



BitCo
Telecoms

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer;
1.3	"IO"	Information Officer;
1.4	"Minister"	Minister of Justice and Correctional Services;
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000(as Amended);
1.6	"POPIA"	Protection of Personal Information Act No.4 of 2013;
1.7	"Regulator"	Information Regulator; and
1.8	"Republic"	Republic of South Africa



2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION FROM BITCO TELECOMS PTY LTD

3.1. Managing Director

Name: Dion Retief
Tel: 087 135 0000
Email: dion.retief@bitco.co.za

3.2. Information Officer

Name: Karen du Plessis
Tel: 087 135 0000
Email: karen.duplessis@bitco.co.za



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3.3. Deputy Information Officer

Name: Dion Retief
Tel: 087 135 0000
Email: dion.retief@bitco.co.za

3.4 Access to information general contacts

Email: popia@bitco.co.za

3.5 National or Head Office

Postal Address: Postnet Suite #86, Private Bag X 1, Jukskei Park, 2153

Physical Address: 29 Grosvenor Road, Bryanston, 2191

Telephone: 087 135 0000

Email: sales@bitco.co.za

Website: www.bitco.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

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

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

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

4.3.2.1. the Information Officer of every public body, and

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

4.3.3. the manner and form of a request for-

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

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

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



- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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 Regulator or a decision of the head of a private body;
- 4.3.7. 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;
- 4.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92.
- 4.4. 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 Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours
 - 4.6.1. English; and
 - 4.6.2. Afrikaans.

5. PROCEDURE TO REQUEST ACCESS TO INFORMATION

- 5.1. A request for access to information for a record held by BitCo Telecoms must be made on a form which corresponds substantially to that of Form 2 of the Regulations along with proof of payment of the prescribed fee to BitCo Telecoms' IO or DIO at the details listed **Error! Reference source not found..**
- 5.2. When completing Form 2 or a form substantially similar, a requester must provide clear and accurate information and clearly state the right which the requestor seeks to exercise or protect, the record which they are seeking to access and an explanation as to how such record will assist them to exercise or protect their rights.
- 5.3. BitCo Telecoms has 30 (thirty) days within which to respond to any request received. Once a decision has been made, BitCo Telecoms' IO or DIO will inform a requester of their

decision whether to grant or refuse a request and any fees payable on a form that corresponds substantially to that of Form 3 of the Regulations.

5.4. BitCo Telecoms may refuse a request for access to a record on any of the grounds listed in Chapter 4 of PAIA (which are listed in the PAIA Guide).

5.5. A requestor is required to pay the request fee before a request will be processed. The request fee is listed in Annexure B to the Regulations. The current request fee payable is **R140.00 (one hundred and forty Rand) per request.**

5.6. The request fee must be paid into BitCo Telecoms' nominated bank account, which details are available from our IO or DIO on request.

6. REMEDIES

6.1. If a requestor is unhappy with a decision made by BitCo Telecoms they may submit a complaint to the Regulator.

6.2. A complaint to the Regulator must be made on a form which corresponds substantially to that of Form 5 of the Regulations. A complaint to the Regulator must be lodged within 180 (one hundred and eighty) days of receipt of the decision from BitCo Telecoms.

6.3. The complaint will then follow the dispute resolution process described in the Regulations as well as the PAIA Guide.

7. CATEGORIES OF RECORDS OF BITCO TELECOMS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following records are made freely available by BitCo and do not require any request to access:

Category of records	Types of the Record	Where Available
Policies and Procedure	BitCo Complaints Procedure	On Website
	Kaltrade Complaints Procedure	On Website
	BitCo Acceptable and Fair Use Policy	On Website
	Take Down Procedure	On Website
	Social Media Policy	On Website
	Support Escalation Process/ Procedure	On Website
	BitCo Home Debit Order Mandate	On Website
Codes of Conduct	BitCo Code of Conduct and Service Charter	On Website
	Kaltrade Code of Conduct and Service Charter	On Website
	Code of Conduct	On Website
Terms and Conditions	Subscriber Terms and Conditions	On Website
	BitCo Home Terms and Conditions	On Website



8. DESCRIPTION OF THE RECORDS OF BITCO TELECOMS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The following records are freely available to the public in accordance with legislation –

Category of Records	Applicable Legislation
BitCo Memorandum of Incorporation	Companies Act 71 of 2008
BitCo PAIA Manual	Promotion of Access to Information Act 2 of 2000
BitCo Privacy Policy	Protection of Personal Information Act 4 of 2013

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BITCO TELECOMS (PTY) LTD

Subjects on which the body holds records

Subject of Records	Categories of Records
Company Secretarial	Memorandum of Incorporation; share certificates, resolutions, director registrations, minutes of meetings, share register
Human Resources	HR policies and procedures; available employment opportunities; employee records
Finance	Banking/bank account records; contractual agreements, accounting records, financial statements and reports, invoices
Insurance	Insurance policy documents
Intellectual Property	Trademarks, copyright, knowhow, and contractual agreements
Tax	Income tax records, contractual agreements
Commercial Agreements	Service level agreements; contractor agreements
Property	Lease agreements
Information Technology	Software licenses, data protection measures, data retention formulae, breach recovery processes

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing Personal Information

BitCo Telecoms processes personal information for, among other things, to deliver goods, services and fulfil the agreements we make with clients, as well as giving offers and developing good user experiences. Furthermore, personal information is used in the general processing and management of our customer relations. BitCo Telecoms may also process personal information to fulfil our obligations under laws and regulations.

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto:



Data Subjects	Personal Information that may be processed
Clients/Customers	Information from client on-boarding which includes personal information; contact details; employer information; bank account information; identity documentation.
Service Providers	Company information such as name, registration number, VAT information, registered address. Information obtained from service level agreements such as, trade secrets confidential information and banking information.
Employees / Directors / Shareholders	Full name, identify documentation, address, contact information, educational qualifications (including curriculum vitae), gender, race, banking information, tax information and medical information.
Independent Contractors / Currently not applicable to BitCo	Company information such as name, registration number, VAT information, registered address, and/or personal information such as full name, address, identity number, contact information and information obtained from contractual agreements such as confidential information, banking information and/or tax information.

10.3 The recipients or categories of recipients to whom the personal information may be supplied

Recipients or Categories of Recipients to whom the personal information may be supplied include the following:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Financial, banking, or accounting information	SOLID, Acumatica
Marketing and communication information	SOLID

10.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- Data protection training provided to staff;
- Data encryption software;
- Data access limitations that are implemented in the company's software.

11. AVAILABILITY OF THE MANUAL

11.1 A copy of the Manual is available -

11.1.1 on the company's website at www.bitco.co.za;

11.1.2 all of BitCo Telecoms' offices for public inspection during normal business hours;

11.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and



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11.1.4 to the Information Regulator upon request.

12. UPDATING OF THE MANUAL

The manual, will on a regular basis, be updated.

Issued by

K. du Plessis

Karen du Plessis – Information Office
Dion Retief – Managing Director