

**PROMOTION OF ACCESS TO INFORMATION ACT
(PAIA)**

SECTION 51 MANUAL

GREATODDS (PTY) LTD

T/A

SPORTINGBET SOUTH AFRICA

REGISTRATION NUMBER:

2012/187650/07

VAT NUMBER:

4060254986

1. INTRODUCTION TO THE PROMOTION OF ACCESS TO INFORMATION ACT

On 9 March 2001, the Promotion of Access to Information Act (“the Act”) came into effect. The Act seeks to advance a culture of transparency and accountability in both public and private bodies. The legislation was enacted as a direct response to Section 32(2) of the constitution of South Africa – the right of access to information – which requires that the Government implements laws in an effort to make information pertaining to public and private bodies more accessible to all.

One of the main requirements specified in the Act is the compilation of a manual that provides information on both the types and categories of records held by the public or private body. In terms of the Act, Greatodds (Pty) Ltd t/a Sportingbet South Africa (hereinafter referred to as “Greatodds” or “Sportingbet” is regarded as a “private body” and therefore the requirements regarding access must be in compliance with the provisions of the Act relevant to private bodies. Adherence to these requirements entails not only compilation of the external manual but also compliance with the general provisions stated in the Act.

The Act gives effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of the Act, the body to which the request is made is obliged to release the information, except where the Act expressly provides that the information may or must not be released.

2. PURPOSE OF PAIA MANUAL

2.1 This PAIA Manual is useful for the public to:

- Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 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.
- Know the description of the records of the body which are available in accordance with any other legislation.
- Access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access.
- Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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.
- Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- Knows the recipients or categories of recipients to whom the personal information may be supplied.
- 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
- 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. INTRODUCTION TO GREATODDS (PTY) LTD

3.1 Greatodds (Pty) Ltd, trading as Sportingbet South Africa, a Bookmaker licenced by the Western Cape Gambling and Racing Board (“WCGRB”), offers online betting services in South Africa. Sportingbet offers a wide variety of sports and events for customers to bet on, including soccer, rugby, cricket, tennis, horse racing, and many more. As one of the leading online betting operators in the country, Sportingbet is known for its user-friendly platform, competitive odds, and a wide range of betting markets.

3.2 The following are the Directors of Greatodds (Pty) Ltd:

- Cuan Chelin
- Tyone Dobbin
- Moses Ngoasheng

4. INFORMATION REQUIRED UNDER SECTION 51(1)(A) OF THE PROMOTION OF ACCESS TO INFORMATION ACT (“THE ACT”)

4.1 Street Address of Information Officer of Greatodds (Pty) Ltd:

Granger Bay Court, Suite 102, 1st Floor, North Wing, Beach Road, Cape Town 8005

4.2 Name of Information Officer of Greatodds (Pty) Ltd:

Mr Brad Gordon

4.3 Contact Number of Information Officer of Greatodds (Pty) Ltd:

(021) 440 9600

4.4 E-mail Address of Information Officer of Greatodds (Pty) Ltd:

informationofficer@sportingbet.co.za

5. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

- Basic Conditions of Employment Act, 75 of 1997
- Company's Act, 71 of 2008
- Compensation of Occupational Injuries and Diseases Act, 130 of 1993
- Employment Equity Act, 55 of 1998
- Income Tax Act, 58 of 1962
- Intellectual Property Laws Amendments Act, 38 of 1997
- Labour Relations Act, 66 of 1995
- Medical Schemes Act, 131 of 1998
- Occupational Health and Safety Act, 1993
- Pension Funds Act, 24 of 1956
- Protection of Business Act, 99 of 1978
- Regional Service Council Act, 109 of 1985
- Short Term Insurance Act, 53 of 1998
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 9 of 1999
- Trademarks Act, 194 of 1993
- Unemployment Contributions Act, 4 of 2002
- Unemployment Insurance Act, 63 of 2001
- VAT Act, 89 of 1991

6. INFORMATION REGULATOR

6.1 Information Regulator

Any queries where you believe the GREATODDS (PTY) LTD has not adequately dealt with your request, or to lodge a complaint, should be directed to:

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg

P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: <https://eservices.inforegulator.org.za/>

Tel: 010 023 5200

Email: enquiries@inforegulator.org.za

7. CATERGORIES OF RECORDS OF GREATODDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Records of a public nature, typically those disclosed on our website may be accessed without the need to submit a formal application, these include but are limited to the following:

CATEGORY OF RECORDS	TYPES OF THE RECORD	AVAILABLE ON WEBSITE
Public Facing Policies and Terms and Conditions	Terms and Conditions, Promotional Terms, Betting Rules, Games Rules, Privacy Policy, Cookie Policy, Responsible Gambling & Self Exclusion Policy	X
General Information	How to, about us and contact us	X
Promotions	Terms and Conditions	X
Deposit and withdrawal Banking Options	A list of the Banking options that we offer	X

Other non-confidential records, such as statutory records maintained by CIPC, may also be accessed without the need to submit a formal application.

8. DESCRIPTION OF THE RECORDS OF GREATODDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Memorandum of incorporation	- Companies Act 71 of 2008
PAIA Manual	- Promotion of Access to Information Act 2 of 2000
Privacy Policy	- Protection of Personal Information Act, 4 of 2013
Risk Management and Compliance Program	<ul style="list-style-type: none"> - Financial Intelligence Centre Act, 38 of 2001 and amendments thereto - Money Laundering and Terrorist Financing Control Regulations and amendments thereto - Protection of Constitutional Democracy Against Terrorist and Related Activities Act 33 of 2004 and amendments thereto - General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act, 22 of 2022
Tax Compliance Pin	- Income Tax Act, 58 of 1962
Vat Registration Certificate	- Value Added Tax Act, 89 of 1991
Bookmaker Licence and Conditions	<ul style="list-style-type: none"> - National Gambling Act, 2004 - National Gambling Amendment Act, 2008 - National Gambling Regulations - Western Cape Gambling Act, 5 of 1995 and amendment thereto

	<ul style="list-style-type: none"> - Western Cape Gambling Rules, 2018 - Western Cape Gambling Regulations and amendments thereto - Western Cape Gambling Levies Act, 5 of 2007 - Western Cape Gambling Levies Regulations
BBBEE Certificate	<ul style="list-style-type: none"> - Broad-Based Black Economic Empowerment Act, 53 of 2003
Employment Contracts	<ul style="list-style-type: none"> - Labour Relations Act, 66 of 1995 - Basic Conditions of Employment Act, 75 of 1997
Proof of payment for SED levies	<ul style="list-style-type: none"> - Skills Development Act, 97 of 1998 - Skills Development Levies Act, 9 of 1999
Proof of payment for UIF contributions	<ul style="list-style-type: none"> - Unemployment Insurance Act, 63 of 2001 - Unemployment Contributions Act, 4 of 2002
HR Policies	<ul style="list-style-type: none"> - Occupational Health and Safety Act, 85 of 1993 - Occupational Health and Safety Regulations - Employment Equity Act, 55 of 1998
Proof of payment for COIDA	<ul style="list-style-type: none"> - Compensation for Occupational Injuries and Diseases Act, 130 of 1993 (COIDA)
Agreements	<ul style="list-style-type: none"> - Intellectual Property Laws Amendments Act, 38 of 1997 - Trademarks Act, 194 of 1993 - Copyright Act, 98 of 1978

Complaints and Responses	Consumer Protection Act, 68 of 2008
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Kindly note that this may not be an exhaustive list, and that these records are not necessarily available for requestors.

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY GREATODDS

SUBJECTS ON WHICH THE BODY HOLDS RECORDS	CATEGORIES OF RECORDS
<p>Customer Records</p>	<ul style="list-style-type: none"> - Full Name - Copies of the national identity number or passport number, including documents - Physical Address and proof thereof - Banking Details and proof thereof - Bank Statements - Contact Number - Correspondence - Any other documentation provided by the customer - Transaction History
<p>Finance</p>	<ul style="list-style-type: none"> - Accounting Records - Annual Financial Statements - Banking Records - Correspondence - Invoices and Statements - Insurance Policies - Management Reports

	<ul style="list-style-type: none">- Tax Reports and Returns- Transactional Records
Human Resources	<ul style="list-style-type: none">- HR Policies and Procedures- Advertised Recruitment Posts- Employment Contracts- Employee Records- Training Records, Manuals, Materials and Reports- Employment Equity Records and Reports- Disciplinary Records- Payroll Records- UIF/SDL/PAYE Returns- Leave Records- Shift Work Schedules- Letter of Appointment- Resignations- Tax Returns of Employees

IT and Software	<ul style="list-style-type: none">- Databases- Computer Software and Hardware- Registered Trademarks and Domains- Consensually obtained member information and relationship history- Software License Agreements- Operating Systems- Network Coverage- Disaster Recovery
Company and Legal	<ul style="list-style-type: none">- Agreements and Contracts- Licenses- Statutory Records- Certificates
Marketing	<ul style="list-style-type: none">- Product Brochures (electronic only)- Advertising Material- Internet

Kindly note that this may not be an exhaustive list, and that these records are not necessarily available for requestors.

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing Personal information.

10.2 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	<ul style="list-style-type: none"> - Full Name - Physical Address - Identity Number - Passport Number - Contact Numbers - Email Address - Employment Status - Banking Details - Source of Funds and/or Source of Wealth - Open-Source Searches
Service Providers	<ul style="list-style-type: none"> - Company Name - Registration Number - VAT Number - Registered Address - Tax Number

	<ul style="list-style-type: none"> - Trade Secrets - Banking Details
Employees	<ul style="list-style-type: none"> - Full Name - Identity Number - Passport Number - Banking Details - Physical Address - Qualifications - Gender - Race - Marital Status and Dependents - Tax Number - Date of Birth

10.3 The recipients or categories of recipients to whom personal information may be supplied.

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Identity number, Passport number and names, for criminal checks	<ul style="list-style-type: none"> - Regulatory Bodies - Law Enforcement Agencies

Identity number, Passport number, names, address, for Credit and fraud checks	Managed Integrity Evaluation (Pty) Ltd (“MIE”) Consumer Profiling Bureau GBG Accountability
Identity number, Passport number, names, for Identity Verification and Watchlist screening	Consumer Profile Bureau GBG
Identity number, Passport number, names, address, Tax number and additional personal information for various Gambling Board related Applications	Western Cape Gambling and Racing Board (WCGRB).
Identity number, Passport number, names, address, for Reporting Obligations	Financial Intelligence Centre
Identity number, Passport number, names, address, for Contractual Obligations	Certain contractual partners like but not limited to our Gaming Providers Entain

10.4 Planned transborder flows of personal information.

Personal Information may be stored outside of the Republic of South Africa on secure Cloud Platforms or Servers.

The following categories of Personal information are stored on the Google Cloud Platform:

- Personal information (Full name, email address, phone number, physical address, Identity, and/or Passport number, Banking details)
- Betting information
- Transaction information
- Documents
- Communication logs

10.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.

Please refer to our Privacy Notice which is available at:

<https://help.sportingbet.co.za/en/general-information/security/privacy-policy>

11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF SECTIONS 62-69 OF THE ACT

Access to a record will or may be refused on one or more of the following grounds:

- 11.1 **Mandatory protection of the privacy of a third party who is a natural person**, if such disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual, subject to the provisions of section 63(2).
- 11.2 **Mandatory protection of the commercial information of a third party**, if the record contains:
- Trade secrets of that party.
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interest of that third party.
 - Information disclosed in confidence by a third party, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
 - Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 11.3 **Mandatory protection of the safety of individuals and the protection of property**, where such disclosure could endanger the life or physical safety of an individual, or prejudice or impair the security of:
- A building, structure, or any system;
 - A means of transport, or
 - Any other property.
- 11.4 **Mandatory protection of records**, which would be regarded as privileged from production in legal proceedings.
- 11.5 **Commercial information of private body**, in that a request for access to a record may be refused if the record contains;
- Trade secrets, financial, commercial, scientific, or technical information of the institution, which disclosure, could likely cause harm to the financial or commercial interest of the institution.
 - Information which, if disclosed, could prejudice or put the institution at a disadvantage in negotiations or commercial competition.
 - A computer program which is owned by the institution, and which is protected by copyright.

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- 11.6 ***Mandatory protection of research information of the institution.*** A request will be refused if this disclosure would disclose the identity of the institution, the researcher, or the subject matter of the research and would place the researcher at a serious disadvantage.
- 11.7 ***Requests for information that are clearly frivolous or vexatious,*** or which involve an unreasonable diversion of resources shall be refused.

12. REQUEST FOR RECORDS

12.1 Request procedure

- a) A “requester” is any person making a request for access to records of GREATODDS (PTY) Ltd. The “requester” must comply with all the procedural requirements contained in the Act relating to the request for access to records.
- b) The “requester” must complete the prescribed form enclosed herewith in “**Form 2**” and submit the same as well as payment of the request fee and a deposit, if applicable, to the Information Officer at the postal or physical, fax or electronic mail address as stated above.
- c) The prescribed form must be filled in with sufficient particulars to at least enable the Information Officer to identify:
 - The record or records requested;
 - The identity of the “requester”;
 - Which form of access is required, if the request is granted; and
 - The postal address, telephone number, email address and /or fax number of the “requester.”
- d) The “requester” must state that he/she requires the information to exercise or protect her/his right and clearly state what the nature of the right is to be exercised or protected. In addition, the “requester” must clearly specify why the records are necessary to exercise or protect such a right.
- e) Greatodds will process the request within 30 days after the request has been received.
- f) The “requester” shall be informed whether the access has been granted or denied. If, in addition, the “requester” requires the reasons for the decision in any other manner, he/she must state the manner of the particulars so required. If a request is made on behalf of another person, then the “requester” must submit proof of the capacity in which the “requester” is making a request to the reasonable satisfaction of the Information Officer and also the ground upon which that person is making the request.
- g) If an individual is unable to complete the prescribed form because of illiteracy or disability, such person may make the request orally.
- h) The “requester” must pay the prescribed fee before any further processing can take place.

13. REMEDIES AVAILABLE WHEN THE COMPANY REFUSES REQUEST FOR INFORMATION

The company does not have an internal appeal procedure. As such, the decision made by the Information Officer is final and requesters will have to exercise such external remedies at their disposal if the request for information is refused and the requester is not satisfied with the answer supplied by the Information Officer.

Section 59 provides that the Information Officer may sever a record and grant access only to that portion which the law does not prohibit access.

14. THIRD PARTIES

If the request is for the record pertaining to the third party, the Information Officer must take all reasonable steps to inform the third party of the request. This must be done within 21 days of receipt of the request. The manner in which this is done must be by the fastest means reasonably possible, but if orally, the Information Officer must thereafter give the third party a written confirmation of the notification.

The third party may within 21 days thereafter either make representation to the company as to why the request should be refused; alternatively grant written consent to the disclosure of the record.

The third party must be advised of the decision taken by the Information Officer on whether to grant or to decline the request and must also be advised of his/her right to appeal against the decision by way of application to Court within 30 days after the notice.

15. AVAILABILITY OF THIS MANUAL

This manual is available for inspection at the offices of GREATODDS (PTY) LTD as set out above free of charge.

The manual can also be accessed on the website of SPORTINGBET SOUTH AFRICA:
<https://www.sportingbet.co.za/>.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

1. If your request is granted the—
 - (a) amount of the deposit, (if any), is payable before your request is processed; and
 - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer