



BITVENTURE

PAIA MANUAL

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

Revision History

The table below reflects revisions (recent changes/updates, deletions, additions, etc.)

Version	Date	Revised By	Description
1.0	1 September 2021	Nelson Manyenga	Document created and initial draft compiled

Review and Approval

The following persons have reviewed and approved this document:

Version	Date	Reviewer	Description
1.0	15 September 2021	Kabambi Biola	Information Officer review and approval

Distribution List

This Manual has been distributed to the following persons:

Name
All Bitventure employees who perform duties for Bitventure and its associated companies. The policy is available on the Bitventure website.

Document Ownership Maintenance

Bitventure's Information Officer and Deputy Information Officer own the maintenance of this document. This document will be reviewed on an annual basis or whenever there is significant change to business practices, operations and regulatory requirements that require changes.

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer
1.3	"FSCA"	Financial Sector Conduct Authority
1.4	"FSP"	Financial Services Provider
1.5	"IO"	Information Officer
1.6	"Minister"	Minister of Justice and Correctional Services
1.7	"NCR"	National Credit Regulator
1.8	"PASA"	Payments Association of South Africa
1.9	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
1.10	"POPIA"	Protection of Personal Information Act No.4 of 2013
1.11	"Regulator"	Information Regulator
1.12	"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 OF BITVENTURE CONSULTING (PTY) LTD

3.1. Information Officer

Name: Kabambi Biola
Tel: 011 616 0849
Email: compliance@bitventure.co.za

3.2. Deputy Information Officer

Name: Nelson Manyenga
Tel: 0116160849
Email: compliance@bitventure.co.za

3.3 Access to information general contacts

Email: compliance@bitventure.co.za

3.4 Head Office

Physical Address: 58 Concorde East Road Bedfordview Johannesburg 2008
Telephone: 011 616 0849
Email: info@bitventure.co.za
Website: www.bitventure.co.za

4. COMPANY BACKGROUND

Bitventure Consulting (Pty) Ltd is a software solutions company that provides state-of-the-art real-time verification and payment services. The company's solutions empower businesses to onboard customers securely and seamlessly, in a matter of minutes, while simultaneously mitigating fraud and increasing revenue. Bitventure is an authorised Financial Services Provider (FSP51134), a registered credit bureau (NCR52), and a PASA registered System Operator and Third-Party Payments Provider.

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

- 5.1. 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.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of:
 - 5.3.1. the objects of PAIA and POPIA;
 - 5.3.2. the postal and street address, phone, and fax number and, if available, electronic mail address of:
 - 5.3.2.1. the Information Officer of every public body, and
 - 5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 5.3.3. the manner and form of a request for:
 - 5.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6. 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:
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. 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;

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.*

- 5.3.7. 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;
 - 5.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 5.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 5.3.10. the regulations made in terms of section 92¹¹.
- 5.4. 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.
- 5.5. The Guide can also be obtained:
- 5.5.1. upon request to the Information Officer;
 - 5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 5.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
- 5.6.1. English and Afrikaans.

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.

⁷ Section 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

⁹ Section 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.

¹⁰ Section 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.”

6. CATEGORIES OF RECORDS OF BITVENTURE CONSULTING (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Personal records	Name, ID/Passport number, Date of birth, gender, contact details.		X
Company records	Name, Registration number, Bank account number, contact details, transaction history, legal agreements.		X
Company policies	FAIS disclosure, Complaints Handling Policy, Privacy Notice, Managing Conflicts of Interest Policy	X	
Products and Services	Types of products and services offered details of products and services.	X	
Regulatory Licenses	License number, Name of Regulator, approved services/activities	X	

7. DESCRIPTION OF THE RECORDS OF BITVENTURE CONSULTING (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	PAIA
FAIS Upfront Disclosure Statement	Financial Advisory and Intermediary Services Act 37 of 2002
Privacy Notice	POPIA
Client Due Diligence	Financial Intelligence Centre Act 38 of 2001
Information Officer and Deputy Information Officer details	POPIA

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BITVENTURE CONSULTING (PTY) LTD

Subjects on which the body holds records	Categories of records
Regulatory Compliance	<ul style="list-style-type: none"> - Compliance policies and procedures - Training manuals and records (attendance and assessments) - Complaints and resolutions - Requests for Information and POPIA/PAIA requests
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records
Finance	<ul style="list-style-type: none"> - Annual Financial Statements - Management Accounts

9. PROCESSING OF PERSONAL INFORMATION

9.1. Purpose of Processing Personal Information

Bitventure uses the Personal Information under its care for the following purpose;

- Conducting credit reference checks and scores
- Administration of agreements
- Providing services to customers and potential customers
- Detecting and prevention of fraud, crime, money laundering and other malpractice
- Conducting market or customer satisfaction research
- Marketing and sales
- In connection with legal proceedings
- Staff administration
- Maintenance of accounts and records
- Complying with legal and regulatory requirements
- Profiling data subjects for the purposes of direct marketing.

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

Categories of Data Subjects	Personal Information that may be processed
Customers: Natural Persons	Names; contact details; physical and postal addresses; date of birth; ID number; tax related information; nationality; gender; confidential correspondence; marital status; deceased status.
Customers: Juristic Persons	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information; IP addresses; intellectual property.
Service Providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information; IP addresses; intellectual property.

Categories of Data Subjects	Personal Information that may be processed
Employees/Directors	Gender; pregnancy; marital status; race; age; language; education information; financial information; employment history; ID number; medical records; physical and postal address; contact details; opinions; criminal record; well-being

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Suspicious Activity/Transaction Reports	Financial Intelligence Centre
Credit and payment history, for credit information	Credit Bureaus

9.4. Planned transborder flows of personal information

Personal Information may be transmitted transborder to Bitventure’s authorised dealers and its suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa. Bitventure will endeavor to ensure that such transborder flows are compliant with section 72 of the POPIA. Bitventure will ensure that at least one of the following conditions are met when transferring Personal Information transborder.

- recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in the POPIA; or
- Data Subject consents to the transfer of their Personal Information; or
- transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

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

Bitventure shall ensure the integrity and confidentiality of all Personal Information in its possession, by taking reasonable steps to:

- Identify all reasonably foreseeable risks to information security;
- Establish and maintain appropriate safeguards against such risks;

Written records

- Personal Information records are kept in locked cabinets, or safes;
- When in use, Personal Information records are not left unattended in areas where non-staff members may access them;
- Bitventure implements and maintains a “Clean Desk Policy” where all employees are required to clear their desks of all Personal Information when leaving their desks for any length of time and at the end of the day;
- Personal Information which is no longer required is disposed of by shredding.

Any loss or theft of, or unauthorised access to, Personal Information is immediately reported to the Information Officer. The Information Officer has the responsibility of immediately informing all affected parties of breaches and measures that Bitventure has taken to avoid such breaches. Bitventure further undertakes to notify the Information Regulator of any data breaches in the form and manner set out in applicable Guidance Notes.

Electronic Records

- All electronically held Personal Information is saved in a secure database;
- As far as reasonably practicable, no Personal Information is saved on individual computers, laptops or hand-held devices;
- All computers, laptops and hand-held devices are access protected with a password, fingerprint or retina scan, with the password being of reasonable complexity and changed frequently;
- Bitventure implements and maintains a “Clean Screen Policy” where all employees shall be required to lock their computers or laptops when leaving their desks for any length of time and to log off at the end of the day;
- Electronical Personal Information which is no longer required is deleted from the individual laptop or computer and the relevant database. The employees ensure that the information has been completely deleted and is not recoverable.

Any loss or theft of computers, laptops or other devices which may contain Personal Information are immediately reported to the Information Officer, who will notify the IT department, who will take all necessary steps to remotely delete the information, if possible.

Bitventure operates in a digital environment, as such, data is encrypted in transit and at rest to ensure the confidentiality, integrity, and availability of information. There are adequate anti-virus and anti-malware packages in place to ensure that the network is protected. Additionally, Bitventure has an independent compliance function that regularly tests the Information Security measures to ensure the integrity of such measures. Where Bitventure processes personal information in its capacity as an Operator in terms of POPIA, the processing parameters thereof are dictated by an Operator Agreement with the Responsible Party.

10. AVAILABILITY OF THE MANUAL

10.1. A copy of the Manual is available-

10.1.1. on www.bitventure.co.za ;

10.1.2. head office of Bitventure Consulting (Pty) Ltd for public inspection during normal business hours;

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

10.1.4. to the Information Regulator upon request.

10.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

Issued by



Kabambi Biola

Chief Executive Officer