



# CCI Promotion of Access to Information Manual

CCI South Africa

## Document Administration Details

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Classification: This document has been issued strictly for internal business purposes of the amalgamated CCI Group of companies.

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## Revision History

Version	Reason of Revision	Review Date	Effective Date	Summary of Changes
V1.0	New Document	09 April 2018	09 April 2018	Creation of Document
V2.0	Approved document updated	August 2023	September 2023	Alignment with legislative requirements

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## 1. Definitions.

If these definitions or other words or phrases used in the Manual are still unclear, please consult the 'Administration Contact' as captured in the in the 'Document Administration Details' section above.

Term	Description
PAIA	Promotion of Access to Information Act
POPIA	Protection of Personal Information Act
CCI	Call Centre International South Africa (PTY) Ltd
Access Fee	A fee prescribed for the purposes of section 22(6) or 54(6)
Regulator	Information Regulator South Africa
Private Body	A natural person who carries or has carried on any trade, business or profession.
Public Body	Any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government
Employee	Any person who works for or provides services to or on behalf of CCI. This person is remunerated for their work or should be paid for their work. Personnel also includes any person who assists in carrying out or conducting the business of CCI as well as, without limitation, any directors, trustees, all permanent, temporary, and part0time staff, and contract workers
Client, Customer or User	Any natural or juristic entity that receives services or products from CCI, this includes prospective clients, customers.

## 2. Foreword.

CCI South Africa ('CCI') is a business process outsourcing company providing services to clients in various industries globally. This is CCI's Promotion of Access to Information Manual ('PAIA Manual') in terms of the Promotion of Access to Information Act 2 of 2000 ('PAIA') and the Protection of Personal Information Act 4 of 2013.

The purpose of this manual is to facilitate requests for access to information of CCI, its holding company, subsidiaries and/or related group entities, as the case may be. This manual is not exhaustive of, nor does it comprehensively deal with, every procedure provided for in the PAIA. Requesters are advised to familiarise themselves with the provisions of the PAIA before making any requests to CCI in terms of the PAIA.

In terms of the PAIA, this PAIA Manual makes it possible for external parties to know what types of information we have and to request access to such information.

The motivation for giving effect to the right of access to information is to foster a culture of transparency and accountability in both public and private bodies and to promote a society in which the people of the Republic of South Africa have effective access to information to enable them to fully exercise and protect all their rights.

Section 9 of the PAIA recognises that such right of access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

*limitation aimed at the reasonable protection of privacy; commercial confidentiality; and effective, efficient, and good governance; and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.*

## 3. Warranties and Representations.

CCI makes no representation and gives no undertaking or warranty that the information in this manual or any information provided by it to a requester is complete or accurate, or that such information is fit for any purpose. All users of any such information shall use such information entirely at their own risk, and CCI shall not be liable for any loss, expense, liability, or claims, howsoever arising, resulting from the use of this manual or of any information provided by CCI or from any error therein.

All users irrevocably agree to submit exclusively to the law of the Republic of South Africa and to the exclusive jurisdiction of the Courts of South Africa in respect of any dispute arising out of the use of this manual or any information provided by CCI.

## 4. Key Contact Details for Access to Information of CCI.

### **Access to information general contact:**

Email: [privacy@cci-sa.co.za](mailto:privacy@cci-sa.co.za)

### **Information Officer:**

Name: Christopher Lawson

Email: [Christopher.lawson@cci.digital](mailto:Christopher.lawson@cci.digital)

### **Deputy Information Officer:**

Name: Mpho Bulamazi

Email: [Mpho.bulamazi@ccisouthafrica.com](mailto:Mpho.bulamazi@ccisouthafrica.com)

### **CCI Head Offices:**

Physical Address: 3 The High Street, Umhlanga, 4319 South Africa

Postal Address: Same as above

Telephone 0312861600

Website <https://www.cci-sa.co.za>

## 5. Guide on how to use the PAIA Manual.

The PAIA manual grants requesters 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.

Requests in terms of the PAIA Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the PAIA Act.

Requesters are referred to the Guide in terms of Section 10 of the PAIA Act.

- The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use the PAIA (“Guide”), in an easily comprehensible manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the PAIA and POPIA.
- The Guide is available in each of the official languages and in braille.
- The aforesaid Guide contains the description of –
  - the objects of the PAIA and POPIA, the postal 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 and section 56 of POPIA.
- The manner and form of a request for access to record of a public body contemplated in section 11 and access to record of a private body contemplated in section 50.
- The assistance available from the Information Officer of a public body in terms of POPIA and PAIA, the assistance available from the Regulator in terms of PAIA and POPIA.
- 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 –
  - an internal appeal a complaint to the Regulator and 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.
- 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, the provision of section 15 and 52 providing the voluntary disclosure of categories of records by a public and private body respectively.
- The notices issued in terms of section 22 and 54 regarding fees to be paid in relation to requests for access, and the regulations made in terms of section 92.
- 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.
- The Guide can also be obtained upon request to the Information Officer

### Information Regulator Details:

Postal address:           The Information Regulator (South Africa)  
                                   PO Box 31533  
                                   Braamfontein  
                                   2017

Tel:                         0100235200

Enquiries:                [enquiries@inforregulator.org.za](mailto:enquiries@inforregulator.org.za)

Website:                 <https://inforegulator.org.za/>

## 6. General records held by CCI include but not limited to:

Categories of Records	Types of Records
Human Resources	<ul style="list-style-type: none"> <li>• Human Resources Policies and Procedures</li> <li>• Disciplinary Hearings</li> <li>• Performance Management</li> <li>• Employee Development</li> <li>• Employment Contracts</li> <li>• Internal Audit Reports</li> <li>• Meeting Minutes</li> <li>• Skills Development and Training Plans</li> <li>• Employment Equity Plans and Statistics</li> </ul>
Marketing and Branding	<ul style="list-style-type: none"> <li>• Photographs</li> <li>• Videos</li> <li>• Slides</li> <li>• Brochures</li> </ul>
Risk and Compliance	<ul style="list-style-type: none"> <li>• Risk Register</li> <li>• Regulatory Universe</li> <li>• Policies and Procedures</li> <li>• Internal Review Reports</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Finance Policies and Procedures</li> <li>• Annual Budget</li> <li>• Fixed Assets Registers</li> <li>• Internal Audit Reports</li> <li>• External Audit Reports</li> <li>• Financial Statements</li> <li>• Reports</li> <li>• Meeting Minutes</li> <li>• Tax Returns</li> <li>• Audit Records</li> </ul>
Legal	<ul style="list-style-type: none"> <li>• Contractual Agreements</li> <li>• Service Level Agreements</li> <li>• Board and Committee Meetings</li> <li>• Terms of Reference</li> </ul>

## 7. Description of records available in accordance with legislation.

CCI is primarily regulated by various laws including but not limited to:

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Guidance Notes	Financial Intelligence Centre Act 38 of 2001
Incident Register	Occupational Health and Safety Act 85 of 1993
Employment Equity Act Reports	Employment Equity Act, 55 of 1998;
Tax Certificate	Income Tax Act, 58 of 1962;
Representative Register	Financial Advisory and Intermediary Services Act 37 of 2002
Committee Charter	Occupational Health and Safety Act, 85 of 1993;
Terms of Reference	Protection of Personal Information Act, 4 of 2013;
UIF Compliance Certificate	Unemployment Insurance Act, 63 of 2001



Letter of Good Standing	Compensation of Injuries and Diseases Act 130 of 1993
BBBEE Certificate	Broad Based Black Economic Empowerment Act 53 of 2003
VAT Certificate	Value Added Tax Act, 89 of 1991.
PAIA Manual	Promotion of Access to Information Act 2 of 2000

## 8. The recipients or categories to whom personal information may be supplied to.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number, address, Identity number and names, for criminal checks	South African Police Services
Qualifications, Identity number for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information, name, Identity number	Credit Bureaus
Income statements	SARS

## 9. Description of Data Subject categories and categories of information relating thereto.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Third Parties	names, registration number, vat numbers, address, bank details, contractual records,
Employees	address, qualifications, gender and race, identity number, tax number, cell phone number, address, biometric, image, medical condition, criminal history, bank details, name, age, pregnancy, language, culture

## 10. Purpose of Processing Personal Information.

POPIA requires responsible parties to process personal information of a data subject for a specific purpose, CCI's purpose of processing personal information will generally depend on the nature of personal information and data subject concerned, the specific purpose to which personal information is processed is disclosed to enable the data subject to make an explicitly informed decision at the time which personal information was collected.

### Customers / Clients

CCI processes clients/customer related data for business administration purposes, such as tailoring services to client specific requirements to fulfil contractual obligation.

### Third Parties

CCI processes records on other parties for business administration purposes such as making payments to our suppliers, contractors and service providers for service and product offerings.

## Employees

CCI processes employee data for business administration purposes and to further meet regulatory and reporting requirements set by various legislation such as Employment Equity Act, Income Tax Act etc.

## 11. Planned Transborder Flows of Personal Information.

CCI has not planned any transborder flow of personal information, however may need to transfer data subjects' personal information to further business activities in countries outside of South Africa, in which case we will fully comply with applicable data protection legislation as prescribed in the Protection of Personal Information Act, CCI will ensure that anyone to whom it pass personal information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection and the third party agrees to treat that personal information with the same level of protection as CCI is required under the POPIA.

## 12. General Description of Information Security Measures at CCI.

CCI continuously establishes and maintains appropriate, reasonable technical and organisational measures by taking appropriate, reasonable technical and organisational measures to safeguard and prevent information under its care from:

- Loss of, damage to or unauthorised destruction of personal information
- Unlawful access to or processing of personal information

### CCI has also taken reasonable measures to:

- Identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control.
- Establish and maintain appropriate safeguards against the risks identified.
- Regularly verify that safeguards are effectively implemented and
- Ensure that safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

### Measures taken by CCI to safeguard information under its care include but not limited to:

- Access Control
- Encryption
- Data Backups
- Anti-Virus and Antimalware
- Awareness Programmes

## 13. Procedure of Access to Records held by CCI.

Section 18 of PAIA prescribes the procedure to be followed in making a request for access to information held by a private/public body. Section 23(1) of POPIA also provides the procedure to access personal information. The manner of access to personal information in terms of section 23 of POPIA should be in accordance with section 18 of PAIA.

A **requester** or data subject must use the prescribed form, FORM 2, when requesting access to a record or personal information.

A **requester** is any person making a request for access to a record of CCI and in this regard, the PAIA distinguishes between two types of requesters for access to information, i.e., Personal Requester, (data subject) and Other Requester.

A data subject is a requester who, having provided adequate proof of identity, is seeking access to a record containing personal information about the data subject. Subject to the provisions of the PAIA and the POPIA, CCI will provide the requested information, or give access to any record about the data subject's personal information

within a reasonable time, (at a prescribed fee, if any) in a reasonable manner and format and in a form that is generally understandable. The prescribed fee for reproduction of the personal information requested will be charged by CCI;

A person falling in the category of “Other Requester” is entitled to request access to information pertaining to third parties. However, CCI is not obliged to grant access prior to the requester fulfilling the requirements for access to information in terms of the PAIA and the POPIA.

The Form 2 must be addressed and submitted to the Information Officer by hand, post or e-mail.

The requester must provide sufficient information of the record(s) requested in order for the Information Officer or Deputy Information Officer, if any, to identify the record(s). The prescribed form must be filled in with enough particularity to at least enable the Information Officer to identify:

- The identity of the requester
- Particulars of record requested
- Type of record
- Form of access
- Manner of access

Some additional important points to remember when completing the request form:

- each section of the form contains instructions that should be followed to improve the likelihood of the request being granted with minimal delay being experienced;
- if records are requested on behalf of another person, please provide a copy of the mandate authorising you to act on behalf of another person;
- a detailed description of the records being requested must be provided to enable the Information Officer or Deputy Information Officer to identify it accurately.

The requester must indicate, as per section 29(2) of PAIA, the form of access that is required.

CCI will only provide records to requestors once all the prerequisites have been met and access has been granted by the Information Officer in English.

An oral request for access to a record(s) may be made if the requester does not have a formal education or has a disability. The Information Officer or Deputy Information Officer will assist the requester to complete the prescribed form on behalf of such requester and provide them with a copy of the completed form.

The requester will be notified of the prescribed fee payable, if any, the method of payment and the office to which they can make such payment or submit proof of payment before a request for information is processed further.

The request for information will, in terms of Section 25 of PAIA, be processed by the Information Officer within 30 days after receipt of the request or as soon as is reasonably possible, whereafter the Information Officer will inform the requester of their decision, either to grant or reject the request for access to records. The decision must, if it is reasonably possible, be communicated in the manner requested by the requester.

The Information Officer to whom a request for access has been made or transferred, may extend the period of 30 days referred to in section 25(1) (in this section referred to as the “original period”) once for a further period of not more than 30 days, if:

- the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of CCI.
- the request requires a search for records in, or collection thereof from, an office of CCI not situated in the same town or city as the office of the Information Officer and cannot reasonably be completed within the original period;
- consultation among divisions of CCI or with another public body is necessary or desirable to decide upon the request and such decision-making process cannot reasonably be completed within the original period;
- more than one of the circumstances contemplated in paragraphs above exist in respect of the request making compliance with the original period not reasonably possible; or
- the requester consents in writing to such extension

If a period is extended in terms of Section 25(1), the Information Officer must, as soon as reasonably possible, but in any event within 30 days, after the request is received or transferred, notify the requester of that extension.

The notice must state:

- the period of the extension
- adequate reasons for the extension, including the provisions of this Act relied upon and
- that the requester may lodge a complaint to the Information Regulator or an application with the court against the extension

## 14. PAIA Prescribed Fees.

The PAIA provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any) before further processing of the request.

If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the information officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the requester has paid the required fees.

A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is subsequently refused, then the Information Officer will repay the deposit to the requester.

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed request fee of R100 before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- The fee structure applicable to the PAIA requests is in terms of this clause and all fees applicable are as prescribed and may be amended from time to time.

Description	Fee
for every photocopy of an A4-size page or part thereof	R1,50 per page
for every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R1.50 per page
for a copy in a computer-readable form on compact disc	R60
for a transcription of visual images, for an A4-size page or part thereof	This service will be outsourced. The fee will depend on the quotation from the service provider
for a copy of visual images	R60
for transcription of an audio record, for an A4-size page or part thereof	R20
for a copy of an audio record	R24

Description	Fee
to search for the record for disclosure, charged per hour reasonably required for such search;	R30 per hour
the actual postal fee is payable when a copy of a record must be posted to a requester.	Actual postal fee

## 15. Grounds For Refusal.

The main grounds for CCI to refuse a request for information relate to the:

- mandatory protection of privacy of a third party who is a natural person;
- mandatory protection of the commercial information of a third party;
- mandatory protection of confidential information of third parties if it is protected in terms of any agreements;
- mandatory protection of the safety of individuals and protection of property;
- mandatory protection of records which would be regarded as privileged in legal proceedings;
- mandatory protection of the commercial activities of CCI;
- the research information of CCI or a third party, if its disclosure would disclose the identity of CCI, the researcher or the subject matter of the research and would place the research at a serious disadvantage; and
- requests for information that are clearly frivolous, or which involve an unreasonable diversion of resources shall be refused.

## 16. Remedies Available When CCI Refuses a Request for Access to Information.

### Internal Remedies

CCI does not have internal appeal procedures, the Courts will have to be approached if the request for information is refused. This would apply to any situation in which the requester wishes to appeal a decision made by the Information Officer.

### External Remedies

A requester who is dissatisfied with an Information Officer’s refusal to disclose information, may, within 30 days of notification of the decision, apply to a Court for relief. Likewise, a third party dissatisfied with an information officer’s decision to grant a request for information, may, within 30 days of notification of the decision, apply to a Court for relief. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and the Magistrates Court.

## 17. Records That Cannot be Found.

If CCI searches for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

## 18. Amendment To This Manual.

Amendments to or a review of this PAIA Manual will take place on an *ad hoc* basis. Interested parties are advised to access our website periodically to inform themselves of any changes. Where material changes take place interested parties may view the changes as available on the CCI website.

Amendments to or a review any aspects relating to the POPIA processes outlined in this PAIA Manual will take place on an *ad hoc* basis. Interested parties are advised to access our website periodically to inform themselves of

any changes. Where material changes take place interested parties may view the changes as available on the CCI website.

## 19. Availability of the Manual.

This manual is also available at CCI's website: <https://www.cci-sa.co.za> and at the offices of CCI.