



**Ahead Start (Pty) Ltd T/A CALLPAY South  
Africa (CALLPAY)**

**PROMOTION OF ACCESS TO  
INFORMATION MANUAL**

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

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## **1. PURPOSE OF PAIA MANUAL**

This PAIA Manual is useful for the public to-

- 1.1. check the categories of records held by CALLPAY which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to a record of CALLPAY;
- 1.3. understand the description of the records of CALLPAY which are available in accordance with any other law;
- 1.4. access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 1.5. understand the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;
- 1.6. understand if the CALLPAY 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;
- 1.7. understand the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. understand the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. understand if CALLPAY 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
- 1.10. understand whether CALLPAY has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## **2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CALLPAY**

**Information Officer:** Arthur Peace

**E-mail:** arthur@callpay.com

**National or Head Office**

**Address:** Unit 92, 5 Beach Estate Blvd, Eden On The Bay, Big Bay, Cape Town, 7441

**Telephone:** 081 092 3212

**Email:** info@callpay.com

**Website:** <https://www.callpay.com/>

**3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 3.1. The Information 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 Protection of Personal Information Act 4 of 2013 (POPIA).
- 3.2. 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 Information Regulator, during normal working hours.
- 3.3. The Guide can also be obtained-
  - upon request to the Information Officer; and
  - from the website of the Information Regulator (<https://inforegulator.org.za/paia-guidelines/>).
- 3.4. A copy of the Guide is also available in the following official languages, for public inspection during normal office hours-  
  
[English](#)  
  
[Zulu](#)
- 3.5. You can access the Guide in the other official languages [here](#).

#### 4. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF PAIA

- 4.1. Records of a public nature, typically those disclosed on the CALLPAY’s website (<https://www.callpay.com/>) and in its various reports, may be accessed without the need to submit a formal application.
- 4.2. Other non-confidential records, such as statutory records maintained at CIPC, may be accessed without the need to submit a formal application, however, an appointment to view such records will still have to be made with the Information Officer.

#### 5. DESCRIPTION OF THE RECORDS OF THE BODY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Where applicable to its operations, CALLPAY also retains records and documents in terms of the legislation below.

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Notice of Incorporation	Companies Act 71 of 2008
Share Register	Companies Act 71 of 2008
Records of directors	Companies Act 71 of 2008
Minutes of meetings of the board of directors and committees	Companies Act 71 of 2008
Annual Financial Statements	Companies Act 71 of 2008
Accounting Records	Companies Act 71 of 2008
Register, record or reproduction of the earnings, time worked, payment for piece work and overtime and other prescribed particulars of all the employees	Compensation for Occupational and Diseases Act, 130 of 1993
Written particulars of an employee after termination of employment	Basic Conditions of Employment Act 75 of 1997
Employee’s name and occupation	Basic Conditions of Employment Act 75 of 1997
Time worked by each employee	Basic Conditions of Employment Act 75 of 1997
Remuneration paid to each employee	Basic Conditions of Employment Act 75 of 1997
Records of disciplinary transgressions, the actions taken by CALLPAY and the reasons for the actions	Labour Relations Act 66 of 1995
Employee records – names, identifications numbers and monthly remuneration and address at which employee is employed	Unemployment Insurance Act 63 of 2002
Employee race and gender information	Employment Equity Act 55 of 1998 Broad-Based Black Economic Empowerment Act 53 of 2003

Records of workplace incidents including incidents which resulted in employees having to receive medical treatment	Occupational Health and Safety Act, 84 of 1993 and Compensation for Occupational and Diseases Act, 130 of 1993
Records of recommendations made to CALLPAY in terms of issues affecting the health of employees	Occupational Health and Safety Act, 84 of 1993 and Compensation for Occupational and Diseases Act, 130 of 1993
Employee remuneration, and tax records	Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962
Tax records	Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962 and Value Added Tax Act 89 of 1991, Skills Development Levies Act 9 of 1999
Electronic communications and transactions records	Electronic Communications & Transactions Act 25 of 2002

**6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CALLPAY**

<b>Subjects on which CALLPAY holds records</b>	<b>Categories of records</b>
Corporate	Director and shareholder records Records relating to the incorporation of CALLPAY Statutory records Minutes and resolutions
Human Resources	HR policies and procedures Advertised posts Employee records Job Applicant records Training records
Finance	Tax records (CALLPAY and employees) Annual financial statements Bank statements Purchase Orders/Invoices Asset Register Insurance information
Operational	Operational reviews Merchant records Consumer (Payer) transaction records Vendor records Guidelines, policies and procedure Contracts Internal and external correspondence Records provided by a third party Information technology Strategic Plans

Subjects on which CALLPAY holds records	Categories of records
	Marketing materials Visitor Records Contact Records

## 7. PROCESSING OF PERSONAL INFORMATION

### 7.1. Purpose of Processing Personal Information

CALLPAY processes personal information in the ordinary course of its business, including, but not limited to, the following:

- providing and improving our services/products;
- creating and managing merchant accounts;
- profile creation and user verification for online services;
- managing commercial relationships with clients and suppliers;
- to receive goods and/or services from suppliers;
- recruitment;
- managing employee relationships and performing employment contracts;
- for security purposes;
- to comply with legal obligations;
- information analysis;
- marketing our services / products;
- communication purposes; and
- administering our website.

For more information regarding the purposes we process personal information, please see our Privacy Notice on our website or for employees, please contact the Information Officer.

### 7.2. Description of the categories of Data Subjects, the information or categories of information relating thereto and categories of recipients

Most commonly, CALLPAY processes the following personal information of the following categories of data subjects:

Categories of Data Subjects	Personal Information that may be processed	Categories of recipients
<b>Merchants</b>	<p>Name and contact details</p> <p>Company registration details and incorporation documents</p> <p>Financial and tax information</p> <p>Director names, contact details and identification number/passport numbers/date of birth/nationality/country of residence/political affiliations/ criminal records or ongoing criminal investigations</p> <p>Key employee names, contact details and identification number/passport numbers/ date of birth/nationality/country of residence/political affiliations/ criminal records or ongoing criminal investigations</p> <p>Shareholder names, contact details and identification number/passport numbers/company registration numbers/date of birth/country of residence/political affiliations/ criminal records or ongoing criminal investigations</p> <p>Teleconference and video conference call recordings</p> <p>Additional information you choose to tell us</p>	<p>Customer information may be shared with:</p> <ul style="list-style-type: none"> <li>● Our affiliates</li> <li>● Our suppliers and Operators</li> <li>● Professional service providers</li> <li>● Other customers</li> <li>● Third Party verification, credit bureaus, debt collectors and background check agencies</li> <li>● Regulatory authorities and the courts</li> <li>● Persons or organisations in the context of a sale of our shares, assets or business</li> </ul>
<b>Consumers (Payers)</b>	<p>Name</p> <p>Banking credentials (not retained)</p> <p>Cardholder details (not retained)</p> <p>Additional information you choose to tell us</p>	<p>Consumer information may be shared with:</p> <ul style="list-style-type: none"> <li>● Our affiliates</li> <li>● Our suppliers and Operators</li> <li>● Professional service providers</li> <li>● Other customers</li> <li>● Third Party verification, credit bureaus, debt collectors and background check agencies</li> </ul>



		<ul style="list-style-type: none"> <li>Regulatory authorities and the courts</li> </ul> <p>Persons or organisations in the context of a sale of our shares, assets or business</p>
<b>Suppliers</b>	Name and contact details Company registration details and incorporation documents Physical and/or postal address Director names and contact details Key employee names and contact details Financial and tax information Teleconference and video conference call recordings Additional information you choose to tell us	Supplier information may be shared with: <ul style="list-style-type: none"> <li>Our affiliates</li> <li>Our suppliers and Operators</li> <li>Professional service providers</li> <li>Our customers</li> <li>Regulatory authorities and the courts</li> <li>Persons or organisations in the context of a sale of our shares, assets or business</li> </ul>
<b>Employees</b>	Name and Contact Details Medical information Identity number and date of birth / ID and/or passport copies Gender Disability information Employment history Criminal records and credit history Employment contracts Performance records Details of dependants, marital status and emergency contacts Payroll, financial and tax records Electronic access and communication records Physical access records Surveillance records Training records Leave records Device usage data including IP address, and online activity Details of payments to third parties Teleconference and video conference call recordings	Employee information may be shared with: <ul style="list-style-type: none"> <li>Our affiliates</li> <li>Our suppliers and Operators</li> <li>Professional service providers</li> <li>Our customers</li> <li>Third Party verification, credit bureau and background check agencies</li> <li>Regulatory authorities and the courts, including the police</li> <li>Persons or organisations in the context of a sale of our shares, assets or business</li> </ul>

	Additional information you choose to tell us	
<b>Job Applicants</b>	Name and contacts details Country of residence Visa information Educational background Interview notes and assessment result Employment history Additional information you choose to tell us	Job applicant information may be shared with: <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• Our suppliers and Operators</li> <li>• Professional service providers</li> <li>• Third Party verification, credit bureau and background check agencies</li> <li>• Regulatory authorities and the courts</li> </ul>
<b>Persons who visit / work at our premises</b>	Names and contact details CCTV Footage	Personal Information may be shared with: <ul style="list-style-type: none"> <li>• Our suppliers and Operators</li> <li>• Professional service providers</li> <li>• Regulatory authorities and the courts</li> </ul>
<b>Persons who contact us / subscribe to our newsletters /engage with us and visitors to our website and apps</b>	Name and contact details Browser information (e.g., IP address, browser type and version, operating system, language), date and time of access, device information, traffic source, content you browse and your navigation around our applications Social log-in information including language preferences, profile photos, social media handles/usernames and online activity You preferences Additional Information you choose to tell us	Personal Information may be shared with: <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• Our suppliers and Operators</li> <li>• Professional service providers</li> <li>• Regulatory authorities and the courts</li> </ul>

### 7.3. Planned transborder flows of personal information

While we generally store all of the personal information that we collect about you in the Republic of South Africa, it is possible that your personal information will be transmitted and hosted outside your region.

We ensure that countries to which your information is being shared either have adequate laws in place or that we entered into contractual arrangements to ensure the protection of your personal information.

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

We apply physical, technical and administrative measures to protect your personal information that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers. We do not transfer your personal information outside of the country of your resident unless we are satisfied that there are sufficient safeguards in place to protect your personal information.

We employ up to date technology to ensure the confidentiality, integrity and availability of the personal information under our care. Measures include, but are not limited to:

- Encryption
- Virus protection software and update protocols.
- Electronic and physical access control.
- Secure setup of hardware and software making up the IT infrastructure.
- Outsourced service providers who process personal information on behalf of us are contracted to implement security controls.
- Policies and procedures are implemented to ensure the security of your information.

## **8. FORM OF REQUEST**

A requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.

A request for access to records held by CALLPAY in terms of section 50 of PAIA must be made on the form contained in the Regulations regarding the Promotion of Access to Information ([Form 2](#)). The request must be made to CALLPAY at the address or email address, specified in section 2 above.

A requester must provide sufficient detail on the prescribed form to allow CALLPAY to identify the record or records which have been requested and the identity of the requester. 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 CALLPAY. 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.

A requester will receive a response to their request on the [Form 3](#).

## **9. AVAILABILITY OF THE MANUAL**

9.1. A copy of the Manual is available-

- on CALLPAY website;
- head office of CALLPAY 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.

9.2. A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

## **10. UPDATING OF THE MANUAL**

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

***Issued by***

***Arthur Peace***

**INFORMATION OFFICER**