

MAMA MONEY (PTY) LTD
and
MAMA MONEY FINANCIAL SERVICES (PTY) LTD

PROMOTION OF ACCESS TO INFORMATION

ACT, 2 OF 2000 (“THE ACT”)

SECTION 51 MANUAL

1. INTRODUCTION

Mama Money (Pty) Ltd, registration number 2013/022174/07, is a private company that facilitates international money transfers, which service is supported by Mama Money Financial Services (Pty) Ltd 2016/296253/07.

This manual has been prepared in accordance with section 51 of the Act and aims to facilitate a request for access to a record held by Mama Money and which is required for the exercise or protection of any right. This manual may be amended from time to time and as soon as any amendments have been finalised, the latest version thereof will be made public.

2. SECTION 51(1)(a) OF THE ACT: CONTACT DETAILS

Company Registration:	
Mama Money (Pty) Ltd	2013/022174/07
Mama Money Financial Services (Pty) Ltd	2016/296253/07
Chief Executive Officer & Information Officer	Raphael Grojnowski
Deputy Information Officer	Gert Kruger
Head of Information Security	Ralph Erasmus
Street Address and Postal Address	29 Sir Lowry Road, Zonnebloem, 7945, Western Cape, South Africa
Telephone	+27 21 202 5420
Website	https://www.mamamoney.co.za/
Email	gertkruger@mamamoney.co.za

3. SECTION 51(1)(b) OF THE ACT: SECTION 10 GUIDE

- a. The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- b. Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are prescribed in sections 53 and 54 of the Act.

- c. Requesters are referred to the Guide in terms of section 10 which has been compiled by the South African Human Rights Commission (“**SAHRC**”) and which contains information on how to exercise any of the rights contemplated in the Act. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address:	Private Bag 2700, Houghton, 2041
Telephone Number:	+27-11-877 3600
Fax Number:	+27-11-403 0625
Email:	paia@sahrc.org.za
Website:	www.sahrc.org.za

Alternatively, the contact details of its successor, The Information Regulator (South Africa), are:

Postal Address:	SALU Building, 316 Thabo Sehume Street, Pretoria
Contact person:	Ms Mmamoroke Mphelo
Telephone Number:	012 406 4818
Fax Number:	086 500 3351
Email:	inforeg@justice.gov.za

4. SECTION 51(1)(c) OF THE ACT: RECORDS AVAILABLE IN TERMS OF LEGISLATION

Records are available in terms of the following legislation that is applicable to our business. These records are not automatically available and any request for access thereto will be assessed in accordance with applicable internal policies and legislative requirements and should be made as detailed in paragraph 6 below.

No:	Reference:	Act:
1	No 71 of 2008	Companies Act

2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 58 of 1962	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 75 of 1997	Basic Conditions of Employment Act
8	No 25 of 2002	Electronic Communications and Transactions Act
9	No 2 of 2000	Promotion of Access of Information Act
10	No 63 of 2001	Unemployment Insurance Act
11	No 85 of 1993	Occupational Health and Safety Act
12	No 53 of 2003	Broad-Based Black Economic Empowerment Act
13	No 9 of 1999	Skills Development Levies Act
14	No 4 of 2013	Protection of Personal Information Act

Request for access to documents held by us will be in accordance with the Act. The type of information/records available to the person requesting the information are listed hereunder:

1.	Administrative Records	<p>These include but are not limited to following:</p> <ul style="list-style-type: none"> • Company Act Records: including <ul style="list-style-type: none"> ○ Documents of incorporation ○ Memorandum of incorporation ○ Minutes of board or directors' meetings ○ Records relating to the appointment of directors/ auditor/ secretary/ public officer and other officers ○ Share register and other statutory registers • Any personal records provided to us by our personnel
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		<ul style="list-style-type: none"> Any records which a third party has provided to us about any of its personnel
2.	Human Resources Records	<p>These include but are not limited to following:</p> <ul style="list-style-type: none"> Any personal records provided to us by our personnel Any records that a third party has provided to us about any of its personnel Conditions of employment and other personnel-related contractual and quasi-legal records Internal evaluation and training records Other internal records and correspondence
3.	Client-related Records	<p>These include but are not limited to following:</p> <ul style="list-style-type: none"> Operational records Databases Information technology Marketing records Internal correspondence Product records Statutory records Internal policies and procedures
4.	Financial Records	<p>These include but are not limited to following:</p> <ul style="list-style-type: none"> Annual Financial Statements Audit Records Tax Returns Accounting Records Banking Records Bank Statements Paid Cheques Electronic Banking Records Asset Register
5.	Income Tax Records	<ul style="list-style-type: none"> PAYE records Documents issued to employees for income tax purposes

		<ul style="list-style-type: none"> • Records of payments made to SARS on behalf of employees • All other statutory compliances: <ul style="list-style-type: none"> ○ Vat ○ Regional Services Levies ○ Skills Development Levies ○ UIF ○ Workmen's Compensation
6	Third Parties	<p>We may possess records pertaining to other parties / third parties, including without limitation, contractors, suppliers, subsidiary companies, and other service providers. These records include:</p> <ul style="list-style-type: none"> • Service level agreements • Rental Agreements • Supply agreements • Financial records • Correspondence <p>Such other parties may possess records which can be said to belong to us. The following records fall under this category:</p> <ul style="list-style-type: none"> • Personnel, client, or our records which are held by another party • Records held by us pertaining to other parties, including without limitation: <ul style="list-style-type: none"> ○ financial records ○ correspondence ○ contractual records ○ records provided by the other party.

5. SECTION 51(1)(d) OF THE ACT: AUTOMATIC DISCLOSURE - CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS

Categories of information available without request:

- A section 52(2) notice regarding the categories of records, which are available without a person having to request access in terms of the Act, has to date not been published. The information in this section provides a reference to the records that the Company holds, which will facilitate a request in terms of the Act.

- All records or information available on our website www.mamamoney.co.za is available without any request.
- Other non-confidential records and information, such as statutory records maintained at Companies and Intellectual Property Commission (“CIPC”), can also be accessed with a request directed either to the CIPC, or from our Deputy Information Officer. A requester will, however, must schedule an appointment with our Deputy Information Officer for such a purpose.

6. SECTION 51(1)(e) OF THE ACT: FORM OF REQUEST FOR ACCESS

A request for access to information held by us must be submitted in writing, using the Information Access Request Form in Annexure A as well as a copy of identity (official ID, ID card, or passport), addressed to the Deputy Information Officer and must include sufficient details to enable us to identify:

- The record being requested.
- The name and contact details of the requester (and if on behalf of another, proof of capacity and authority to act on behalf thereof).
- The form of access required.
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

Upon receipt of the completed Information Access Request Form and proof of payment of the prescribed fees, we will consider the request and provide a response within 30 (thirty) working days. Should the request be denied, reasons will be provided, and the requester will have the right to challenge the decision through the appropriate Magistrates Court.

7. PERSONAL INFORMATION PROCESSED

Section 17 of the Protection of Personal Information Act (“POPIA”) requires a responsible party to maintain a record of all processing operations or activities or functions under its responsibility in a PAIA manual.

POPIA requires the following information to be provided:

POPIA Information Required:	Our Information:
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<p>(i) Purpose of processing personal information</p>	<ul style="list-style-type: none"> • To deliver the services requested to customers. • Engagement of employees, job applicants (successful or unsuccessful) and third-party service providers.
<p>(ii) Description of categories of data subjects and of information or categories of information relating thereto</p>	<p>Categories data subjects:</p> <ul style="list-style-type: none"> • Customers • Employees • Job applicants (successful or unsuccessful) • Third-party service providers. <p>Categories information</p> <p>Personal information, as further detailed in the privacy policy.</p>
<p>(iii) Recipients or categories recipients to whom the personal information may be supplied</p>	<p>We may only share personal information of data subjects with selected third parties including business partners, suppliers and sub-contractors for the performance of any contract between us and the data subject or if we are under a duty to disclose or share personal information in order to comply with any legal obligation.</p>
<p>(iv) Planned transborder flows of personal information</p>	<p>No personal information is transferred outside of the Republic of South Africa unless –</p> <ul style="list-style-type: none"> • recipient country can offer such data an “adequate level” of protection; • the data subject provides its prior written consent to the transfer;

	<ul style="list-style-type: none"> • the recipient is subject to a law, code of conduct or contract which provides comparable protection for the personal information as the protections contained in our privacy policy, including similar provisions relating to the further transfer of the personal information. • the transfer is necessary for the performance of a contract between us and the data subject; or • the transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject, and if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.
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8. SECTION 51(1)(f) OF THE ACT: OTHER INFORMATION AS PRESCRIBED

Section 51(1)(f) of the Act grants the Minister powers to publish a notice prescribing any other information that companies will have to disclose.

9. REQUEST FEES

All prices listed below are exclusive of value added tax as set out in the Value Added Tax Act, No. 89 of 1991.

The request fee payable by a requester, other than a personal requester (i.e., a person seeking access to records that contain their personal information), is R50.00.

The fee for a copy of the manual is R1.10 for every photocopy of an A4-size page or part thereof.

(a) For every photocopy of an A4-size page or part thereof	R1.10
(b) 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
(c) For a copy in a computer-readable form on compact disc	R70.00

<p>(d) (i) For a transcription of visual images, for an A4-size page or part thereof</p> <p>(ii) For a copy of visual images</p>	<p>R40.00</p> <p>R60.00</p>
<p>(e) (i) For a transcription of an audio record, for an A6-size page or part thereof</p> <p>(ii) For a copy of an audio record</p>	<p>R20.00</p> <p>R30.00</p>
<p>(f) To search for and prepare the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation</p>	<p>R30.00</p>
<p>(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form</p>	<p>R0.75</p>
<p>(c) For a copy in a computer-readable form on compact disc</p>	<p>R70.00</p>
<p>(d) (i) For a transcription of visual images, for an A4-size page or part thereof</p> <p>(ii) For a copy of visual images</p>	<p>R40.00</p> <p>R60.00</p>

ANNEXURE A

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]

Section 1.01 A. Particulars of private body

The Head:

Section 1.02

Section 1.03 B. Particulars of person requesting access to the record

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| <p>(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.</p> |
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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:

Section 1.04 C. Particulars of person on whose behalf request is made

<p>This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person.</p>

Full names and surname:

Identity number:

D. Particulars of record

- | |
|---|
| <p>(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.</p> |
|---|

1 Description of record or relevant part of the record:

2 Reference number, if available:

3 Any further particulars of record:

Section 1.05 E. Fees

- | |
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| <p>(c) 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.
(d) You will be <i>notified</i> of the amount required to be paid as the request fee.</p> |
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- (e) 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.
- (f) If you qualify for exemption *of the payment of any fee*, please state the reason for exemption.

Reason for exemption from payment of fees:

Section 1.06 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.	
NOTES:	
(a) Compliance with your request in the specified form may depend on the form in which the record is available.	
(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.	
(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document
4. If record is held on computer or in an electronic or machine-readable form:			
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (usb 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

Section 1.07 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:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

Section 1.08 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
.....20 of

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE