

**Lesaka Technologies Proprietary Limited
and its subsidiaries**

(hereinafter referred to as "Lesaka")

(Registration no.: 2002/031446/07)

**MANUAL PREPARED IN ACCORDANCE WITH SECTION
51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT NO. 2 OF 2000 ("PAIA")**

(hereinafter referred to as the "Manual")

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1. CONTACT DETAILS

Lesaka Technologies Proprietary Limited and its direct and indirect subsidiaries:

- Net1 Finance Holdings (Pty) Ltd;
- Prism Holdings (Pty) Ltd;
- Net1 Universal Electronic Technological Solutions (Pty) Ltd;
- Net1 Mobile Solutions (Pty) Ltd;
- Moneyline Financial Services (Pty) Ltd;
- Manje Mobile Electronic Services (Pty) Ltd;
- Prism Payment Technologies (Pty) Ltd;
- RMT Systems (Pty) Ltd;
- Connect Group;
- EasyPay (Pty) Ltd; and
- The Smart Life Insurance Company Limited¹.

Contact person: Lincoln Camagu Mali

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E-mail: popicompliance@net1.com

Website: www.lesakatech.com

¹ Smart Life is an independent business unit with their own Compliance Function and therefore, is managed separately.

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|------------------------------|---|-----------------------------------|--------------|
| Approved by: Lesaka Board | Last revision date: July 2022 Version: 3 | Date of next review: July 2023 | Page 2 of 27 |
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2. HOW TO USE PAIA TO ACCESS INFORMATION

(Information provided in terms of section 51(1) of PAIA)

PAIA 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 in terms of PAIA, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.

A guide on how to use PAIA is required to be compiled by the Information Regulator and when same is available, will be accessible (in various official languages) on the Information Regulator's website and on our website or you may request a copy of the guide from us by contacting our Information Officer. You may also direct any queries to:

The Information Regulator of South Africa

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

E-mail: enquiries@infoeregulator.org.za

PAIAComplaints@infoeregulator.org.za

Website: <https://www.justice.gov.za/infoereg/index.html>

3. INTRODUCTION

Section 32 of the Constitution of the Republic of South Africa, No. 108 of 1996 (“the Constitution”) provides:

- (1) *Everyone has the right of access to –*
- (a) *any information held by the state; and*
 - (b) *Any information that is held by another person and that is required for the exercise or protection of any rights.*
- (2) *National legislation must be enacted to give effect to this right and may provide for reasonable measures to alleviate the administrative and financial burden on the state.*

Section 32 of the Constitution affords everyone the right to access information held by the State or any other person. The Constitution requires that national legislation be enhanced to give effect to this right. The Promotion of Access to Information Act, 2 of 2000 (“PAIA”), gives effect to this constitutional right of access as required in terms of sub-section (2).

The Act provides that a person must be given access to any record of a private body if the record is required for the exercise of any right² and the procedural requirements relating to a request have been complied with. The Act applies to any recorded information, regardless of form or medium, under the control of the private body, and whether or not the private body created it.

Where a request is made in terms of PAIA, the private or public body to which the request is made is obliged to release the information, except where PAIA expressly provides that the information must not be released. The Act sets out the requisite procedural issues attached to such request.

Lesaka has confirmed its status as a private body in terms of the definition in PAIA.

Overview of the Structure and Functions of Lesaka

Lesaka is a leading provider of payment solutions, transaction processing services and financial technology across multiple industries and in a number of emerging and developed economies.

Lesaka have developed and market a comprehensive transaction processing solution that encompasses their smart card-based alternative payment system for the unbanked and under-banked populations of developing economies and for mobile transaction channels. Lesaka 's market-leading system can enable the billions of people globally who generally have limited or no access to a bank

² After Lesaka has satisfied itself that the requester is seeking to exercise or protect a right and not an interest, Lesaka is then required to ascertain whether the information requested will assist the requester in exercising or protecting the right. The requester is therefore required to establish a nexus, or causal link between the right alleged and the information requested. It does not follow from the mere establishment of the right by the requester that he is automatically entitled to the information requested. The requester must establish that the information sought will assist him in exercising or protecting his right.

account to enter affordably into electronic transactions with each other, government agencies, employers, merchants and other financial service providers.

Our universal electronic payment system, or UEPS, and UEPS/ EMV derivative discussed below, uses biometrically secure smart cards that operate in real-time but offline, unlike traditional payment systems offered by major banking institutions that require immediate access through a communications network to a centralized computer. This offline capability means that users of our system can conduct transactions at any time with other card holders in even the most remote areas so long as a smart card reader, which is often portable and battery powered, is available. Our off-line systems also offer the highest level of availability and affordability by removing any elements that are costly and are prone to outages. Our latest version of the UEPS technology has been certified by the EuroPay, MasterCard and Visa global standard, or EMV, which facilitates our traditionally proprietary UEPS system to interoperate with the global EMV standard and allows card holders to transact at any EMV-enabled point of sale terminal or automated teller machine, ATM. The UEPS/ EMV technology has been deployed on an extensive scale in South Africa through the issuance of MasterCard-branded UEPS/ EMV cards to our social welfare grant customers. In addition to effecting purchases, cash-backs and any form of payment, our system can be used for banking, healthcare management, international money transfers, voting and identification.

We also provide secure financial technology solutions and services, by offering transaction processing, financial and clinical risk management solutions to various industries. We have extensive expertise in secure online transaction processing, cryptography, mobile telephony, integrated circuit card (chip/smart card) technologies, and the design and provision of financial and value-added services to our cardholder base.

Our technology is widely used in South Africa today, where we process debit and credit card payment transactions on behalf of a wide range of retailers through our EasyPay system, process value-added services such as bill payments and prepaid airtime and electricity for the major bill issuers and local councils in South Africa and provide mobile telephone top-up transactions for all of the South African mobile carriers. We provide financial inclusion services such as microloans, insurance, mobile transacting and prepaid utilities to our cardholder base.

4. LESAKA'S PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 ("POPIA")

(Information required under section 51(1)(c) of PAIA)

Purpose of Lesaka 's processing of personal information -

- 4.1 Lesaka will process personal information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant data subject.
- 4.2 Lesaka will retain personal information only for as long as is necessary to accomplish Lesaka 's legitimate business purposes or for as long as may be permitted or required by applicable law.

We use the personal information we collect:

- 4.3 for the purposes of providing products or services to customers and where relevant, for purposes of doing appropriate customer onboarding and credit vetting;
- 4.4 for purposes of onboarding suppliers as approved suppliers of Lesaka. For this purpose, Lesaka will also process a supplier's personal information for purposes of performing credit checks, and this may include engaging third party credit vetting agencies;
- 4.5 for purposes of monitoring the use of Lesaka 's electronic systems and online platforms by consumers. Lesaka will, from time to time, engage third party service providers (who will process the data subject's personal information on behalf of Lesaka) to facilitate this;
- 4.6 for purposes of preventing, discovering and investigating non-compliance with Lesaka policies, and investigating fraud, or other related matters;
- 4.7 in connection with the execution of payment processing functions, including payment of Lesaka 's suppliers' invoices;
- 4.8 to provide a service to Lesaka customers in terms of relevant services agreements;
- 4.9 for employment-related purposes such as recruitment, administering payroll and carrying out background checks;
- 4.10 in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
- 4.11 in connection with external audit purposes. For this purpose, Lesaka engages external service providers and, in so doing, shares personal information of the data subjects with third parties;

- 4.12 to respond to any correspondence that Lesaka commercial customer may send to Lesaka, including via email or by telephone;
- 4.13 to contact the data subject for direct marketing purposes;
- 4.14 in order to address customer complaints in respect of Lesaka 's products and services;
- 4.15 for such other purposes to which the data subject may consent from time to time; and
- 4.16 for such other purposes as authorised and in compliance with the applicable law.
- 4.17 Lesaka will not use the personal information which we collect for any purposes other than those purposes specified above

Categories of data subjects and of the personal information relating thereto

- 4.18 Lesaka collects personal information directly from the data subject and/or from third parties, and where Lesaka obtains personal information from third parties, Lesaka will ensure that it obtains the consent of the data subject to do so or will only process the personal information without the data subject's consent where Lesaka is permitted to do so in terms of the applicable laws.
- 4.19 Data subjects in respect of which personal information is processed include Customers of Lesaka.
- 4.20 Examples of third parties from whom personal information is collected include; our customers when Lesaka handles personal information on their behalf; regulatory bodies; other companies providing services to Lesaka and where Lesaka makes use of publicly available sources of information.

Recipients or categories of recipients to whom personal information may be supplied

- 4.21 Lesaka may be required to disclose personal information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any court or tribunal. We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Lesaka, our customers, or others.
- 4.22 Lesaka will comply with POPIA before transferring personal information to a third party who is a contractor of Lesaka. Before transferring personal information to a third party contractor, such as an authorised service provider, Lesaka will obtain assurances from the third party that it will process personal information in a manner consistent with POPIA. Where Lesaka learns that a third party contractor is using or disclosing personal information in a manner contrary to POPIA, Lesaka will take reasonable steps to prevent such use or disclosure.

- 4.23 We reserve the right to disclose and transfer a data subject's information, including their personal information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

Planned Transborder Flows of personal information

- 4.23.1 In carrying out any cross-border transfers, Lesaka shall adhere to the provisions of POPIA and any applicable laws.

5. INFORMATION SECURITY MEASURES

The security and confidentiality of personal information is important to Lesaka. We have implemented reasonable technical, administrative, and physical security measures to protect personal information from unauthorised access or disclosure and improper use.

We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.

In processing any personal information, Lesaka shall comply with the following minimum technical and organisational security requirements:

- 5.1 **Physical Access** – Access to personal information is restricted in our offices and only to those employees who need the personal information to perform a specific job / task.
- 5.2 **Employee Training** – All employees with access to personal information are kept up-to-date on our security and privacy practices. After a new policy is added, these employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the personal information of all data subjects.
- 5.3 **Unique User Identification** – employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Lesaka 's password and confidentiality policy.
- 5.4 **Passwords** – Lesaka shall ensure that there are passwords required for any access to personal information in line with its password policy.
- 5.5 **Physical access and privileges** – Lesaka ensures that access to personal information is limited to employees on a "need to know" basis, and Lesaka employees are required to strictly utilise their unique user ID and applicable passwords to access same. The access to such personal information shall be subject to a two-step authorization/authentication process.
- 5.6 **Back-ups** – Lesaka ensures that all personal information is backed-up regularly, based on operational or legal requirements, and that back up testing is conducted regularly in order to ensure that personal information can be recovered in the event that such personal information is lost, damaged or destroyed.
- 5.7 **Malware protection** – Lesaka ensures that its environment has comprehensive malware protection software employed, which software is specifically designed to protect Lesaka from the most recent malware infections.
- 5.8 **Vulnerability scanning** – Lesaka frequently conducts vulnerability scanning in order to assess whether personal information is adequately protected from external threats.

- 5.9 **Network configuration** – Lesaka continuously monitors all designated networks, employs intrusion detection systems and/or intrusion prevention systems, and records any security incidents.
- 5.10 **Systems Review** – Lesaka conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

6. INFORMATION HELD BY LESAKA IN TERMS OF PAIA

(Information required under section 51(1)(e) of PAIA)

This section of the Manual sets out the categories and descriptions of records held by Lesaka. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records. List of records per subject (subject to qualifications below).

▪ **Client records**

- Bank holder details;
- Personal details (indicative details);
- Financial details (banking details and income); and
- Signed declaration by account holder.

Financial records

- Financial statements of company;
- Financial documents compiled by Auditors;
- Financial documents compiled by Actuaries;
- Internal budget documents;
- Cheque and banking facilities, bank account numbers;
- History documents on financial status of company; and
- Tax details.

Property records

- Names of properties owned by company;
- Property details: purchase/lease/selling information; and
- Legal documents as part of property information.

▪ **Investment records**

- Details of investments of company on JSE;
- Details of investment in property;
- Investment portfolios and formulas; and
- Investment performance and documents compiled by advisers.

▪ **Company records**

- Registration details;
- Company license information and details;

- Policies and procedures;
 - Sales;
 - Products;
 - Strategy;
 - Business directives;
 - Suppliers' contracts;
 - Personnel/staff details;
 - Pension/provident fund details; and
 - Medical Aid fund details.
- **Legal records**
 - Documents compiled by Attorneys;
 - Records of legal cases;
 - Appeal records; and
 - Cancellation/termination of membership legal records.
 - **Other records**

This includes four broad subjects:

- Personnel records;
- Customer-related records;
- Private body records;
- Records in the possession of or pertaining to other parties.

Personal records³

Personnel records include the following:

- Any personal records provided to Lesaka by their personnel;
- Any records a third party has provided to Lesaka about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

³ Personnel refers to any person who works for or provides services to or on behalf of Lesaka and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Lesaka. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Customer-related records⁴

Customer-related information includes the following:

- Any records a customer has provided to a third party acting for or on behalf of Lesaka;
- Any records a third party has provided to Lesaka;
- Records generated by or within Lesaka pertaining to the customer, including transactional records.

Private body records

The following are considered to include but not be limited to records which pertain to Lesaka's own affairs:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

Other Parties

Lesaka may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies and service providers. Alternatively, such other parties may possess records which can be said to belong to Lesaka.

The following records fall under this category:

- Personnel, customer, or private body records which are held by another party as opposed to being held by Lesaka; and
- Records held by Lesaka pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

⁴ A customer includes any natural or juristic entity who receives services from Lesaka.

7. LESAKA RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

(Information required under section 51(1)(b)(iii) of PAIA)

Certain legislation mandates Lesaka to allow any person access to specified information, upon request, irrespective of who that person may be. Access to information may be granted in terms of such other legislation if the manner of request is not more onerous than a request under PAIA.

Records are kept in accordance with legislation applicable to Lesaka, which includes but is not limited to, the following:

1. Basic Conditions of Employment Act 75 of 1997
2. Collective Investment Schemes Control Act 45 of 2002.
3. Companies Act 71 of 2008
4. Compensation for Occupational Injuries and Diseases Act 130 of 1993
5. Competition Act 89 of 1998
6. Constitution of the Republic of South Africa, 1996
7. Consumer Protection Act 68 of 2008
8. Electronic Communications and Transactions Act 25 of 2002
9. Employment Equity Act 55 of 1998
10. Financial Intelligence Centre Act 38 of 2001
11. Income Tax Act 58 of 1962 (Section 75)
12. Insolvency Act 24 of 1936
13. Labour Relations Act 66 of 1995
14. Long-Term -term Insurance Act 52 of 1998
15. National Credit Act 34 of 2005
16. Occupational Health and Safety Act 85 of 1993
17. Prevention of Organised Crime Act 121 of 1998
18. Promotion of Access to Information Act 2 of 2000
19. Pension Funds Act 24 of 1956
20. Protection of Personal Information Act 4 of 2013
21. Security Services Act 36 of 2004;
22. Skills Development Act 97 of 1998
23. Tax Administration Act 28 of 2011
24. Tax on Retirement Funds Act 38 of 1996
25. Trademarks Act 194 of 1993
26. Unemployment Insurance Act 63 of 2001
27. Value Added Tax Act 89 of 1991

Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of PAIA.

8. ACCESS TO RECORDS HELD BY LESAKA

8.1. Records /information which are automatically available to a person without the requirement of a formal request or the person having to request access in terms of PAIA:

1. Address and telephone details of company head office and provincial offices;
2. Web site and company e-mail address;
3. Management team names and company details (e-mail address, tel.& fax no);
4. Directors' names;
5. Total of staff members (numbers);
6. Contents in annual reports;
7. Contents in company magazine;
8. Contents in product brochures;
9. Names of suppliers of services (i.e. cleaning services, gardening etc.).

9. GRANTING OR DECLINING OF INFORMATION

9.1. Requests for access by a requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

- 9.1.1. where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);
- 9.1.2. where the request requires a search for records in, or collection of such records from, an office of Lesaka located far away from any of Lesaka 's regional offices;
- 9.1.3. consultation among divisions of Lesaka or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
- 9.1.4. more than one of the circumstances contemplated in paragraphs 9.1, 9.1.1 and 9.1.2, exist in respect of the request making compliance with the original period not reasonably possible; or
- 9.1.5. the requester consents in writing to such extension.

9.2. If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

Compulsory declining of requests for information

9.3. Requests for access by a requestor must be refused by the Information Officer if –

- 9.3.1. the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (see section 63 of PAIA);
- 9.3.2. the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (see section 64 of PAIA);
- 9.3.3. the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (see section 65 of PAIA);
- 9.3.4. the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);
- 9.3.5. the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (see section 67 of PAIA); or

- 9.3.6. the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (see section 69 of PAIA).

9.4. Requests for access by a requestor may be refused by the Information Officer if –

- 9.4.1. the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (see section 66(b));
- 9.4.2. the record:
- 9.4.3. contains trade secrets of Lesaka;
- 9.4.4. contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of Lesaka;
- 9.4.5. contains information, the disclosure of which could reasonably be expected:
- i. to put Lesaka at a disadvantage in contractual or other negotiations; or
 - ii. to prejudice Lesaka in commercial competition; or
 - iii. is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by Lesaka, except insofar as it is required to give access to a record to which access is granted in terms of PAIA; or
- 9.4.6. the record contains information about research being or to be carried out by or on behalf of Lesaka, the disclosure of which would be likely to expose: (a) Lesaka; (b) a person that is or will be carrying out the research on behalf of Lesaka; or (c) the subject matter of the research, to serious disadvantage.

- 9.5.** If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

10. REQUEST PROCEDURE

10.1. Details of submitting a formal request

1. Submit Request Form (Annexure A) for the attention of the appropriate Information Officer to the address, fax number or electronic mail address provided at paragraph 1 of this Manual.
2. Ensure that the right you wish to protect or exercise is fully described in the Request Form.
3. If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction
4. The information, if granted, will be supplied to the requester in a format applicable to the request. If declined the requestor will be notified in writing and will be provided with the reasons for the decision.

11. FEES

11.1 Lesaka may at any time choose to waive any request fee, access fee and/ or reproduction fee.

Request fees:

11.2 The Information Officer must by notice require the requester to pay the prescribed request fee (if any) before further processing the request (see s 54(1) of PAIA).

11.3 The fee that the requester must pay to a private body is [R50]. The requester may lodge an application to the court against the tender or payment of the request fee (See section 54(3)(b) of PAIA).

Access fees and fees for reproduction :

11.4 If access to a record/s is granted by Lesaka, the requester may be required to pay an access fee for the search for and preparation of the records and for re-production of the record/s.

11.5 The access fees which apply are set out below. Lesaka can refuse access until such access fees have been paid.

| Applicable fees for reproduction | Fee |
|---|---|
| The request fee payable by every requestor | R140.00 |
| Photocopy/printed black & white copy of A4 size page per page or part thereof | R2.00 |
| Printed copy of A4 size page or part thereof | R2.00 |
| For a copy in a computer-readable form on: | |
| a. Flash drive (to be provided by requestor) | R40.00 |
| b. Compact disc | |
| • If provided by requestor | R40.00 |
| • If provided to requestor | R60.00 |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on quotation from the Service provider. |
| Copy of visual images | |
| Transcription of an audio record, per A4 size page | R24.00 |
| Copy of an audio recorded on: | |

| | |
|--|---|
| Lesaka | Promotion of Access to Information Act Manual |
| a. Flash drive (to be provided by requestor) | R40.00 |
| b. Compact disc | |
| • If provided by requestor | R40.00 |
| • If provided to requestor | R60.00 |
| To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. | R145.00 |
| To not exceed a total cost of- | R435.00 |
| Deposit: If search exceeds 6 hours | One third of amount per request calculated in items of 2 to 8 |
| Postage, e-mail, or any other electronic transfer | Actual expense, if any. |

12. AVAILABILITY OF THE MANUAL

(Availability of Manual under section 51(3))

- 12.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Lesaka. Copies of the Manual may be made, subject to the prescribed fees.

13. REVIEW

The Audit Committee of the Company will periodically (preferably annually) review the [manual] and may recommend changes from time to time for the consideration of the Board.

Any proposed changes to this [manual] where indicated, shall be referred to the Board for appropriate action.

BOARD APPROVAL RECEIVED: SEPTEMBER 2022

ANNEXURE A – 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 Information Officer

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: _____

C. Particulars and approval of person/ data subject on whose behalf the 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: _____

Signed at _____ this _____ day _____ of 20 _____

Data subject signature

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 a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant: _____

2. Reference number, if applicable: _____

3. Any further particulars of the record: _____

E. Fees

- (a) 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.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) 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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: _____

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 here under, state your disability and indicate in which form the record is required.

Disability: _____

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 to 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 the 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* (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? | | | <input type="checkbox"/> YES |
| Postage is payable. | | | <input type="checkbox"/> NO |

G. Particulars of right to be exercised or protected

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

- Indicate which right is to be exercised or protected: _____

- Explain why the record requested is required for the exercise or protection of the right: _____

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