



DATA DISCOVERY

Promotion of Access to Information Manual

Data Discovery (Pty) Ltd

Registration number:
2013/088455/07

Access to Information Manual

We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).

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Introduction

Data Discovery (Pty) Ltd conducts business as an analytics company that provides data, credit risk & decision analytics, as well as analytical prospecting & marketing services, among various other related services.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”).

The PAIA Act gives effect to everyone’s constitutional right of access to information held by private or public bodies. A ‘private body’ means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. We are a private body. If you request records held by private bodies like us, you can only do so if the record is required for the exercise or protection of any rights. If a public body lodges a request for information held by a private body, the public body also must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates described.

Our details

Our details are as follows:

- **Company name:** Data Discovery (Pty) Ltd
- **Registration number:** 2013/088455/07
- **Postal address:** Block A, Agri-Hub Building, 477 Witherite Street, The Willows, Pretoria, 0081
- **Physical address:** Block A, Agri-Hub Building, 477 Witherite Street, The Willows, Pretoria, 0081
- **General company email:** info@data-discovery.co.za
- **Information officers:** Jacques Anthonie Krynauw
Christiaan Rabie Kok
- **Website:** <http://www.data-discovery.co.za>

Further guidance

If you would like further guidance on how you can get access to information under PAIA, you may contact the Information Regulator to find out more information about PAIA. The Information Regulator has compiled a guide in each official language of South Africa on how to exercise any right under PAIA. The guide is available here:

https://www.inforegulator.org.za/docs/misc/PAIA-Guide-English_20210905.pdf

The Information Regulator's contact details are as follows:

- **Postal address:** P.O Box 3153, Braamfontein, Johannesburg, 2017
- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Phone number:** 010 023 5200
- **Website:** www.inforegulator.org.za
- **General e-mail:** enquiries@inforegulator.org.za
- **Complaints email:** PAIAComplaints@inforegulator.org.za

Records we hold

We hold the following subjects and categories of records:

- **Company records;**
- **Business records;**
- **Financial records;**
- **Insurance records;**
- **Personnel records;**
- **Policies and directives;**
- **Agreements or contracts;**
- **Regulatory documents;**
- **Published information;**
- **Client information;** and
- **Reference materials.**

Please note that records that are ‘not automatically available,’ must be requested using the process outlined in the ‘How to request access’ section of this manual.

Company records

Company records are all our records related to the incorporation and administration of our company. Some of them may be available from **BizPortal**, via BizProfile, a search tool for all companies registered on the Companies and Intellectual Property Commission (CIPC).

Memorandum of incorporation	BizPortal
Directors’ names	BizPortal
Documents of incorporation	BizPortal
Minutes of board of directors meetings	Not automatically available
Written resolutions	Not automatically available
Records relating to appointment of directors, auditor, secretary, public officer, or other officers	Not automatically available
Share register and other statutory registers	Not automatically available
Other statutory records	Not automatically available

Business records

Business records include any documents that have economic value to the business.

Operational records	Not automatically available
Databases	Not automatically available
Published works	Not automatically available
Internal correspondence	Not automatically available
Product records	Not automatically available

Financial records

Financial records are all our records related to our finances.

Financial statements	Not automatically available
Tax returns	Not automatically available
Other documents relating to taxation of the company	Not automatically available
Accounting records	Not automatically available
Banking records	Not automatically available
Banking details	Automatically available on request
Bank statements	Not automatically available
Electronic banking records	Not automatically available
Paid cheques	Not automatically available
Asset register	Not automatically available
Rental agreements	Not automatically available
Invoices	Not automatically available
Financial agreements	Not automatically available

Insurance records

Insurance records are all our records related to our insurable assets.

Insurance policies held by the company	Not automatically available
Register of all immovable property owned by the company	Not automatically available

Income tax records

Income tax records are all our records related to our income tax obligations.

PAYE Records	Not automatically available
Corporate tax records	Not automatically available
Customs tax	Not automatically available
Documents issued to employees for income tax purposes	Not automatically available
Records of payments made to SARS on behalf of employees	Not automatically available
VAT records	Not automatically available
Regional Services Levies	Not automatically available
Skills Development Levies	Not automatically available
UIF	Not automatically available
Workmen's Compensation	Not automatically available

Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

List of employees	Not automatically available
Employee personal information	Not automatically available

Employee employment contracts	Not automatically available
Employment policies and procedures	Not automatically available
Employment Equity Plan	Not automatically available
Medical aid records	Not automatically available
Pension and provident fund records	Not automatically available
Salaries of employees	Not automatically available
Leave records	Not automatically available
Internal evaluations	Not automatically available
Disciplinary records	Not automatically available
Disciplinary codes	Not automatically available
Training records	Not automatically available
Operating manuals	Not automatically available
Personal records provided by personnel	Not automatically available
Other statutory records	Not automatically available
Related correspondence	Not automatically available

Policies and directives

Policies and directives include both internal and external documents.

Internal relating to employees and the company	Not automatically available
External relating to clients and other third parties	Not automatically available
Information technology systems and documents	Not automatically available

Agreements or contracts

Agreements or contracts include the documents themselves and all related documents.

Standard Agreements	Not automatically available
Contracts concluded with clients	Not automatically available
NDA's	Not automatically available
Letters of intent, MOUs	Not automatically available
Third party contracts (such as JV agreements, VAR agreements, etc.)	Not automatically available
Office management contracts	Not automatically available
Supplier contracts	Not automatically available

Regulatory documents

Regulatory documents include any documents required to comply with any laws.

Permits	Not automatically available
Licences	Not automatically available
Authorities	Not automatically available

Published information

Published information includes any document that we prepare and produce.

External newsletters and circulars	Automatically available
Internal newsletters and circulars	Not automatically available
Information on the company published by third parties	Not automatically available

Client information

Client information includes any information about anyone that we provide goods or services to, including our clients, leads, or prospects.

Client details	Not automatically available
Contact details of individuals within clients	Not automatically available
Communications with clients	Not automatically available
Sales records	Not automatically available
Transactional information	Not automatically available
Marketing records	Not automatically available

Information we hold to comply with the law

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997;
- Broad Based Black Economic Empowerment Act No. 53 of 2003;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Consumer Protection Act 68 of 2008;
- Copyright Act 98 of 1978;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962;
- Labour Relations Act 66 of 1995;
- National Credit Act 34 of 2005;
- Occupational Health and Safety Act 85 of 1993;
- Protection of Personal Information Act 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Unemployment Insurance Act 63 of 2001; and
- Value Added Tax Act 89 of 1991.

How to request access

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete Form 2 which is

available from the Information Regulator's website at: <https://info regulator.org.za/docs/forms/InfoRegSA-PAIA-Form02-Reg7.pdf>

Please submit the completed form (together with the relevant request fee we explain below) to our company's general email address or our physical address in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

Grounds for refusal

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

How we will give you access

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

How much it will cost you

Request fees

When submitting your request, you must pay us a **request fee** as the law prescribes. You must pay us the prescribed fees before we give you access. You will receive a notice from our information officer upon your request, setting out the application procedure.

Access fees

If we grant the request, you will have to pay us a further **access fee** the law prescribes that includes a fee for the time it takes us to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure. Our information officer will notify you if you need to pay a deposit for the access fee. The deposit may be up to one third of the prescribed access fee. The access fee will provide for:

- the costs of making the record, or transcribing the record,
- a postal fee (if applicable), and
- the reasonable time we need to search for the record and prepare the record for you.

If you paid the deposit and we refused your request, we will refund you the deposit amount. Until you have paid the fees, we may withhold the record you requested.

How we process and protect personal information

We process the personal information of various categories of people for various purposes as set out in this clause.

Categories of people

We process the personal information of the following categories of people:

- consumers or clients;
- clients in the financial services, retail and insurance industries;
- prospects or leads;
- employees;
- contractors, vendors, or suppliers;
- debtors and creditors; and
- directors and shareholders.

Purposes

We process the personal information to:

- provide our goods or supply our services;
- provide analytics and scorecard development services to our clients;
- better understand our data subjects' needs when doing so;
- keep our data subject records up-to-date;
- manage employees in general;
- manage supplier contracts in general;
- manage clients in general;
- enforce debts;
- market goods and services to consumers on behalf of our clients;
- run promotional competitions for businesses; and
- process consumer requests or complaints.

Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- ID numbers;
- personal and demographic details, such as names, ages, gender and marital status;

- employer information;
- background information of employees;
- contract information;
- credit bureau information;
- market intelligence information; and
- debt and debtor information.

Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our clients:

- affiliates and partners;
- third party vendors to help us maintain our services.

Cross-border transfers

We do not send personal information outside of South Africa. If we ever do, we will only transfer data to other countries who have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same standard we must protect it.

Security

We secure our data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. This includes but is not limited to connections to servers through VPN, two-factor authentication and access control to servers. Data is not stored on personal or work laptops.

We have a comprehensive set of policies that make up our Information Security Policy Framework which includes but is not limited to:

- Information Security and Corporate Governance Policy
- Confidentiality and Liability Agreement
- Internal Audit Policy
- Acceptable Use Policy
- Clean Desk Policy
- Email Policy
- Ethics Policy
- Anti Bribery and Corruption Policy
- Password Construction & Protection Policy
- Remote Access and Remote Access Tools Policy
- Software Installation Policy
- Incident Response Policy
- Record Retention Policy and Schedule

We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

Availability of our Privacy Policy

For further details on how we process personal information, see our Privacy Policy which is available in English and available on our website (www.data-discovery.co.za).

Remedies

If your request for access is denied, you may:

- apply to a court with appropriate jurisdiction, or
 - lodge a complaint with the Information Regulator,
- for the necessary relief within 180 calendar days of us notifying you of our decision.

Other prescribed information

The Minister of Justice and Constitutional Development has not made any regulations prescribing any other information that needs to appear in this manual.

Availability of this Manual

This manual is available in English and will be available on our website (www.data-discovery.co.za), and at our company offices.

Updates to this Manual

This manual will be updated whenever we make material changes to the current information.