

Access to Information Manual

Prepared in accordance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA).

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1. Introduction

- a. Xneelo (Pty) Ltd is a specialist hosting company offering competitive shared and dedicated hosting solutions and domain registrations. This is our '**Access to Information Manual**' and applies to xneelo and where applicable, to the xneelo Associated Affiliates. Its purpose is to help you access our information and any other information that we have. PAIA requires us to make it available to you so that you:
 - know what types of information we have; and
 - can request access to it.
- b. The manual may be amended from time to time and as soon as any amendments have been finalised the latest version of the manual will be made available on our website, referred to below.

- c. This document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. Please familiarise yourself with the provisions of the [Act](#) before lodging any request.

2. Contact Details

Our details are as follows:

• Name of Private Body:	xneelo (Pty) Ltd
• Registration Number:	2005/023926/07
• Postal Address:	PO Box 3450, Durbanville, South Africa, 7551
• Physical Address:	Belvedere Office Park, Unit F, Bella Rosa Street, Durbanville, South Africa, 7550
• Phone Number:	021 970 2000
• Fax Number:	021 970 2001
• Head of Private Body / Information Officer:	Mr. P. Delpont
• Deputy Information Officer:	Ms. S. Nortje
• Information Officer Email:	legal@xneelo.com
• Website:	xneelo - Trusted in Hosting

3. Availability of this manual

This Manual is available without further cost:

- by accessing it on our [website](#); or
- for inspection at our office, upon request, during office hours.

Copies of the Manual may be made, subject to the prescribed fees. Copies may also be requested from the South African Information Regulator.

The Information Regulator is required to compile a guide on how to use PAIA and make it available and accessible in various languages; this information can be found on the Regulator's website. An English version is available on our website, or alternatively you may request a copy of the guide by contacting our Information Officer.

All queries should be directed to The Information Regulator of South Africa, their contact details are as follows:

• Phone Number	012 406 4818
• Fax Number	086 500 3351
• Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
• Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
• Website	https://www.justice.gov.za/inforeg/index.html
• Email	inforeg@justice.gov.za complaints.IR@justice.gov.za

4. Voluntary Disclosure

We have not published a notice in terms of Section 52(2) of the Act, however, it should be noted that the information relating to us and our services is freely available on our website, without having to submit a formal request to access the information in terms of PAIA.

5. Records we hold

We hold the following subjects and categories of records:

a. Internal records

• Memorandum of Incorporation (formerly Memorandum and Articles of Association)	Not automatically available
• Financial records	Not automatically available
• Marketing records	Not automatically available
• Operational records	Not automatically available
• Intellectual property	Not automatically available
• Internal correspondence	Not automatically available
• Product records	Not automatically available
• Statutory records	Not automatically available

b. Personnel records

Personnel refers to any person who works for or provides services to us or on our behalf, and receives or is entitled to receive any remuneration. It also refers to any other person who assists us in carrying out or conducting our business. This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers. Personnel records include the following:

• Any personal records provided to us by our personnel	Not automatically available
• Any records a third party has provided to us about any of their personnel	Not automatically available
• Conditions of employment and other personnel-related contractual and quasi-legal records	Not automatically available
• Internal evaluation records	Not automatically available
• Other internal records and correspondence	Not automatically available

c. Customer records

Please be aware that we are very concerned about protecting the confidential information of our customers. Please motivate any request for customer information very carefully, having regard to sections 63 to 67 of the Act. Customer information includes the following:

• Any records a customer has provided to us or a third party acting for us or on our behalf	Not automatically available
• Contractual information	Not automatically available
• Customer needs assessments	Not automatically available
• Personal records of customers	Not automatically available
• Credit information and other research conducted in respect of customers	Not automatically available
• Any records a third party has provided to us about Customers Confidential, privileged, contractual and quasi-legal records of customers Customer evaluation records Customer profiling.	Not automatically available
• Performance research conducted on behalf of customers or about customers	Not automatically available
• Any records a third party has provided to us either directly or indirectly	Not automatically available

<ul style="list-style-type: none"> Records generated by or within our business pertaining to customers, including transactional records 	Not automatically available
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d. Technical records

Technical records generated by, or within our business pertaining to customers.

e. Other Parties' records

Records are kept in respect of other parties. This includes, without limitation, contractors, suppliers, joint ventures, service providers and general market conditions. In addition, such other parties may possess records that can be said to belong to us. The following records fall under this category:

<ul style="list-style-type: none"> Personnel, customers or our records which are held by another party as opposed to being held by us. 	Not automatically available
<ul style="list-style-type: none"> Records held by us pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, cached information, records provided by the other party, and records third parties have provided about the contractors/suppliers or customers. 	Not automatically available

f. Other

Further records are held including:

<ul style="list-style-type: none"> Information relating to our own commercial activities. 	Not automatically available
<ul style="list-style-type: none"> Research carried out on behalf of one of our clients or commissioned from a third party for a customer. 	Not automatically available
<ul style="list-style-type: none"> Research information belonging to us, whether carried out by ourselves or commissioned from a third party. 	Not automatically available

Information we hold to comply with the law

We hold records for the purposes of PAIA in terms of the following main laws, among others:

<ul style="list-style-type: none"> Basic Conditions of Employment Act 75 of 1997;
<ul style="list-style-type: none"> Closed Corporation Act No. 69 of 1984
<ul style="list-style-type: none"> Companies Act 61 of 1973
<ul style="list-style-type: none"> Companies Act 71 of 2008
<ul style="list-style-type: none"> Compensation for Occupational Injuries and Disease Act 130 of 1993
<ul style="list-style-type: none"> Consumer Protection Act 68 of 2008
<ul style="list-style-type: none"> Electronic Communications and Transactions Act 25 of 2002
<ul style="list-style-type: none"> Employment Equity Act 55 of 1998
<ul style="list-style-type: none"> Financial Intelligence Centre Act 38 of 2001
<ul style="list-style-type: none"> Income Tax Act 58 of 1962
<ul style="list-style-type: none"> Income Tax Act 58 of 1962
<ul style="list-style-type: none"> Labour Relations Act 66 of 1995
<ul style="list-style-type: none"> Occupational Health and Safety Act 85 of 1993

• Promotion of Access to Information Act No. 2 of 2000
• Protection of Personal Information Act 4 of 2013
• Regional Services Councils Act No. 109 of 1985
• Skills Development Levies Act 9 of 1999;
• Skills Development Act No. 97 of 1998
• Unemployment Contributions Act No. 4 of 2002
• Unemployment Insurance Act 63 of 2001
• Value Added Tax Act 89 of 1991

Access to the records held by the private body in question

• The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of this Act in terms of section 52(2) Section 51(1)(c)	Not applicable
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6. Procedure for obtaining access to information

a. How to request access

A request for access to information must be made in the prescribed form ([Form C](#)) to the appointed information officer indicated above, which can also be found on the Information Regulator's [Website](#).

Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and

allows for you to submit the request on behalf of someone else, by providing proof of capacity in which the request is made, to our satisfaction.

Once "[Form C](#)" has been submitted, the appointed information officer will notify the requester of the prescribed fee (if any) payable before further processing the request.

The information officer shall within 30 days, after the request is received, notify the requester whether the request has been granted/or refused, as well as provide the requester with any additional fees which may be levied. This additional fee would be for the reproduction, preparation and time, reasonably required to search and prepare the disclosure.

b. Grounds for refusal

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

c. How we will give you access

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

d. How much it will cost you

Fees may be levied, at the discretion of xneelo, in accordance with reproduction costs, preparation and time required to search and prepare disclosures. We will provide you with a written estimate of the fee before providing the services.

The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

7. How we process and protect personal information

We process the personal information of various categories of people for various purposes as set out in this clause and in terms of our [Privacy Policy](#).

a. Categories of people

We process the personal information of the following categories of people:

- customers or clients;
- prospects or leads;
- employees;
- contractors, vendors, or suppliers;
- debtors and creditors;
- dealers; and
- directors and shareholders.

b. Purposes

xneelo will only process a Data Subject's Personal Information for a specific, lawful and clear purpose(s) and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible. We will ensure that there is a legal basis for the Processing of any Personal Information and will ensure that the processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).

We will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject, which include, but is not limited to:

- provide our goods or supply our services;
- better understand our data subjects' needs when doing so;
- keep our data subject records up-to-date;
- manage employees in general;
- manage supplier contracts in general;
- manage dealer relationships in general;
- manage customers in general;
- manage customer credit in general;
- market to customers in various countries;
- market goods and services to prospects;
- process customer requests or complaints; and
- process personal information of employees for forensic purposes.

xneelo will retain Personal Information only for as long as is necessary to accomplish our legitimate business purposes or for as long as may be permitted or required by applicable law.

c. Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and ages;
- demographic details, such as races and age groups;
- biometric information;

- account numbers when processing debit orders;
- background information;
- contract information;
- credit information; and
- debt and debtor information.

d. Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our customers or clients:

- Contractors, vendors, or suppliers;
- Agents, distributors, or other resellers;
- Operators, other responsible parties, or co-responsible parties; and
- Third-party vendors (such as software developers) to help us maintain our services.

e. Cross-border transfers

We send personal information outside of South Africa to various countries. We will only transfer data to other countries who have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same standard we must protect it.

f. Security

We secure our data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

Other prescribed information

The Minister of Justice and Constitutional Development has not made any regulations prescribing any other information that needs to appear in this manual.