



PAIA MANUAL

MMT Inland (Pty) Ltd

**Prepared in terms of section 14 of the Promotion of Access to
Information Act 2 of 2000 (as amended)**

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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 **PFMA** - Public Finance Management Act No.1 of 1999 (as Amended)
- 1.7 **POPIA** - Protection of Personal Information Act No.4 of 2013
- 1.8 **Regulator**- Information Regulator.

2. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to: -

- 2.1 Check the nature of the records which may already be available at MMT Inland, without the need for submitting a formal PAIA request.
- 2.2 Understand how to make a request for access to a record of MMT Inland.
- 2.3 Access all the relevant contact details of the persons who will assist the public with the records they intend to access.
- 2.4 Know all the remedies available from MMT Inland regarding request for access to the records, before approaching the Regulator or the Courts.
- 2.5 The description of the services available to members of the public from MMT Inland, and how to gain access to those services.
- 2.6 A description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 2.7 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.
- 2.8 Know if MMT Inland 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
- 2.9 Know whether MMT Inland has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. ESTABLISHMENT OF MMT INLAND (PTY) LTD.

Company registration number: 2003/023030/07

3.1 Objectives/Mandate

MMT Inland has developed and published this manual to ensure that the best practice of access to information is in place. MMT Inland is a Microsoft-exclusive Information, Communication and Technology business partner and provides innovative solutions based on world-class technology that targets business efficiency and accuracy through the provision of products and solutions, assisting companies from a process and technology perspective. Our proven track record ensures MMT Inland is seen as a leader, in South Africa and internationally.

MMT Inland's solutions not only impact office-bound staff, but also significantly deliver efficiencies into sales and field services teams by enhancing information, communication, and data exchange, allowing these teams to operate in a completely mobile and real-time manner. Our unique value offering provides management control over information and governance processes to ensure your businesses achieves sustainable results through the implementation of customer management, mobility (service, sales & field force management), information access, process automation, and specialised development solutions.

MMT Inland offers products and services as individual components that fit our clients existing business systems, or we can create complete end-to-end solutions to automate our client's entire sales, service & marketing process. The philosophy of close partnering and sharing risk with dynamic business partners extends to implementing a roadmap that will differentiate MMT Inland from their competitors and ultimately drive revenue, profit, and growth for both parties.

3.2 ISO 27001:2022 certification

MMT Inland achieved the ISO 27001:2013 certification in January 2014. In May 2024 during the annual surveillance audit, MMT Inland was transitioned to the 2022 standard and successfully completed the audit.

3.3 Scope of ISO 27001:2022 certification

As per the company's ISMS PO01 – Information Security policy (see Annexure 3).

The scope of this policy document is: ***Information security management system encompassing all information assets utilized for provision of Microsoft Dynamics 365 CE and F&O, Microsoft O365 and SharePoint, Power Platform, and Azure (Cloud) based application development,***

maintenance & support services (Offsite & On site) from its location at 1st floor Devon House, Hampton Office Park, 20 Georgian Crescent, Bryanston, Johannesburg. The logical boundary terminates at the above location. This is in accordance with the Statement of Applicability.

3.4 Security Goals

MMT Inland is committed to safeguarding the confidentiality, integrity, and availability of all physical and electronic information assets of the Company to ensure that regulatory, operational, and contractual requirements are fulfilled.

The overall goals for information security at MMT Inland are the following:

- Ensure compliance with current laws, regulations, and guidelines.
- Comply with requirements for confidentiality, integrity, and availability for MMT Inland employees, interns, and other users.
- Establish controls for protecting MMT Inland information and information systems against theft, abuse and other forms of harm and loss.
- Motivate administrators and employees to maintain the responsibility for, ownership of and knowledge about information security, to minimize the risk of security incidents.
- Ensure that MMT Inland can continue their services even if major security incidents occur.
- Ensure the protection of personal data (privacy).
- Ensure the availability and reliability of the network infrastructure and the services supplied and operated by MMT Inland.
- Comply with methods from international standards for information security, e.g., ISO/IEC 27001.
- Ensure that external service providers comply with MMT Inland information security needs and requirements.
- Ensure flexibility and an acceptable level of security for accessing information systems from a VPN connection, where such access is not available through cloud services.

3.5 Security Strategy

MMT Inland's current business strategy and framework for risk management are the guidelines for identifying, assessing, evaluating, and controlling information related risks through establishing and maintaining the information security policy.

It has been agreed that information security is to be ensured by the policy for information security and a set of underlying and supplemental documents to secure operations at MMT Inland. Even after

serious incidents, MMT Inland shall ensure the availability of continuity plans, backup procedures, defence against damaging code and malicious activities, system and information access control, incident management and reporting.

The term information security is related to the following basic concepts:

- **Confidentiality:** That information is not made available or disclosed to unauthorized individuals, entities, or processes.
- **Integrity:** Safeguarding the accuracy and completeness of assets.
- **Availability:** Being accessible and usable upon demand by an authorized entity.

Some of the most critical aspects supporting MMT Inland's activities are availability and reliability for network, infrastructure, and services. MMT Inland practices openness and principles of public disclosure but will in certain situations prioritize confidentiality over availability and integrity. Every user of MMT Inland information systems shall comply with this information security policy. Violation of this policy and of relevant security requirements will therefore constitute a breach of trust between the user and MMT Inland and may have consequences for employment or contractual relationships.

4. STRUCTURE OF MMT INLAND AND FUNCTIONS

4.1 Structure

See Annexure 1

4.2 Functions

See Annexure 2

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF MMT INLAND

5.1 Chief Information Officer

Name: Wilhelm van Rensburg

Tel: 083 703 3276

Email: Wilhelm.vanrensburg@mintgroup.net

5.2 Administrator

Name: Lauren Clark

Tel: 072 0800 393

Email: lauren.clark@mintgroup.net

5.3 Access to information general contacts

Email: info@mintgroup.net

5.4 National / Head Office

Physical address: 1st floor Devon House, Hampton Office Park, 20 Georgian Crescent,
Bryanston, 2152

Post address: as above.

Office telephone: +27 11 856 4400

Email: info@mintgroup.net

Website: <https://za.mintgroup.net>

6. DESCRIPTION OF ALL REMEDIES AVAILABLE IN RESPECT OF AN ACT OR A FAILURE TO ACT BY MMT INLAND

Please note all the remedies available in respect of an act or a failure to act. These include:

- a) Complaining to the Information Regulator or any regulatory body; and/or
- b) Approaching the Court with jurisdiction for appropriate relief within 180 days of notification of the decision by the Information Regulator.

Please note that currently MMT Inland does not have internal appeal procedures that relate specifically to PAIA, but rather to general grievances and/or data security breaches. As such the decision made by the Information Officer is final and parties will have to exercise external remedies noted or a) and b) above.

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

7.1 The Regulator has, in terms of section 10(1) of PAIA, 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.

7.2 The Guide is available in each of the official languages.

7.3 The aforesaid Guide contains the description of-

- 7.3.1 the objects of PAIA and POPIA;
 - 7.3.2 the postal and street address, phone number and, if available, electronic mail address of:
 - 7.3.2.1 the Information Officer of every company that is registered, and
 - 7.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 7.3.3 the manner and form of a request for -
 - 7.3.3.1 access to a record of a company such as MMT Inland contemplated in section 11; and
 - 7.3.3.2 access to a record of a private body contemplated in section 50;
 - 7.3.4 the assistance available from the Information Officer of a company in terms of PAIA and POPIA;
 - 7.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 7.3.6 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 -
 - 7.3.6.1 an internal appeal;
 - 7.3.6.2 a complaint to the Regulator; and
 - 7.3.6.3 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
 - 7.3.7 the provisions of sections 14 and 51 requiring a company and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 7.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a company and private body, respectively;
 - 7.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 7.3.10 the regulations made in terms of section 92.
- 7.4 Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours. The Guide can also be obtained-
- 7.4.1 upon request to the Information Officer.
 - 7.4.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD BY MMT INLAND

Subjects on which the body holds records	Categories of records held on each subject
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> - Annual Reports - Strategic Plan - Annual Performance Plan
Financial information	<ul style="list-style-type: none"> - Annual Financial Statements - audit results - Budgets - Costs - Vendor/supplier information - Invoicing information - Debtors' information - Payroll information
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures; - Advertised posts; - Employees records; - Learning and development e.g.: skills development and training plans - Employment equity plan and statistics
Client Relationship Management system (CRM)	<ul style="list-style-type: none"> - Client data - Marketing information - Proposal value and details - Legal agreements

9. CATEGORIES OF RECORDS OF MMT INLAND WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category	Document Type	Available on Website	Available upon request
Legislation /Regulations	- Evidence of Compliance		X
Strategic Documents (Plans and Report)	<ul style="list-style-type: none"> - Organisational profile (Overview, Objectives, Functions, Architecture) - Annual Reports; - Strategic Plan; - Annual Performance Plan; - Strategic and Performance Plans; 	X	

10. SERVICES AVAILABLE TO MEMBERS OF THE PUBLIC FROM MMT INLAND AND HOW TO GAIN ACCESS TO THOSE SERVICES

10.1 Powers, duties and function

In terms of its powers, duties and functions pertaining to PAIA and POPIA, MMT Inland is committed to providing data subjects with a description of the personal information that it processes, the reasons for such processing and with whom it may be shared.

This type of personal information will vary as it depends on the reason for processing. For further information related to the decisions that guide MMT Inland's processing, please view the Group and Privacy policy on the website: <https://za.mintgroup.net/privacy-policy/>

11. PUBLIC INVOLVEMENT IN THE FORMULATION OF POLICY OR THE EXERCISE OF POWERS OR PERFORMANCE OF DUTIES BY MMT INLAND

MMT Inland (Pty) Ltd is a private company that is incorporated under the laws of South Africa and as such there is currently no public involvement in the formulation of policy or the exercise of powers or performance.

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose of Processing

MMT Inland primarily collects personal information so that it can process client orders and manage client accounts and email clients with any special offers on other products and services that might be appropriate. If the data subject agrees, MMT Inland will share the personal information with its affiliate companies so that these companies may offer their products and services.

Please see our privacy policy for more information: <https://za.mintgroup.net/privacy-policy/>

12.2 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
Natural Persons	Names and surname; contact details (contact number(s), fax number, email address); Residential, postal or business address; Unique Identifier/Identity; Number and confidential correspondence
Juristic Persons	Names of contact persons; Name of legal entity; physical and postal address; contact details (contact number(s), fax number, email address); registration number; financial, commercial, scientific or technical information and trade secrets
Employees	Gender, pregnancy; marital status; Race age, language, educational information (qualifications); financial information; employment history; ID number; physical and postal address; contact details (contact number(s), email address); criminal behaviour; well-being and their relatives (family members) race, medical, gender, sex, nationality,
Categories of Data Subjects	Personal Information that may be Processed
	ethnic or social origin, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, biometric information of the person

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

Category of personal information	Recipients or Categories of Recipients
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

12.4 Planned transborder flows of personal information

MMT Inland may from time to time as part of its role as a Communication and Technology business partner process the personal information of data subjects with third parties in other countries.

When processing the personal information of data subjects in this manner, the parties need to comply with the provisions of POPIA. Such transfer of personal information will only be done if the following requirements are met:

- The processing with the third-party recipient is subject to a law or agreement that provides an adequate level of protection, and such processing complies with the conditions for reasonable processing.
- The processing will comply with conditions that are the same or similar to the metrics of POPIA.
- Consent by the data subject to the transfer.
- Such transfer is necessary for the performance of a contract that is in the interest of the data subject, or
- The transfer is for the benefit of the data subject, and it is either not reasonably practicable to obtain the consent of the data subject or if reasonably practicable, the data subject would be likely to give such consent.

12.5 General Description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information

MMT Inland is committed to ensuring that its information security practices are continuously updated to keep pace with the information technology landscape. To this end, MMT Inland endeavours to consistently improve the security of its environment and information by ensuring that information security controls and protocols are adequately implemented as befits the situation.

As part of MMT Inland's commitment to its employees, clients, partner and community, data is secured by maintaining reasonable measures to protection personal information from loss, misuse,

unauthorised access, disclosure, alteration and destruction. In addition, reasonable steps are also taken to keep the personal information accurate, complete, and reliable for the intended use.

These reasonable steps include protocols and measures aimed at ensuring that the access to the personal information is restricted based on permission granted and is later modified with access being revoked on the termination of employment.

13. AVAILABILITY OF THE MANUAL

13.1 This Manual is made available in the following official language -

13.1.1 English

13.2 A copy of this Manual or the updated version thereof, is also available as follows-

13.2.1 On MMT Inland's website, <https://za.mintgroup.net>;

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

13.2.3 to the Information Regulator upon request.

13.3 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.

14. UPDATING OF THE MANUAL

MMT Inland will, if necessary, update and publish this Manual annually.

Issued by

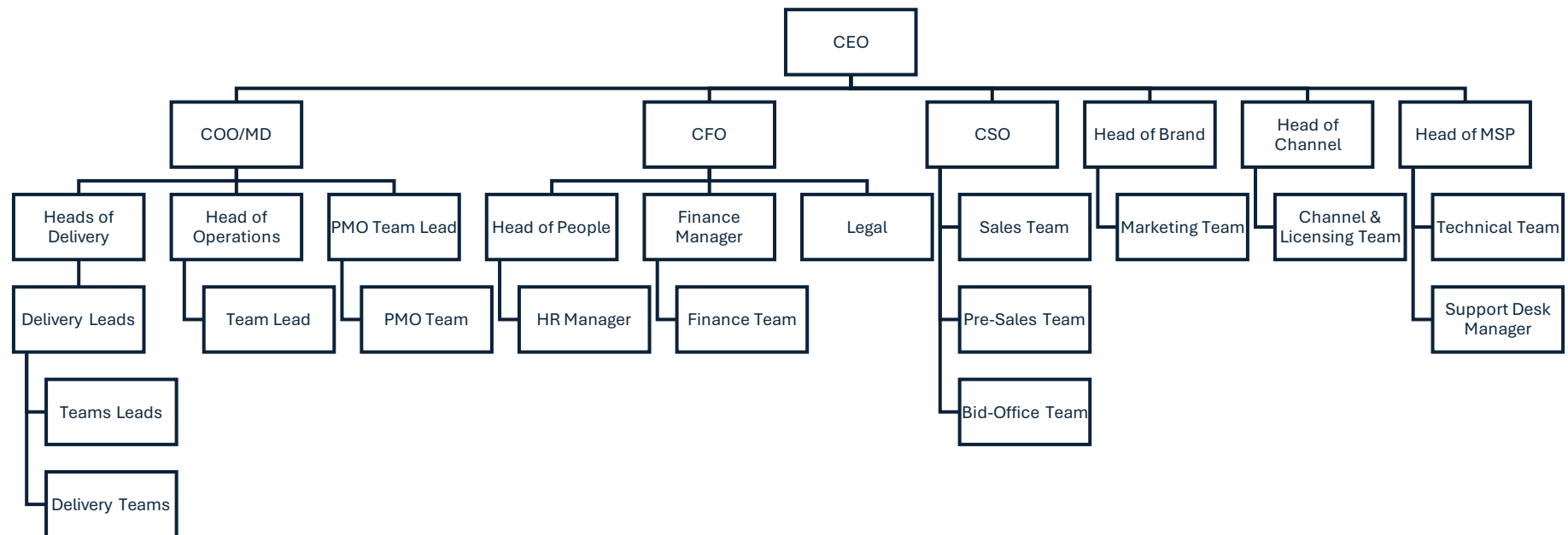


Wilhelm van Rensburg

Chief Operating Officer and Managing Director

MMT Inland (Pty) Ltd

ANNEXURE 1 – STRUCTURE OF MMT INLAND



ANNEXURE 2 – FUNCTIONS OF MMT INLAND

