



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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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	“MD”	Managing Director
1.5	“Minister”	Minister of Justice and Correctional Services;
1.6	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.7	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.8	“Regulator”	Information Regulator; and
1.9	“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 it processes.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF UMAFRIKA GAMING TECHNOLOGIES (PTY) LTD

3.1 Information Officer

Name: Mr. Michael Andrew Alexander
Tel: 011 997 4200 / 083 301 5924
Email: mike.alexander@umafrika.co.za
Fax number: 011 608 0030

3.2 Access to information general contacts

Email: mike.alexander@umafrika.co.za

3.3 National or Head Office

Postal Address: PO Box 2570, Bramley 2018 South Africa

Physical Address: 70 Saturn Crescent, Cnr Milky Way, Linbro Business Park,
Linbro Park 2090 South Africa

Telephone: 011 997 4200

Email: mike.alexander@umafrika.co.za



Website: www.umafrika.co.za

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.

The guide is available at the following links to the Information Regulator's website:

Information Regulator's Website	https://inforegulator.org.za/paia-guidelines/
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- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The Guide contains the description of-
- 4.3.1. the objectives of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-

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.



- 4.3.3.1. access to a record of a public body contemplated in section 11³; and
- 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
- 4.3.7. 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;

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.



- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. 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.
- 4.5. The Guide can also be obtained-
- 4.5.1. on request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://info regulator.org.za>);
 - 4.5.3. by downloading it from the Regulators website (see 4.1).
- 4.6 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours -
- 4.6.1 English
 - 4.6.2 Afrikaans – isiNdebele – isiXhosa – isiZulu – Siswati – Sepedi – Sesotho
 - 4.6.3 Setswana – Tshivenda – Xitsonga

Please visit <https://info regulator.org.za/paia/> for the latest versions of these guides.

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.”



5. CATEGORIES OF RECORDS OF UMAFRIKA GAMING TECHNOLOGIES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

umAfrika Gaming Technologies (Pty) Ltd, as a private body, may voluntarily make available a description of categories of records available without a person having to request access in terms of PAIA, and the only fee for access to these records may be the prescribed fee for reproduction.

The automatically available information includes:

- Information available on the umAfrika website.
- Marketing material which includes brochures, pamphlets and advertisements and which is available on the umAfrika website.
- Information already available in the public domain.
- Information available on [BizPortal](#).

6. DESCRIPTION OF THE RECORDS OF UMAFRIKA GAMING TECHNOLOGIES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

umAfrika Gaming Technologies (Pty) Ltd maintains records on the following categories as detailed below. The below is not an exhaustive list.

Company Secretarial / Legal

- General contracts
- Statutory records
- Licences
- Minutes of meetings
- Title Deeds
- Correspondence
- Organogram
- Management Agreements
- Leases
- Limits of Authority
- Registered trademarks, trade names, protected names and other copyright items

Human Resources

- Staff records
- Contracts of employment
- Employment equity
- Policies and Procedures
- Pension and Provident Fund details
- Remuneration Committee reports
- Disciplinary Code



- Collective Agreements
- B-BBEE Verification Certificate

Financial

- Audited financial statements
- Taxation records
- Asset registers
- Management accounts
- Banking details
- Treasury documents
- Insurance documentation
- Information technology

Each request for this information will be individually assessed and does not imply that a request for access to the record will be honoured. There are various grounds for refusal of access to records.

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy ([Section 63](#)),
- another company's commercial information ([Section 64](#)),
- someone else's confidential information ([Section 65](#)),
- research information ([Section 68](#)),
- the safety of individuals and property ([Section 66](#)), or
- records privileged from production in legal proceedings ([Section 67](#)).

Our decision on giving you access:

We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record.

If we deny your request for access, you may:

- apply to a court ([Section 78](#)) with appropriate jurisdiction, or
- [complain](#) to the Information Regulator,

for the necessary relief within 180 calendar days of us notifying you of our decision.



7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY UMAFRIKA GAMING TECHNOLOGIES (PTY) LTD

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	- Annual Reports, - Strategic Plan, - Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records - Candidate records
Commercial	- Standard agreements - Contracts concluded with customers - NDAs - Letters of intent, MOUs - Third party contracts (such as JV agreements, VAR agreements, etc.) - Office management contracts - Bond agreements - Rental agreements - Supplier or service contracts
Compliance	- Regulatory documents, including permits, licences, authorities
Legal	- Policies or directives - Internal policies: relating to employees and the organisation - External policies: relating to customers and other third parties - • Information technology systems and documents



8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Activity	Information Collected	Department	Purpose
Employment Equity management	names, surnames, race, gender, ID numbers, age, disability, remuneration.	Legal and Compliance	Compliance with the EE Act
Broad-Based Black Economic Empowerment	names, surnames, race, gender, ID numbers, age, disability, remuneration.	Legal and Compliance	1. Compliance with the BEE Act and Codes of Good Practice; SANAS regulations; BEE Commission practice notes. 2. Required for measurement and verification purposes.
Employee Education Assistance Programme (EEAP)	CHILDRENS's information: Names, surnames, race, gender, ID numbers. Parent's names and surnames, school names, fees information	Legal and Compliance with HR (GROK Consulting)	1. Required for BEE programme – measurement of spend, confirmation of age of scholars, race, gender. 2. Required for annual company budgeting.
Register of Directors	Names, surnames, ID numbers, physical address, race, gender	Legal and Compliance	1. Required by Companies Act 2. Required by financial and BEE auditors annually.
National manufacturer and Employee licensing – South Africa	Name, surname, ID number, passport number, address, financial information, criminal record,	Legal and Compliance	Required by the national and provincial gambling acts.



Activity	Information Collected	Department	Purpose
	credit history, educational, occupational.		
National manufacturer and Employee licensing – Botswana	Name, surname, ID number, passport number, address, financial information, criminal record, credit history, educational, occupational.	Legal and Compliance	Required by the Botswana gambling legislation for the review and processing of applications for manufacturer registration and employee licensing.
COVID-19 Workplace Safety	Screening information – name, surname, mobile number, symptoms data, temperature checks, names of those infected/tested.	Legal and Compliance	Required by Covid-19 Workplace Safety Regulations
Employee information	Name, surname, address, contact details, next of kin, employment contracts and amendments, bank account information.	Human Resources	Information required to be kept on file by BCEA, LRA, COIDA.
Customer contact details	Gender, name, surname, mobile number, e-mail address, birthday.	Sales	Required for marketing and sales information.
Customer and supplier contact details	Company registration documents, physical & postal address, VAT registration numbers, email addresses, telephone numbers and bank account confirmation letters for suppliers.	Finance	Collected for the purposes of creating new accounts on Sage and for the purposes of account payments.

8.2 Description of the categories of Data Subjects

- customers or organisations,
- prospects or leads,
- employees,



- recruiters and medical practitioners providing services related to employees,
- contractors, vendors, or suppliers,
- children and their guardians,
- debtors and creditors,
- dealers, and
- directors and shareholders.

8.3 Categories of personal information

- contact details, such as phone numbers, physical and postal addresses, and email addresses,
- personal details, such as names and ages,
- demographic details, such as races and age groups,
- health information,
- biometric information,
- account numbers,
- background information,
- contract information,
- credit information,
- market intelligence information,
- learner information, and
- debt and debtor information.

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

- Contractors, vendors, or suppliers.
- Agents, distributors, or other resellers.
- Operators, other responsible parties, or co-responsible parties.
- Third party vendors to help us maintain our services.

8.5 Planned transborder flows of personal information

Activity	Information Collected	Department	Purpose
National manufacturer and Employee licensing – Botswana	Name, surname, ID number, passport number, address, financial information, criminal record, credit history, educational, occupational.	Legal and Compliance	Required by the Botswana gambling legislation for the review and processing of applications for manufacturer registration and employee licensing.
Customer contact details	Gender, name, surname, mobile number, e-mail address, birthday.	Sales	Required for marketing and sales information.



Activity	Information Collected	Department	Purpose
Customer and supplier contact details	Company registration documents, physical & postal address, VAT registration numbers, email addresses, telephone numbers and bank account confirmation letters for suppliers.	Finance	Collected for the purposes of creating new accounts on Sage and for the purposes of account payments.

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

- Data backups;
- Anti-virus software installed at server and client level; and
- Secure firewall installed by external IT service provider.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on (<https://umafrika.co.za/legal-compliance/>) ,

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

9.1.3 to the Information Regulator upon request.

9.2 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.



10. UPDATING OF THE MANUAL

The head of umAfrika Gaming Technologies (Pty) Ltd will, on a regular basis, update this manual.

Issued by



19-Sep-2025

Mike Alexander

Date

PAIA Position: Head of Private Body

POPIA Position: Default Information Officer

Job Title: Managing Director

Promotion of Access to Information (PAIA) Forms

- *Form 01:* Request for a Guide from the Regulator [*Regulation 2*]
- *Form 01:* Request for a Copy of the Guide from an Information Officer [*Regulations 3*]
- *Form 02:* Request for Access to Record [*Regulation 7*]
- *Form 03:* Outcome of request and of fees payable [*Regulation 8*]
- *Form 04:* Internal Appeal Form [*Regulation 9*]
- *Form 05:* Complaint Form [*Regulation 10*]
- *Form 13:* PAIA Request for Compliance Assessment Form [*Regulation 14(1)*]

Please ensure that you use the LATEST version of the above forms. These are listed at <https://info regulator.org.za/paia-forms/> .

REVISION HISTORY

Revision Number	Section	Description of Change		
1.0	All	Creation		
2.0	4.1	a) Removed hyperlink from the statement “made available the revised Guide on how to use PAIA (“Guide”)”. b) Added the following: The guide is available at the following links to the Information Regulator’s website: <table><tr><td>Information Regulator’s Website</td><td>https://inforegulator.org.za/paia-guidelines/</td></tr></table>	Information Regulator’s Website	https://inforegulator.org.za/paia-guidelines/
	Information Regulator’s Website	https://inforegulator.org.za/paia-guidelines/		
	4.5.3	Added “Regulators website (see 4.1)” to ensure readers access the website for the latest version of the Guide.		
	4.6.3	a) Removed the hyperlinks from each of the languages the Guide is available in. b) Added “Please visit https://inforegulator.org.za/paia/ for the latest versions of these guides.”		
	9.1.1	Updated the website address for the PAIA manual (https://umafrika.co.za/legal-compliance/)		
6	Added the following: “We may have to refuse you access to certain records in terms of PAIA to protect: • someone else’s privacy (Section 63), • another company’s commercial information (Section 64), • someone else’s confidential information (Section 65), • research information (Section 68), • the safety of individuals and property (Section 66), or • records privileged from production in legal proceedings (Section 67). Our decision on giving you access: We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record. If we deny your request for access, you may: • apply to a court (Section 78) with appropriate jurisdiction, or • complain to the Information Regulator, for the necessary relief within 180 calendar days of us notifying you of our decision.”			



Revision Number	Section	Description of Change
	Promotion of Access to Information (PAIA) Forms	Added "Please ensure that you use the LATEST version of the above forms. These are listed at https://info regulator.org.za/paia-forms/" Removed the hyperlinks from the actual forms to ensure they do not point to an obsolete version.

