

Access to Information Manual

March 2022

V1.1

Contents

1. Introduction 3
2. Purpose 3
3. The Lime Loans Online PAIA Manual 3
4. Who can request access to information? 3
5. Contact Details 4
6. Access to the Guide 4
7. Company Overview 5
8. Classes of Records 5
9. Access Procedure and Information Requests 7
10. Annexure A: Access Request Form 11
11. Exceptions 14
12. Responsibilities 14
13. Enforcement 14
14. Policy Owner 14
15. Policy Control and Monitoring 15
16. References 15

1. Introduction

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("the Act"). The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.
The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

2. Purpose

PAIA fosters a corporate culture of transparency and accountability, within the context of the protection of personal information. In this regard, the provisions of the Protection of Personal Information Act 4 of 2013) are also relevant whenever a request for information is received.

In terms of PAIA, if a person other than a government department or agency requests information from a private body, such information may only be provided if:

- The information is requested to protect a right
- The person requesting the information complied with the procedural requirements of that private body relating to such requests for information; and
- There is no ground on which to refuse access to such information.

With the above provisions in mind, the Act requires private bodies to compile a PAIA manual to assist in the exercise of right to information.

3. The Lime Loans Online PAIA Manual

A copy of this Manual is available by sending a request for a copy to the Information Officer by email. The Manual may also be obtained from the South African Human Rights Commission ("SAHRC") at the addresses set out below. This Manual will be updated from time to time, as and when required.

4. Who can request access to information?

In terms of section 2 of This PAIA Manual, a requester, in relation to a private body, means:

- any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
- a person acting on behalf of the person contemplated in below paragraph

In terms of section 53(2)(d) of the Act, a request for access must at least require the requester concerned to identify the right the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.

In essence, PAIA provides that a requester will be entitled to access to a record if the record is required for the exercise or protection of a right.

Requests can be made

- As a personal requester
- As an agent of a requester on behalf of someone else
- As a third-party seeking information.

5. Contact Details

Name of Institution	: Lime Loans South Africa (Pty) Ltd
Information Contact	: Operations Executive
Physical Address	: C505, 5th Floor, Bridgewater 3, 4 Conference Lane, Century City, Cape Town, 7441
Postal Address	: C505, 5th Floor, Bridgewater 3, 4 Conference Lane, Century City, Cape Town, 7441
Contact Number	: +27 10 442 6722
E-mail	: admin@lime24.co.za

6. Access to the Guide

The South African Human Rights Commission ("SAHRC") published guidelines in terms of section 10 of the Act that will facilitate ease of use of the Act for requesters.

The guide to the Act can be obtained below:

Postal Address:
South African Human Rights Commission Promotion of Access to Information Act Unit
Private Bag 2700
Houghton
Johannesburg
2041

Business Address:
Forum 3
Braampark Office Park
Braamfontein
2001

Queries:

Tel	: +27 11 877 3600
Fax	: +27 11 484 7146/7
Website	: www.sahrc.org.za
Email	: PAIA@sahrc.org.za

7. Company Overview

7.1 Scope

This PAIA Manual has been designed for Lime Loans South Africa and the intention of this manual is to ensure that Lime Loans South Africa complies with the Act.

7.2 Institution Information

Lime Loans South Africa (Pty) Ltd ("Lime Loans") was launched in 2016. Lime Loans forms part of Lime Credit Group Limited based in Cyprus.

7.3 Disclosure

Lime Loans has not published a notice in terms of Section 52(2) of the Act, it should be noted that information relating to Lime Loans and its services is available on Lime Loans South Africa website www.lime24.co.za. Other information relating to Lime Loans is also available on its website from time to time.

Further information in the form of marketing material is also visible on the website from time to time.

8. Classes of Records

8.1 Records available to the public Sec 51 (1) (c)

Information is available in terms of the following legislation, if and where applicable:

- Basic Conditions of Employment No. 75 of 1997
- Closed Corporation Act No. 69 of 1984
- Companies Act 61 of 1973
- Electronic Communications and Transactions Act 25 of 2002.
- Labour Relations Act 66 of 1995
- Promotion of Access to Information Act No. 2 of 2000
- Regional Services Councils Act No. 109 of 1985
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

8.2 Access to the records held by a private body

The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of this Act in terms of section 52(2) Section 51(1)(c)

Records held by Lime Loans South Africa (Pty) Ltd

Lime Loans maintains records on the following categories and subject matters. However, note that recording a category or subject matter in this manual does not imply that a request for access to such records would be allowed. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

Internal Records

- CIPC Records
- Memorandum and Articles of Association
- Financial records
- Operational records
- Intellectual property
- 3rd Party Records
- Marketing records
- Product records
- Statutory records
- Internal policies and procedures
- Employee Records

Employee" refers to any person who works for, or provides services to or on behalf of Lime Loans South Africa (Pty) Ltd. and who receives, is entitled to receive any remuneration, and any other person who assists in carrying out or conducting the business of Lime Loans (Pty) Ltd. This includes directors, executive directors, non-executive directors, all permanent, temporary, and part-time staff.

Personnel records include the following:

- All personal records provided to Lime Loans by their personnel
- All records a third party has provided to Lime Loans about any of their personnel
- Conditions of employment and other personnel-related contractual and related legal records
- Internal evaluation records
- Any other internal records and correspondence

Customer Records

Note that Lime Loans take the protection and confidentiality of its customers information very seriously. Therefore, motivate any request for customer information carefully by having regard to Sections 63 to 67 of the Act.

Customer information includes the following:

- Any / all records a customer has provided Lime Loans, or a third party acting for/on behalf of Lime Loans
- Customer needs assessments
- Personal records of customers
- Credit information and other research conducted in respect of customers
- Any records a third party has provided to Lime Loans (Pty) Ltd. about customers
- Confidential, privileged, contractual and/or any legal records of customers
- Customer evaluation records
- Records generated by or within Lime Loans (Pty) Ltd pertaining to customers, including transactional records.

Technical Records

Technical records generated by, or within Lime Loans (Pty) Ltd pertaining to customers.

Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, joint ventures, service providers and general market conditions. In addition, such other parties may possess records, which can be said to belong to Lime Loans (Pty) Ltd.

The following records fall under this category:

- Personnel, customer, or Lime Loans (Pty) Ltd records which are held by another party as opposed to being held by Lime Loans (Pty) Ltd
- Records held by Lime Loans (Pty) Ltd pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, cached information, records provided by the other party, and records third parties have provided about the contractors/suppliers or customer.

Other Records

Further records are held including:

- Information relating to Lime Loans (Pty) Ltd owned commercial activities
- Research carried out on behalf of a client, by Lime Loans (Pty) Ltd or commissioned from a third party for a customer
- Research information belonging to Lime Loans (Pty) Ltd whether carried out itself or commissioned from a third party.

9. Access Procedure and Information Requests

9.1 Request for Access

Request for Access to Information must be emailed to admin@lime24.co.za

9.2 Guidance on completion of the Access Form

To facilitate the processing of your request:

- Use the prescribed form on the Lime Loans website
- Type or print in block letters
- If a question is not applicable, answer as "N/A"
- Proof of identity is required to identify the requester.
- Provide sufficient details to enable an efficient processing of your request
- Provide sufficient records on the record requested.
- Address the prescribed form to the contact details in section 5 above
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

9.3 Submission of Access Form

The completed Access Request Form and its annexures, if applicable, must be submitted via registered mail or email and must be addressed to the Information Officer as detailed in section 5 above.

9.4 Payment of Prescribed Fees

There are two categories of fees which are payable:

- The request fee: R50
- The access fee: This is calculated by considering reproduction costs, search, and preparation costs, as well as postal costs. These fees are set out in Prescribed fees as published under Annexure A: Part 3 of the Regulations Regarding the Promotion of Access to Information are as follows:

Published under Government Notice R187 in Government Gazette 23119 of 15 February 2002 as amended by:

GN R1244/GG 25411 of 22/9/2003, GN R990/GG 29278 of 13/10/2006, GN R466/GG 29914 of 1/6/2007.

Fees in respect of private bodies

The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

The fees for reproduction referred to in regulation 11(1) are as follows:	Rand
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
For a copy in a computer-readable form on -	
Compact disc	7.50
a) For a transcription of visual images, for an A4-size page or part thereof	40.00
b) For a copy of visual image	60.00
c) For a transcription of an audio record, for an A4-size page or part thereof	20.00
d) For a copy of an audio record	30.00
The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is	50.00
The fees payable by a requester referred to in regulation 11(3) are as follows:	**Rand**
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
For a copy in a computer-readable form on -	
Compact disc	7.50
a) For a transcription of visual images, for an A4-size page or part thereof	70.00
b) For a copy of visual images	40.00
c) For a transcription of an audio record, for an A4-size page or part thereof	60.00
d) For a copy of an audio record	20.00
To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	30.00
For purposes of section 54(2) of the Act, the following applies:	
Six hours as the hours to be exceeded before a deposit is payable; and one third of the access fee is payable as a deposit by the requester.	
The actual postage is payable when a copy of a record must be posted to a requester.	

9.5 Notification

Please note that the requester will be notified in writing of the outcome of their request. If the requester prefers another method to be notified of the outcome, please email admin@lime24.co.za with sufficient details to enable compliance with the request:

9.6 Refusal of access to Records

Lime Loans does not have internal appeal procedures regarding PAIA requests. As such, the decision made by the duly authorised persons in section 5 above is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator for relief.

9.7 Grounds for Refusal

- An information officer is obliged to refuse access to a record if the disclosure would be an unreasonable disclosure of personal information about a third party, including a deceased individual.
- Commercial Information - A request for access will be refused if the record contains trade secrets, financial, commercial, scientific, or technical information of the body or a third party that is likely to harm Lime Loans or third party. (See section 63 of Protection of Personal Information Act 4 of 2013
- An information officer is obliged to refuse a request for access to a record if disclosure would constitute an action for breach of the duty of confidence owed to a third party in terms of an agreement. (See Section 68 of PAIA Act)
- An information officer is obliged to refuse a request for access to a record if disclosure could possibly result in endangering the life of physical safety of individuals and protection of property. (See Section 65 of PAIA Act).

10. Annexure A: Access Request Form

10.1 Request for Access to a Record of Private Body

Refer to Section 53(1) of Promotion of Access to Information Act 2 of 2000, regulation 10.

10.2 Particulars of private body

The Head:

10.3 Details of the person requesting access to the record

The particulars of the person who requests access to the record must be given below.
The address and/or fax number in the Republic of South Africa to which the information is to be sent must be given.

Proof of the capacity in which the request is made, if applicable, must be attached

- Full names and surname :
- Identity number :
- Postal address :
- Fax number :
- Telephone number :
- E-mail address :
- Capacity in which request is made, when made on behalf of another person:

10.4 Details of the person on whose behalf the request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

- Full names and surname
- Identity number

10.5 Details of Record

Provide full particular 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 a separate page and attach it to this form. The requestor must sign all the additional pages.

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

10.6 Details of Record

- 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 as the request fee.
- 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.
- If you qualify for exemption of the payment of any fee, please state the reason for exemption. Reason for exemption from payment of fees.

10.7 Access to Record Form

Disability: Form in which record is required:			Form in which Record is Required:				
Mark the appropriate box with an X.							
NOTES: (a) Compliance with your request in the specified form may depend on the form in which the record is available. (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.							
1. If the record is in written or printed form:							
	Copy of Record		Inspection of Record				
2. If record consists of visual images (This includes photographs, slides, video recordings, computer-generated images, sketches, etc)							
	View of Images		Copy of Images		Transcription of Images		
3. If record consists of recorded words / information which can be reproduced in sound							
	Listen to Soundtrack		Transcript of Soundtrack				
4. If record is held on computer or in an electronic or machine-readable form							
	Printed copy of Record		copy of information derived from Record		Copy in computer readable form (Compact disc)		
'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? (Postage is payable)						Yes	No

10.8 Details of right to be exercised or protected

If the provided space is inadequate, please continue a separate page and attach it to this form. The requester must sign all the additional pages.

- 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.

10.9 Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner, and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at……This……day of.....20……

_____

SIGNATURE OF REQUESTER /

PERSON ON WHOSE BEHALF

REQUEST IS MADE

11. Exceptions

Exceptions to the requirements in this policy must be documented along with justification and submitted to the policy owner.

A risk assessment will be performed, and a mitigation plan created, which will be mutually agreed by the head / lead of the business area submitting the exception and the Policy Owner.

The Policy Owner is responsible for ensuring that an audit trail of any such exceptions / agreements is maintained.

12. Responsibilities

It is the responsibility of all employees (permanent, fixed term contractors) and where relevant third parties to ensure that this policy is adhered to.

13. Enforcement

Non-conformance or breach by any employees (permanent, fixed term contractors) and third parties will be subject to investigation and may lead to disciplinary actions, up to and including termination of employment/contract.

It is the responsibility of all relevant technical resources and relevant third parties to ensure that this policy is adhered to in the provision of technical/procedural controls implemented on Lime Loans systems.

14. Policy Owner

The Operations Executive is the Policy Owner.

- The Policy Owner is responsible for the maintenance, review, and update of this Policy. Questions on the Policy itself should be directed to the Policy Owner. The Policy will be reviewed annually by the Policy Owner, who will be responsible for consulting with the appropriate Lime Loans stakeholders.
- This Policy will be reviewed immediately if changes are required. For example, if changes are required to reflect significant technology change or revisions to compliance standards.
- Responsibility for cascading this Policy and any updates to concerned Lime Loans employees lies with the Policy Owner.

15. Policy Control and Monitoring

- As part of the joiner's process, all relevant employees will, on joining Lime Loans, receive information on their responsibilities for Information Security.
- Every new employee must complete an information learning module satisfactorily as part of the induction process.
- 1st line of defence IT team will perform regular validation of security activities against defined processes.
- 1st line of defence (Policy Owner) review, approval, and communication of policies (annually).
- 2nd line of defence (Managing Director) may monitor compliance with this policy and regulatory requirements.
- 3rd Line of defence (Internal / External Audit) will monitor compliance with this Policy as per the Internal / external Audit Plan.

16. References

- Lime Loans Access Request Form