



**INFORMATION PAIA MANUAL OF FIS SOUTH AFRICA GROUP
("PAIA MANUAL")**

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

VERSION DATE: 6 August 2025

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“FIS”	FIS Systems South Africa and its affiliates worldwide;
1.2	“FIS South Africa Group”	FIS Systems South Africa and GL Trade (South Africa);
1.3	“FIS Systems South Africa”	FIS Systems South Africa (Pty) Ltd.;
1.4	“GL Trade (South Africa)”	GL Trade (South Africa) Proprietary Limited;
1.5	“Managing Director”	Managing Director of FIS Systems South Africa;
1.6	“Minister”	Minister of Justice and Correctional Services;
1.7	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended);
1.8	“POPIA”	Protection of Personal Information Act No.4 of 2013; and
1.9	“Regulator”	Information Regulator.

2. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

- 2.1 The Promotion of Access to Information Act, No.2 of 2000 (the **“Act”**) as amended, gives effect to section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the **“Constitution”**) of access to any information held by the state and/or another person that is required for the exercise or protection of any right.
- 2.2 Where a request is made in terms of the Act, the body to whom the request is made must consider whether to release the information, giving due consideration to applicable legislative and/or regulatory requirements, except where the Act expressly states that the records containing such information may not be released.
- 2.3 This manual, compiled in accordance with section 51 of the Act, complies with the requirements of POPIA.

3. PURPOSE OF PAIA MANUAL

- 3.1 To foster a culture of transparency and accountability within FIS South Africa Group by facilitating requests for access to records (including records containing Personal

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Information (also defined as personal data in the FIS Privacy Policy) of FIS South Africa Group as provided for in the Act; and

- 3.2 To actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all their rights more fully.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF FIS SOUTH AFRICA GROUP

Information Officer

Name: Kershika Nookiah
Tel: +27 661147045
Email: kershika.nookiah@fisglobal.com

Access to information general contact

Email: privacyoffice@fisglobal.com

National Office of FIS South Africa Group

Physical Address: 5th Floor West, Atrium on Fifth Office Block,
Cnr 5th and Maude Street
Sandton City

Postal Address: Postnet Suite 240 Private Bag X9976 Sandton Gauteng
2146

Email: privacyoffice@fisglobal.com
Website: fisglobal.com

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. 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 (the “**Guide**”), in an easily

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comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The Guide contains descriptions of:

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

5.3.3. the manner and form of a request for:

5.3.3.1. access to a record of a public body contemplated in section 11³; and

5.3.3.2. access to a record of a private body contemplated in section 50⁴;

5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² 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.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) 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.*
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- 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6. 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:
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. an application with a court against a decision by the information officer 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;
- 5.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

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5.3.10. the regulations made in terms of section 92¹¹.

5.4. 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.

5.5. The Guide can also be obtained:

5.5.1. upon request to the Information Officer¹²;

5.5.2. from the website of the Regulator (<https://inforegulator.org.za/paia-guidelines/>).

5.6. A copy of the Guide is also available in English, for public inspection during normal office hours.

6. HOW TO OBTAIN ACCESS TO RECORDS

6.1. The requester must comply with all procedural requirements contained in the Act relating to the request for access to a record.

6.2. The requester must complete the relevant request form prescribed in Annexure A of the PAIA Regulations which is available by accessing the following link: <http://www.sahrc.org.za/home/21/files/Form%20C.doc%20August%202013.doc>.

The completed form should be submitted to the Information Officer by email at the contact details given above with a copy to privacyoffice@fisglobal.com. The form must be filled in with sufficient information to enable the Information Officer to identify the record requested and the identity of the requester.

6.3. FIS will process the request within 30 days. The Information Officer may request an extension for a further period of no more than 30 additional days for specific reasons,

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;
 (b) any matter relating to the fees contemplated in sections 22 and 54;
 (c) any notice required by this Act;
 (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
 (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

¹² <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg3.pdf>

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which include the request involving (a) a large volume of documents, (b) consultation with other public or private entities, or (c) if the requester has granted an extension in writing. FIS will notify the requester in writing should an extension be required.

- 6.4. The prescribed time periods will not commence until the requester has furnished all the necessary and required information.
- 6.5. When responding to a request, FIS will advise the requester of the access fee to be paid for the information, the format in which access is to be granted and the fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or format in which access is to be granted.
- 6.6. The requester shall be advised in writing whether access is granted or denied (in whole or in part).
- 6.7. Should the request be granted, the notice will state the access fee (if any) to be paid upon access, the form in which access will be given and further that the requester may lodge a complaint to the Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint to the Regulator or the court application.
- 6.8. Should the request be refused, the notice must state adequate reasons for the refusal, including the provisions of PAIA relied upon, and that the requester may lodge a complaint to the Regulator or an application to a court against the refusal of the request, and the procedure (including the period) for lodging a complaint to the Regulator or the court application.

7. REFUSAL OF ACCESS

- 7.1. Private Bodies such as FIS Systems South Africa and GL Trade (South Africa) are entitled to refuse a request for information on the following grounds:
 - 7.1.1. Protection of the privacy of a third party, including a deceased individual, if that third party is a natural person, which would involve the unreasonable disclosure of personal information of that natural person (Section 63(1) of PAIA);

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- 7.1.2. Protection of commercial information of a third party as defined by PAIA, if the record contains (a) trade secrets of that third party, (b) financial, commercial, scientific or technical information other than trade secrets of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, and (c) information disclosed in confidence to FIS by a third party, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or would prejudice that third party in commercial competition (Section 64 of PAIA);
 - 7.1.3. Protection of confidential information if the disclosure would constitute a breach of a duty of confidence to a third party in terms of an agreement (Section 65 of PAIA);
 - 7.1.4. Protection of safety of individuals and protection of property (Section 66 of PAIA);
 - 7.1.5. Protection of records which would be regarded as privileged in legal proceedings or subject to legal privilege in any other respect, unless the person so entitled to privilege waives the privilege (Section 67 of PAIA);
 - 7.1.6. Protection of commercial activities of FIS, which includes (a) trade secrets of FIS, (b) financial, commercial, scientific or technical information, disclosure of which could cause harm to the financial or commercial interests of FIS, (c) information, which if disclosed, could put FIS at a disadvantage in negotiations or commercial competition, and (d) a computer programme owned by FIS, and which is protected by copyright (Section 68 of PAIA);
 - 7.1.7. Protection of research information of FIS or a third party on behalf of FIS if the disclosure would expose the third party, FIS, the researcher or the subject matter of the research to serious disadvantage (Section 69 of PAIA); and
 - 7.1.8. Frivolousness or vexatiousness requests that clearly involve an unreasonable diversion of resources.
- 7.2. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not
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possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act.

8. PRESCRIBED FEES

8.1. The prescribed fees for requesting and accessing records from private bodies are prescribed in Annexure B of the PAIA Regulations, and are also available on the website of the SAHRC at <https://www.sahrc.org.za/index.php/understanding-paia>.

8.2. These fees are as follows:

8.2.1. for every photocopy of an A4 size page or part thereof: R1,10

8.2.2. for every printed copy of an A4 size page or part thereof: R0,75

8.2.3. for a copy of a compact disc: R70,00

8.2.4. for a transcript of visual images for an A4 size page or part thereof: R40,00

8.2.5. for a copy of visual images: R60,00

8.2.6. for a transcript of an audio record, for an A4 size page or part thereof: R20,00

8.2.7. for a copy of an audio record: R30,00

9. RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

9.1. Records of a public nature, including those disclosed on the FIS website (fisglobal.com) and in its various annual reports, may be accessed without the need to submit a formal application.

9.2. Other non-confidential records, such as statutory records maintained at The Companies and Intellectual Property Commission, may also be accessed without

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the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

10. RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

10.1. Where applicable to its operations, FIS South Africa Group also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act, the below mentioned legislation, and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of the Act.

10.2. The accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

Category of Records	Applicable Legislation
<i>Memorandum of incorporation</i>	<i>Companies Act 71 2008</i>
<i>Employee records</i>	<i>Unemployment Contributions Act No 63 of 2001</i>
	<i>Pension Funds Act No 24 of 1956</i>
	<i>Employment Equity Amendment Act 2003</i>
	<i>Labour Relations Act No 66 of 1995 (and Amendment Act)</i>
	<i>Basic Conditions of Employment Act No 75 of 1997</i>
	<i>Occupational Health and Safety Act No 85 of 1993</i>
	<i>Compensation of Occupational Injuries and Diseases Act No 130 of 1993</i>
	<i>Skills Development Levies Act No 9 of 1999</i>

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<i>Broad-Based Black Economic Empowerment (BBBEE) records</i>	<i>Broad-Based Black Economic Empowerment Act 2003</i>
	<i>Employment Equity Act No 55 of 1998 (and Amendment Act)</i>
<i>Legal records</i>	<i>Business Act No 71 of 1991</i>
	<i>Companies Act No 71 of 2008</i>
	<i>Copyright Act No 98 of 1978</i>
<i>Business records</i>	<i>Cybercrimes Act No 19 of 2020</i>
<i>Financial records</i>	<i>Income Tax Act No 58 of 1962</i>

11. RECORDS AND CATEGORIES OF RECORDS HELD BY FIS SOUTH AFRICA GROUP

11.1. This clause serves as a reference to the categories of information that FIS South Africa Group holds. The information is confidential and grouped according to records relating to the subjects and categories below.

11.2. Accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before FIS South Africa Group will consider access.

Subjects on which the body holds records	Categories of records
<i>Client Records</i>	<i>Business information of clients</i> <i>Client contact details (addresses, contact person)</i> <i>Statutory and tax related records of clients</i> <i>Clients' directors and personnel</i> <i>Client safeguards for anti-money laundering</i> <i>Client correspondence</i> <i>Client bank account statements and financial statements</i> <i>Agreements with clients</i>

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Subjects on which the body holds records	Categories of records
	• <i>Client contractual obligations</i> • <i>Client IT information</i> • <i>Client intellectual property</i> • <i>Document titles and type</i> • <i>Project names and details</i> • <i>Engagement names and IDs</i> • <i>Records provided by a third party</i> • <i>Records generated within FIS</i> • <i>Records provided by FIS to its clients</i>
<i>Employee Records</i>	• <i>Biographic data (marital status, birth date, ID, nationality, next of kin, work permit, visa)</i> • <i>Race and gender</i> • <i>Effective start and end date with FIS</i> • <i>Email address</i> • <i>Personal cellular, mobile or wireless number</i> • <i>Title, position, department, reporting line</i> • <i>Permanent or fixed term contract information</i> • <i>Financial details</i> • <i>Compensation data</i> • <i>Qualifications</i> • <i>Training records</i> • <i>Disability</i> • <i>Performance management records</i> • <i>Tax number</i> • <i>Counsellor information</i> • <i>Dependant data</i> • <i>Provident Fund Contribution</i> • <i>Medical claims and data</i> • <i>Reference and background checks</i> • <i>Records provided by a third party relating to employees</i> • <i>Conditions of employment and other personnel-related contractual and quasi legal records</i>

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Subjects on which the body holds records	Categories of records
	• <i>Internal pricing and other internal records</i> • <i>Correspondence relating to employees</i> • <i>Employment Equity Plans</i>
<i>Employee Income Tax Records</i>	• <i>PAYE records</i> • <i>Documents issued to employees for income tax purposes</i> • <i>Records of payments made to SARS on behalf of employees</i> • <i>All other statutory compliances: VAT, Regional Services Levies, Skills Development Levies, UIF, Workmen's Compensation, PAYE records</i>
<i>Information Technology Records</i>	• <i>Asset serial numbers</i> • <i>Asset models</i> • <i>Account usernames and passwords</i> • <i>Photographs and video footage</i>
<i>Service Provider Records</i>	• <i>Service provider registration documents</i> • <i>Ownership records</i> • <i>BBBEE information</i> • <i>Service provider contact details</i> • <i>Service provider certifications relating to security</i>
<i>Private Body Records</i>	• <i>Financial records</i> • <i>Operational records</i> • <i>Databases</i> • <i>Marketing records</i>
<i>Internal Correspondence</i>	• <i>Product records</i> • <i>Statutory records</i> • <i>Internal policies and procedures</i> • <i>Records held by officials / officers of FIS</i>
<i>Other Party Records</i>	• <i>Records held by another party</i> • <i>Records held by FIS pertaining to other parties including contractors, suppliers, vendors, service providers and other FIS Group companies</i>

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12. PROCESSING OF PERSONAL INFORMATION

12.1. For more information on the processing of Personal Information by FIS, including categories of data subjects, categories of personal information, purposes and third party recipients, please refer to the FIS Privacy Centre ([fisglobal.com/privacy](https://www.fisglobal.com/privacy)).

12.2. The FIS website also provides the FIS Security Statement which summarizes FIS' information security policies, procedures and standard (https://www.fisglobal.com/-/media/fisglobal/files/PDF/policy/Solutions/Client-Security-Statement-Sept2021.pdf?sc_lang=en).

13. AVAILABILITY OF THE MANUAL

13.1. A copy of this Manual is available:

13.1.1. on the FIS website at [fisglobal.com/privacy](https://www.fisglobal.com/privacy);

13.1.2. at the national office of FIS South Africa Group for public inspection during normal business hours;

13.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and

13.1.4. to the Regulator upon request.

13.2. A fee for a copy of the Manual, as contemplated in the schedule of fees set out in Annexure B of the PAIA Regulations, shall be payable per each A4-size photocopy made.

13.3. FIS South Africa Group will update this PAIA Manual at such intervals as may be deemed necessary.

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This version of the PAIA Manual of FIS South Africa Group is approved and signed by the Managing Director of FIS Systems South Africa on behalf of the FIS South Africa Group on this 6th day of August 2025.

Signed by:

Moorosi Mokhanoi

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Moorosi Mokhanoi

Managing Director

FIS Systems South Africa

For and on behalf of the FIS South Africa Group