PROMOTION OF ACCESS TO INFORMATION ACT

SECTION 51 MANUAL

This Manual should be read with the Promotion of Access to Information Act, 2 of 2000 (PAIA), as amended, the PAIA Regulations, and the Protection of Personal Information Act, 4 of 2013 (POPIA).

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Introduction and Purpose

Connet IT Systems (Pty) Ltd t/a Connect Mobile Communication ("Connect Mobile") is a mobile communication and technology services company. This Manual is prepared in terms of section 51 of PAIA to assist persons who wish to request access to records held by Connect Mobile and to describe how Connect Mobile processes personal information for purposes of section 51(1)(c) of PAIA read with POPIA.

The Manual describes the records held by Connect Mobile, the procedure for requesting access, applicable fees and remedies, and the categories of personal information processed by the company. The inclusion of a category of record in this Manual does not mean that access will automatically be granted. Each request is considered in accordance with PAIA, including the applicable grounds for mandatory or discretionary refusal.

Company and Information Officer Details

Requests for access to records should be directed to legal@connect-mobile.co.za using the contact details below.

Particular	Details
Full name of juristic person	Connet IT Systems (Pty) Ltd
Trading name	Connect Mobile Communication
Registration number	2007/030256/07
Postal address	Postnet Suite 497, Private Bag X1, The Willows, Pretoria, 0041
Street address	79 Eros Road, Boardwalk Office Park, Block 12, Unit 2, Faerie Glen, Pretoria, 0081
Head / CEO / IO	Brendan White
Telephone	+27 12 991 4328
General email	info@connect-mobile.co.za
Deputy Information Officer	Louise Steenkamp

Email	legal@connect-mobile.co.za
Website	www.connect-mobile.co.za

Guide on how to use PAIA

The Information Regulator has published a Guide on how to use PAIA. The Guide explains, among other matters, the objects of PAIA, how to make a request for access to a record, assistance available from Information Officers and the Information Regulator, applicable fees, remedies, and the circumstances in which access may be refused. The PAIA Guide and prescribed forms are available from the Information Regulator: PAIA resources and forms.

Information Regulator	Current Contact Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Toll free	0800 017 160
Email	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za

Records Automatically Available

Certain information is available without a person having to submit a formal PAIA request. This may include information published on Connect Mobile's website or otherwise made publicly available by the company. Where Connect Mobile publishes a notice of categories of records that are automatically available in terms of section 52 of PAIA, that notice should be read with this Manual.

Category	Examples / Manner of Access
Company information	About the company, contact details and publicly published company information - available on the Connect Mobile website.
Products and services	Public descriptions of Connect Mobile products and services - available on the Connect Mobile website and published marketing material.
Public notices and publications	Notices, articles, newsletters or other material intentionally made public by Connect Mobile, where applicable.

Records Available in Terms of other Legislation

Connect Mobile creates and retains records in accordance with legislation applicable to its activities. The following legislation may apply, depending on the nature of the record and the company's obligations at the relevant time. This list is not intended to be exhaustive. Records will only be made available where disclosure is required or permitted by the applicable legislation and subject to any lawful restrictions.

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

Subjects and Categories of Records Held

Connect Mobile holds records relating to its corporate, financial, employment, commercial, technical and operational activities. Access to a record may be refused where PAIA requires or permits refusal, including where disclosure would unlawfully affect the privacy of a third party, commercial information, confidential information, safety or security, legally privileged material, or other protected interests. The principal subjects and categories include:

Subject	Categories of Records
Corporate and statutory	Incorporation documents; Memorandum of Incorporation; registers; board and shareholder records; director and officer records; statutory filings; governance records.
Finance and tax	Annual financial statements; accounting records; bank records and statements; asset register; invoices; supplier records; tax returns; VAT, PAYE, UIF and Skills Development Levy records; rental agreements.
Human resources	Employment contracts; policies and procedures; employment equity records; payroll and salary records; leave; training; disciplinary records; performance and recruitment records; benefit records; health and safety records.
Customers and commercial	Customer and prospect records; proposals; quotations; contracts; service schedules; account information; correspondence; billing records; service and support records.
Suppliers and partners	Supplier and partner contracts; onboarding and due-diligence records; contact information; invoices; payment records; performance and service records.
Products, services and operations	Service documentation; operational procedures; service configuration records; reports; usage and transaction records; service management and support records, subject to confidentiality and applicable law.
Information technology and security	IT policies and procedures; system and application records; access-control records; security and risk records; incident and

	change-management records; audit and monitoring records; business continuity and disaster recovery records.
Compliance and legal	PAIA and POPIA records; regulatory records; contracts; legal correspondence; compliance registers; policies; risk and audit records; certifications and assurance records.
Sales and marketing	Marketing material; campaigns; customer communications; sales records; website content; consent and preference records where applicable.
Intellectual property	Trade marks, copyrighted material, proprietary documentation, software-related records and other intellectual property records.

How to Request Access to Records

A requester seeking access to a record that is not automatically available must submit the prescribed Form 2 - Request for Access to Record - to Connect Mobile's Information Officer. A request may be submitted electronically to legal@connect-mobile.co.za or delivered to the company's address. The request must contain sufficient information to enable Connect Mobile to identify the requester and the requested record. In particular, the requester should:

- identify the record or records requested with sufficient particularity;
- provide the requester's contact details and indicate the preferred form of access;
- identify the right that the requester seeks to exercise or protect and explain why the requested record is required for that purpose;
- where the request is made on behalf of another person, provide proof of the capacity or authority in which the request is made; and
- if the requester wishes to receive the decision in a manner other than, or in addition to, a written response, specify the preferred method and provide the necessary contact details.

Connect Mobile may request reasonable clarification or supporting information where necessary to process the request. The Information Officer or delegated deputy will deal with the request in accordance with PAIA and the applicable Regulations.

Fees

PAIA permits prescribed request and access fees to be charged. Where a fee is payable, Connect Mobile will notify the requester in accordance with the prescribed process. Access to a record may be deferred until the applicable fee has been paid. The current private-body fee structure published by the Information Regulator is reproduced in Annexure A for convenience; if the prescribed tariff changes, the tariff in force at the time of the request will apply.

Decision on a Request and Remedies

Connect Mobile will consider a request and communicate its decision in accordance with PAIA. The outcome and any fees payable may be communicated using the prescribed Form 3 - Outcome of Request and of Fees Payable. If access is granted, the requester will be informed of the form in which access will be provided and any applicable access fee.

If access is refused, the requester will be provided with the reasons for refusal to the extent required by PAIA and informed of the applicable remedies. As Connect Mobile is a private body, PAIA does not provide an internal appeal procedure against its decision. A requester may, subject to PAIA, lodge a complaint with the Information Regulator using the prescribed complaint process (Form 5) or approach a competent court for appropriate relief.

Processing of Personal Information in Terms of POPIA

Connect Mobile processes personal information only for legitimate business, contractual, operational and legal purposes. Depending on the relationship and service concerned, these purposes may include:

- providing, administering, supporting and improving communication and technology services;
- customer, supplier, partner and account administration;
- billing, payments, accounting, audit and financial administration;
- employee administration, recruitment, payroll, training and workplace management;
- responding to enquiries, support requests and complaints;
- sales, marketing and relationship management, subject to applicable consent and direct-marketing requirements;
- security, fraud prevention, access control, monitoring, incident management and business continuity;
- meeting legal, regulatory, contractual, audit and compliance obligations; and

- processing information on behalf of customers where Connect Mobile acts as an operator in the delivery of contracted services.

Data Subject Category	Examples of Personal Information Processed
Customers, prospects and their representatives	Names; job titles; business and contact details; account and contractual information; billing and payment information; correspondence; support and service records.
End users / subscribers	Mobile numbers and other identifiers; service interaction, transaction, messaging or usage-related information; technical information and other data processed in connection with services, depending on the relevant customer solution.
Employees, former employees and applicants	Identification and contact details; employment history; qualifications; payroll, tax and banking information; benefits; leave; training; performance; disciplinary and other employment-related records.
Suppliers, partners and service providers	Names; contact and business details; contracts; due-diligence information; banking and payment information; correspondence and performance records.
Website and platform users	Contact information; account identifiers; device, log and technical information; enquiry and interaction information; cookies or similar information where applicable.
Visitors and other business contacts	Contact details; visitor/access records; correspondence and other information reasonably required for security or business engagement.

Where necessary and lawful, personal information may be disclosed to or processed by categories of recipients such as:

- customers or authorised customer representatives, where Connect Mobile processes information in providing contracted services;
- mobile network operators, telecommunications providers and other communication service providers;
- hosting, cloud, software, infrastructure, security and technology service providers;
- banks, payment providers, accountants, auditors and other financial service providers;

- professional advisers, insurers and legal service providers;
- regulators, law-enforcement bodies, courts, government departments or other public authorities where required or permitted by law; and
- other contracted operators or service providers that process information on Connect Mobile's behalf.

Connect Mobile may transfer or permit access to personal information outside South Africa where this is necessary for a service, technology platform, customer requirement or business operation. Any such transfer must be undertaken in accordance with POPIA, including section 72 where applicable, and subject to appropriate contractual, organisational or other safeguards. The actual destination and safeguards depend on the service and service providers concerned.

Security Safeguards

Connect Mobile maintains appropriate and reasonable technical and organisational safeguards designed to protect the confidentiality, integrity and availability of personal information and other information assets. Safeguards are selected having regard to the nature of the information and the risks associated with processing. These safeguards may include, as appropriate:

- information-security governance, policies and procedures;
- identity and access management, authentication and least-privilege controls;
- network, system and endpoint security controls;
- logging, monitoring and security incident management;
- backup, recovery, business continuity and disaster recovery controls;
- vulnerability, patch and change management;
- employee confidentiality obligations, awareness and training;
- supplier and operator due diligence and contractual controls;
- physical and environmental security measures; and
- risk assessment, audit, review and continuous improvement within Connect Mobile's information-security management framework.

Availability and Updating of this Manual

This Manual is available on Connect Mobile's website and for public inspection at its principal place of business during normal business hours, subject to reasonable arrangements. A copy may also be requested by sending an email to legal@connect-mobile.co.za.

Connect Mobile will review and update this Manual when material changes occur to its records, processing activities, contact details, applicable legal requirements or Information Regulator guidance. The current version should be used when making a request.

Annexure A - Current Private-body PAIA Fee Structure

The following fees reflect the private-body fee structure published by the Information Regulator in 2026. The prescribed tariff in force at the time of a request prevails if it differs from this annexure.

Item	Description	Amount
1	Request fee payable by every requester	R140.00
2	Photocopy or printed black-and-white copy of an A4-size page or part thereof	R2.00 per page
3	Printed copy of an A4-size page or part thereof	R2.00 per page
4	Computer-readable copy: flash drive supplied by requester; CD supplied by requester; CD supplied by body	R40.00 / R40.00 / R60.00
5	Transcription of visual images	Outsourced - quotation
6	Copy of visual images	Outsourced - quotation
7	Transcription of an audio record, per A4-size page	R24.00
8	Audio copy: flash drive supplied by requester; CD supplied by requester; CD supplied by body	R40.00 / R40.00 / R60.00
9	Search and preparation, for each hour or part thereof excluding the first hour; maximum	R145.00 per hour; max R435.00
10	Deposit if search exceeds six hours	One third of applicable amount
11	Postage, email or other electronic transfer	Actual expense, if any

Annexure B - Useful PAIA Forms and Resources

Resource	Purpose
Form 2 - Request for Access to Record	Used to submit a formal request for access to a record.
Form 3 - Outcome of Request and of Fees Payable	Used to communicate the outcome of a request and applicable fees.
Form 5 - Complaint Form	Used to lodge a PAIA complaint with the Information Regulator, where applicable.
PAIA Guide	Explains how PAIA works, rights and procedures, fees and remedies.

Current forms and the PAIA Guide: Information Regulator - PAIA

Information Regulator eServices: eServices portal