

## 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: 1 Television Centre, 101 Wood Lane, London, United Kingdom, W12 7FA

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, 1 Television Centre, 101 Wood Lane, London, United Kingdom, W12 7FA

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/inforeg/](http://www.justice.gov.za/inforeg/)

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

email (general enquiries): [inforeg@justice.gov.za](mailto:inforeg@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 Annexe A, 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.

9.2 **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.



### Request for access to record

#### 1. Particulars of the company

Name of the company: [insert]

Registration number [insert]

The Head: [insert]

Postal Address: [insert]

E-mail: [insert]

#### 2. Particulars of person requesting access to the record

- 2.1 The full particulars of the person who requests access to the record must be given below.
- 2.2 The address in the Republic to which the information is to be sent must be given.
- 2.3 Proof of the capacity in which the request is made, if applicable, must be attached.

**Full names and surname:** \_\_\_\_\_

**Identity Number:** \_\_\_\_\_

**Postal Address:** \_\_\_\_\_

\_\_\_\_\_

**Telephone Number:** \_\_\_\_\_

**E-mail address:** \_\_\_\_\_

**Capacity in which  
request is made  
when made on behalf  
of another person:** \_\_\_\_\_

#### 3. Particulars of person on whose behalf 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:** \_\_\_\_\_

**4. Particulars of record**

- |     |   |
|-----|---|
| 4.1 | 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. |
| 4.2 | If the space is inadequate, please continue on a separate folio and attach it to this form. <b>The requester must sign all the additional folios.</b>             |

**Description of record  
or relevant part of the  
record:**

\_\_\_\_\_

**Reference number, if  
available:**

\_\_\_\_\_

**Any further particulars of  
record:**

\_\_\_\_\_  
\_\_\_\_\_

**5. Fees**

- |     |  |
|-----|--|
| 5.1 | A request for access to a record, other than a record containing personal information about yourself, will be processed only after a <b>request fee</b> has been paid. |
| 5.2 | You will be notified of the amount required to be paid as the request fee.   |
| 5.3 | The <b>fee payable for access</b> to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.     |
| 5.4 | If you qualify for exemption of the payment of any fee, please state the reason for exemption.   |

**Reason for exemption from payment of fees:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**6. Form of access to record**

If you are prevented by an impediment or disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:  _____  _____  _____		Form in which record is required:  _____  _____  _____	
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Mark the appropriate box with an "X":

NOTES:

6.1 Compliance with your request in the specified form may depend on the form in which the record is available.

6.2 Access in the form requested may be refused in certain circumstances. In such case, you will be informed if access will be granted in another form.

6.3 The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

<b>1. If the record is in written or printed form:</b>			
	Copy of record*		Inspection of record
<b>2. If the record consists of visual images</b> (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
	View the images		Copy of the images*
			Transcription of the images*

<b>3. If the record consists of recorded words or information which can be reproduced in sound:</b>			
	Listen to the soundtrack  (audio cassette)		Transcription of soundtrack  (written or printed document)*
<b>4. If the record is held on computer or in an electronic or machine-readable form:</b>			
	Printed copy of record*		Printed copy of information derived from the record*
			Copy in computer readable form* (stiffy or 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?  <b>Postage is payable.</b>			<b>YES</b>
			<b>NO</b>

**7. Particulars of the right to be exercised or protected**

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

**Indicate which right is to be exercised or protected:**

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**Explain why the record requested is required for the exercise or protection of the aforementioned right:**

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**8. 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?**

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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

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SIGNATURE OF REQUESTER/PERSON ON  
WHOSE BEHALF REQUEST IS MADE