

**PROMOTION OF ACCESS TO INFORMATION MANUAL OF
GATEWAY COMMUNICATIONS (PTY) LTD
("GATEWAY COMMUNICATIONS")
IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT 2 OF 2000 ("PAIA")**

1. Introduction

This manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act, 2000 ("**PAIA**"). This manual explains how requesters can submit requests for access to information to Gateway Communications in terms of PAIA.

2. The business

Gateway Communications is a Business to Business Telecommunications provider and part of PCCW Global. We provide carrier services solutions including regional, national, and international voice connectivity services, cellular backhaul, and satellite networks and infrastructure service.

- 2.2 Stephan Hugo has been duly appointed by the head of PCCW Global, as the Information Officer for PCCW Global and is the person to whom requests for access to information must be made in terms of PAIA and in terms of the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

3. Gateway Communications' contact details

Details	Information Officer
Name	Stephan Hugo
Postal Address	PO Box 12, The Woodlands, 2080, Gauteng, South Africa
Physical Address	Building 12, Woodmead Estate, 1 Woodmead Drive, Woodmead, 2191, Gauteng, South Africa
Telephone	011 799 7111
Email	InformationOfficer-ZA@pccwglobal.com

4. The Section 10 Guide on how to use PAIA

- 4.1 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 POPIA. The guide is available from the offices of the Information Regulator and on its website (<https://infoeregulator.org.za/>). The Guide is also available for inspection at Gateway Communications offices in English and any of the other official languages if needed, during normal working hours. For any queries concerning this guide please direct any queries to:.

Information Regulator:

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg,
2191

Telephone Number: 010 023 5200

Website: <https://infoeregulator.org.za/>

email (complaints): PAIAComplaints@infoeregulator.org.za

email (general enquiries): enquiries@infoeregulator.org.za

5. Records that are available in terms of other legislation

5.1 Gateway Communications does not make available to requesters any records that are automatically available and no notice has been published in terms of section 52(2) of PAIA regarding the categories of Gateway Communications' records which are automatically available to requesters without having to request access to such information.

5.2 A requester may request information which is available in terms of the following legislation, provided that the requester complies with the requirements set out in such legislation, this manual and PAIA:

5.2.1 Basic Conditions of Employment Act, 1997;

5.2.2 Companies Act, 2008;

5.2.3 Compensation for Occupational Injuries and Diseases Act, 1993;

5.2.4 .Electronic Communications and Transactions Act 2 of 2000

5.2.5 Employment Equity Act, 1998;

5.2.6 Income Tax Act, 1962;

5.2.7 Labour Relations Act, 1995;

5.2.8 Occupational Health and Safety Act, 1993;

5.2.9 Promotion of Access to Information Act, 2000;

5.2.10 Protection of Personal Information Act, 2013;

5.2.11 Skills Development Levies Act, 1999;

5.2.12 Unemployment Insurance Act, 2001; and

5.2.13 Value Added Tax Act, 1991.

Please note that the legislation listed above is not a closed list of legislation in terms of which Gateway Communications holds records.

6. Subjects and categories of information held by Gateway Communications

The subjects and categories of records held by Gateway Communications are as follows:

Subject	Category
Company records	Constitutional documents (including incorporation documents, the memorandum of incorporation and the shareholders agreement) Share registers, share certificates, registers and details concerning shareholder meetings and resolutions Details concerning the identity of directors, directors' meetings, director resolutions Statutory registers and minute books
Financial records	Bank records Financial statements Management accounts Audit reports Tax records
Strategic and operational information	Minutes of management meetings Minutes of board meetings Annual reports

Assets	Asset register Share certificates Debtors information Bank account reconciliation
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Liabilities	General ledger
Information technology	Asset register Repair and maintenance records Software licences IT policies and procedures
Compliance	General policies and procedures – compliance tasks with reporting
Human resources	Staff records Contracts of employment Statutory records Training and skills development records Employment equity records Leave records Beneficiary records HR policies and procedures Disciplinary procedures Salary information Pension fund information Medical aid information

Contractual relationships	Leases Contracts with customers Contracts with vendors
Customer Information	Customer details

	Communications with customers Sales contracts Transactional information
Marketing	Brand Information Strategies Agreements Client relationship programmes Marketing publications and brochures

7. Description of personal information processing in terms of POPIA

Gateway Communications processes personal information as follows:

Subject	Category
Purpose of the processing	Sale of products and services To verify identity To process applications to subscribe to our services To market products and services to customers To comply with statutory obligations To conduct market research surveys To conduct credit checks Security, administrative and legal purposes To fulfil contractual obligations that we have with customers or third parties
Data subject categories and their personal information	Employees: record of employee life cycle General public: general enquiries and viewing the company website Industry bodies: membership records Media: records of media interactions Service providers: record of service provider life cycle Clients: records of life cycle

Recipients of personal information	Employee pension funds Companies in the same group as us Financial institutions Industry bodies Law enforcement Medical aid schemes Operators (service providers) Statutory authorities
Expected transnational transfer of personal information	Transfer of personal information to operators Transfer of personal information to other members in the group Transfer of personal information through social media platforms
Security measures to protect personal information	Physical security measures • Access control measures • Internal security measures Cyber security measures • Anti-spam measures

	• Anti-virus measures • Installing security firewalls • Password control Training programs on information security Information security audits IT-related company policies
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For more information on how we process personal information, please refer to our privacy policy available at: <https://www.pccwglobal.com/privacy-statement/>

8. The request procedure

8.1 Prescribed form

8.1.1 A request for information must be made in the prescribed form, a copy of which is attached as Annexe A, must be addressed to the Information Officer and must be submitted with the prescribed fee (see paragraph 8.3).

8.1.2 The prescribed request form is available from the Information Officer and from the Information Regulator, whose contact details are set out in paragraph 4 above.

8.2 Manner of request

8.2.1 The request must be made to the address, facsimile number or email address of Gateway Communications (PTY) Ltd set out in paragraph 3 above.

8.2.2 The requester must provide enough detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form (mode/method) of access is required. The requester should indicate if it requires notice of the decision of the Information Officer in any manner, other than in writing.

8.2.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

9

8.2.4 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

8.3 Fees

8.3.1 A requester who seeks access to a record containing personal information must pay the required request fee.

- 8.3.2 The Information Office must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.
- 8.3.3 The requester may lodge an application to the high court relating to the payment of the request fee.
- 8.3.4 After the Information Officer has decided on the request, the requester must be notified in the required form.
- 8.3.5 If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.
- 8.3.6 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.

9. Availability of this manual

This manual is available for inspection free of charge at Gateway Communications' principal place of business set out in paragraph 3 above, during normal business hours and also at <https://www.pccwglobal.com/privacy-statement/>;

10 Changes to this Manual

This manual will be updated from time to time by the Information Officer of Gateway Communications.

Annex A

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile
	Cellular		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			

Postal Address	
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Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD

(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned	

right:	
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FEES	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d) If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer