incidents;
- Daily back-ups;
- Outsourced Service Providers who process Personal Information on behalf of SPRINTHIVE are contracted to implement security controls.

SPRINTHIVE also limits access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. SPRINTHIVE will, on an on-going basis, continue to review their security controls and related processes to ensure that the personal information of their Data Subjects remains secure.

#### 10.6 Employee Contracts and Signed Acknowledgements

All SPRINTHIVE employees are required to sign a data privacy addendum as part of or in addition to their Employment contract. Employees are also required to annually sign an Acknowledgement of the SPRINTHIVE IT policy.

This is to ensure that all SPRINTHIVE employees are aware of their responsibilities in terms of the safeguarding of all personal information within the private body. Failure to comply could result in the instigation of disciplinary procedures.

### 11. Request Procedure

11.1 A person who requests access to records must complete the necessary request form, as set out in Appendix A. The completed form must be marked for the attention of the Chief Information Officer (refer to the “Contact Details” section above).

The following should be detailed in the form:

- The requester must indicate which form of access is required;
- Identify the right that is sought to be exercised or protected;

- Provide an explanation of which the requested record is required for the exercise or protection of that right; and
- Provide proof of the capacity in which the Requester is requesting the information;
- Proof of identification of the Requestor (and related third parties acting on behalf of the requestor) must be provided on submitting the request form.

11.2 SPRINTHIVE will decide whether to grant or decline the Request for Access within 30 days of receipt of the Request for Access and must give notice to the Requester with reasons (if required) to that effect. The period referred to above may be extended for a further period of not more than 30 days if the Request for Access depending on the complexity of the request or if it is for a large number of Records.

11.3 SPRINTHIVE will notify the Requester in writing should an extension of time as contemplated above be required.

11.4 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requester must state the manner and particulars so required.

11.5 If a request is made on behalf of another person, then the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).

11.6 If access to a record/information is granted, the Requestor will be notified and will include the following:

- An indication of the prescribed fee that should be paid before further processing can take place.
- An indication of the form in which the access will be granted.

11.7 If access to a record/information is denied, the requestor will be notified and will include the following:

- Adequate reasons for the refusal.
- Advice on how to lodge an application against the refusal with a court, once the Requestor has exhausted all available remedies with SPRINTHIVE.

## **12. Grounds for Refusal**

SPRINTHIVE may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which SPRINTHIVE may refuse access include:

- Protecting personal information that SPRINTHIVE holds about a third person (who is a natural person) including a deceased person, from unreasonable disclosure;
- Protecting commercial information that SPRINTHIVE holds about a third party or SPRINTHIVE (for example a trade secret, financial, commercial, scientific or technical information that may harm the commercial or financial interests of SPRINTHIVE or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;

- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of SPRINTHIVE;
- Disclosure of the record would put SPRINTHIVE at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer program which is owned by SPRINTHIVE and which is protected by copyright and intellectual property laws;
- Research information of SPRINTHIVE or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

### **13. Information or Records not found**

If the Company cannot find the records that the Requester is looking for despite reasonable and diligent search and it believes either that the records are lost or that the records are in its possession but unattainable, the Requester will receive a notice in this regard from the Information Officer in the form of an affidavit setting out the measures taken to locate the document and accordingly the inability to locate the document.

### **14. Remedies available to the Requester upon refusal of a request for access in terms of PAIA**

14.1 The Company does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

14.2 In accordance with sections 56(3) (c) and 78 of PAIA, a Requester may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

### **15. Availability of the Manual**

This Manual is made available in terms of PAIA and section 4 of the Regulations to POPIA. This Manual is also available on the company's website and at the offices of SPRINTHIVE for inspection during normal business hours.

No fee will be levied for inspection as contemplated in this clause. Copies of the Manual can be obtained from the Information Officer at the prescribed standard rates.



**16. Updates to Manual**

This Manual will be updated at such intervals that may be deemed necessary.

**SIGNED AT** \_\_\_\_\_ **on** \_\_\_\_\_

**ISSUED BY:**

\_\_\_\_\_  
**THE HEAD OF THE PRIVATE BODY (CEO)**

## FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY  
(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)

### [Regulation 10]

#### A. Particulars of private body

The Head:

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#### B. Particulars of person requesting access to the record

- |     |   |
|-----|---|
| (a) | The particulars of the person who requests access to the record must be given below.                |
| (b) | The address and/or fax number in the Republic to which the information is to be sent must be given. |
| (c) | Proof of the capacity in which the request is made, if applicable, must be attached.                |

Full names and surname:
Identity number:
Postal address:
Fax number:
Telephone number:
E-mail address:

Capacity in which request is made, when made on behalf of another person:

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#### C. Particulars of person on whose behalf request is made

This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person.
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Full names and surname:
Identity number:

**D. Particulars of record**

- |  |
|--|
| (a) 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. |
| (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.          |

1 Description of record or relevant part of the record:

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2 Reference number, if available:

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3 Any further particulars of record:

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**E. Fees**

- |  |
|--|
| (a) A request for access to a record, other <i>than</i> a record containing personal information about yourself, will be processed only after a request fee has been paid.           |
| (b) You will be <i>notified of</i> the amount required to be paid as the request fee.  |
| (c) The fee payable for access to a record depends <i>on</i> the form <i>in which</i> access is required and the reasonable time <i>required</i> to search for and prepare a record. |
| (d) If you qualify for exemption <i>of</i> the payment <i>of</i> any fee, please state the reason for exemption.   |

Reason for exemption from payment of fees:

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**F. Form of access to record**

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Form in which record is required:	
Mark the appropriate box with an X.	
<p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

<b>1. If the record is in written or printed form:</b>						
	copy of record*		inspection of record			
<b>2. If record consists of visual images</b> this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)						
	view the images		copy of the images*		transcription of the images*	
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>						
	listen to the soundtrack (audio cassette)		transcription of soundtrack* written or printed document			
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>						
	printed copy of record*		printed copy of information		copy in computer readable form* (stiffy or compact disc)	
* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.					YES	NO

**G. Particulars of right to be exercised or protected**

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

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**H. Notice of decision regarding request for access**

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at.....this..... day of .....22

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**SIGNATURE OF REQUESTER / PERSON ON  
WHOSE BEHALF REQUEST IS MADE**