

Confluent

PAIA MANUAL OF CONFLUENT HOLDINGS (PTY) LTD (PAIA MANUAL)

Promotion of Access to Information Act (PAIA) MANUAL

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

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1. ABOUT THIS MANUAL

If you need access to information, this manual will provide you with the necessary contact details and procedures to ask us for that information. It provides a clear overview of the structure, functions, services, and index of information we hold to help identify where the required information could be. It also provides the forms you need to complete and sets out the fees you may need to pay before assisting you.

This manual applies to Confluent Holdings (Pty) Ltd and its subsidiaries:

- Confluent Holdings (Pty) Ltd registration number: 2022/716762/07
- DebtBusters (Pty) Ltd, registration number: 2007/026552/07
- Just Money Protect (Pty) Ltd, registration number: 2007/015303/07
- Just Money (Pty) Ltd, registration number: 2007/012821/07
- IDM Holdings (Pty) Ltd, registration number: 2008/016691/07
- Intelligent Credit Management Services (Pty) Ltd, registration number: 2024/037833/07
- Confluent Services (Pty) Ltd, registration number: 2004/031355/07
- Just Money Motor & Home (Pty) Ltd, registration number: 2019/588488/07
- Kudough Credit Solutions (Pty) Ltd, registration number 1998/002263/07

2. OUR DETAILS

Name: Confluent Holdings (Pty) Ltd
Address: Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7405
Contact details: +27 21 481 1700
Email address: info@confluent.biz

3. INFORMATION OFFICERS

Our information officer and deputy information officer(s) will tend to your PAIA request.

3.1. Group Information Officer

Name and surname	Linda Mawema
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7405
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7405
Phone	021 481 1700
E-mail	Risk&Compliance@confluent.biz
Entity	Confluent Holdings (Pty) Ltd

3.2. Information Officer

Name and surname	Johan van Tonder
Postal Address	1 st Floor East Block, Centennial Place, Century City, 7441
Physical Address	1 st Floor East Block, Centennial Place, Century City, 7441
Phone	021 524 4330
Email	Risk&Compliance@confluent.biz
Entity	Just Money Motor & Home (Pty) Ltd

3.3 Information Officer

Name and surname	Chris Janse van Rensburg
Postal Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7405
Physical Address	Mutual Park, Jan Smuts Drive, Pinelands, Cape Town, 7405
Phone	086 999 0952
E-mail	info@kudough.co.za
Entity	Kudough Credit Solutions (Pty) Ltd

4. THE INFORMATION AND CATEGORIES OF RECORDS WE HOLD

Here is a description of different subjects about which we have information and the categories of records we hold for each subject, including but is not limited to the following:

Subject	Category of records	Availability
Client records	Name, Surname, ID number, marital status, cell phone, email address, gross income, residential address, bank details, gender, credit report data, information about a client's debt counselling application	Client records are freely available to the client upon request Third parties are required to provide consent from the client to obtain client information.
Human resources	Personal records provided to the subsidiaries by employee/ personnel. Records a third party has provided to the group about its personnel. Conditions of employment and other personnel-related contractual and quasi-legal. Records internal evaluation records; Advertised posts. other internal records and correspondence related to a particular employee, HR policies and procedures	Records should be formally requested in terms of PAIA
Finances	Financial statements, Financial and tax records, Asset register, Management account	Records should be formally requested in terms of PAIA

5. PROTECTION OF PERSONAL INFORMATION

Our company uses personal information to deliver our services and make sure our operations run smoothly. You can find more information about how we use personal information in our privacy notices available on our website.

Personal information is any information about an identifiable living individual or an identifiable, existing juristic person.

5.1. Data Subject Types, Information Categories, and Collection Purposes

Here is a broad description of the categories of data subjects whose information we collect and the categories of information we collect and use:

Categories of data subjects	Categories of information we collect and use	Why we collect and use the information
Clients	Name, Surname, ID number, marital status, cell phone, email address, gross income, residential address, bank details, gender, credit report data	To deliver on services offered by the subsidiaries.
Employees	Name, Surname, ID number, marital status, cell phone, email address, gross income, residential address, bank details, gender, skills training history, internal evaluations	Ongoing Employment purposes Statistical and Historical purposes
Prospective employees	Name, Surname, ID number, marital status, cell phone, email address, residential address, gender, employment history	To consider employment prospects Statistical and Historical purposes
Service providers	Details of entity, business address, employee details where necessary, bank details	For purposes of performing in terms of a mandate/contract

5.2. Who receives personal information

We share personal information with:

Our Service providers

Our Partners

Other companies in the group

5.3. Cross-border flows of information

We may share personal information with parties that are outside the borders of South Africa.

5.4. Information security measures

We have implemented appropriate, reasonable, technical, and organisational measures to secure the integrity and confidentiality of personal information.

6. RECORDS THAT ARE AUTOMATICALLY AVAILABLE

The following categories of records are automatically available:

Any information available on our public website

Register of directors

Media releases

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Confluent Group and its subsidiaries are required in accordance with legislation to retain certain records. We hold records for the purposes of PAIA in accordance with the following legislation, among others

Name of legislation
National Credit Act 34 of 2005
Basic Conditions of Employment Act 75 of 1997
Income Tax Act 58 of 1962
Unemployment Contributions Act 63 of 2001
Unemployment Insurance Act No. 30 of 1966
Employment Equity Act No. 55 of 1998
Copyright Act No. 98 of 1978
Broad-Based Black Economic Empowerment Act, 2003
Value Added Tax Act No. 89 of 1991
Business Act No. 71 of 1991
Electronic Communications and Transactions Act No. 25 of 2002
Companies Act 71 of 2008
Occupational Health and Safety Act No. 85 of 1993
Insolvency Act No. 24 of 1936
Pension Funds Act No. 24 of 1956
Financial Advisory and Intermediary Services Act, 2002 (Act No. 37 of 2002)
Financial Intelligence Act 38 of 2001
Financial Sector Regulation Act 2017
Labour Relations Act 66 of 1995
Skills Development and Levies Act 9 of 1999
Prevention of Organised Crime Act No. 121 of 1998

Prescription Act No. 68 of 1969
Unemployment Insurance Act 63 of 2001
Insurance Act No. 18 of 2017
Promotion of Access to Information Act No. 2 of 2000
Protection of Personal Information Act No. 4 of 2013
Financial Advisory and Intermediary Services Act, 2000 (Act No. 37 of 2002)
Long-term Insurance Act, 1998 (Act No 52 of 1998)
Short-term Insurance Act, 1998 (Act No 53 Of 1998)

8. HOW TO REQUEST ACCESS TO RECORDS

You can request access to records by completing Form 2 (attached to this manual in Appendix A). If your request does not comply with the formalities in this manual, we will let you know which steps you should take to comply. If you are making a request on behalf of someone else, you must submit reasonable proof of authority.

You must provide us with proof of identity before we can process any request.

9. OUTCOME OF YOUR REQUEST AND FEES PAYABLE

We will decide within 30 days of receiving your request whether to grant or decline the request. We will notify you in writing of our decision and explain why we accepted or refused your request.

If your request is successful, we will let you know what the related fees are and how you can pay them.

We may require that you pay a deposit before we process your request. The fee structure is available on the SAHRC website at www.sahrc.org.za

If you request large quantities of information or if we cannot reasonably obtain the information you request within the original 30 days, we might have to extend the period by another 30 days. We will notify you in writing if we require an extension.

If you do not hear from us within the period stipulated above, it means that we refused your request in terms of section 58 of PAIA.

10. REFUSAL REASONS

The SAHRC's guide to understanding PAIA sets out all the reasons why an entity may or must refuse a PAIA request.

11. IF A RECORD CANNOT BE LOCATED

If there are records that we cannot find despite a reasonable and diligent search, we will notify you explaining the measures we have taken to locate the record. If, after we have provided explanation, we find the records, we will grant you access to the records unless we have a reason to refuse your request.

12. FOR ASSISTANCE OR ADDITIONAL INFORMATION

If you require further assistance, the Information Regulator has published a guide that introduces PAIA, describes where to find information and how to request access to information. It explains when access to information may be refused and may offer key references and resources.

The guide will be available at the head office of the Information Regulator and may be provided by Confluent Holdings to a requestor upon request.

JD House, 27 Stiemens Street,

Braamfontein, Johannesburg, 2001

Alternatively, it may be found at all the provincial offices and on the Information Regulator website at: <https://inforegulator.org.za/paia-guidelines/>.

13. FORMS

Please see below forms you will be required to complete in order to submit a request:

Form 2: Request for access to a record

Form 3: Outcome of request and fees payable

Form 5: Lodging of complaint to the Information Regulator (available at: [PAIA Forms](#))

APPENDIX A: FORM 2 REQUEST FOR ACCESS TO RECORD

NOTE:

1. Proof of identity must be attached by the requestor.
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 & surname	
Identity number	
Capacity in which request is being made (<i>when made on behalf of another person</i>)	
Postal address	
Street address	
Fax number	
Telephone/cell phone number	
Email address	
Full names of person on whose behalf request is made (<i>if applicable</i>):	

Identity number	
Postal address	
Street address	
Email address	
Telephone/cell phone number	
PARTICULARS OF RECORD REQUESTED <i>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 space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed).</i>	
Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
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 (Mark the applicable box with an "X")	
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 (Mark the applicable box with an "X")	
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>	
Email 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 THE 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 requestor 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	
FEES a) <i>A request fee must be paid before the request will be considered.</i> b) <i>You will be notified of the amount of the access fee to be paid.</i> c) <i>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.</i> d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>	
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 Requestor / 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

APPENDIX B: FORM 3 OUTCOME OF REQUEST AND FEES PAYABLE

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO:

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (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) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Appendix C.	
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OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (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).	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive (provided by requestor) (ii) Compact disc (provided by requestor) (iii) Compact disc (provided to requestor)	R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider.		
Copy of visual images	Service to be outsourced. Will depend on the quotation of the service provider.		
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive (provided by requestor) (ii) Compact disc (provided by requestor) (iii) Compact disc (provided to requestor)	R40.00 R40.00 R60.00		

Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ **Yes** ☐ **No**

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20____

Information officer: _____