

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("the Act") FOR DCM MARKETING (PTY) LTD ("THE COMPANY") (registration number 2015 / 202779 / 07)

Information Officer Details

Duly authorised by head of company

Information	Officer	Tonderayi Tongoona
full names		
Information	Officer	compliance@zororo-phumulani.co.za
email address		

Document Review History

Date	Version	Author/Reviewers	Action / comment
12 – 10 - 2020	001	Lisa Boogaard / Tonderayi Tongoona	

Company Address and Contact Details

Street address	Nzunza House, 28 Melle Street, Braamfontein		
	Johannesburg, 2001		
Telephone number	011 339 1484		
Website	www.zororo-phumulani.co.za		

1) Introduction

This manual is prepared in terms of section 51 of the Act and in term of the Protection of Personal Information Act 4 of 2013 ("POPIA").

The Company is a private body as contemplated in the Act and this manual provides the procedural steps and requirements a requestor must make to access information subject to the limitations to the rights of access to information as provided in the Act.

Kindly note the person requesting a record in terms of this manual ("the requestor"):

- must require the record to exercise or protect the requestor's rights;
- must request the record following the correct procedure as set out in this manual;
- may be refused access to the record on the grounds set out in the Act.

The Company has not submitted a notice providing for the Voluntary disclosure and automatic availability of certain records as contemplated in section 52(1) of the Act.

This manual is available for inspection at Nzunza House, 28 Melle Street, Braamfontein, Johannesburg

2 Applicability of this Manual

This manual applies to the Company and subsidiaries of the Company as provided in the table below

Company name	Registration number
DCM Marketing	2015 / 202779 / 07
Poket Money	2020 / 254612 / 07
Zororo Phumulani Investments	2013 / 077548 / 07

3 Human Rights Commission Guide

In terms of the Act, the Human Rights Commission ("HRC") is to prepare a guide in an easily comprehensible form and manner detailing how to utilise the Act and containing information for persons who may wish to exercise any right contemplated by the Act.

For queries to the HRC and to obtain the guide kindly note the following details:

Telephone number: 011 877 3600 (switchboard);

Email address: paia@sahrc.org.za;

Website: http://www.sahrc.org.za

Head office address: Braampark Forum 3, 33 Hoofd Street,

Braamfontein

4 Categories of records and subjects on which records are held

Services and Products

- Funeral Service
- Funeral Ware
- Repatriation Service
- Funeral Assurance
- Accidental insurance cover
- Long term insurance
- Make payments to the wallet (Poket Money)
- Purchase Digital Services available within the Poket Money App
- All records kept in terms of legislation applicable to any of the above products or services

Company records

- Contract Management
- Supplier Records
- Insurance
- Product and Service Records
- Finance
- Actuarial
- Marketina
- Client care
- Information Technology
- Product Management
- Human Resources
- Company Law records

The subjects (individuals and entities) in respect of which records are held:

- Advisers
- Brokers
- Clients
- Consultants
- Directors
- Employees
- Independent contractors
- Service Providers
- Shareholders

Records held in terms of the following legislation

- Electronic Communications and Transactions Act, 25 of 2002
- Compensation of Occupational Injuries and Diseases Act, 130 of 1993
- Long-term insurance Act, 52 of 1998
- Employment Equity Act, 55 of 1998
- Companies Act, 64 of 2008
- Skills Development Act, 97 of 1998
- Income Tax Act, 58 of 1962
- Value-Added Tax Act, 89 of 1991
- Labour Relations Act, 66 of 1995
- Unemployment Insurance Act, 30 of 1966
- Financial Advisers and Intermediary Services Act, 37 of 2002
- Basic Conditions of Employment Act, 75 of 1997
- National Credit Act, 34 of 2005
- Financial Intelligence Centre Act, 38 of 2001

Procedure to gain access to records

The Requestor must:

- properly complete the form provided in annexure A and submit same to the Company by email or by hand to one of the addresses provided on the covering page of this manual;
- pay the prescribed request fee if any before the Company processes the request and in accordance with the provisions of the Act;

Decision of the Company to grant access to records

The Company will within thirty days of having received the request or after having received the additional particulars the Company requested in terms

of the Act to enable it to consider the request, notify the Requestor of its decision to grant or decline the request.

Kindly note that the Company may decline to grant access to records, in accordance with the Act on the basis of the:

- mandatory protection of privacy of third party who is natural person;
- mandatory protection of commercial information of a third party;
- mandatory protection of certain confidential information of third party;
- mandatory protection of safety of individuals, and protection of property;
- mandatory protection of records privileged from production in legal proceedings;
- commercial information of private body;
- mandatory protection of research information of third party, and protection of research information of private body
- mandatory disclosure in public interest

ANNEXURE A

FORM TO REQUEST ACCESS TO RECORD OF THE COMPANY DIRECTED TO THE INFORMATION OFFICER OF THE COMPANY

Details of Requestor

Full names of requestor	
Identity number/registration number	
Capacity of requestor if request is	
made on behalf of other person	
(please submit written evidence of	
authority together with this form)	
Contact number	
Email address	
Physical address	

Record requested

Provide full particulars of the record	
requested	
(if space is inadequate please	
provide particulars on separate	
document and submit with this form)	
Details of right being enforced	
protected giving rise to request for	
record	
(if space is inadequate please	
provide particulars on separate	
document and submit with this form)	

<u>Fees</u>

A request for access to a record,	
other than a record containing	
personal information about yourself,	
will be processed only after a	
request fee has been paid. You will	
be notified of the amount required	
to be paid which amount will be	
dependent on the form of access	
and the time required by the	
Company to search for and prepare	
a record. If you qualify for	
exemption of the payment of any	
fee, please state the reason for	
exemption.	

Disability	1
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<u>Disability</u>				
If you are prevented by	disability			
from reading or viewing	a record,			
please advise:				
Type of disability				
Form in which record is re	equirea			
Form of Access to Record				
If it is not possible to provide	de a record ir	n the form red	guested, the Company	
will advise you and will fur			•	
an alternative form.		, , , , , , , , ,	- 1	
Written or printed form (m	ark x next to a	applicable o _l	ption)	
Copy of record		Inspection (of record	
Visual images (mark x nex	rt to annlicat	ole option)		
		. ,		
Copy of images		View images		
Recorded words or inform	ation which c	an be repro	duced in sound (mark x	
next to applicable option)			
Listen to soundtrack		Audio transcription of soundtrack		
Flactor de la colonidad			,	
Electronic record (mark x	next to applic	cable option)	
Printed copy of record	Printed copy of		Copy or transcription of	
	information derived		record (compact disc)	
from record				
Notice of decision by the	Company wil	ll be given to	you in writing. Please	
advise how you would like	• •	•	•	
,				
Signed on this the day	of	2020.		

By or on behalf of the Requestor