257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

PAIA MANUAL

iContact

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 | Version 1.0 | [27 October 2026]

1. Introduction and purpose

This manual tells you what records iContact holds, how to request access to them under PAIA, what it costs, and what to do if a request is refused.

iContact Pty Ltd, trading as iContact ("iContact", "the company", "we"), is a private body that provides outsourced contact centre and business process services to clients in South Africa. This manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"). Section 32 of the Constitution gives everyone the right of access to information held by another person, where that information is needed to exercise or protect a right. PAIA gives effect to that right.

This manual works together with the iContact POPI Policy (version 3.0). PAIA covers requests for access to records of any kind. The Protection of Personal Information Act 4 of 2013 ("POPIA") covers how we handle personal information, and gives data subjects the right to know what we hold about them and to ask for it to be corrected or deleted. Terms such as "personal information", "data subject" and "record" have the meanings given in PAIA and POPIA. Under the POPI Policy, our Information Officer develops and maintains this manual, regulates access to information under PAIA, and administers POPIA. We consider every access request against this manual, and the Information Officer will direct you to the correct route if you are unsure which applies. Section 7 of this manual summarises how we process personal information, and the POPI Policy sets out the full detail.

2. Company and contact details

Requests under PAIA go to the Information Officer at the details below. The Chief Executive Officer is the head of the private body for the purposes of PAIA and also serves as the Information Officer. The Deputy Information Officer assists with day-to-day requests.

Item	Detail
Registered name	iContact Pty Ltd, trading as iContact
Registration number	2015/272807/07
Head of the private body	Clinton Cohen, Chief Executive Officer
Information Officer	Mlibazisi Sibanda, Global Head: Compliance
Deputy Information Officer	Clementine Nakeli, Compliance Officer
Physical address	257 Beyers Naude Drive, Cresta, Randburg, Johannesburg, Gauteng 2195
Postal address	P.O. Box 4591 Cresta 2118
Telephone	011 019 0290
Email for PAIA and POPIA requests	privacy@icontactbpo.com
Website	www.icontactbpo.com

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

Item	Detail
Inspection hours	Monday – Friday: 0900hrs – 1700hrs, excluding public holidays & weekends.

This manual applies to iContact only. Other companies in the Alefbet group publish their own manuals.

3. The Information Regulator's PAIA Guide

The Information Regulator publishes a guide, in all official languages, on how to use PAIA and POPIA. It explains the right of access, how to make a request to a public or private body, and the remedies available. You can download the Guide from the Regulator's website, or ask the Regulator or our Information Officer for a copy.

Information Regulator	Detail
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

Our Information Officer can also help you understand how to make a request. Contact details are in section 2.

4. Records available without a request

No notice has been published under section 52(2) of PAIA listing categories of records that are automatically available. The following are available to anyone without a formal request:

- This PAIA manual.
- The request forms referred to in section 8, including Form 2 and the Personal Information Request Form.
- The public content of our website, including service and corporate information.
- Our privacy notice and a summary of the POPI Policy, where published.

All other records are available only through a formal request under section 8 of this manual, and may be refused on the grounds in section 9.

5. Records available under other legislation

We keep records as required by the legislation below, where it applies to the company. This list is not exhaustive. Access to these records is governed by the relevant Act and by PAIA.

Legislation	Type of record
Companies Act 71 of 2008	Company registration, directors, shareholders, annual financial statements

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

Legislation	Type of record
Promotion of Access to Information Act 2 of 2000 and Protection of Personal Information Act 4 of 2013	Manual, access requests and decisions, processing and security records, complaints and breach registers
Consumer Protection Act 68 of 2008	Consumer complaints and consumer rights records
Electronic Communications and Transactions Act 25 of 2002	Electronic communications and transaction records
Basic Conditions of Employment Act 75 of 1997	Employment contracts, working time and leave records
Labour Relations Act 66 of 1995	Disciplinary, grievance and collective agreement records
Employment Equity Act 55 of 1998	Employment equity plans and reports
Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999	Training and levy records
Unemployment Insurance Act 63 of 2001	UIF contribution records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury on duty records
Occupational Health and Safety Act 85 of 1993	Health and safety records
Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991 and Tax Administration Act 28 of 2011	Tax and VAT records
Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE certificates and scorecard records

6. Subjects and categories of records held

The table lists the subjects on which we hold records and the categories of record on each. Listing a record here does not mean it will be released. Each request is assessed against the grounds for refusal in section 9.

Subject	Categories of records
Client programmes and contracts	Service agreements and statements of work; operator and data processing agreements; scripts, call flows and operating procedures; service level and performance reports; client correspondence and instructions
Customer interactions	Call recordings and call logs; transcripts; email, chat and messaging records; quality assurance and monitoring records; complaint and escalation records
Workforce management	Forecasts, schedules, attendance, adherence and productivity records
Training and quality	Training material and attendance; assessments and coaching records; quality scorecards

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

Subject	Categories of records
Human resources	Employment contracts; payroll and benefits; leave, attendance and performance records; disciplinary and grievance records; recruitment files
Information technology and security	System, telephony platform and access logs; asset registers; backup and recovery records; security policies; vendor access records
Compliance and risk	POPIA and PAIA records; complaints register; audit and certification records; incident and breach registers; policies and procedures
Finance and tax	Annual financial statements; management accounts; ledgers; invoices; bank records; tax and VAT returns; budgets
Suppliers and procurement	Supplier contracts; vendor due diligence; correspondence; invoices and statements
Corporate and governance	Incorporation documents; share registers; minutes and resolutions; statutory returns
Marketing and communications	Brochures and presentations; website content; brand assets
Facilities	Lease agreements; building and site records; health and safety records

Many customer interaction records, such as call recordings, are held by us on behalf of our clients, who decide why and how the information is processed. They carry personal and confidential information about third parties. Sections 8 and 9 explain how this affects access.

7. Processing of personal information

iContact processes personal information only for lawful, specific purposes and only as far as needed for them. This section summarises that processing for PAIA purposes. It is consistent with the iContact POPI Policy, which prevails if the two ever differ.

Our roles. For most client programmes, iContact is an operator. It processes the personal information of the client's customers on the client's instructions and under a written agreement. iContact is a responsible party for its own employee, applicant, supplier and website visitor information, and for any processing where it decides the purpose and means itself. The role depends on the actual activity and contract.

Purposes of processing

- Delivering outsourced contact centre services for clients, including inbound and outbound customer contact, enquiries, queries and account administration.
- Recording and monitoring calls and other interactions for quality, training, dispute resolution and compliance, as instructed by the client.
- Managing workforce scheduling, performance and training.
- Managing employees, recruitment, payroll and benefits.
- Managing clients, suppliers and service providers.
- Meeting legal and regulatory obligations, including record-keeping, tax and reporting duties.
- Protecting our people, systems and premises.

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

Categories of data subjects and information

Data subject	Personal information processed
Clients' customers and callers	Names, identity and contact details; account and reference numbers; the content of calls and messages; call recordings; information the client instructs us to process for its programme
Clients and their staff	Business and contact details, roles, instructions, contract and correspondence information
Employees and job applicants	Identity and contact details; employment, payroll, banking, qualification, performance and disciplinary information
Suppliers and service providers	Business, contact, banking and contract information
Website visitors and other enquirers	Contact details, enquiry content, technical usage data

Recipients to whom information may be supplied

- Our clients, in respect of the programmes we run for them.
- Information technology, telephony, hosting, communications, quality assurance and payment service providers acting as operators or sub-operators under written agreements.
- Group shared service teams, where authorised and protected. Group membership alone does not entitle a recipient to personal information.
- Attorneys, auditors and professional advisers.
- Regulators, courts, law enforcement and other authorities where the law requires or permits it.

Transfers outside South Africa. We do not transfer personal information outside South Africa without the express permission of the Information Officer. Where a client programme or service provider requires a transfer, we proceed only if section 72 of POPIA is met: the recipient is subject to law or a binding agreement giving substantially similar protection, the data subject consents, or another section 72 condition applies.

Information security measures. We match security to the sensitivity of the information. Controls include: access limited to authorised individuals; servers sited in secure locations; encryption of personal information in transit and at rest; firewalls and endpoint detection and response software on servers and computers; continuous security monitoring; regular penetration testing and IT audits; regularly tested backups; due diligence on operators and service providers before we contract with them, and agreements that bind them to POPIA; and assessment and approval of any AI or automated tool before it is used with personal information. Employees sign confidentiality terms and receive POPI awareness training. Anyone who suspects a breach must report it to the Information Officer within 4 hours. We keep a breach log. Where we process information as an operator, we notify the client immediately of any security compromise. Where we are the responsible party, we notify the Information Regulator and affected data subjects as section 22 of POPIA requires. The Information Officer schedules periodic POPI audits.

Rights of data subjects. Under POPIA and our POPI Policy, a data subject may: ask whether we hold their personal information and request access to it; ask us to correct or delete it; object on reasonable grounds to its processing; object to direct marketing by unsolicited electronic communications; be told when their information is collected, and when it may have been accessed by an unauthorised person; and complain to the Information Regulator or bring civil proceedings. Section 8 explains how requests are made and charged, and section 10 how complaints are handled.

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

8. How to request access to a record

Send a completed Form 2 (Request for Access to Record) to our Information Officer. We decide within 30 days of receiving a complete request and the request fee.

You can get Form 2 in three ways: download it from the PAIA page of our website at www.inforegulator.org.za/paia/, where we publish it beside this manual; download it from the Information Regulator's website; or ask the Information Officer to email it to you.

1. Complete Form 2 in full. Describe the record clearly enough for us to find it, say which right you want to exercise or protect, and say how you want access (copy, inspection, transcription, or electronic copy).
2. Attach proof of identity, such as a certified copy of your identity document. If you ask for a record on someone else's behalf, attach proof of that capacity. Provide only the identity evidence reasonably needed to verify identity and authority.
3. Send the form by email, by post or by hand, using the details in section 2. If you cannot read or write, or have a disability, you may make the request orally and we will complete the form for you.
4. Pay the request fee, unless you are a personal requester (see below). We confirm receipt and tell you if anything is missing.
5. We decide within 30 days. We may extend this once by up to 30 days where the request is for a large number of records, needs a search in different premises, or needs consultation, and we tell you before the first 30 days end.
6. We notify you of the decision in writing. If access is granted, the notice sets out any access fee, any deposit, the form of access and the time to appeal or complain. If we do not respond in time, the request is treated as refused.

Records we hold for a client. Where a record is held by us on behalf of a client, for example a call recording from a client programme, we assess whether it is in our possession or under our control. We may consult the client before deciding, and we will tell you if your request should be made to the client instead. A client's ownership of, or confidentiality terms over, a record does not by itself defeat a request.

Personal requesters and POPIA requests. If you ask for a record that contains your own personal information, you do not pay the request fee. You pay only the access fee for reproduction, search and preparation. You may instead ask what personal information we hold about you, and why, using our Personal Information Request Form, which the Information Officer supplies on request. We verify your identity before releasing anything, and we process the request within 30 days, which we may extend once by up to 30 days with notice. To have your information corrected or deleted, use the same form or the dedicated mailbox in section 2. The Information Officer will process your request under whichever Act fits. Where we hold your information only as an operator for a client, we may need to refer you to that client.

Fees. The fees below are those prescribed under PAIA at the date of this manual. They may change, and the amounts in force when you make your request apply.

Item	Fee
Request fee (every requester except a personal requester)	R140.00
Photocopy or printed copy, A4	R2.00 per page or part
Electronic copy on a flash drive you provide	R40.00

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

257 Beyers Naude Drive
Blackheath, Randburg
South Africa

Tel: +27 (0) 11 019 0290
Fax: +27 (0) 86 677 7994
www.icontactbpo.com

Item	Fee
Electronic copy on a CD you provide	R40.00
Electronic copy on a CD we provide	R60.00
Transcription of audio, per A4 page	R24.00
Copy of audio on a flash drive or CD you provide	R40.00
Copy of audio on a CD we provide	R60.00
Search and preparation, per hour or part of an hour after the first hour	R145.00, capped at R435.00 per request
Postage, email or electronic transfer	Actual cost

If the search for the records will take more than six hours, or reproduction fees will be significant, we may ask for a deposit of one third of the estimated access fee before we search. We refund the deposit if access is refused. The current schedule is on the Information Regulator's fee page.

9. Grounds for refusal of access

We may refuse access only on a ground in Chapter 4 of Part 3 of PAIA, and we give written reasons and the provision relied on. Where a record has parts that can be disclosed, we release those parts.

- Protection of the privacy of a third party who is a natural person, including a deceased person (section 63). This is the most common ground for us, because call recordings and customer files hold information about people other than the requester.
- Protection of the commercial information of a third party (section 64).
- Protection of certain confidential information of a third party, such as information we hold under a duty of confidence to a client (section 65).
- Protection of the safety of individuals and the protection of property (section 66).
- Protection of records privileged from production in legal proceedings (section 67).
- Protection of our own commercial information (section 68).
- Protection of research information (section 69).
- The record does not exist or cannot be found after a reasonable search. We then give you an affidavit or statement saying so (section 55).

A ground for refusal does not apply if disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70).

If a record concerns a third party and we are considering releasing it, we notify the third party and consider their representations before deciding. The third party has the same rights to complain or apply to a court as a requester.

10. Remedies if a request is refused

There is no internal appeal against a decision of a private body. If you are unhappy with our decision, you have two remedies, and you may use either or both:

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro

1. **Complaint to the Information Regulator.** Lodge a complaint on the prescribed form (PAIA Form 5) within 180 days of our decision. Send it to PAIAComplaints@inforegulator.org.za. Contact details are in section 3.
2. **Application to court.** Apply to a court with jurisdiction for appropriate relief within 180 days of our decision. A court can order us to release the record.

Third parties who object to our decision to release a record have the same remedies.

Complaints about personal information. Submit a written complaint to the Information Officer at the address or dedicated mailbox in section 2. The Information Officer will give you a POPI Complaint Form where needed, acknowledge the complaint within 2 working days, and revert with a proposed solution within 7 working days of receipt. You may ask for the complaint to be escalated to our governing body. If you are still not satisfied, you may complain to the Information Regulator under section 74 of POPIA.

11. Availability, review and document control

This manual is available on our website, at our principal place of business during business hours, and from the Information Officer on request. We provide a copy to the Information Regulator on request. We review it at least once a year, and sooner if our details, structure or the law change. The next review is due 12 months after the approval date.

Item	Detail
Document	PAIA Manual, iContact
Version	1.0
Issue date	27 October 2026
Owner	Information Officer
Approved by	Clinton Cohen, Chief Executive Officer
Related documents	iContact POPI Policy (version 3.0); Alefbet Cyber Security Policy (version 1.0)

iContact (Pty) Ltd Reg No. 2015/272807/07
Directors: Clinton Cohen (Managing), David Hood, Daniel Shapiro, Yaron Shapiro