

ROCKETSEED 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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Companies Concerned

The South African entities of the Rocketseed Group, which are relevant to the Company POPIA statement and PAPIA manual are:

- **RocketFin (Pty) Limited** (2018/227819/07) – Holding company of the below South African subsidiaries and Rocketseed Group finance function
- **RocketDev (Pty) Limited** (2016/094522/07) – Research and Development
- **Rocketseed (South Africa) (Pty) Limited** (2000/021758/07) – Sales and Distribution
- **RocktePad (Pty) Limited** (2020/241196/07) – Sales and Distribution
- **RocketMailer (Pty) Limited** (2020/240933/07) – Newsletter Tool



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
- 1.9. “**Rocketseed**” - the collective name of Rocketseed subsidiaries to which POPIA and PAIA are applicable, as per the “Companies Concerned” above.

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 Of Rocketseed

- 3.1. Chief Information Officer
Name: Dr Eszter Nagy
Tel: +44 207 706 9520
Email: eszter.nagy@rocketseed.com
- 3.2. Access to information general contacts
Email: privacy@rocketseed.com
- 3.3. National or Head Office



Postal Address: 8 Sussex Mews East, W2 2TS, London, United Kingdom

Telephone: +44 207 706 9520

Contact: <https://www.rocketseed.com/contact/>

Website: www.rocketseed.com

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.
- 4.2. The aforesaid Guide contains the description of-
 - 4.2.1. the objects of PAIA and POPIA;
 - 4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.2.2.1. the Information Officer of every public body, and
 - 4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.2.3. the manner and form of a request for-
 - 4.2.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.2.3.2. access to a record of a private body contemplated in section 50⁴;
 - 4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.2.6. 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-
 - 4.2.6.1. an internal appeal;
 - 4.2.6.2. a complaint to the Regulator; and
 - 4.2.6.3. 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;
 - 4.2.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.



- 4.2.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.2.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.2.10. the regulations made in terms of section 92¹¹.
- 4.3. 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.
 - 4.4. The Guide can also be obtained-
 - 4.4.1. upon request to the Information Officer;
 - 4.4.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
 - 4.5. The Guide is currently only available on English.

5. Categories Of Records Held By Rocketseed Which Are Available Without A Person Having To Request Access (section 51(1)(b)(ii) of PAIA)

Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and detailed in below. This information may be inspected, collected, purchased or copied (if copyright, then with prior written permission from Rocketseed) at the website <https://www.rocketseed.com/>. The records include:

Marketing brochures – Contact information – Corporate Responsibility – Strategic Plan – Services Provided – Project information – Career information – Media releases

6. Description Of The Records Held By Rocketseed Which Are Available In Accordance With Any Other Legislation (section 51(1)(b)(iii) of PAIA)

Basic Conditions of Employment Act 75 of 1997 – Companies Act 71 of 2008 – Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA) – Employment Equity Act 55 of 1998 – Income Tax Act 58 of 1962 – Labour Relations Act 66 of 1995 – Medical Schemes Act 131 of 1998 – Occupational Health and Safety Act 85 of 1993 – Pension Funds Act 24 of 1956 – 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 – Engineering Profession Act 46 of 2000 – National Environmental Management Act 107 of 1998 – National Water Act 36 of 1998

⁷Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”



7. Description Of The Subjects On Which The Body Holds Records And Categories Of Records Held On Each Subject By Rocketseed (section 51(1)(b)(iv) of PAIA)

The following is a list of the subjects on which Rocketseed holds records and the categories into which these records fall. The procedure in terms of which such records may be requested from Rocketseed is set out in Section 8 of this manual. The records listed below will not in all instances be provided to a requester who requests them in terms of PAIA. The requester must show that he or she has the right in terms of PAIA to be given access to the records in question.

7.1. Administration

Shareholder records – Share register – Minutes of shareholder Meetings – Directors' records – Minutes of board meetings – Records relating to the incorporation – Other statutory information relating to tax, broad-based black economic empowerment (BBBEE) – Minutes of meetings of committees and sub-committees

7.2. Management

Minutes of meetings of Executive Committee – Internal correspondence – Resolutions of the directors

7.3. Finance

Accounting records – Tax records – Debtors' records – Creditors' records – Insurance records – Auditors' reports – Interim and annual financial statements – Procurement records – Bank statements and other banking records for business and trust accounts – Invoices issued in respect of debtors and billing information – Records regarding Rocketseed's financial commitments

7.4. Human Resources

List of employees – Statistics regarding employees – Employment contracts – Conditions of employment – Curriculum vitae of employees, including qualifications – Information relating to prospective employees, including their curriculum vitae – Personnel records including personal details, disciplinary records, performance and internal evaluation records – Employee tax information – Records of Unemployment Insurance Fund contributions – Payroll records – Health and safety records – Workplace skills plans – Codes of conduct – Disciplinary code and procedure – Grievance procedure – Appeal procedure – Remuneration policy – Internal policies and procedures regarding dismissals, performance appraisal, recruitment, selection, advertising of positions, appointments, retirement, promotions, leave, extended sick leave, study leave, salaries, overtime, bonuses, health and safety, adoption leave and benefits, broad-based black economic empowerment (BBBEE) procurement, loans, working parents, smoking, use of company resources including telephones, motor vehicles and computers, sexual harassment, HIV-Aids and Pro Bono policy – Training schedules and material – Correspondence relating to personnel

7.5. Suppliers

Supplier lists and details of suppliers – Agreements with suppliers

7.6. Information Technology

Computer software – Support and maintenance agreements – Records regarding computer systems and programmes Property – Asset registers – Lease agreements in respect of immovable property – Records regarding insurance in respect of movable property – Records regarding insurance in respect of immovable property Miscellaneous – Internal correspondence – Firm publications

8. Request procedure in terms of PAIA (section 53 of PAIA)

8.1. A request for access to records held by Rocketseed in terms of section 50 of PAIA must be made through:

8.1.1. Our general Request to Access and Erasure form on our website www.rocketseed.com/privacy

8.1.2. Appendix 1 attached to this manual. The request must be made to Rocketseed at the address, or email address, specified in Section 3 above.



- 8.2. A requester must provide sufficient detail on the prescribed form to allow Rocketseed to identify the record or records which have been requested and the identity of the requester (section 53(2) of PAIA). If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to Rocketseed (section 53(2)(f) of PAIA). The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa (sections 53(2)(b) and (c) of PAIA).
- 8.3. The requester must identify the right that he, she or it is seeking to exercise by accessing records held by Rocketseed and must explain why the particular record or records requested is or are required for the exercise or protection of that right (section 53(2)(d) of PAIA).
- 8.4. Rocketseed may, and must in certain instances, refuse access to records on any of the grounds set out below:
 - that access would result in the unreasonable disclosure of Personal Information about a third party,
 - to protect the commercial information of a third party or of Rocketseed itself, that it is necessary to protect the confidential information of a third party,
 - to protect the safety of individuals or property,
 - that a record constitutes privileged information for the purpose of legal proceedings, and
 - to protect the research information of a third party or Rocketseed itself.
- 8.5. Access to documents may also be refused on the basis of professional privilege.
- 8.6. Rocketseed is required to inform a requester in writing of its decision in relation to a request (section 56 of PAIA). If the requester wishes to be informed in another manner as well, this must be set out in the request and the relevant details included, to allow Rocketseed to inform the requester in the preferred manner.
- 8.7. Rocketseed will make a decision in relation to a request for records within 30 days of receiving it, unless third parties are required to be notified of the request or the 30-day period is extended as provided for in PAIA. Rocketseed will notify the requester if the 30-day period for processing a request is to be extended.
- 8.8. Where a request is refused, a requester may apply to the High Court within 30 days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The High Court will determine whether the records should be made available or not.

9. Processing Of Personal Information (section 51(1)(c) of PAIA)

9.1. Purpose of Processing Personal Information

The purpose is dependent on whether Subjects use only Rocketseed website, or additionally, our services.

If using our services, including signing up to newsletters, Subjects are required to register, and we collect personal data. We use this personal data for the provision of the service or the performance of the contract. We may use personal data for other similar purposes, including marketing and communications, but that will only occur in the case we have consent or another legal justification for doing so.

- 9.1.1. **If visiting Rocketseed website**, the browsers transmits some data automatically through cookies.

Date and time of retrieval of one of our web pages – Browser type and settings – Operating system – Last web page visited – Data transmitted and the access status – IP address

- 9.1.2. **From our Customers/Clients** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

The processing of subject data is done for the purpose of contact management, sales and distribution of products and services, as well as for communication and marketing.



These steps are required prior to a contract with the data subject, and retention of such data for a maximum of six years, or what is required for tax and legal purposes.

- 9.1.3. **From our Staff/Contractors/Suppliers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Organisation's administration and management – These steps are required prior to a contract with the data subject – The data is retained for a maximum of six years, or what is required for tax and legal purposes

- 9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Provided under Section 7.

- 9.3. The recipients or categories of recipients to whom the personal information may be supplied (Chapter 5 of Part 3 of PAIA)

To maintain and improve our services, your personal data may need to be shared with or disclosed to service providers, other Controllers or, in some cases, public authorities.

We may be mandated to disclose your personal data in response to requests from a court, police services or other regulatory bodies. Where feasible, we will consult with you prior to making such disclosure and, in order to protect your privacy, we will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

Data storage and where processing takes place, unless specifically requested by a client to be on a dedicated server within their own premises, are hosted by sub-processors (data centres), which have been assessed having rigorous safety environment, ISO certifications and stringent breach management and prevention procedures.

- 9.3.1. Rocketseed may supply the Personal Information to service providers who render the following services to Rocketseed:

Capturing and organizing data – Storing data – Sending of emails and other correspondence to clients – Conducting due diligence checks.

- 9.3.2. Rocketseed will conclude appropriate agreements with any service providers that Process Personal Information on its behalf to require service providers to protect Personal Information in line with the requirements of POPIA.

- 9.3.3. Rocketseed does not share the Personal Information of Data Subjects with any third parties, except if:

It or the third party has a legitimate interest in the Personal Information being shared, and an appropriate balance has been struck between that interest and protecting Data Subjects rights – It is necessary to conclude or implement a contract with a Data Subject – It is obliged to provide such information for legal or regulatory purposes – It is required to do so for purposes of existing or future legal proceedings – It is involved in the prevention of fraud, loss, bribery or corruption – The third party performs services and Processes Personal Information on Rocketseed's behalf as its Operator

- 9.3.4. Rocketseed will send its Data Subjects appropriate notifications or communications of its Processing if it is obliged to do so by law, or in terms of its contractual relationship with Data Subjects.

- 9.4. Planned transborder flows of personal information

Rocketseed may transfer Personal Information under its control to organisations in other countries in order to:

- liaise with other Rocketseed subsidiaries,
- provide information to prospective clients, or
- to store data with third party cloud storage providers; e.g. Dropbox, PeopleHR and GDrive

Rocketseed will take steps to ensure that recipients of Personal Information in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of



protection of Personal Information and uphold the principles for reasonable and lawful Processing of Personal Information, in terms of POPIA.

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

Rocketseed restricts, secures and controls all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal data only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal data for historical or statistical purposes, we ensure that the personal data cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data..

10.1. Rocketseed employs up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Such measures include:

Firewalls – Secure web gateways – Regular vulnerability scans of IT networks and systems – Cybersecurity awareness training for all employees – Virus protection software and update protocols – Logical and physical access control – Secure setup of hardware and software making up the IT infrastructure – Requiring Operators who Process Personal Information on behalf of Rocketseed to implement security controls in terms of Rocketseed contract with them.

11. Availability Of The Manual

A copy of the Manual is available-

- on www.rocketseed.com/privacy
- head office of Rocketseed for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.
- A fee for a copy of the Manual, as contemplated in Appendix B of the Regulations, shall be payable per each A4-size photocopy made.

12. Fees Payable (section 54 of PAIA)

A requester has to pay a **request fee** of R140.00. This request fee may be paid at the time a request is made, or the person authorised to deal with such requests on Rocketseed's behalf may notify the requester that he, she or it needs to pay the request fee before processing the request any further. A requester may apply to Court to be exempted from the requirement to pay the request fee.

Action Taken	Fees Payable
No fee is payable: <ul style="list-style-type: none"> • Where a requester asks confirmation whether Rocketseed holds their data or Personal Information • If submitting a request for confirmation, and/or erasure via our website through the Data Subject Request Form. 	R0.00
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. To not exceed the total cost of:	R450.00
Postage, e-mail or any other electronic transfer	Actual expense if any
Photocopy / printed black & white copy of A4-size page	R2.00 per page
Printed copy of A4-size page	R2.00 per page



For a copy in a computer-readable form on:

- | | |
|---|--------|
| • Flash drive (to be provided by requestor) | R40.00 |
| • Compact disc: | |
| ○ if provided by requestor | R40.00 |
| ○ if provided to the requestor | R60.00 |

13. Information or records not found (section 55 of PAIA)

If all reasonable steps have been taken to find a record that is requested under PAIA, and the requested record cannot be found or does not exist, then Rocketseed will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

The affidavit or affirmation will provide a full account, of all the steps taken to find the record or to determine the existence thereof, including details of all communications by Rocketseed with every person who conducted the search.

If the record in question should later be found, the requester will be given access to the record in the manner stipulated by the requester unless access is refused by Rocketseed as permitted by PAIA (as dealt with in Section 8 above).

14. Updating Of The Manual

The Chief Information Officer will on a regular basis update this manual.

Issued By,

RocketFin (Pty) Limited



PERSONAL INFORMATION REQUEST FORM

Please provide specific details (along with any relevant dates) of the information being requested and any additional information that may help us to locate your personal information and to confirm your identity.

By completing this form, you are making a subject access request under the Protection of Personal Information Act for personal information collected, processed, and held about you by us that you are entitled to receive.

Data Subject Information	
Name and Surname	
Contact Number	
Email Address	
Information Being Requested	
A. I just want to know what Personal Information Rocketseed has of me under its control.	
B. I want to request the correction of my Personal Information.	
C. I want to object against the processing of my Personal Information.	
D. I want you to delete or destroy my Personal Information.	
<i>If you ticked B, C or D, please substantiate your request below, and if necessary, attach additional information to this document.</i>	

Declaration

By signing below, you confirm that you are the data subject named in this Subject Access Request Form. You warrant that you are the individual named and will fully indemnify Rocketseed for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal information from anyone else, including members of your family.

Name

Date

Signature