

SYNTELL (PTY) LTD

MANUAL PREPARED IN TERMS OF SECTIONS 10 AND 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 IN RESPECT OF SYNTELL AND ITS ASSOCIATED ENTITIES

1. INTRODUCTION

This Manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act No. 2 of 2000 and contains the information specified in section 51(1) thereof. It contains information required by a person wishing to exercise any right, contemplated by the Act.

The aim of the Manual is to assist potential Requesters in requesting access to information (documents or records) from Syntell as contemplated under the Act. The Manual may be amended from time to time and as soon as any amendments have been effected, the latest version of the Manual will be published and distributed in accordance with the Act.

The information as per this Manual, as applicable to a private body, is as follows:

- the contact details of the head of the private body;
- a description of the guide referred to in section 10 of the Act;
- the latest notice published by the Minister of Justice and Constitutional Development under section 52(2) of the Act;
- a description of the records of the private body which are available in terms of any legislation other than the Act;
- a description of the subjects on which the private body holds records and the categories of records held on each subject in sufficient detail to facilitate a request for access to a record; and
- other information as prescribed by regulation.

A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.

Syntell (Pty) Ltd is involved in the provision of road safety and traffic control management systems, revenue collection products, postal automation systems and outsourced call centre services.

This manual provides the relevant information for the above Syntell group as these companies have the same head office, the same physical and postal addresses, the same contact person, and the same contact details.

2. INTERPRETATION

The following words or expressions will bear the following meanings in this Manual:

"PAIA" means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;

"POPIA" means the Protection of Personal Information Act No.4 of 2013, together with any regulations published thereunder;

"Customer" means a natural or juristic person who or which receives services or products from Syntell;

"Correspondence" means written and electronic communication exchanged between two or more parties;

"Employee" means any person who works for, or provides services to, or on behalf of Syntell, and receives or is entitled to receive remuneration;

"Information Officer" means the designated Syntell information officer/s or the head of the body, as described in this Manual;

"Information Regulator" means the Information Regulator (South Africa);

"Manual" means this manual, together with all annexures thereto as amended and made available at the offices of Syntell from time to time;

"Requester" means any person or entity requesting access to a record that is under the control of Syntell; and

"Syntell" means Syntell (Pty) Ltd (registration number 2003/022275/07), a private company which is a technology company providing practical and innovative technology-based services and systems that enable effective administration at local, provincial and national government level, and includes the entities associated with it as listed in paragraph 3;

3. SCOPE OF THE MANUAL

This Manual has been prepared in respect of the South African entities that are listed below:

- Syntell – Registration Number 2003/022275/07
- Syntell Systems (Pty) Ltd – Registration Number 2014/114415/07
- Syntell Smart Works (Pty) Ltd – Registration Number 2002/016725/07
- Mikros Traffic Monitoring (Pty) Ltd – Registration Number 1998/002159/07
- Mikros Systems (Pty) Ltd – Registration Number 1984/007805/07
- Mikros Traffic Monitoring (KZN) (Pty) Ltd – Registration Number 1999/009613/07

4. THE GUIDE ON HOW TO USE THE ACT TO ACCESS INFORMATION

(Information provided in terms of section 51(1)(b) of the Act)

The Act 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 the Act, the public body must be acting in the public interest.

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

A Guide on how to use the Act has been compiled by the Information Regulator in terms of section 10(1) of the Act and is available and can be obtained on the website of the Information Regulator (<https://inforegulator.org.za/paia-guidelines/>). Alternatively, any person wishing to obtain the Guide can obtain same from the office of the Information Regulator, as well as direct any queries thereto, the contact details of which are as follows:

Information Regulator (South Africa)
Postal Address: P O Box 31533 Braamfontein, Johannesburg, 2017
Street Address: J.D House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Tel: +27 (0)10 023 5200
Email: enquiries@inforegulator.org.za / PAIACompliance@inforegulator.org.za
Website: <https://inforegulator.org.za/>

5. OVERVIEW OF SYNTELL

Syntell is a company involved in the provision of practical and innovative technology-based services and systems that enable effective administration at local, provincial and national government level

6. COMPANY CONTACT DETAILS

(Information required under section 51(1)(a) of the Act)

Name of body:	Syntell (Pty) Ltd
Registration Number:	2003/022275/07
Chief Executive Officer:	Mr Mark Chewins
Contact person (company secretary):	Karen Hamer Davies
Physical address:	2 nd Floor Greater Westerford Building 240 Main Road Rondebosch Cape Town SOUTH AFRICA 7701
Postal address:	PO Box 30298 Tokai 7966
Telephone:	+27 21 204-6205
Fax:	+27 21 204-6499
Email:	legal@syntell.co.za
Web site:	https://www.syntell.co.za/

7. SECTION 10 GUIDE ON HOW TO USE THE ACT

The section 10 Guide on how to use the Act will be available from the Information Regulator (South Africa). The guide is available in each of the official languages of South Africa. Enquiries can be directed to:

The Information Regulator (South Africa):

Postal Address: P O Box 31533
Braamfontein
Johannesburg
2017

Tel: +27 (0)10 023 5200

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

Email: enquiries@infoeregulator.org.za / PAIACompliance@infoeregulator.org.za

8. Information freely available from Syntell

No notice has been published in terms of section 52. However, certain information and records are freely available without needing to be requested in terms of the request procedures set out in the Act and provided for in this manual.

9. RECORDS AVAILABLE IN TERMS OF LEGISLATION OTHER THAN THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

Documents are held in accordance with statutory provisions that include those in the following Acts:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 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
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 30 of 1966; 4 of 2002
- Regional Services Council Act 109 of 1985
- Value-Added Tax Act 89 of 1991
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Protection of Personal Information Act 4 of 2013

10. CATEGORIES OF RECORDS HELD BY THE SYNTELL GROUP

[TAKE NOTE: This section of the Manual sets out the categories and descriptions of records held by the Syntell group. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under the Act. In particular, certain grounds of refusal as set out in the Act may be applicable to a request for such records.]

CATEGORIES OF RECORD	DESCRIPTION OF RECORD
Administration and Management	Shareholder records Share register Minutes of meetings of the directors Minutes of meetings of committees and sub committees. Minutes of meetings of Executive Committee Internal correspondence Resolutions of the directors
Financial Records	Annual financial statements Tax returns Accounting records Bank Statements and Banking records Audit reports conducted Invoices in respect of creditors and debtors Bank facilities and account details Records regarding financial commitments All the necessary records that a Financial Services Provider needs to hold in terms of the Financial Advisory and Intermediary Services Act as well as the records the an accountable institution needs to hold in terms of the Financial Intelligence Centre Act.
Company Records	Documents of incorporation Memorandum and Articles of Association Share register and other statutory registers List of employees Employment contracts
Human Resources	Personnel records of each employee Disciplinary records Compensation or redundancy payments Records relating to conditions of employment Employee tax information Training schedules and manuals Agreements with Customers Payroll records Internal policies and procedures Information relating to prospective employees including curricula vitae and application forms
Syntell Customers	Customer documentation in terms of Financial Intelligence Centre Act No. 38 of 2001 Correspondence with Customers and third parties
Intellectual Property	Trade-marks, copyrights and designs held Software licences Records relating to domain names
Immovable and Movable Property	Agreements for the lease of immovable property

	Agreements for the lease or sale of movable property
	Records regarding insurance in respect of movable property
	Records regarding insurance in respect of immovable property
	Product lists
Information Technology	Records regarding computer systems and programmes held by Syntell
Website	Syntell's website address is https://www.syntell.co.za/ and is accessible to anyone who has access to the Internet.
Miscellaneous	Security agreements, guarantees and indemnities
	Marketing agreements
	Internal correspondence
	Suretyship agreements
	Supplier lists and details of suppliers
	Agreements with suppliers

11. FORM OF REQUEST FOR ACCESS TO INFORMATION

- Records will only be made available subject to the provisions of PAIA.
- The Requester must use the prescribed form (Form 2) to make the request for access to a record to Syntell's designated Information Officer at the address, fax number or electronic mail address of Syntell. A copy of the form is attached as Annexure A to this manual.
- The Requester must provide sufficient detail on the request form to enable the head of the private body to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.
- The Requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 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 of the head of Syntell.
- After the Information Officer has made a decision on the request, the Requester will be notified using the required form. If the request is granted then a further access fee must be paid for reproduction, for search and preparation, and for any time that has exceeded the prescribed hours to search for and prepare the record for disclosure, as per Form 3, attached hereto as Annexure B.
[See section 54(6) of PAIA].
- In terms of Part 3, Chapter 4 of PAIA, Syntell may and in certain instances must refuse access to records on the grounds set out in the Act. The grounds include:
 - that granting access would result in the unreasonable disclosure of personal information about a third party;
 - that it is necessary to protect the commercial information or the confidential information of a third party;

- that it is necessary to protect the commercial information of a third parties or of Syntell itself;
- that it is necessary to protect the safety of individuals or property;
- that it is necessary to protect the research information of a third party or of Syntell;
- that it is necessary to protect certain records of the South African Revenue Service; and
- that the record constitutes privileged information for the purposes of legal proceedings.

12. PRESCRIBED FEES

A Requester who seeks access to a record containing personal information about that Requester is not required to pay the request fee. Every other Requester, who is not a personal Requester, must pay the required request fee of R50.00 to a private body such as Syntell.

The head of the private body must notify the Requester (other than a personal Requester) by notice, requiring the Requester to pay the prescribed fee (if any) before further processing the request.

The Requester may lodge an application to the court against the tender or payment of the request fee.

After the head of the private body has made a decision on the request, the Requester must be notified in the required form.

If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

Syntell is entitled to withhold a record until the required access fees have been paid, which are payable as follows:

Action Required	Fee Payable
Photocopy of an A4-size page or part thereof	R1.10 per page
Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75 per page
For a copy in a computer-readable form on – Stiffy disc / Compact disc	R7.50 / R70.00
Transcription of visual images on an A4-size page or part thereof	R50.00 per page
Copy of visual images	R60.00
Transcription of an audio record on an A4-size page or part thereof	R20.00
Copy of an audio record	R30.00

In addition, if the search for and preparation of the record or records requested takes more than six hours, Syntell may charge R30.00 for each hour or part thereof which is required for the search for and preparation of the records. Moreover, if Syntell is of the opinion that the search and preparation of the records requested will require more than six hours, it is entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the Requester. In such event, the Requester may make an application to Court to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the Requester.

13. RECORDS OR INFORMATION NOT FOUND

If, after all reasonable steps to locate a record have been taken, and no record is found, then the Information Officer will notify the Requester, by way of an affirmation or affidavit that access to the requested and titled document cannot be provided. The affirmation or affidavit will include detailed account of the steps taken to try locate the record.

Should a record be found at a later stage, the Information Officer shall provide the Requester access to such record, unless access to the record is refused on the grounds permitted by PAIA (Part 3, Chapter 4).

14. OTHER INFORMATION HELD BY SYNTELL AS MAY BE PRESCRIBED

The Minister of Justice and Constitutional Development has not made any regulations in this regard.

15. PROCESSING OF PERSONAL INFORMATION

The purpose for which the Company processes personal information includes but is not limited to:

- rendering of services to our customers;
- employee administration;
- transacting with our suppliers and third party service providers;
- maintaining records;
- recruitment;
- general administration;
- financial requirements;
- compliance with legal and statutory requirements; and
- facilities management.

Description of the categories of Data Subjects, information processed, and recipients thereof:

Data Subjects	Information	Recipients
Prospective and current employees, consultants, interns, and volunteers	• Name, identification number, biographical data; • Contact details; • Educational, employment, and criminal history; • Biometric and health information; • Psychometric assessments; • References and background checks; and • Account information, performance reports, and skills/training reports (for	Relevant Provincial and National Government Departments and their agents.

	current employees, interns, and consultants).	
Prospective and current suppliers, service, providers, contractors, sub-contractors, and business partners	• Name, identification number/company registration number; • Registration number; • Contact details; • Financial history; • References and background checks; • Account information; and • Performance reports.	Relevant Provincial and National Government Departments, public entities, business enterprises and their agents.
Service users (clients and customers) and visitors	• Name, identification number, biographical data; • Contact details; and • Compliments or complaints.	Relevant Provincial and National Government Departments, public entities, business enterprises and their agents.

16. AVAILABILITY OF THE MANUAL

This manual is available in terms of section 51(3) of PAIA for inspection at the offices of Syntell at no cost, during office hours. Copies of the manual may be obtained, subject to the prescribed fees, from these offices. The manual can be accessed on <https://www.syntell.co.za/>.

16. INFORMATION REQUESTED ABOUT A THIRD PARTY

Where any information is requested from Syntell that relates to a third party, Syntell is required to notify the third party of the request. The third party has an opportunity to grant his, her or its consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the Requester. If Syntell decides to grant access to the record, it will notify the affected third party again. The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by Syntell or not.

17. PRESCRIBED FORMS AND FEE STRUCTURE

The forms and fee structure prescribed under PAIA in respect of private bodies in terms of sections 53 and 54 of PAIA are available from the Government Gazette, or at the website of the Information Regulator (South Africa) (<https://infoeregulator.org.za/>), under the heading "PAIA", subheading "Forms" section.

Furthermore, at Annexure A attached hereto.

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FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made <i>(if applicable)</i> :	
Identity Number	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	

Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES

a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

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You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

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FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Annexure B

FORM 3 OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the—

(a) amount of the deposit, (if any), is payable before your request is processed;
and

(b) requested record/portion of the record will only be released once proof of full payment is received. 2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.

OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	

Preferred language:

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

Kindly note that your request has been:

☐ Approved



Denied, for

the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy	R1.10 per page		
Printed copy	R0.75 per page		
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R70.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R70.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):



Yes



No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank: _____ Name of
account holder: _____ Type of account:
_____ Account number:
_____ Branch Code:
_____ Reference Nr:
_____ Submit proof of
payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer