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

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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 Mama Money Financial Services (Pty) Ltd	 2013/022174/07 2016/296253/07
Chief Executive Officer & Information Officer	Raphael Grojnowski
Deputy Information Officer	Gert Kruger
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 - HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

3.1 The Information Information Regulator has, in terms of section 10(1) of the Act, as amended, updated and made available the revised Guide on how to use the Act ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the Act and the Protection of Personal Information Act ("POPIA").

3.2 The Guide is available in each of the official languages and in braille.

3.3 The aforesaid Guide contains the description of-

3.3.1 the objects of PAIA and POPIA;

3.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

3.3.2.1 the Information Officer of every public body, and

3.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

3.3.3 the manner and form of a request for-

3.3.3.1 access to a record of a public body contemplated in section 11; and

3.3.3.2 access to a record of a private body contemplated in section 50;

3.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

3.3.5 the assistance available from the Information Information Regulator in terms of PAIA and POPIA;

3.3.6 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-

3.3.6.1 an internal appeal;

3.3.6.2 a complaint to the Information Information Regulator; and

3.3.6.3 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 Information Information Regulator or a decision of the head of a private body;

3.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

3.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

3.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

3.3.10 the regulations made in terms of section 92.

3.4 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 Information Regulator, during normal working hours.

3.5 The Guide can also be obtained-

3.5.1 upon request to the Information Officer;

3.5.2 from the website of the Information Regulator (**https://www.justice.gov.za/inforeg/**).

3.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours- English and Xhosa.

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**	These include but are not limited to following: • Company Act Records: including ○ 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 • Any records which a third party has provided to us about any of its personnel
2.	**Human Resources Records**	These include but are not limited to following: • 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**	These include but are not limited to following: • Operational records • Databases • Information technology • Marketing records • Internal correspondence

		• Product records • Statutory records • Internal policies and procedures
4.	**Financial Records**	These include but are not limited to following: • Annual Financial Statements • Audit Records • Tax Returns • Accounting Records • Banking Records • Bank Statements • Paid Cheques • Electronic Banking Records • Asset Register
5.	**Income Tax Records**	• PAYE records • Documents issued to employees for income tax purposes • Records of payments made to SARS on behalf of employees • All other statutory compliances: ○ Vat ○ Regional Services Levies ○ Skills Development Levies ○ UIF ○ Workmen's Compensation
6	**Third Parties** ○ ○	We may possess records pertaining to other parties / third parties, including without limitation, contractors, suppliers, subsidiary companies, and other service providers. These records include: • Service level agreements • Rental Agreements • Supply agreements • Financial records • Correspondence Such other parties may possess records which can be said to belong to

		us. The following records fall under this category: • Personnel, client, or our records which are held by another party • Records held by us pertaining to other parties, including without limitation: ○ 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 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:
(i) Purpose of processing personal information	• To deliver the services requested to customers. • Engagement of employees, job applicants (successful or unsuccessful) and third-party service providers.
(ii) Description of categories of data subjects and of information or categories of information relating thereto	**Categories data subjects:** • Customers • Employees • Job applicants (successful or unsuccessful) • Third-party service providers. **Categories information** Personal information, as further detailed in the privacy policy.
(iii) Recipients or categories recipients to whom the personal information may be	We may only share personal information of data subjects with selected third parties

supplied	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.
(iv) Planned transborder flows of personal information	No personal information is transferred outside of the Republic of South Africa unless – • recipient country can offer such data an "adequate level" of protection; • the data subject provides its prior written consent to the transfer; • 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.
• (iv) General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information •	Personal information of clients and employees are processed and stored securely within the Mama Money secure cloud infrastructure. Security controls, such as encryption,

	Firewalls, intrusion detection, vulnerability management, multi factor authentication, anti-malware software is used. • All personal information is managed with restricted access, degrees of power, and separation of functions. • Mama Money has taken efforts, and will continue to take steps, to ensure that third-party providers processing personal information on Mama Money's behalf use sufficient protection within our commercial agreements and in accordance with privacy laws.

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
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40.00

(ii) For a copy of visual images	R60.00
(e) (i) For a transcription of an audio record, for an A6-size page or part thereof (ii) For a copy of an audio record	R20.00 R30.00
(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	R30.00
(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
(d) (i) For a transcription of visual images, for an A4-size page or part thereof (ii) For a copy of visual images	R40.00 R60.00

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 I.1 A. Particulars of private body

The Head:

Section I.2
Section I.3 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:

Section I.4 C. Particulars of person on whose behalf request is made

This section must be completed *ONLY if* a request *for information is* made on behalf of *another* person.

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:
2 Reference number, if available:
3 Any further particulars of record:

Section I.5 E. Fees

(c)	A request for access to a record, other *than* a record containing personal information about yourself, will be processed only after a request fee has been paid.
(d)	You will be *notified of* the amount required to be paid as the request fee.
(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 I.6 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:					
	copy of record*		inspection of record		
2. If record consists of visual images this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)					
	view the images		copy of the images"		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack audio cassette		transcription of soundtrack* written or printed document		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record"		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 I.7 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 I.8 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 ……20

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE