

	PAIA MANUAL	
	Manual Code	HR-MAN-01
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

PAIA MANUAL

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

	PAIA MANUAL	
	Manual Code	HR-MAN-01
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

TT Connect (PTY) LTD

1	Definitions	3
2	Purpose of the PAIA Manual	4
3	Key Contact Details for Access to Information of TT Connect (Pty) Ltd	5
4	Guide on how to use PAIA and how to Obtain Access to the Guide	6
5	Guide of Information Regulator	7
6	Latest Notices in terms of Section 52(2) of PAIA	8
7	Availability of Certain Records in terms of PAIA	8
8	Request Process	11
9	Grounds for Refusal	12
10	Remedies Should a Request be Refused	13
11	Fees	13
12	Processing of Personal Information	14
13	The Recipients or Categories of Recipients to whom the Personal Information may be Supplied	16
15	Availability of the Manual	18
16	Objection to the Processing of Personal Information by a Data Subject	18
17	Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information	18
18	Updating of the Manual	19
19	Applicable Forms (PAIA and POPIA)	20

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Term	Definition
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the 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 IO and DIO who will assist the public with the records that 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 recipients or categories of recipients to whom the personal information may be supplied.
- 2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 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 TT Connect (Pty) Ltd

3.1 Chief Information Officer

Name	Clayton Reeve
------	---------------

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Contact number	010 492 5070
Email address	legal@ttconnect.co.za

3.2 National or head office

Physical address	Clearwater Corporate Office Park North Block C Cnr Atlas & Merlin drive Parkhaven Boksburg 1459
Postal address	Clearwater Corporate Office Park North Block C Cnr Atlas & Merlin drive Parkhaven Boksburg 1459
Contact number	010 492 5070
Email	legal@ttconnect.co.za
Registration number	1971/002281/07

3.3 Subsidiary Company

Company name	Tesuco Telecommunications (Pty) Ltd
Company registration number	1965/004423/07
Information Officer	Clayton Reeve
Email	legal@ttconnect.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.
- 4.2 The guide is available in each of the official languages and in braille.
- 4.3 The aforesaid guide contains the description of:
 - 4.3.1 The objects of PAIA and POPIA;
 - 4.3.2 The postal and street address, phone and fax number and, if available, email address of:
 - 4.3.3 The IO of every public body, and

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 4.3.4 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA¹;
- 4.3.5 The manner and form of a request for:
- 4.3.5.1 Access to a record of a public body contemplated in section 11².
 - 4.3.5.2 Access to a record of a private body contemplated in section 50³.
 - 4.3.5.3 An internal appeal.
 - 4.3.5.4 A complaint to the Regulator.
 - 4.3.5.5 An application with a court against a decision by the IO 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.
- 4.3.6 The provisions of sections 14⁴ and 51⁵ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.7 The provisions of sections 15⁶ and 52⁷ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.8 The notices issued in terms of sections 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access;
- 4.3.9 The regulations made in terms of section 92¹⁰;
- 4.3.10 The assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.11 The assistance available from the Regulator in terms of PAIA and POPIA; and

¹ 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

² Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 50 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.

⁴ Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

⁵ Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

⁶ Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁷ Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁸ Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

⁹ Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

¹⁰ Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

4.3.12 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.

4.4 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 Upon request to the IO.

4.5.2 From the website of the Regulator (www.inforegulator.org.za.)

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

4.6.1 English.

4.6.2 Afrikaans.

4.6.3 Zulu.

5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

Postal address	P O Box 31533, Braamfontein, Johannesburg, 2017
Contact number	+27 (10) 023-5200
Website	www.inforegulator.org.za
Email	PAIAComplaints@inforegulator.org.za .

6 Latest Notices in terms of Section 52(2) of PAIA

While no official notice has been published by the Minister under Section 52(2) of PAIA, the company voluntarily makes the following records available without a formal request.

7 Availability of Certain Records in terms of PAIA

Categories of Records Held by TT Connect (Pty) Ltd Available Without a Formal Request and Records Available Upon Request:

 TT Connect LAST MILE OPEN ACCESS FIBRE	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Category of Records	Types of the Record	Available Without a Formal Request	Available on Request
PAIA Manual	Company's current PAIA Manual	X	X
Company Overview	Company profile, business overview, information relating to TT Connect as the holding company and Tesuco Telecommunications as its operational fibre network subsidiary, organisational structure, vision, values, management information and contact details.	X	X
Products and Services	Information relating to telecommunications infrastructure, turnkey telecommunication solutions, fibre network infrastructure, internet connectivity services, alternative power solutions, telecommunication station design, installation and maintenance services, radio frequency equipment, and related technical products and services offered by the Group.	X	X
Network Infrastructure and Service Information	Public information relating to fibre network coverage, network availability, service offerings, service areas, installation processes, IP assignment logs, fault data, Call Detail Records and technical specifications, where appropriate.	X	X
Policies (Public-Facing)	Privacy Policy, Website Terms of Use, Cookie Policy (where applicable), Acceptable Use Policy and other publicly available governance policies.	X	X
Legal Disclosures	Website disclaimers, terms and conditions, regulatory notices, licence information (where applicable), compliance notices and other legal disclosures.	X	X
News and Announcements	Company news, business updates, network expansion announcements, infrastructure developments, partnerships, certifications, community initiatives and other corporate announcements.	X	X
Marketing Material	Company brochures, capability statements, service brochures, network information, presentations, promotional material and other marketing collateral relating to Tesuco Telecommunications and TT Connect.	X	X
POPIA and PAIA Awareness Training Records	Records of internal or external training and awareness initiatives relating to the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA).	–	X

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Information Officer Contact Details	Name, designation, email address, telephone number and business address of the Information Officer.	X	X
--	---	---	---

7.1 Description of the records/subjects of TT Connect (Pty) Ltd which are available in accordance with any other legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI), company registration documents, share register, directors' resolutions, board meeting minutes and statutory records	Companies Act, 71 of 2008
Employment contracts, employee files, payroll records, attendance registers, leave records, remuneration records and HR policies (applicable to TT Connect and Tesuco Telecommunications employees and any employees of other operating entities)	Basic Conditions of Employment Act, 75 of 1997
Disciplinary records, grievance records, employment policies, CCMA documentation and collective agreements (where applicable)	Labour Relations Act, 66 of 1995
Employment Equity Plan, Employment Equity Reports (EEA2 and EEA4), Employment Equity Committee records and workforce profiles	Employment Equity Act, 55 of 1998
Workplace Skills Plans (WSPs), Annual Training Reports (ATRs), training records, learnership documentation and skills development records	Skills Development Act, 97 of 1998
PAYE records, IRP5 certificates, employee tax records, tax returns and correspondence with SARS	Income Tax Act, 58 of 1962
UIF contribution records, declarations and employee benefit records	Unemployment Insurance Act, 63 of 2001
VAT returns, annual financial statements, accounting records, management accounts, financial statements and correspondence with SARS	Value-Added Tax Act, 89 of 1991; Income Tax Act, 58 of 1962
Occupational health and safety policies, risk assessments, incident reports, safety inspections, Health and Safety Committee records, safe work procedures and workplace safety documentation	Occupational Health and Safety Act, 85 of 1993
Compensation Fund registration, injury-on-duty reports, compensation claims and related records	Compensation for Occupational Injuries and Diseases Act, 130 of 1993
B-BBEE certificates, procurement records, supplier records, transformation documentation and enterprise and supplier development records	Broad-Based Black Economic Empowerment Act, 53 of 2003
Customer agreements, supplier agreements, fibre service agreements, internet connectivity agreements, installation agreements, maintenance contracts, service level	Consumer Protection Act, 68 of 2008 (where applicable)

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

agreements (SLAs), contractor agreements, customer support records and complaints	
Telecommunications network records, fibre infrastructure records, network maintenance records, service provisioning records, fault management records, network performance reports and technical service documentation	Electronic Communications Act, 36 of 2005
Telecommunications licences, regulatory correspondence, spectrum-related records (where applicable), compliance reports and communications with regulatory authorities	Electronic Communications Act, 36 of 2005; Independent Communications Authority of South Africa Act, 13 of 2000
Personal information processing records, privacy notices, consent records, operator agreements, records of processing activities, information security records, data breach registers and access control records	Protection of Personal Information Act, 4 of 2013
PAIA Manual, access to information requests, request registers, Information Officer records and PAIA compliance records	Promotion of Access to Information Act, 2 of 2000
Electronic communications, email records, website records, electronic agreements, electronic signatures, digital correspondence and electronic transaction records	Electronic Communications and Transactions Act, 25 of 2002
Records retention schedules, document disposal records, archives and document management records	National Archives and Records Service of South Africa Act, 43 of 1996 (where applicable)
Lawful interception requests, communication-related information records, subscriber identification and verification records (where applicable), SIM registration records (where applicable), and records maintained to comply with lawful interception obligations	Regulation of Interception of Communications and Provision of Communication-Related Information Act, 70 of 2002 (RICA)
Cybersecurity policies, information security policies, network security records, cyber incident and breach records, security monitoring logs, vulnerability assessments, penetration testing reports, digital forensic records, incident response records and cybercrime reporting records	Cybercrimes Act, 19 of 2020
Records relating to the hosting, publication or distribution of digital or online content (where applicable), website and online platform compliance records, content moderation records and related compliance documentation	Films and Publications Act, 65 of 1996

**Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

7.2 The company holds and/or processes the following records for the purposes of PAIA and POPIA:

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 7.2.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.
- 7.2.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
- 7.2.3 Further information which may be made available upon request.
- 7.3 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

- 8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.
- 8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
 - 8.4.1 The record(s) requested;
 - 8.4.2 The identity of the requestor;
 - 8.4.3 What form of access is required; and
 - 8.4.4 The postal address or fax number of the requestor.
- 8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.
- 8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.
- 8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
 - 8.8.1 The decision; and
 - 8.8.2 Fees payable.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.
- 8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.
- 8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.
- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.
- 8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.
- 8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.
- 8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
 - 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 9.4 Mandatory protection of the safety of individuals and the protection of property.
- 9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;
 - 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
 - 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
 - 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.
- 9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.
- 9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

- 10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Details	Fee
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of Personal Information

12.1 The purposes for processing personal information include:

- 12.1.1 To establish, manage and maintain business relationships with customers, suppliers, contractors, service providers, business partners, regulators and other stakeholders.
- 12.1.2 To design, install, operate, maintain and support telecommunications infrastructure, fibre optic networks, internet connectivity services, alternative power solutions and related telecommunications products and services.
- 12.1.3 To process customer enquiries, quotations, service applications, installations, service requests, maintenance requests, fault reports, orders and after-sales support.
- 12.1.4 To communicate with customers, suppliers, contractors, service providers, employees, regulators and other stakeholders regarding products, services, network operations, installations, maintenance, account management and business operations.
- 12.1.5 To manage supplier and contractor relationships, procurement activities, inventory management, logistics, infrastructure deployment, contract administration and project management.
- 12.1.6 To process payments, invoices, purchase orders, customer accounts, billing, credit applications, financial transactions and maintain accounting and financial records.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 12.1.7 To conduct customer onboarding, supplier onboarding, contractor vetting, identity verification, credit assessments and other business verification processes where required.
- 12.1.8 To manage recruitment, employment, payroll, leave, training, performance management, employee benefits, occupational health and safety and other human resource functions.
- 12.1.9 To design, operate, monitor, maintain and improve telecommunications infrastructure, fibre networks, network performance, service availability, system reliability and technical support services.
- 12.1.10 To monitor, maintain and improve the security of the Company's premises, telecommunications infrastructure, information systems, networks, equipment and business operations, including preventing fraud, investigating incidents, managing cybersecurity risks and protecting confidential information.
- 2.1.11 To comply with applicable legal, regulatory, contractual and licensing obligations, including obligations under the Protection of Personal Information Act, the Promotion of Access to Information Act, tax legislation, labour legislation, the Electronic Communications Act and other applicable laws.
- 12.1.12 To investigate and resolve customer complaints, service-related issues, disputes, network incidents, legal claims and regulatory enquiries.
- 12.1.13 To generate management reports, operational analytics, network performance reports and business insights to improve service delivery, operational efficiency, infrastructure planning and strategic decision-making.
- 12.2.13 To market and promote the Company's telecommunications services, fibre network solutions, infrastructure capabilities, business initiatives, products and events, where permitted by law and in accordance with the data subject's communication preferences and consent, where required.
- 12.2. 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 / Clients	Full name, company or organisation name, identity number (where required), contact details, physical and billing addresses, installation address, customer account details, service applications, quotations, contracts, invoices, payment records, banking details (where applicable), service requests, fault reports, network service information and correspondence.
Suppliers, Service Providers and Vendors	Company name, contact person details, company registration number, VAT number, banking details, tax information, physical and postal address, contracts, quotations, invoices, procurement records and correspondence.
Contractors and Installation Partners	Full name, identity number, contact details, qualifications, professional registrations (where applicable), tax information, banking details, contracts, work allocation records, invoices, access records and correspondence.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Business Partners and Resellers	Company name, contact person details, contact information, commercial agreements, service agreements, correspondence and business relationship information.
Employees	Full name, identity number, contact details, residential address, banking details, tax number, employment contracts, payroll information, leave records, attendance records, performance records, disciplinary records, qualifications, emergency contact details, race, B-BBEE, gender and disability information (for Employment Equity compliance), training records, occupational health and safety records and system access information.
Job Applicants	Full name, contact details, curriculum vitae, qualifications, employment history, references, identity number and the results of background, criminal, credit or qualification verification checks (where lawful and applicable).
Directors and Company Officers	Full name, identity number, contact details, appointment documentation, statutory declarations, corporate governance records, directorship information and shareholding information (where applicable).
Visitors	Full name, contact details, company represented, visitor register information, vehicle registration details, access control records and CCTV footage (where applicable).
Regulatory Authorities and Government Departments	Contact person details, official correspondence, licences, permits, regulatory filings, inspection records, compliance documentation and statutory reporting information.
Shareholders and Investors (where applicable)	Full name, contact details, shareholding information, statutory records, dividend payment information (where applicable) and correspondence.
Website Users	IP address, browser type, device information, cookies (where applicable), website usage information, online enquiry details and analytics information.
IT System and Network Users	Username, login credentials, access logs, IP addresses, device identifiers, authentication information, system activity logs, network usage information and security monitoring records.

12. 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 numbers and personal identification information	South African Police Service (SAPS), accredited identity verification and background screening service providers (where applicable)
Qualifications, professional registrations, certifications and licences	South African Qualifications Authority (SAQA), relevant professional bodies, licensing authorities and accredited verification service providers (where applicable)
Employment history and references	Previous employers, recruitment agencies and accredited background screening service providers

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

Banking and payment information	Banks, financial institutions, payment service providers, external auditors and authorised financial service providers
Tax and payroll information	South African Revenue Service (SARS), payroll administrators, employee benefit administrators and authorised payroll service providers
Employee benefit information	Pension fund administrators, medical aid schemes, insurers, employee wellness providers and employee benefit administrators
Customer, supplier, contractor and business partner information	Service providers, contractors, legal advisors, auditors, insurers, subcontractors and business partners where disclosure is necessary for the performance of a contract or service
Customer account, service installation and network service information	Installation contractors, field technicians, fibre infrastructure partners, network service providers, customer support providers and other authorised third parties involved in delivering and maintaining telecommunications services
Billing, quotations, contracts and payment information	Banks, payment service providers, debt collection agencies (where applicable), legal advisors, auditors and authorised financial service providers
Personal information required for statutory or regulatory compliance	Government departments, regulatory authorities (including ICASA where applicable), courts, tribunals, law enforcement agencies or other public bodies where disclosure is required or authorised by law
CCTV footage, visitor records, access control and security information (where applicable)	Authorised security service providers, property management companies, law enforcement authorities and forensic investigators where required by law or for the investigation of security incidents
IT systems, telecommunications infrastructure, electronic communications and website records	Managed IT service providers, cloud hosting providers, cybersecurity service providers, software vendors, telecommunications infrastructure service providers, network monitoring providers and other authorised technology service providers responsible for maintaining and securing the Company's information systems, networks and telecommunications infrastructure

13. Planned Transborder Flows of Personal Information

- 13.1. TT Connect may transfer or store certain categories of personal information outside the Republic of South Africa, primarily through the use of cloud-based service providers, payment gateways, marketing platforms, and IT hosting providers. These service providers may be located in jurisdictions such as the United States of America, the European Union, and other regions where global service providers host their systems.
- 13.2. The Company may share personal information with third parties and in certain instances this may result in transborder flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013. General description of information

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

security measures to ensure the confidentiality, integrity and availability of the information:

- 13.2.1. Keeping our systems secure through access controls, system monitoring, and usage tracking;
- 13.2.2. Storing physical and digital records in secure, access-controlled environments;
- 13.2.3. Restricting access to buildings, systems, and records to authorised personnel only;
- 13.2.4. Securely destroying or deleting personal information once it is no longer required;
- 13.2.5. Ensuring compliance with relevant data protection standards, legal requirements, and industry codes of conduct.
- 13.3. In addition, the following technical security safeguards have been implemented to support these objectives:
 - 13.3.1. Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
 - 13.3.2. Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
 - 13.3.3. Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
 - 13.3.4. Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
 - 13.3.5. Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
 - 13.3.6. Ongoing system monitoring and access logging to detect and respond to suspicious activity;
 - 13.3.7. Physical security controls such as keycard access, secure storage, and visitor management procedures;
 - 13.3.8. Employee training and awareness programmes to promote secure data handling and prevent human error;
 - 13.3.9. Secure disposal of physical and electronic records when no longer needed or when required by law.
 - 13.3.10. These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

14. Availability of the Manual

- 14.1. A copy of the manual is available:
 - 14.1.1. On our website or at any head office of for public inspection during normal business hours;
 - 14.1.2. To any person upon request and upon the payment of a reasonable prescribed fee; and

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

14.1.3. To the Information Regulator upon request.

14.2. 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.

15. Objection to the Processing of Personal Information by a Data Subject

- 15.1. A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.
- 15.2. A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.
- 15.3. A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.
- 15.4. If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

16. Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- 16.1. A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- 16.2. A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 16.3. A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.
- 16.4. A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.

	PAIA MANUAL	
	Manual Code	HR-POL-48
	Date of Version	16 September 2026
	Owner of Manual	Tuanette Schoeman
	Manual Approval	Clayton Reeve

- 16.5. A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.
- 16.6. A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

17. Updating of the Manual

The head of TT Connect will update this manual on a regular basis to reflect any necessary changes.

Name of IO	Clayton Reeve
Title of the head of the body	Managing Director

APPLICABLE FORMS

PAIA Forms

Form 01: [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)

Form 02: [Request for Access to Record \[Regulation 7\]](#)

Form 03: [Outcome of Request and of Fees Payable \[Regulation 8\]](#)

Form 05: [Complaint Form \[Regulation 10\]](#)

Form 13: [PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

POPIA Forms

Form 1: [Objection to the Processing of Personal Information](#)

Form 2: [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)

Form 3: [Application for the Issue of a Code of Conduct](#)

Form 4: [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)

Form 5: [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)