

## ACCESS TO INFORMATION

### MANUAL OF BRITBOX INTERNATIONAL TRADING LIMITED IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

#### 1. Overview and Objectives of the Manual

- 1.1 The Promotion of Access to Information Act 2 of 2000 ("**PAIA**", "**the Act**") gives effect to section 32 of the Constitution of the Republic of South Africa and facilitates the right to access information held by the State, as well as information held by another person (or private body) when such privately-held information is required for the exercise and protection of rights.
- 1.2 More broadly, PAIA aims to underline the importance of access to information in a democratic society by fostering a culture of transparency and accountability. PAIA does this by requiring public (government) and private (non-government) bodies to create both a manual describing the type of records they hold, and procedures for others to access that information.
- 1.3 PAIA also sets limits on the types of information that can be accessed.
- 1.4 This manual is compiled in accordance with Section 14 of PAIA and offers an outline of BritBox International Trading Limited ("**BritBox**") information, which is accessible to the public.
- 1.5 This manual details the categories of personal information and the recipients of the information that BritBox processes. This manual also sets out the security measures that BritBox has put in place to ensure the confidentiality, integrity and availability of the personal information it processes.

#### 2. Introduction to BritBox

- 2.1 BritBox is an online digital streaming service, operating as a joint venture of the BBC and ITV plc, available in a number of countries, including Australia, Canada, South Africa and the United States.

#### 2.2 National or Head Office

Postal Address: BritBox International, ITV White City, 201 Wood Lane,  
London, England, W12 7RU  
Email: [support-za@britbox.com](mailto:support-za@britbox.com)  
Website: BritBox.com

#### 3. Information Officer

- 3.1 Reemah Sakaan (CEO) in terms of PAIA and POPIA, has been designated and appointed as BritBox's Information Officer.

#### 4. Contact details of Information Officer

All requests for information must be directed to BritBox's Information Officer at the following addresses:

Postal Address: BritBox International, ITV White City, 201 Wood Lane,

London, England, W12 7RU

E-mail: [privacy-za@britbox.com](mailto:privacy-za@britbox.com)

## 5. The Section 10 Guide on how to use PAIA

- 5.1 The Information Regulator has published a guide as prescribed by Section 10 of PAIA and in accordance with the Protection of Personal Information Act, 2013 ("POPIA"). The guide is available at the offices of the Information Regulator and on its website. Please direct any queries regarding this guide to:

### Information Regulator

The Research and Documentation Department

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number: 010 023 5200

Website: [www.justice.gov.za/infoereg/](http://www.justice.gov.za/infoereg/)

email (complaints): [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

email (general enquiries): [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## 6. Records that are available from BritBox in terms of other legislation

A requester may request information which is available in terms of the following legislation, provided that the requester complies with the requirements set out in such legislation, this manual and PAIA.

- 6.1 Companies Act, 2008;
- 6.2 Income Tax Act, 1962;
- 6.3 Promotion of Access to Information Act, 2000;
- 6.4 Protection of Personal Information Act, 2013;
- 6.5 Value Added Tax Act, 1991.

## 7. Records available without formal requests

- 7.1 Promotion of Access to Information Manual.

## 8. Records and information that should be formally requested in terms of PAIA

This section of the Manual sets out the subject and categories of records held by BritBox. The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under the Act. In particular, certain grounds of refusal as set out in the Act may be applicable to a request for such records. Those grounds of refusal are summarised in paragraph 9.4 below. The following information may be formally requested by following the process set out in paragraphs 9.1 and 9.2 below.

## 8.1 **Corporate governance records**

- 8.1.1 Constitutional documents (including incorporation documents, the memorandum of incorporation and the shareholders agreement);
- 8.1.2 Share registers, share certificates, registers and details concerning shareholder meetings and resolutions;
- 8.1.3 Details concerning the identity of directors;
- 8.1.4 Statutory registers.

## 8.2 **Strategic and operational information**

- 8.2.1 Organisational and business plans;
- 8.2.2 Budget reports;
- 8.2.3 Minutes of management meetings;
- 8.2.4 Minutes of board meetings; and
- 8.2.5 Annual Reports.

## 8.3 **Financial management records**

- 8.3.1 Financial accounting;
- 8.3.2 Financial reporting;
- 8.3.3 Budgets;
- 8.3.4 Insurance;
- 8.3.5 Tax management; and
- 8.3.6 Management accounting.

## 8.4 **Procurement records**

- 8.4.1 Policies and procedures;
- 8.4.2 Tender invitations and process records;
- 8.4.3 Documents relating to acquisition of goods and services;
- 8.4.4 Supplier agreements and service level agreements; and

## 8.5 **Compliance**

- 8.5.1 BBBEE compliance;
- 8.5.2 Legislation compliances; and
- 8.5.3 Regulatory reports.

## 8.6 **Information technology records**

- 8.6.1 Incidents and service requests;
- 8.6.2 Software programmes;
- 8.6.3 Service level agreements;
- 8.6.4 System event and performance logs;
- 8.6.5 IT policies and procedures; and
- 8.6.6 Network maintenance.

## 8.7 **Data subject categories and their personal information**

- 8.7.1 General public: general enquiries and viewing the company website;
- 8.7.2 Industry bodies: membership records;
- 8.7.3 Media: records of media interactions;
- 8.7.4 Service providers: record of service provider life cycle; and
- 8.7.5 Subscribers/users.

## 8.8 **Recipients of personal information**

- 8.8.1 Financial institutions;
- 8.8.2 Industry bodies;
- 8.8.3 Law enforcement;
- 8.8.4 Operators (service providers); and
- 8.8.5 Statutory authorities.

## 8.9 **Expected transnational transfer of personal information**

- 8.9.1 Transfer of personal information to other BritBox companies;
- 8.9.2 Transfer of personal information to operators (service providers).

## 8.10 **Security measures to protect personal information**

- 8.10.1 Physical security measures:
  - 8.10.1.1 Access control measures;
  - 8.10.1.2 Internal security measures;
- 8.10.2 Cyber security measures:
  - 8.10.2.1 Anti-spam measures;

- 8.10.2.2 Anti-virus measures;
- 8.10.2.3 Installing security firewalls;
- 8.10.2.4 Password control;
- 8.10.3 Information security audits; and
- 8.11 **Miscellaneous agreements**
  - 8.11.1 Loans from third parties (including banks);
  - 8.11.2 Loans to third parties;
  - 8.11.3 Suretyship agreements;
  - 8.11.4 Security agreements, guarantees and indemnities;
  - 8.11.5 Agency, management and distribution agreements;
  - 8.11.6 Marketing agreements;
  - 8.11.7 Agreements with suppliers of BritBox;
  - 8.11.8 Confidentiality and/or non-disclosure agreements; and
  - 8.11.9 Any other relevant agreements.

## 8.12 **Correspondence**

- 8.12.1 Correspondence of BritBox, including internal and external memoranda.

## 9. **The request procedure**

### 9.1 **Prescribed form**

- 9.1.1 A request for information must be made in the prescribed form, a copy of which is attached as 0, must be addressed to the Information Officer and must be submitted with the prescribed fee (see paragraph 9.3).
- 9.1.2 The prescribed request form is available from BritBox's Information Officer and from the Information Regulator's offices and website, whose contract details are set out, respectively, in paragraphs 4 and 5.1 above.
- 9.1.3 The outcome of a request and any fees payable in respect of a request will be communicated to the requestor in the prescribed form, a copy of which is attached as Annexe B.

### 9.2 **Manner of request**

- 9.2.1 The request must be made to the contact details of BritBox's Information Officer set out in paragraph 4 above.
- 9.2.2 The requester must provide enough detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate if it requires notice of the decisions of the Information

Officer in any manner, other than in writing.

9.2.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

9.2.4 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

### 9.3 **Fees**

9.3.1 A requester who seeks access to a record containing personal information must pay the required request fee.

9.3.2 The Information Officer will by notice, require the requester to pay the prescribed fee, if any, before further processing the request.

9.3.3 The requester may lodge an application to the high court relating to the payment of the request fee.

9.3.4 After the Information Officer has decided on the request, the requester will be notified in the required form.

9.3.5 If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.

9.3.6 The prescribed fees are available from the Information Officer and from the Information Regulator, whose contact details are set out in paragraph 4 and 5.2 above.

### 9.4 **Circumstances under which a request for access to information will be refused**

9.4.1 Access to a record of information will be refused based on the grounds of refusal as set out in PAIA, which shall include the following categories of information:

9.4.1.1 mandatory protection of privacy of a third party who is a natural person;

9.4.1.2 mandatory protection of commercial information of a third party;

9.4.1.3 mandatory protection of certain confidential information and protection of certain other confidential information of a third party;

9.4.1.4 mandatory protection of the safety of individuals and the protection of property;

9.4.1.5 mandatory protection of police dockets in bail proceedings and protection of law enforcement and legal proceedings;

9.4.1.6 mandatory protection of records privileged from production in legal proceedings;

- 9.4.1.7 protection of commercial information of a private body (including BritBox);
- 9.4.1.8 defence, security and international relations of the Republic;
- 9.4.1.9 economic interests and financial welfare of the Republic and commercial activities of public bodies;
- 9.4.1.10 mandatory protection of research information of a third party and protection of research information of a public body;
- 9.4.1.11 operations of public bodies; and
- 9.4.1.12 manifestly frivolous or vexatious requests or substantial and unreasonable diversion of resources.

## 10. **Availability of this Manual**

This manual is available for inspection at:

- 10.1 BritBox's website: [BritBox.com](http://BritBox.com);
- 10.2 BritBox's head office set out in paragraph 2 above, during normal business hours.

LAST UPDATED: 18 October 2023

## ANNEXE A

### REQUEST FOR ACCESS TO RECORD

**NOTE:**

1. Proof of identity must be attached by the requester.
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			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			
Street Address			
E-mail Address			



Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
<b>PARTICULARS OF RECORD REQUESTED</b>				
<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 provided 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				
<b>TYPE OF RECORD</b> <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				
<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>				
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	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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>	
E-mail 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>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester 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:	

<b>FEES</b>	
a) A request fee must be paid before the request will be considered.	
b) You will be notified of the amount of the access fee to be paid.	
c) 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.	
d) If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

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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 Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

\_\_\_\_\_  
**Signature of Information Officer**

## ANNEXE B

## OUTCOME OF REQUEST AND OF 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 ( <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> ) 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 Annexure B.	
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OR

**2. You requested:**

Printed copies of the information ( <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 information on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
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 ( <i>including transcriptions</i> )	
E-mail 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> )	

Kindly note that your request has been:

- Approved
- Denied, for the following reasons:

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**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	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
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			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**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)

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 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Information Officer**