

Amatole Telecommunications Services (Pty) Ltd
(trading as Easttel)

POPIA Manual

Effective Date: 11 October 2024

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1. Introduction

Amatole Telecommunications Services (Pty) Ltd, trading as Easttel ("Easttel"), is committed to protecting the privacy and confidentiality of personal information in accordance with the Protection of Personal Information Act No. 4 of 2013 ("POPIA"). This manual outlines how Easttel collects, uses, stores, and discloses personal information, and details the procedures for accessing such information.

2. Company Details

Company Name:	Amatole Telecommunications Services (Pty) Ltd (Trading as Easttel)
Registration Number:	2004/013673/07
Physical Address:	The Pavilion, Dock Road, V & A Waterfront, Cape Town, Western Cape, South Africa
Domicile & Postal Address:	Attention – Mrs Laila Clark, C/O Conlon & Associates, Suite 2 Clevedon House, 2 Clevedon Road, Selborne, East London, 5201, East London
Telephone Number:	021-565 0500
Email Address:	support@easttel.co.za
Website:	www.easttelsa.com
Information Officer:	Mark Gray
Email (Information Officer):	informationofficer@easttel.co.za

3. Definitions

Data Subject:	The person to whom personal information relates.
Personal Information:	Information relating to an identifiable, living natural person or juristic person.
Processing:	Any operation or activity concerning personal information.
Responsible Party:	Easttel, who determines the purpose and means of processing personal information.

Information Regulator: The regulatory authority established in terms of POPIA.

4. Purpose of the Manual

This manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA") and as required by POPIA. It aims to:

- 4.1 Facilitate requests for access to records held by Easttel.
- 4.2 Explain how personal information is processed and protected.
- 4.3 Inform data subjects of their rights regarding their personal information.

5. Applicable Legislation

Easttel conducts its business in accordance with various South African laws, including, but not limited to:

- 5.1 Companies Act No. 71 of 2008
- 5.2 Electronic Communications Act No. 36 of 2005
- 5.3 Protection of Personal Information Act No. 4 of 2013
- 5.4 Promotion of Access to Information Act No. 2 of 2000
- 5.5 Electronic Communications and Transactions Act No. 25 of 2002
- 5.6 Income Tax Act No. 58 of 1962
- 5.7 Labour Relations Act No. 66 of 1995

6. Records Available in Terms of Other Legislation

Records are kept in accordance with the above legislation and may include:

- 6.1 Corporate governance documents
- 6.2 Financial records
- 6.3 Tax records
- 6.4 Employment records

6.5 Customer agreements

6.6 Compliance records

7. Schedule of Records

7.1. Company Records

7.1.1 Memorandum of Incorporation

7.1.2 Minutes of Board Meetings

7.1.3 Statutory Registers

7.1.4 Licences and Permits

7.2. Financial Records

7.2.1 Annual Financial Statements

7.2.2 Accounting Records

7.2.3 Tax Returns

7.2.4 Asset Registers

7.3. Human Resources Records

7.3.1 Employee Personal Information

7.3.2 Employment Contracts

7.3.3 Payroll Records

7.3.4 Training and Development Records

7.4. Customer Records

7.4.1 Customer Agreements

7.4.2 Billing Information

7.4.3 Communications with Customers

7.4.4 Consent Records

7.5. Operational Records

7.5.1 Policies and Procedures

7.5.2 Incident Reports

7.5.3 Service Level Agreements

7.5.4 Maintenance Records

8. Processing of Personal Information

8.1. Types of Personal Information Collected:

8.1.1 Employees:

- ✓ Identification information
- ✓ Contact details
- ✓ Employment history
- ✓ Banking details

8.1.2 Customers:

- ✓ Names and contact information
- ✓ Billing details
- ✓ Service usage data
- ✓ Communication records

8.1.3 Suppliers and Service Providers:

- ✓ Company details
- ✓ Contact information
- ✓ Banking details

8.2. Purpose of Processing

8.2.1 **Service Delivery:** To provide telecommunications services.

8.2.2 **Billing and Invoicing:** For payment processing and account management.

8.2.3 **Regulatory Compliance:** To comply with legal and regulatory obligations.

8.2.4 **Employment Purposes:** For HR management and payroll.

8.2.5 **Marketing:** To inform customers about services and promotions (with consent).

8.3. Legal Basis for Processing

Processing is conducted in accordance with POPIA, based on:

- 8.3.1 **Consent:** Where the data subject has given explicit consent.
- 8.3.2 **Contractual Necessity:** Processing necessary for the performance of a contract.
- 8.3.3 **Legal Obligation:** Compliance with a legal obligation.
- 8.3.4 **Legitimate Interests:** For legitimate business interests not overridden by the data subject's rights.

9. Data Subject Rights

Data subjects have the right to:

- 9.1 **Access Personal Information:** Request details of personal information held.
- 9.2 **Correction or Deletion:** Request correction or deletion of inaccurate or obsolete information.
- 9.3 **Objection:** Object to the processing of personal information.
- 9.4 **Withdrawal of Consent:** Withdraw consent at any time (where processing is based on consent).
- 9.5 **Lodge a Complaint:** Submit complaints to the Information Regulator.

10. Information Security Measures

Easttel implements appropriate technical and organisational measures to safeguard personal information against:

- 10.1 Unauthorised Access
- 10.2 Accidental Loss or Destruction
- 10.3 Damage or Theft
- 10.4 Security measures include:
 - 10.4.1 Secure servers and firewalls
 - 10.4.2 Encryption of data
 - 10.4.3 Access controls and authentication

10.4.4 Regular security assessments

11. Third-Party Information Sharing

Personal information may be shared with third parties only under the following circumstances:

- 11.1 Legal Requirements:** To comply with legal obligations.
- 11.2 Service Providers:** With third-party service providers for operational purposes (under confidentiality agreements).
- 11.3 Consent:** Where the data subject has given explicit consent.
- 11.4 Business Transfers:** In the event of a merger, acquisition, or sale.

12. Access to Records

Access to records is governed by PAIA and POPIA. Requests for access must be made in accordance with the prescribed procedures.

13. Fees Payable

Fees may be charged for:

- 13.1 Request Fee:** A standard fee for processing the request.
- 13.2 Access Fee:** Costs associated with reproduction and delivery of records.

Fee details are available from the Information Regulator or Easttel's Information Officer.

14. Request Procedure

- 14.1 Complete Request Form:** Use the prescribed Form C (available from the Information Regulator's website).
- 14.2 Submit the Form:** Send the completed form to the Information Officer via email or postal address.

- 14.3 Payment of Fees:** Pay the request fee (if applicable) upon submission.
- 14.4 Acknowledgement:** Easttel will acknowledge receipt within 14 days.
- 14.5 Decision:** A decision will be communicated within 30 days, extendable once for a further 30 days.

15. Contact Details of the Information Regulator

Office of the Information Regulator

- ✓ Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- ✓ Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
- ✓ Email: enquiries@inforegulator.org.za
- ✓ Website: <https://inforegulator.org.za/>

16. Updates to the Manual

This manual will be reviewed regularly and updated as required. The latest version will be made available on Easttel's website and at our offices.

17. Contact Information

For any queries or requests regarding this manual or personal information processing, please contact:

- 17.1 Information Officer:** Mark Gray
- 17.2 Email:** informationofficer@easttel.co.za
- 17.3 Telephone:** 021-565 0500
- 17.4 Physical Address:** The Pavilion, Dock Road, V & A Waterfront, Cape Town, Western Cape, South Africa
- 17.5 Domicile:** Attention – Mrs Laila Clark, C/O Conlon & Associates, Suite 2 Clevedon House, 2 Clevedon Road, Selborne, East London, 5201, East London