

**Mobile Telephone Networks (MTN)
Access to Information Manual**



We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).



TABLE OF CONTENTS

1.	INTRODUCTION	4
2.	OUR DETAILS	4
3.	FURTHER GUIDANCE.....	5
4.	RECORDS WE HOLD.....	5
4.1	COMPANY RECORDS	6
4.2	BUSINESS RECORDS	7
4.3	FINANCIAL RECORDS.....	7
4.4	INSURANCE AND TAX RECORDS.....	7
4.5	PERSONNEL RECORDS.....	8
4.6	POLICIES AND DIRECTIVES.....	9
4.7	AGREEMENTS OR CONTRACTS AND TELECOMMUNICATIONS RECORDS.....	9
4.8	REGULATORY DOCUMENTS AND ENVIRONMENTAL RECORDS.....	9
4.9	INTERNALLY COMMISSIONED OR PRODUCED INFORMATION	10
4.10	CUSTOMER INFORMATION	10
4.11	REFERENCE MATERIALS.....	11
4.12	AUTOMATICALLY AVAILABLE RECORDS.....	11
4.13	INFORMATION WE HOLD TO COMPLY WITH THE LAW	11
5.	HOW TO REQUEST ACCESS.....	14
6.	GROUND FOR REFUSAL.....	15
7.	PROCEDURE FOR ACCESS OR REFUSAL.....	15
8.	HOW MUCH IT WILL COST YOU	16
9.	HOW WE PROCESS AND PROTECT PERSONAL INFORMATION.....	17
9.1	CATEGORIES OF DATA SUBJECTS.....	17
9.2	PURPOSES FOR PROCESSING OF PERSONAL INFORMATION.....	19
9.2.1	OPERATIONAL PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION.....	20
9.2.2	MARKETING OR PROMOTIONAL PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION.....	21
9.2.3	REGULATORY PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION.....	21
10.	CATEGORIES OF PERSONAL INFORMATION.....	21



11.	THIRD-PARTY DISCLOSURES	22
12.	CROSS-BORDER TRANSFERS	22
13.	SECURITY	23
14.	OTHER PRESCRIBED INFORMATION	23
15.	PAIA FORMS	23
16.	AVAILABILITY OF THIS MANUAL	23
17.	AVAILABILITY OF THE GUIDE ON HOW TO USE PAIA.....	23
18.	UPDATES TO THIS MANUAL.....	24



1. INTRODUCTION

We are Mobile Telephone Networks (Pty) Ltd (MTN); we operate mobile and fixed communication services in terms of the Electronic Communications Network Services and Electronic Communications Services Licences. This is our 'Access to Information Manual'.

The purpose of this document is to help you access our information and records as a private body pursuant to section 51 of the PAIA Act.

PAIA requires us to make it available to you so that you:

- know what types of information and records we hold.
- can request access to the information and records we hold.

This manual exists to tell you what information we have and help you get access to it.

2. OUR DETAILS

Our details are as follows:

Company name:	Mobile Telephone Networks (Pty) Ltd
Registration number:	1993/001436/07
Postal address:	Private Bag 9955, Cresta, 2118
Physical address:	Innovation Centre, 216 – 14th Avenue, Fairland, Roodepoort, 2195
Information Officer in terms of PAIA:	Rakesh Ishwardeen
Email for purposes of PAIA queries:	PAIA.ZA@mtn.com
Email for purposes of PoPIA queries:	PoPI@mtn.com
Information Officer phone number:	011 912 3000
Fax number:	011 912 3168
MTN contact email:	Customercare@mtn.com
Websites:	www.mtn.co.za and www.mtnbusiness.co.za

These are all our details, but please rather contact us by email whenever possible.



3. FURTHER GUIDANCE

If you would like further guidance on how you can get access to information under PAIA, you may contact the Information Regulator to find out more information about PAIA. The Information Regulator has a guide in each of the official languages of South Africa on how to exercise any right under PAIA.

Their contact details are as follows:

- **Phone number:** 011 023 5200
- **Postal address:** P.O Box 31533, Braamfontein, Johannesburg, 2017
- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
- **Website:** <https://inforegulator.org.za/>.

For further guidance on how you can get access to information, please contact the Information Regulator by visiting their website at <https://inforegulator.org.za/>.

4. RECORDS WE HOLD

We hold various subjects and categories of records, including [company records](#), [business records](#), [financial records](#), insurance and tax records, personnel records, policies and directives, [agreements or contracts](#), regulatory documents, [internally produced and commissioned information](#), [customer information](#) and [reference materials, as well as publicly available information](#).

Some records which we hold can be made automatically available to you upon your request, which means that you would not have to complete a PAIA application Form 2 to obtain access to these records. Where the record is not automatically available, you will be required to submit a PAIA application Form 2 to us.

Set out below are the various subjects and categories of records which MTN keeps in electronic or physical form and how you can access them.



4.1 COMPANY RECORDS

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

Memorandum of incorporation	Automatically available from CIPC
Directors' names	Automatically available from CIPC
Documents of incorporation	Automatically available from CIPC
Minutes of board of directors' meetings	Not automatically available
Written resolutions	Not automatically available
Records relating to appointment of directors, auditor, secretary, public officer, or other officers	Not automatically available
Register, share certificates and other statutory registers	Not automatically available
Debt securities, share incentives schemes or trusts	Not automatically available
Shareholders' agreement	Not automatically available
Other statutory records	Not automatically available



4.2 BUSINESS RECORDS

Business records include any documents that have economic value to the business.

Operational records and reports	Not automatically available
Databases	Not automatically available
Published works	Not automatically available
Internal correspondence	Not automatically available
Product records	Not automatically available
Profiles of subsidiary companies	Not automatically available

4.3 FINANCIAL RECORDS

Financial records are all our records related to our finances.

Financial statements	Not automatically available
Tax returns	Not automatically available
Other documents relating to taxation of the company	Not automatically available
Accounting records	Not automatically available
Banking records	Not automatically available
Paid cheques	Not automatically available
Asset register	Not automatically available
Rental agreements	Not automatically available
Invoices	Not automatically available
Financial agreements	Not automatically available

4.4 INSURANCE AND TAX RECORDS

Insurance records are all our records related to our insurable assets. Tax records are all our records relating to our tax obligations.

Insurance policies held by the company	Not automatically available
Register of all immovable property owned by the company	Not automatically available
Income tax records	Not automatically available.
PAYE records	Not automatically available



Corporate tax records	Not automatically available
Customs tax	Not automatically available
Documents issued to employees for income tax purposes	Not automatically available
Records of payments made to SARS on behalf of employees	Not automatically available
VAT records	Not automatically available
Regional services levies	Not automatically available
Skills development levies	Not automatically available
UIF	Not automatically available
Workmen's compensation	Not automatically available

4.5 PERSONNEL RECORDS

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

List of employees	Not automatically available
Employee personal information	Not automatically available
Employee employment contracts	Not automatically available
Employment policies and procedures	Not automatically available
Employment equity plan	Not automatically available
Medical aid records	Not automatically available
Pension fund records	Available at the Registrar of pension funds
Salaries of employees	Not automatically available
Leave records	Not automatically available
Internal evaluations	Not automatically available
Disciplinary records	Not automatically available
Disciplinary codes	Not automatically available
Training records	Not automatically available
Operating manuals	Not automatically available
Personal records provided by personnel	Not automatically available
Other statutory records	Not automatically available
Related correspondence	Not automatically available



4.6 POLICIES AND DIRECTIVES

Policies and directives include both internal and external documents.

Internal relating to employees and the company	Not automatically available
External relating to clients and other third parties	Not automatically available
Information technology systems and documents	Not automatically available

4.7 AGREEMENTS OR CONTRACTS AND TELECOMMUNICATIONS RECORDS

Agreements or contracts include the documents themselves and all related documents.

Standard agreements	Not automatically available
Contracts concluded with customers	Not automatically available
Letters of Intent, MOUs	Not automatically available
Third party contracts (such as JV agreements, VAR agreements, etc.)	Not automatically available
Office management contracts	Not automatically available
Supplier contracts	Not automatically available
Tender contracts	Not automatically available
Telecommunications services records	
List of service providers and dealers	Not automatically available
Contracts concluded with customers	Not automatically available
Stored communication related information	Not automatically available
Cellular phone and SIM-card records	Not automatically available
Call data records	Not automatically available

4.8 REGULATORY DOCUMENTS AND ENVIRONMENTAL RECORDS

Regulatory documents include any documents required to comply with any laws.

Permits	Not automatically available
Licences	Not automatically available



Authorities	Not automatically available
Environmental approvals	Not automatically available
Local authority approvals	Not automatically available
Incidence records and statistics	Not automatically available
Risk management system	Not automatically available
Operational risk review reports	Not automatically available
Written communications to ICASA on tariffs, and fees	Not automatically available
Environmental records	
List of all base transceiver station site and leases	Not automatically available
Environmental approvals	Not automatically available
Base transceiver station site upgrade information	Not automatically available
Local authority approvals	Not automatically available
Base transceiver site electromagnetic emission levels	Not automatically available

4.9 INTERNALLY COMMISSIONED OR PRODUCED INFORMATION

Internally produced or commissioned information includes any document that we prepare and produce, or that is prepared and produced at our request.

External newsletters and circulars	Automatically available
Internal newsletters and circulars	Not automatically available
Information on the company published by third parties	Not automatically available
Written submissions to regulators, legislators and/or policy makers	Not automatically available

4.10 CUSTOMER INFORMATION

Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

Customer details	Not automatically available
Contact details of individuals within customers	Not automatically available
Communications with customers	Not automatically available



Sales records	Not automatically available
Transactional and billing information	Not automatically available
Marketing records	Not automatically available

4.11 REFERENCE MATERIALS

Reference materials include any sources of information that we contribute to.

Books	Not automatically available
Newsletters and journals articles	Not automatically available
Magazines	Not automatically available
Newspaper articles	Not automatically available

4.12 AUTOMATICALLY AVAILABLE RECORDS

Over and above the automatically available information set out above, the following records are automatically available:

Automatically Available Records	Manner of Access to Records
Customer Information Privacy Notice	Soft Copy / Website
Third Party Privacy Notice	Soft Copy / Website
PAIA Manual	Soft Copy / Website
Data Subject Request Forms	Soft Copy / Website
Customer Service Charter	Soft Copy/Website
MTN Legal Terms and Conditions	Soft Copy / Website
Product and Promotional Terms and Conditions	Soft Copy / Website
Current Competitions and their Terms and Conditions	Soft Copy/Website
Marketing Material	Soft Copy / Website
Job Advertisements	Soft Copy / Website
Published Annual Reports	Soft Copy / Website
Published Financial Statements	Soft Copy / Website
Media Releases	Soft Copy / Website
Published Events	Soft Copy / Website

4.13 INFORMATION WE HOLD TO COMPLY WITH THE LAW

Records are kept in accordance with legislation as is applicable to MTN, which



include (but may not be limited to) the following legislation:

Legislation	Type of information to be retained
Basic Conditions of Employment Act No. 75 of 1997	Records of information containing the personal details of all its employees, working times and remuneration package.
Broad Based Black Economic Empowerment Act No. 53 of 2003 ("BBBEE")	Records of activities undertaken to promote economic transformation and meaningful participation of black people in the mainstream economy.
Companies Act No. 71 of 2008	Company documents and records, Memorandum of incorporation and records of their directors
Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993	Employee record or reproduction of same relating of wages, time worked, payment for piece work and overtime
Consumer Protection Act No. 68 of 2008	Records of transactions aimed at promoting and protecting the economic interests of consumers.
Criminal Procedure act No. 51 of 1977	The Act makes provision for the admissibility of documents as evidence where such documents were compiled in the course of trade or business by persons who have personal knowledge of matters contained in the document.
Electronic Communications and Transactions Act No. 25 of 2002	Records of electronic transactions.
Employment Equity Act No. 55 of 1998	Records relating to the workforce, employment equity plans and other relevant employment related records.
Financial Intelligence and Centre Act No. 38 of 2001	<ul style="list-style-type: none"> • Records necessary to establish a relationship • Client's Identity Document • ID of a person on whose behalf the client is acting and proof of authority • Nature of business relationship/transaction • Amounts involved • Details of employee who captured info on behalf of company



Labour Relations Act No. 66 of 1995	Records of disciplinary transgressions against employees, actions taken and reasons for the action
National Credit Act No. 34 of 2005	Records of all applications for credit, credit agreements and credit accounts in the prescribed manner and form and for the prescribed time.
Occupational Health and Safety Act No. 85 of 1993	Records relating to the health and safety of persons in the workplace
Pension Funds Act 24 of 1956	<ul style="list-style-type: none"> • Every fund is expected to maintain books of account and other records as may be necessary for the purpose of the fund. • All the money and assets belonging to the fund may be kept in the name of the pension fund by other institutions subject to conditions determined by the Minister.
Prevention and Combating of Corrupt Activities Act No. 12 of 2004	<ul style="list-style-type: none"> • Records relating to any offer of improper gratification relating to the procurement or execution of contracts or employment relationship.
Regulation of Interception of Communications and Provision of Communication Related Information Act No. 70 of 2002 ("RICA")	<ul style="list-style-type: none"> • The Act requires the following information to be stored in respect of all customers: Name, surname, ID number, MSISDN and one address • For businesses: name, registration number, business address, name and surname of business representative, his or her ID number as well as the address
Skills Development Act no. 97 of 1998	Records of all learnership agreements.
Skills Development Levies Act No. 9 of 1999	Every employer is expected to make payments towards the skills development levy at a rate of 1% of the leviable amount. Records detailing payments made by the Employer are expected to be kept.
Unemployment Insurance Act No. 30 of 1996	Records relating to payment of contributions to the Unemployment Insurance Fund relating to: illness, maternity and for dependents.



5. HOW TO REQUEST ACCESS

We have authorised and designated our Information Officer to deal with all matters relating to PAIA to comply with our obligations in terms of PAIA.

A request for access to a record must be made in a prescribed Form 2 to MTN at its address, fax number, or electronic email address outlined in paragraph 2. The form is available from the website on [PAIA Forms - Information Regulator](#).

The Requester must provide sufficient information for identification purposes. Therefore, proof of identity is required to authenticate the Requester such as a certified copy of their identity document, driver's licence or passport.

If the request is made on behalf of another person, the Requester must provide proof of capacity in which they are making the request and authorisation to make such request.

If you need help filling out the form, you may ask the Information Officer to provide assistance to you.

Please submit the completed form to our Information Officer together with the relevant request fee as set out in 0 below. (Further details appear at Annexure B to the PAIA Regulations, available here: <https://inforegulator.org.za/wp-content/uploads/2020/07/20210827-gg45057gon757-PAIAregulations.pdf> at our Information Officer's email address, our physical address, or by fax in terms of our details provided above.

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;
- fully describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right; and
- provides any other way you would like to be informed of our decision other than in writing.

If you do not use the standard form, we may:



- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- not be able to process the application in line with the prescribed timelines.

You may request information by completing a request for access form and submitting it to our Information Officer together with a request fee of R140.

6. GROUNDS FOR REFUSAL

Even upon receipt of a fully completed request, we may have to refuse you access to certain records in terms of PAIA to protect:

- The privacy of an individual;
- Our trade secrets or the trade secrets of any other firm;
- commercial information relating to us or any other third party;
- confidential information relating to us or any other third party
- the personal information of another person;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information of ours or of another third party.

We may have to refuse you access to a record to protect others.

7. PROCEDURE FOR ACCESS OR REFUSAL

We will evaluate and consider all requests to us in terms of PAIA.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. We may request an extension for a further 30-day period where your request:

- Is for a large number of records; or
- Requires a search through records which are in a different city or town; or
- Requires a level of consultation in order to act on the request which cannot be completed within 30 days.

In the event that we require an extension, we will notify you of our intention to extend the request.

If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.



If we approve your request for access to our records, then we will advise you on:

- The prescribed reproduction fees for accessing the information or documentation;
- Payable deposit and balance (if any);
- The form in which access will be given, unless you have asked for access in a specific form; and
- The right to lodge an application in court or to complain to the Information Regulator against the access fee to be paid or the form of access to be granted within 180 days of us notifying you of our decision.

If the request for access is refused, we will advise you about the reasons for refusal. You have a right to lodge an application in court or complain to the Information Regulator against the refusal of the request.

Publication of this manual does not give rise to any automatic rights to access information records, except in terms of PAIA. Your right of access to information will always be balanced against the rights of others.

8. HOW MUCH IT WILL COST YOU

The POPI Act entitles a Private Body to levy prescribed fee to a Requester before further Processing the request.

According to section 23(3) of PoPIA, a Responsible Party may require payment of a prescribed fee for the provision of a record of Personal Information about the Data Subject in its possession.

We will provide you a written estimate of the fee before providing the services; any may require the Requester to pay a deposit for all or part of the fee.

Please see below prescribed fees applicable that have been published in the Annexure B of PAIA Regulations, 2021. Details appear at Annexure B to the PAIA Regulations, available here: <https://inforegulator.org.za/wp-content/uploads/2020/07/20210827-gg45057gon757-PAIAreulations.pdf>

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.



3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact disc • If provided by the requestor • If provided to the requestor	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Services to be outsourced. Will depend on quotation from Service Provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (iii) Flash drive (to be provided by the requestor) (iv) Compact disc • If provided by the requestor • If provided to the requestor	R40.00 R40.00 R60.00
9.	To search for an prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

9. HOW WE PROCESS AND PROTECT PERSONAL INFORMATION

We process the personal information of various categories of people/ data subjects for various purposes as set out in this clause.

9.1 CATEGORIES OF DATA SUBJECTS

Customers	• Information relating to customers' financial or employment history.
-----------	---



	<ul style="list-style-type: none"> • Any unique identifying number or symbol such as customers' cell phone number, account number, handset serial number, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the customer. • Customers' biometric information, which while processed, is encrypted and is utilised for identity verification. • Any correspondence sent by customers that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence. • CCTV footage (which includes video recordings) monitoring our stores, parking lots and MTN office buildings for security purposes.
Third Party	<ul style="list-style-type: none"> • Registered name, address, company registration number, the names, identity numbers, addresses and other relevant details of the Third Party's directors and employees which may include financial information and banking details. • MTN SA also collects information about the Third Party's usage of its information technology and electronic equipment including, but not limited to, telephone, internet usage and emails.
Employee	<ul style="list-style-type: none"> • Detailed identification information (e.g., name, position, title, office location, business telephone number, date of birth, picture, identity document number, passport numbers and other national ID numbers as required, employment identification number, private email and/or postal address, residential address, and car registration number). • Electronic identification Information (e.g., login information, access rights, badge number, IP address, online identifiers/cookies, logs, and connection time, sound, or image recording such as CCTV, video, and voice recordings). • Personal and physical characteristics (e.g., gender assigned at birth, immigration status, and physical characteristics). • Family information (e.g., marital status, marriage certificate and number of children). • Education and employment information (e.g., remuneration, bonus, pension entitlements, insurance and other benefits information, employment dates such as dates of hiring/promotion/position change, performance evaluation,



	<p>position information such as position title and reference number, attendance information including, where relevant, illness or leaves of absence for medical or other reasons, language skills, and training, education, and development information).</p> <ul style="list-style-type: none">• National registry number, tax identifying number; social security number or local equivalent.• Signatures (both handwritten and electronic).• Financial information (e.g., bank account details, professional credit card numbers, tax related information and, where relevant, information relating to account transactions and dealings); and• Monitoring of company assets and systems (e.g., where relevant, information about how you may use IT systems and hardware, records of phone calls and other Personal Information that may be Processed as a result of the monitoring of the employees carried out in accordance with MTN's relevant and applicable policies).• Information relevant to the administration of benefits: (e.g., to the extent that employees are entitled to medical aid and/or provident fund / pension fund benefits. We only collect the Personal Information prescribed by the relevant service provider in order to process applications for these benefits and/or to administer these benefits. The Personal Information required may include, but not limited to, Personal Information of dependents of the medical aid plan and/or beneficiaries of provident funds / pension funds).
Prospective Employees	<ul style="list-style-type: none">• Title and position• Professional employment history• Language skills, experience, qualifications, contact details, as well as current and expected earnings, results from personality or cognitive ability tests, opinions and references of others about the prospective employee.

9.2 PURPOSES FOR PROCESSING OF PERSONAL INFORMATION

PAIA not only requires us to inform you when we use your personal information as part of our processing, but also to notify you of the purpose for which we process it, to ensure we deliver on our commitment to you.



9.2.1 OPERATIONAL PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION

The below is a list of activities where we use your personal information to provide you with your required services or products. If you object to the operational purposes of processing your information, it would adversely affect our ability to continue to provide you with quality services or products. We may still be able to process this information if we have another lawful ground for processing it.

The operational purpose of these activities is to:

- Keep you updated with the progress of your order regarding the products and/or services.
- Provide services that require information about where you are when using your equipment/service (location information), subject to you accepting the location user setting.
- Educate you about changes to your products and/ or services.
- Contact you in the event of a query received by you, and respond to any questions or concerns you may have about using our network, products or services.
- Protect our network and other users of our network, and manage the volume of calls, texts and other usage of our network, products or services. For example, we identify peak periods of use for us to ensure that the network can handle the volume at those times. Understanding how our customers use our network, products and/ or services. This enables us to develop more appropriate and relevant products and services, as well as personalise the products and services we offer you.
- Carry out research and statistical analysis to monitor how you use our network, products and services on an anonymous or personal basis. Conduct market research and perform statistical analyses of your behaviour. Being aware of your interest in and use of the various areas of our websites, applications, products and services will enable us to better serve you.
- Share purpose specific information across our different business units and departments for processing to serve you more efficiently such as, but not limited to, billing, queries and the customer loyalty programme services.



- Prevent and detect fraud, information security and information privacy incidents and other crimes, recover debts or trace those who owe us money.

9.2.2 MARKETING OR PROMOTIONAL PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION

We may process your information to:

- Send you promotional materials, personalised offers or details by sms, e-mail, postal service, or electronic communication provided you or your organisation has given your/its consent to receive such marketing from us or our authorised third parties; or
- Let you know about other companies' products and services (including offers and discounts we've specially negotiated for you) that we think may interest you.

We send you this information if you or your organisation have chosen to receive it.

9.2.3 REGULATORY PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION

We also process your personal information for regulatory purposes. There are laws and regulations which require us to process your personal information. Failure to do so will place us in violation of that law.

For example, we must comply with the Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 (RICA) which requires us to process information such as your name, identity number and physical address.

10. CATEGORIES OF PERSONAL INFORMATION

PoPIA makes a clear distinction between two categories of personal information.

The first category is personal information (PI). This type of information relates to both natural and juristic persons. Examples of personal information is your name, surname, identification number, date of birth, passport number, cell phone number, email address, marital status, nationality, language, views, pregnancy status, bank account details etc. Insofar as juristic entities are concerned, this includes confidential personal information that are not made public in ordinary circumstances.



The second category of personal information is **special personal information (SPI)**. Examples of special personal information is your physical or mental health status, criminal status, religion, biometrics, disability, sexual orientation etc.

We apply various security controls during the collection and processing of both personal information and special personal information and make every reasonable effort to ensure that it is not lost, stolen or compromised in any way.

11. THIRD-PARTY DISCLOSURES

We may disclose your personal information to third parties who assist us in carrying out our functions to fulfil our obligations to our customers, clients or in relation to our commercial activities. Where we disclose your personal information to any third party, the latter will be obliged to use that personal information for the reasons and purposes it was disclosed for and for no other reason whatsoever.

To this end, we have agreements in place with these third parties to ensure an adequate level of security and confidentiality for your personal information.

We give the following third parties personal information that we process in the ordinary course of business:

- 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.

12. CROSS-BORDER TRANSFERS

As a global communications partner, we send personal information outside of South Africa to various countries, especially on the African continent. We will ensure compliance with PoPIA in relation to any cross-border transfers of personal information.

For example, we will only transfer data to other countries who have similar privacy laws to South Africa's and/or ensure that the third party who is the recipient of the information is subject to a binding agreement which provides for an adequate level of protection similar to PoPIA.



13. 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.

We do our best to keep all data in our possession secure and up to date.

14. OTHER PRESCRIBED INFORMATION

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

15. PAIA FORMS

Please visit the website of the Information Regulator [here](#) for all PAIA related forms to exercise your rights:

Form	Use
Form 01	Request for a Guide from the Information Regulator
Form 01	Request for a copy of the Guide from the Information Officer of MTN
Form 02	Request for access to a record from MTN
Form 04	Internal appeal form
Form 05	Complaint form
Form 13	PAIA request for compliance assessment form

16. AVAILABILITY OF THIS MANUAL

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website at: <https://www.mtn.co.za/home/help/content/privacy-policy>

17. AVAILABILITY OF THE GUIDE ON HOW TO USE PAIA



The Information Regulator has, in terms of section 10(1) of PAIA updated and made available the revised Guide on how to use PAIA in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

Members of the public can inspect or make copies of the Guide from MTN (at the details set out above) during normal working hours. The Guide is available in English. The Guide can also be obtained upon request to the Information Officer or from the website of the Regulator ([PAIA Guidelines - Information Regulator \(inforegulator.org.za\)](http://inforegulator.org.za))

18. UPDATES TO THIS MANUAL

This manual will be updated whenever we make material changes to the current information.

This manual was last updated on 1 November 2024.