

ZENSAR SOUTH AFRICA PTY. LTD.

PAIA MANUAL

in terms of

Section 51 of

The Promotion of Access to Information Act

2/2000

(the "Act")

1. INTRODUCTION

Zensar is an IT services provider with its registered address at 155 West Street, Sandown, Sandton, Gauteng 2031.

This manual has been drafted for the users who request information under the Act to inform them of the requirements which a request for information must meet as prescribed by the Act.

2. Information required to be published under of section 51(1)(a) of the Act:

Registered Address	155 West Street, Sandown, Sandton, Gauteng 2031
Physical and Postal Address	Unit 2C, The Matrix building 8 Bridgeway, Bridgeway Precinct Century City, Cape Town 7441
Telephone Number	+ 27-11-7854540
Chief Executive Officer	Ajay Bhutoria
Information Officer	Vishwas Pitre

3. Guide 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, 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, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC on their website (www.sahrc.org.za)

4. Categories of information collected:

Zensar collects the following categories of personal information:

Categories of Personal Information	Use of Information
Identification information, application usage data (e.g., features/pages accessed by a member), location data (GPS).	To operate and improve the Websites and associated services.
Identification information, application usage data (e.g., features/pages accessed by a member), location data (GPS).	To understand and analyze information related to the number and type of visitors that browse and use the Websites.
Identification information, application usage data (e.g., features/pages accessed by a member), location data (GPS).	To verify you and your authority to use the Websites.
Name, phone number, mailing address, email address.	To provide you with information, products, or services that you request from us, or that may be of interest to you.
Name, phone number, mailing address, email address, banking information.	To provide Services to Clients, under the Client's direction and instruction.
Name, phone number, mailing address, email address, banking information.	To enable suppliers and vendors to provide services efficiently and uphold our payment obligations to them
Name, phone number, mailing address, email address.	To respond to your comments, inquiries and questions and provide customer services.
Name, phone number, mailing address, email address.	To permit you to participate in social sharing, including commenting on our blog or on our social media platforms such as LinkedIn, Instagram, and Facebook.
Name, phone number, mailing address, email address.	To send administrative information to you, for example, information regarding the Websites and changes to our terms, conditions, and policies. Because this information may be important to your use of the Websites, you may not opt-out of receiving these communications.
Name, mailing address, email address, phone number, demographic information	To permit you to register for a webinar and/or event and for us to communicate with you regarding that webinar/event.
Name, mailing address, email address, phone number, demographic information	To link or combine with other personal information we get from third-parties, to help understand your needs and provide you with better information on the Websites.

Name, mailing address, email address, phone number, demographic information, employment-related information	To permit you to submit an employment application with us and for us to consider your eligibility for employment.
Name, mailing address, email address, phone number, demographic information	To fulfil any other purpose for which you provide it or for which you have given us consent to use it.

5. Notice as per Section 51(1)(c) of the Act:

The records described in Section 4 are available upon request to the body per the procedure in Section 9 below. The grounds of processing are:

- 5.1 To support sales and marketing activities;
- 5.2 To support recruitment and management of staff and personnel;
- 5.3 To support engagement with suppliers and vendors;
- 5.4 To support engagement with the general public; and
- 5.5 To support engagement with investors and the media.

The categories of data subjects are:

- 5.6 Customers: record of customer life cycle;
- 5.7 Employees: record of employee life cycle;
- 5.8 Suppliers: record of supplier life cycle;
- 5.9 General public: tracking general enquiries and web site visits;
- 5.10 Investors: records as maintained by the Company Secretary ; and
- 5.11 Media: records of media interactions.

6. Records available for access without having to request access in terms of the Act:

Any records which are publicly available, for example the annual reports and or other records published on Zensar's website.

7. Records are kept in terms of the following legislation:

Zensar retains records and documents in terms of multiple statutes and regulations. Unless disclosure is permitted in terms of the applicable legislation, regulations, or contractual obligations, records that are required to be made available in terms of the requirements of the Act and the relevant legislation.

8. Categories of Records held by Zensar as per Section 51(1)(d) and (e)

General information about Zensar South Africa (Pty) Ltd. can be accessed via the internet on www.zensar.com which is available to all persons who have access to the internet. The subjects on which the private body holds records and the categories on each subject in terms of Section 51(1)(e) are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act.

- 8.1 Companies Act Records

- All trust deeds;
- Documents of Incorporation;
- Index of names of members of Close Corporation;
- Memorandum of Incorporation;
- Minutes of meeting of the Board of Directors;
- Minutes of meetings of Shareholders;
- Proxy forms
- Register of debenture-holders;
- Register of directors' shareholdings;
- Research and development;
- Share certificates; and
- Share Register and other statutory registers and/or records and/or documents;
- Special resolutions/Resolutions passed at General and Class meetings.

Records relating to the appointment of:

- Auditors;
- Directors;
- Prescribed Officer.
- Public Officer; and
- Secretary

8.2 Financial Records

- Accounting Records
- Annual Financial Reports;
- Annual Financial Statements
- Asset Registers;
- Bank Statements
- Banking details and bank accounts;
- Banking Records
- Debtors / Creditors statements and invoices;
- General ledgers and subsidiary ledgers;
- General reconciliation;
- Invoices;
- Paid Cheques
- Policies and procedures;
- Rental Agreements; and
- Tax Returns.

8.3 Income Tax Records

- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory compliances:
 - VAT
 - Regional Services Levies

- o Skills Development Levies
- o UIF
- o Workmen's Compensation

8.4 Personnel Documents and Records

- Accident books and records;
- Address Lists;
- Disciplinary Code and Records;
- Employee benefits arrangements rules and records;
- Employment Contracts;
- Employment Equity Plan
- Forms and Applications;
- Grievance Procedures;
- Leave Records;
- Medical Aid Records;
- Payroll reports;
- Wage register;
- Pension Fund Records;
- Safety, Health and Environmental records;
- Salary Records;
- SETA records
- Standard letters and notices
- Training Manuals;
- Training Records;
- Workplace and Union agreements and records.

9. Procedure for requesting information under the Act

To exercise the data rights described above, please submit a request to Zensar by contacting us at dpo@zensar.com.

Only you or a person authorized to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

To facilitate the processing of your request, kindly:

- 9.1 Use the prescribed form, available [here](#).
- 9.2 Address your request to the Deputy Information Officer, Abhishek Dubey.
- 9.3 Provide sufficient details to enable Zensar to identify:
 - (a) The record(s) requested;
 - (b) The requester (and if an agent is lodging the request, proof of capacity);
 - (c) The form of access required;
 - (d) (i) The postal address or fax number of the requester in the Republic;
 - (ii) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars hereof;
 - (e) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 9.4 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 designated head of the private body.

- 9.5 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 9.6 Every other requester, who is not a personal requester, must pay the required request fee.
- 9.7 The designated 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.

10. Grounds for refusal of access to records.

Zensar may refuse a request for information on the following grounds:

- 10.1. For the protection of the privacy and personal information of a third party who is a natural person, including a deceased person.
- 10.2. For the protection of the commercial information of third parties, which if disclosed, would to put that third party at a disadvantage in contractual or other negotiations or prejudice that third party in commercial competition.
- 10.3. For the protection of confidential information of third parties if such information is protected by any agreement.
- 10.4. For the protection of safety of individuals and protection of property.
- 10.5. For protection of records considered privileged under legal proceedings.
- 10.6. For the protection of the commercial information of Zensar, which if disclosed, would to put that third party at a disadvantage in contractual or other negotiations or prejudice that third party in commercial competition.
- 10.7. The protection of research information of third party and the protection of research information of private body.

11. Prescribed Fees.

The following applies to requests (other than personal requests):

- 12.1 A requestor is required to pay the prescribed fees (**R50**) before a request will be processed;
- 12.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 12.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 12.4 Records may be withheld until the fees have been paid.
- 12.5 The fee structure is as follows:
 - (a) The “request fee” payable by a requester, other than a personal requester, referred to in section 54(1) of the Act, is R50 .
 - (b) The “fees for reproduction” referred to in section 52(3) and “access fees” payable by a requester referred to in section 54(7), unless exempted under section 54(8) of the Act, are as follows:
 - (i) for every photocopy of an A4-size page or part thereof R1.

- (ii) for every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R1
- (iii) for a copy in a computer-readable form on:
 - a. stiffy disc R50
 - b. compact disc R70

12.6 The “request fee” and any other subsequent fees must be deposited into the bank account detailed below and the proof shall be sent to abhishek.d@zensar.com.

Bank : Standard Chartered Bank
Address of Bank : 2nd Floor, 115 West Street, Sandton
Account Name : ZENSAR (SOUTH AFRICA) PTY LTD.
Account Number : 00188603500
Company registration
number : 2013/194972/07
Branch Code : 730020
SWIFT Address : SCBLZAJJ
Branch : Johannesburg Branch
Currency : ZAR
Type : Current Account

13. **Decision.**

- 13.1. Zensar shall make the decision to grant or refuse the request for information and shall communicate the same to the requester with reasons within 30 (thirty) days of the receipt of the request.
- 13.2. In case the request is for large quantity of information or if the information is located at a different location of Zensar or if the information cannot reasonably be collected within 30 (thirty) days, Zensar may extend the time for the decision by another 30 (thirty) days by providing the requester a written notice of the same.

This manual is available for inspection at the office of Zensar South Africa (Pty) Ltd free of charge. This manual will be updated whenever we make material changes to the current information.