

POLICY

PAIA and POPIA Manual

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Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act 4 of 2013 ("POPIA").

1. List of acronyms and abbreviations

- 1.1 "IO": Information Officer.
- 1.2 "PAIA": Promotion of Access to Information Act 2 of 2000.
- 1.3 "POPIA": Protection of Personal Information Act 4 of 2013.
- 1.4 "Regulator": Information Regulator (South Africa).
- 1.5 "Republic": Republic of South Africa.

2. Purpose of this manual

- 2.1 This manual helps people to:
 - 2.1.1 check the categories of records held by FirstNet that are available without a formal PAIA request;
 - 2.1.2 understand how to request access to a record held by FirstNet, by giving a description of the subjects and categories of records it holds;
 - 2.1.3 know the description of the records that are available under other legislation;
 - 2.1.4 find the contact details of the Information Officer;
 - 2.1.5 know the description of the guide on how to use PAIA, published by the Regulator, and how to obtain it;
 - 2.1.6 know whether FirstNet processes personal information, the purpose of the processing, the categories of data subjects and information, the recipients, whether information is transferred across borders, and the security measures FirstNet applies, as required by section 51(1)(c) of PAIA; and
 - 2.1.7 know how to object to processing or request correction or deletion of personal information.

3. Key contact details

- 3.1 Name of private body: FirstNet Technology Services (Pty) Ltd ("FirstNet"), registration number 2006/031608/07, a wholly owned subsidiary of the First Technology Group. FirstNet also trades through its FirstCoreAI business unit.
- 3.2 Head of the private body: Vaughan Gerson, Managing Director.
- 3.3 Information Officer: Vaughan Gerson (Managing Director). Email: privacy@firstnet.co.za. Telephone: 0861 989 896.
- 3.4 Registered address: 26 Augrabies Road, Waterfall Office Park, Midrand, 1686.
- 3.5 Durban office: 11 Richefond Circle, Umhlanga Ridge, 4319.
- 3.6 Postal address: the same as the registered address.
- 3.7 General telephone: 0861 989 896. Website: www.firstnet.co.za.

4. Guide on how to use PAIA

- 4.1 The Regulator has updated and made available the guide on how to use PAIA ("Guide"), in each official language, as required by section 10 of PAIA.

- 4.2 The Guide is designed to help any person who wishes to exercise a right under PAIA or POPIA. It explains, among other things: the objects of PAIA and POPIA; the contact details of information officers of public and private bodies; how to request access to a record; the help available from information officers and the Regulator; the remedies available, including internal appeals (for public bodies), complaints to the Regulator and court applications; the prescribed fees; and the regulations made under PAIA.
- 4.3 Anyone may inspect or make copies of the Guide at FirstNet's offices, including its offices in Midrand and Umhlanga Ridge, during normal working hours, or obtain it from the Regulator's website at <https://inforegulator.org.za/paia-guidelines/> or by contacting the Regulator.
- 4.4 Information Regulator contact details (checked on 13 October 2026; check the website for the latest):
 - 4.4.1 Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191.
 - 4.4.2 Telephone: 010 023 5200.
 - 4.4.3 General enquiries: enquiries@inforegulator.org.za.
 - 4.4.4 PAIA complaints: PAIAComplaints@inforegulator.org.za.
 - 4.4.5 POPIA complaints: POPIAComplaints@inforegulator.org.za.
 - 4.4.6 Website: <https://inforegulator.org.za>.

5. Records available without a request (section 52)

- 5.1 FirstNet has not published a notice under section 52(2) of PAIA. The following records are, however, freely available without a formal request:
 - 5.1.1 information on FirstNet's website, www.firstnet.co.za, including service descriptions, news, the Knowledge Hub, and the documents on the Legal Notices page (among them the Standard Terms and Conditions, Service Specific Terms, Data Processing Annexure, Acceptable Use Policy, Broadband Fair Use Policy, Code of Conduct and Service Charter, Complaints Procedure, Privacy Notice, Website Terms of Use, Rapid Response Guide and this manual); and
 - 5.1.2 product brochures, one-pagers and other marketing material.

6. Records available under other legislation

- 6.1 FirstNet keeps records under the following legislation, where it applies to FirstNet. Some of these records are available to the persons specified in that legislation:
 - 6.1.1 Basic Conditions of Employment Act 75 of 1997;
 - 6.1.2 Broad-Based Black Economic Empowerment Act 53 of 2003;
 - 6.1.3 Companies Act 71 of 2008;
 - 6.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993;
 - 6.1.5 Consumer Protection Act 68 of 2008;
 - 6.1.6 Cybercrimes Act 19 of 2020;
 - 6.1.7 Electronic Communications Act 36 of 2005;
 - 6.1.8 Electronic Communications and Transactions Act 25 of 2002;
 - 6.1.9 Employment Equity Act 55 of 1998;
 - 6.1.10 Films and Publications Act 65 of 1996;
 - 6.1.11 Income Tax Act 58 of 1962;
 - 6.1.12 Independent Communications Authority of South Africa Act 13 of 2000;
 - 6.1.13 Labour Relations Act 66 of 1995;
 - 6.1.14 National Credit Act 34 of 2005;
 - 6.1.15 Occupational Health and Safety Act 85 of 1993;

- 6.1.16 Protection of Personal Information Act 4 of 2013;
- 6.1.17 Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002;
- 6.1.18 Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999;
- 6.1.19 Tax Administration Act 28 of 2011;
- 6.1.20 Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002; and
- 6.1.21 Value-Added Tax Act 89 of 1991.

6.2 This list is not complete. Where a record must be kept under other legislation, a request for it may also be made under that legislation.

7. Subjects and categories of records held by FirstNet

7.1 Listing a category below does not mean that a request for those records will be granted. Every request is evaluated under PAIA, including the grounds for refusal in Chapter 4 of Part 3.

Subject	Categories of records
Company and governance	Memorandum of Incorporation, share register, minutes of board and shareholder meetings, CIPC records, company secretarial records
Finance and tax	Annual financial statements, accounting records, management accounts, tax and VAT records, banking records, asset registers, insurance policies
Regulatory	ICASA licence records (the I-ECNS and I-ECS licences are held by FirstNet's group company First Technology (Pty) Ltd) and regulatory returns, ISPA membership records, Film and Publication Board records, RICA records, B-BBEE certificates, ISO/IEC 27001 and ISO 9001 certification records
Human resources	Employment contracts, personnel files, payroll, leave records, training records, disciplinary records, employment equity reports, recruitment records
Customers	Customer agreements and Service Schedules, quotes, orders, credit applications and vetting results, invoices and statements, support tickets, correspondence, complaints records, service handover forms
Network and service operations	Network designs and configuration, IP address and number allocation records, call detail records, connection and usage logs, security and incident logs, monitoring data, change and maintenance records
Data centre and premises	Access control logs, visitor registers, CCTV footage, biometric access records, maintenance and certification records for facilities
Suppliers and partners	Supplier and Vendor agreements, reseller agreements, purchase orders, supplier invoices, due diligence records
Information technology	Policies and procedures, ISMS documentation, software licences, system documentation
Sales and marketing	Marketing material, website content, marketing consent and opt-out records, event records
Legal	Contracts, litigation and dispute records, legal opinions (which may be privileged)

8. Processing of personal information (section 51(1)(c))

8.1 Purpose of processing. FirstNet processes personal information to: provide and bill its connectivity, cloud, security, voice and sovereign AI services; carry out credit vetting; comply with legal and regulatory obligations (including RICA, ICASA, tax and employment laws); secure its network, premises and data centres and prevent fraud and abuse; manage its relationships with suppliers, resellers and partners; employ and manage staff; respond to enquiries and complaints; and market its services as allowed by section 69 of POPIA. More detail is in the FirstNet Privacy Notice at www.firstnet.co.za/privacy-policy/.

8.2 Categories of data subjects and personal information:

Data subjects	Personal information
Customers (natural persons) and contact persons at customer organisations	Name, identity or passport number, contact details, job title, address, billing and banking details, credit information, RICA information, service and usage records, call detail records, correspondence, portal credentials
Customers (juristic persons)	Name, registration number, VAT number, address, directors, financial and credit information, B-BBEE status, contact persons
Website visitors and enquirers	Contact details submitted in forms, IP address, analytics data (see the Privacy Notice)
Employees, contractors and job applicants	Identity information, contact details, qualifications, employment history, remuneration, banking and tax details, leave and performance records, race and gender for employment equity reporting, health information where required by law, next of kin
Suppliers, Vendors, resellers and partners	Business contact details, company information, banking and tax details, B-BBEE status, contract information
Visitors to premises and data centres	Name, identity number, company, vehicle registration, time of access, CCTV images, biometric data for access control

8.3 FirstNet also processes personal information on behalf of its customers as an operator (for example data hosted in its cloud, call recordings, guest Wi-Fi data and AI Inputs). That processing is governed by the FirstNet Data Processing Annexure, and requests about it should be made to the relevant customer as responsible party.

8.4 Recipients or categories of recipients:

- 8.4.1 First Technology Group companies that provide shared services to FirstNet;
- 8.4.2 operators and suppliers, including data centre operators, network operators, cloud and software providers, payment processors, debt collectors, auditors and professional advisers;
- 8.4.3 Vendors, where needed to provide or license a product the customer has ordered;
- 8.4.4 credit bureaux;
- 8.4.5 regulators and public bodies, including ICASA, the South African Revenue Service, the Department of Employment and Labour, the Film and Publication Board and the Information Regulator; and
- 8.4.6 law enforcement agencies and courts, under RICA, the Criminal Procedure Act 51 of 1977, the Cybercrimes Act 19 of 2020 and other law.

8.5 Planned transborder flows. FirstNet stores personal information in South Africa by default. Personal information is transferred outside South Africa where FirstNet or its customers use services or systems hosted offshore, for example email and productivity services, website analytics (Google Analytics) and Vendor cloud platforms, and where a customer's Service Schedule names a site outside South Africa. Transfers are made only under section 72 of POPIA.

8.6 Security measures. FirstNet operates an information security management system certified to ISO/IEC 27001:2022 by INTERCERT (certificate IC-IS-2512139), with the scope: "The Information Security Management System at FirstNet Technology Services (Pty) Ltd applies to the design, deployment, operation, and support of cloud, connectivity, voice, firewall, and security services, including all associated network infrastructure and technical operations." Its measures include information security policies and risk assessment; role-based access control and multi-factor authentication for administrative access; network segmentation and firewalling; encryption in transit and, where the service provides it, at rest; vulnerability management and patching; logging and monitoring; physical access control, CCTV and biometric access at data centres; staff confidentiality undertakings and training; written security obligations on operators; incident response and breach notification under section 22 of POPIA; backup and business continuity; and secure disposal of data and media.

9. How to request access to a record

- 9.1 A request for access to a record must be made on Form 2 prescribed by the PAIA regulations ("Request for access to record"), available from the Regulator's website or from the Information Officer, and sent to the Information Officer at the email or physical address in section 3.
- 9.2 The requester must:
- 9.2.1 give enough detail to enable the Information Officer to identify the record and the requester;
 - 9.2.2 state the form of access required;
 - 9.2.3 give an address, email address or other contact details in South Africa;
 - 9.2.4 identify the right the requester wants to exercise or protect, and explain why the record is needed for that purpose (section 53(2)(d));
 - 9.2.5 state if the requester wants to be informed of the decision in another way, and give the details; and
 - 9.2.6 if the request is made on behalf of someone else, provide proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.
- 9.3 FirstNet will decide on a request within 30 (thirty) days of receiving it, and may extend that period once by up to 30 (thirty) days under section 57 of PAIA, with written notice and reasons.
- 9.4 FirstNet may refuse access on the grounds set out in Chapter 4 of Part 3 of PAIA, including to protect the privacy of third parties, commercial information of FirstNet or third parties, confidential information, the safety of individuals and property, records privileged from production in legal proceedings, and research information.
- 9.5 Customer information: FirstNet owes confidentiality to its customers. A requester asking for records about a FirstNet customer should motivate the request carefully with reference to sections 63 to 69 of PAIA. FirstNet will notify third parties as required by section 71.

10. Fees

- 10.1 The fees payable for a request are those prescribed in the regulations under PAIA, as amended from time to time. They may include a request fee (payable before the request is processed, except for a requester asking for personal information about themselves), and an access fee for searching, preparing and reproducing the record.
- 10.2 Where the search and preparation will take longer than the prescribed hours, FirstNet may ask for a deposit, as allowed by PAIA.
- 10.3 A requester who asks for their own personal information under section 23 of POPIA may ask FirstNet to confirm, free of charge, whether FirstNet holds personal information about them.

11. Personal information requests under POPIA

- 11.1 A data subject may:
- 11.1.1 object to the processing of their personal information under section 11(3) of POPIA, using Form 1 of the POPIA regulations; and
 - 11.1.2 request correction or deletion of their personal information, or destruction or deletion of a record, under section 24 of POPIA, using Form 2 of the POPIA regulations.
- 11.2 These requests may be sent to the Information Officer at the contact details in section 3.

12. Remedies

- 12.1 FirstNet does not have an internal appeal procedure. A requester who is dissatisfied with the Information Officer's decision may, within 180 (one hundred and eighty) days of the decision, lodge a complaint with the Regulator (using the prescribed form) or apply to court for relief, as provided in sections 77A to 78 of PAIA.

13. Availability of this manual

- 13.1 This manual is available:

13.1.1 on FirstNet's website at www.firstnet.co.za/legal-notices/;

13.1.2 at FirstNet's offices in Midrand and Umhlanga Ridge for public inspection during normal working hours; and

13.1.3 to the Regulator on request.

13.2 A copy may be requested from the Information Officer. A fee may be charged for a printed copy, as prescribed.

14. Updating of this manual

14.1 The Head of FirstNet will update this manual when FirstNet's information or contact details change, and will review it regularly.

Issued by: Vaughan Gerson, Managing Director and Information Officer FirstNet Technology Services (Pty) Ltd Date: 1 November 2026

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