



LEADS CLINIC OY, REG NR 3125532-1

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

DATE OF COMPILATION: 01/07/2021

DATE OF REVISION: 01/07/2021

TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS	3
2.	PURPOSE OF PAIA MANUAL	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LEADS CLINIC OY (LTD)	4
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE	5
6.	DESCRIPTION OF THE RECORDS OF LEADS CLINIC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	9
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LEADS CLINIC	10
8.	PROCESSING OF PERSONAL INFORMATION	13
9.	AVAILABILITY OF THE MANUAL	15

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO“ | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended); |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LEADS CLINIC OY (LTD)

3.1. Chief Information Officer

Name: Joen Schauman
Tel: +358 50 540 5467
Email: joen@leadsclinic.com

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Afolabi Raheem

Tel: +358 40 8419691
Email: foli@leadsclinic.com

3.3 Access to information general contacts

Email: info@leadsclinic.com

3.4 Head Office

Postal Address: Puistokatu 25 A 21
40200 Jyväskylä
Finland

Physical Address: Puistokatu 25 A 21
40200 Jyväskylä
Finland

Telephone: +358 50 5405467

Email: info@leadsclinic.com

Website: leadsclinic.com and myloan.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF LEADS CLINIC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1 The following records are automatically available without a person having to request access in terms of the Act.

5.1.1. Statutory Records in Terms of The Companies Act 71 Of 2008

- Memorandum of incorporation;
- Register of directors;
- Registration certificate appointed auditors

5.1.2. Corporate Communications

- Corporate mission statement.

5.1.3. Human Resources • Employment Equity returns to the Department of Labour;

- Work skills development plan submitted to Insurance SETA;
- Personnel records are available to the employee whose file it is;
- Records of disciplinary hearings and related matters are available to the employee concerned;
- The company's policies and procedures;
- The company's staff handbook; and
- Standard Terms and Conditions of Employment applicable to all Staff.

5.1.4. Intellectual Property

- Leads Clinic's copyright, designs, logos, trademarks (collectively "intellectual property").

5.1.5. Product Information

- Information on all products, benefits and services that are publicly available

6. DESCRIPTION OF THE RECORDS OF LEADS CLINIC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1 Records are available in accordance with the following current South African legislation (only to the extent that the relevant Act makes disclosure of records compulsory) –

- The Occupational Health and Safety Act No. 29 of 1996;
- Consumer Affairs (Unfair Business Practices) Act No. 71 of 1988;
- The Compensation for Occupational Injuries and Disease Act No. 130 of 1993;
- Intellectual Property Laws Amendments Act No. 38 of 1997;
- Income Tax Act No. 95 of 1967
- The Value Added Tax Act No. 89 of 1991;
- The Income Tax Act No. 58 of 1962;
- The Companies Act No. 71 of 2008 –

o Leads Clinic, as a foreign entity, is registered in the Republic of Finland. All documents of incorporation of Leads Clinic may be at relevant authorities in Finland. The documents include the memorandum of incorporation, as well as the relevant forms.

o Registers of the directors' and officials' interests in contracts entered into by the company are kept at the registered office of the company and are available for inspection.

- Basic Conditions of Employment Act No. 75 of 1997;
- Employment Equity Act No. 55 of 1998;
- The Labour Relations Act No. 66 of 1985;
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998;
- The Pension Funds Act No. 24 of 1956;
- The National Credit Act;
- The Competition Act No. 89 of 1998;
- The Electronic Communications and Telecommunications Act 25 of 2002;
- The Financial Intelligence Centre Act 38 of 2001
- The Insurance Act 18 of 2017
- The Long-Term Insurance Act 52 of 1998
- The Short-Term Insurance Act 53 of 1998;

- The Financial Sector Regulation Act 9 of 2017;
- Protection of Personal Information Act 4 of 2013; and
- The Financial Advisory and Intermediary Services Act 37 of 2002.

The aforementioned records are not automatically available without a request in terms of the Act, as contemplated in paragraph 6 hereof. The Information officer will take into considerations section 8 of the manual to decide on whether or not access to any of the information stated above should be given to the requester.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LEADS CLINIC

7.1. Strategic Records

- Administration Records;
- Internal Reports and Communications; and
- Strategic Plans and Supporting Documentation

7.2. Company Secretarial

- Contracts and Agreements;
- Property Records;
- Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright);
- Investment Records;
- Share Registration Records;
- Statutory Records;
- Minute Books;
- Internal Reports and Communications;
- List of Suppliers;
- List of Debtors and Creditors;
- Insurance Policies;
- Lease Agreements;
- Office Building Structures;
- Tender Contracts;
- Employees travel records;
- Internal Policies and procedures; and
- General correspondence.

7.2. Finance

- Tax Records;

- Corporate and Subject Records;
- Administrative Records; and
- Internal Reports and Communications.

7.3. Governance Records

The purpose of the Governance functions is to provide the management within Leads Clinic with objective assurance that risks are being appropriately managed nationally. These records comprise the following categories –

- Risk Management Records;
- General Correspondence;
- Audit Practice Records;
- Compliance Records;
- General Administration Records; and
- Audit Reports and Supporting Working Papers.

7.4. Accounting

The Finance department maintains financial and management accounts for Leads Clinic. Corporate Account records comprise the following main categories –

- Accounting Records;
- Investment Records;
- General Correspondence;
- Management Reports;
- Transactional Records;
- VAT Records;
- PAYE Records;
- Tax Records;
- Consolidation Records;
- Internal Reports and Communications;
- A list of the company's creditors and debtors;
- Salary information;
- Bank account information; and
- Fixed assets register.

7.5. Legal

The Legal department provides assistance with all corporate legal matters' material to the Legal department records comprise the following categories –

- Bills and Legislation;
- Intellectual Property Documentation/ Licences
- Powers of Attorney;
- Working Files;

- General Correspondence;
- Copies of Agreements;
- Statutory Records
- Litigation Records;
- Legal Records, Contracts and Documentation;
- Internal Reports and Communications;
- Various Business Contracts;
- Compliance and legal risk management documentation; and
- Legal Opinions and Research.

7.6. Procurement

- Procurement Policies and Procedures;
- Procurement Forms;
- Provider/Supplier Lists;
- Provider/Supplier Agreements and Service Level Standards; and
- Administrative Records.

7.7. Human Resources

- Employee's personal details;
 - Job Profiles;
- Division and Cost Centres;
- Remuneration;
- Various Employee Contracts;
- Medical Aid
- Employee Benefits;
- Employment equity records;
- Disciplinary records;
- Job competency profile;
- Employee performance contract;
- Training records / Skills development plans;
- Internal Policies and Procedures;
- General correspondence; and
- Employee Assistance Programme Reports and Evaluations.

7.8. Operational and Customer records

- Management Records;
- Administration Files including sales records, servicing records, claims records and complaints information;
- Various Consumer & Entity Data Records and Personal Information;
- Procurement of Data Records including scanning and court agent records;

- Consulting Documentation;
- Quality Assurance Policies, Procedures and Reports;
 - Data Compliance Records; and
- Logistics Documentation
- Call Centre Quality Assurance Procedures; and
- Call Centre Data and Records.

7.9. ICT (Information Communication Technology)

These records relate to developing, implementing and supporting ICT policies, standards and best practice in Leads Clinic and comprise the following main categories:

- General Correspondence;
- Policy Records;
- Facilities Records;
- Project Management Records;
- Systems and Technology Descriptions and Information; and
- Cybersecurity and Data Protection Records.

7.10. Marketing

- Marketing Records;
- Administration Files;
- Company brochures and publications;
- Documents relating to public relation events;
- Advertising Material;
- Company media releases;
- Research and Development Records;
- Industry, delivery, size and product –specific data; and
- Management Information Statistics

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Leads Clinic processes personal information in order to render services and quotes from contractually bound third party credit providers and debt counsellors.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status, and bank details as well as other self-reported data
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Some personal information will be stored in the cloud outside the Republic of South Africa. In these cases the information will be stored on AWS servers located in Frankfurt, Germany.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on (myloan.co.za);

9.1.2 head office of Leads Clinic for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Leads Clinic will on a regular basis update this manual.

Issued by

Joen Schauman

Chief Executive Officer