



JACKPOTSTAR 777 (PTY)LTD

("Jackpotstar 777")

(Registration Number: 2019/582022/07)



PAIA MANUAL

Published for Jackpotstar 777 (Pty) Ltd as a Private Body in terms of section 51 of the Promotion of Access to Information Act 2 of 2000.

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1. INTRODUCTION

Jackpotstar 777 is a company registered in terms of the Company Laws of South Africa, and provides various online gaming products and services to its customers ("Jackpotstar 777").

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (the "PAIA") [the "Manual"] and provides an outline of the type of records and personal information which Jackpotstar 777 holds and processes. The Manual also explains how to submit requests for access to these records in terms of the PAIA. In addition to explaining how to access, or object to, personal information held by Jackpotstar 777, or request correction of the personal information, in terms of sections 23 and 24 of the Protection of Personal Information Act 4 of 2013 (the "POPIA"), the Manual also explains how to submit requests for access to these records in terms of the PAIA.

The objective of the PAIA is to give effect to the constitutional right to access to information, which information is held by a public or private body and which information is required for the exercise or protection of any rights. The PAIA recognises the right entrenched in section 32 of the Constitution of the Republic of South Africa, 1996 and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

Accordingly, this PAIA Manual aims to establish and foster a culture of compliance with prevailing data protection legislation, which in turn gives rise to an environment within which the rights to access to information are actively protected and promoted.

Section 9 of the PAIA dictates that the right to access to information is not an unlimited right and is subject to certain limitations, which include limitations which balance the rights which data subjects have to access information against other rights which data subjects and interested parties have, whether it be in terms of the Constitution of the Republic of South Africa, 1996 or otherwise. Some of these rights which the right to access to information are weighed up against are aimed at protecting the fundamental right to privacy and maintaining the confidentiality (whether it be commercial or individual confidentiality) of interested parties so as to maintain acceptable levels of governance.

1.1 Availability and Purpose of this PAIA Manual

This PAIA Manual is published on Jackpotstar 777's website at <https://www.lotto247.co.za> or alternatively, a copy can be requested from the Information Officer or Deputy Information Officer, which copy may also be inspected at Jackpotstar 777's physical address set forth in paragraph 2 below.

The primary purpose of this PAIA Manual is to facilitate requests for access to information held by Jackpotstar 777, which requests shall be made in accordance with the prescribed procedures and at the rates provided for in section 5 of this PAIA Manual. In addition to the above, the further purposes of this PAIA Manual, are to describe the records held by Jackpotstar 777 and to clearly articulate the grounds upon which access to any such records may be refused.

1.2 Availability of the Privacy Notice

Jackpotstar 777's Privacy Notice can be accessed on <https://www.lotto247.co.za/en/privacy>.



1.3 Availability of guides to the PAIA and POPIA

Guides to the PAIA and POPIA can be obtained and queries directed to:

PAIA and POPIA

The office of the Information Regulator:

Physical Address:

JD House 27 Stiemens Street Braamfontein
Johannesburg
Gauteng
P.O.BOX31533, Braamfontein, Johannesburg, 2017

Website: www.justice.gov.za/inforeg

E-mail: inforeg@justice.gov.za

Complaints Email: complaints.IR@justice.gov.za

2. JACKPOTSTAR 777 CONTACT DETAILS

Contact details in terms of section 51 of PAIA:

Information Officer:	Mr Paul Robinson dpo@lotto247.co.za
Deputy Information Officer:	Mr David Jacobs dpo@lotto247.co.za
Postal address:	P O Box 12499, Mill Street, Gardens, Cape Town, 8010
Registered address:	Ground Floor, 17 Queenspark Avenue, Salt River, Cape Town, 7925
Telephone:	021 123 4567
E-mail address:	dpo@lotto247.co.za
Website:	https://www.lotto247.co.za

General Information:

Name of private body:	Jackpotstar 777 (Pty) Ltd
Industry:	Gaming
Registration number:	2019/582022/07
VAT registration number:	4620124729
Postal address:	P O Box 12499, Mill Street, Gardens, Cape Town, 8010
Physical address/ Place of business:	Ground Floor, 17 Queenspark Avenue, Salt River, Cape Town, 7925
Telephone:	021 123 4567
E-mail address:	dpo@lotto247.co.za
Website:	https://www.lotto247.co.za



3. COMPANY RECORDS

3.1 Availability of Jackpotstar 777's Records

The provisions of the PAIA, specifically the provisions of section 50 of the PAIA dictate that a requester for access to information must be afforded access to any record of Jackpotstar 777 if the following requirements are met:

- where a particular record is required for the exercise or protection of any rights (Section 50(1)(a) of PAIA);

where a requester complies with the procedural requirements set forth in the PAIA relating to a request for access to particular records (Section 50(1)(b) of PAIA); and

- where access to that particular record is not refused in terms of any of the grounds for refusal to access contemplated in terms of Chapter 4 of the PAIA (Section 50(1)(c) of PAIA).

The below table sets forth the categories and subcategories of records which Jackpotstar 777 processes. Each category and subcategory of records set out below may be subject to any one (or a number) of the grounds upon which Jackpotstar 777 may refuse access to records. These grounds for refusal are set out in Chapter 4 of the PAIA, as well as described in the table at 3.2 below.

Personnel records

- Personnel refers to any person who works for or provides services to or on behalf of Jackpotstar 777 and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Jackpotstar 777. This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to Jackpotstar 777 by our personnel
- Any records a third party has provided to Jackpotstar 777 about any of their personnel.
- Conditions of employment and other personnel-related contractual and quasi-legal records
- Internal evaluation records
- Training schedules and materials
- Other internal records and correspondence related to a particular individual

Customer-related records

- Please be aware that Jackpotstar 777 is very concerned about protecting the personal information of any Data Subjects as defined in terms of the Protection of Personal Information Act, 4 of 2013). Please motivate any request for customer information very carefully, having regard to Sections 63 to 67 of the Act.

Customer information records [that may contain personal information] include the following:

- Any records a customer has provided to Jackpotstar 777 or a third party acting for or on behalf of Jackpotstar 777
- Contractual information
- Customer needs assessments
- Personal records of customers
- Credit information and other research conducted in respect of customers
- Any records a third party has provided to Jackpotstar 777 about customers
- Confidential, privileged, contractual and quasi-legal records of customers
- Customer evaluation records
- Customer profiling
- Performance research conducted on behalf of customers or about customers
- Any records a third party has provided to Jackpotstar 777 either directly or indirectly
- Records generated by or within Jackpotstar 777 pertaining to customers, including transactional records



Technical records

- Technical reports
- Technical data
- Plans, new products and services, brands and trademarks forming part of the intellectual property rights of Jackpotstar 777

Third Parties

Records are kept in respect of other third parties, including without limitation contractors, suppliers, joint ventures, service providers, and general market conditions. In addition, certain third parties may possess records, which can be said to belong to Jackpotstar 777 and in such instances those third parties process such records for and on behalf of Jackpotstar 777 in their capacities as process operators and subject to prescribed contractual terms. The following records fall under this category:

- Personnel, customer or Jackpotstar 777 records which are held by another third party as opposed to being held by Jackpotstar 777; and
- Records held by Jackpotstar 777 pertaining to other parties, including financial records, correspondence, contractual records, electronic mail, logs, cached information, records provided by the other party, and records third parties have provided about the contractors/suppliers or customer.

Other Records

Further records are held including:

- Information relating to Jackpotstar 777's own commercial activities
- Research carried out on behalf of a client by Jackpotstar 777 or commissioned from a third party for a customer
- Research information belonging to Jackpotstar 777, whether carried out itself or commissioned from a third party.

3.2 Grounds for Refusal of Access to Jackpotstar 777's Record

Upon receipt of a request for access to information, Jackpotstar 777 will be required to consider such a request in light of the provisions of section 50 of the PAIA Act. Subject to such consideration, Jackpotstar 777 will be required to either grant such a request or refuse such a request. If Jackpotstar 777 elects to refuse access to a particular record, such refusal will be subject to Jackpotstar 777's interpretation of the various prescribed grounds for refusal as set forth in Chapter 4 of the PAIA and in the table below:

Ground(s) For Refusal	Description and Explanation of Ground(s) for Refusal
Mandatory protection of privacy of third party who is a natural person [Section 63 of PAIA]	Jackpotstar 777 may refuse access to a record if the disclosure of that record would involve the unreasonable disclosure of personal information relating to a third party, including a deceased individual.
Mandatory protection of commercial information of third party [Section 64 of PAIA]	<p>Jackpotstar 777 may refuse a request for access to a record if the record comprises of or is constituted by the following information relating to a third party -</p> <p>Trade secrets of a third party;</p> <p>Financial, commercial, scientific or technical information, other than trade secrets, of a third party, which if disclosed is likely to cause harm to the commercial or financial interests of the third party;</p> <p>Information which has been supplied in confidence by a third party, the disclosure of which could reasonably be expected to place the third party at a disadvantage in contractual or other negotiations or is likely to prejudice the third party in commercial competition.</p>
Mandatory protection of certain confidential information of a third party [Section 65]	Jackpotstar 777 may refuse access to a record which if disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement or contractual relationship.
Mandatory protection of safety of individuals and protection of property [Section 66]	<p>Jackpotstar 777 may refuse a request for access to record if its disclosure could reasonably be expected to endanger the life or physical safety of an individual, or if its disclosure would be likely to prejudice or impair the security of:</p> <p>a building, structure or system, including but not limited to a computer or communication system, a means of transport or any other property;</p> <p>method(s), system(s), plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public or the security of property.</p>
Commercial information of Private Body [Section 68]	<p>Jackpotstar 777 may refuse a request for access to a record if the record contains (or comprises of):</p> <p>Trade secrets of the Private Body;</p> <p>Financial, commercial, scientific or technical information, other than trade secrets of the Private Body, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Private Body;</p> <p>Information, the disclosure of which could reasonably be expected to put the Private Body at a disadvantage in contractual or other negotiations or prejudice the Private Body in commercial competition;</p>

	A computer program (as defined in section 1(1) of the Copyright Act 98 of 1978 as amended) owned by the Private Body, except insofar as it is required to give access to a record to which access is granted in terms of the PAIA Act.
Mandatory protection of research information of third party, and protection of research information of private body [Section 69)	Jackpotstar 777 may refuse a request for access to a record if the record contains information about research being or to be carried out by or on behalf of a third party/private body, the disclosure of which would be likely to expose the third party/private body, a person that is (or will be) carrying out the research on behalf of the third party/private body, or the subject matter of the research to serious disadvantage.

4. PRESCRIBED REQUEST FORMS AND FEES

4.1 How to gain access to records held by Jackpotstar 777

Records which are held by Jackpotstar 777 may be accessed by requests for such access to information and documentation in the prescribed manner and subject to certain requirements being met. In this regard a requester is any person making a request for access to a record held by Jackpotstar 777, and there are two types of requesters:

- A Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester and Jackpotstar 777 will voluntarily provide the requested information, or give access to any record with regard to the requester's personal information. In this regard, the prescribed fees for the reproduction of this information requested may be charged.

- Other Requester

This requester (other than a personal requester) is entitled to request access to information on third parties. Jackpotstar 777 is, however, not obliged to voluntarily grant access and the requester must fulfil the procedural requirements for access in terms of the PAIA Act, including the payment of a request and access fee.

Requests for access to records must be made by completing the prescribed Form A and paying the requester's fee. Where such access is granted in terms of this PAIA Manual, the information and documentation will be made available at the offices of Jackpotstar 777 (the particulars of which appear in section 2 above) or in the manner requested, should this be reasonable and possible. The manner of access will include:

- Perusal with copying of material if needed and at the prescribed fee for copies;
- Access to visual, audio visual material with a transcription, dubbing, copying or both, if required.

To facilitate the processing of any request by a requester for information or documentation in terms of this PAIA Manual, requesters are required to follow the procedure set forth herein below:

- i. Use the prescribed Form A attached hereto as **Annexure B**, alternatively found on Jackpotstar

777's website - <https://www.lotto247.co.za>

- ii. Address your request to the Information or Deputy Information Officer (dpo@lotto247.co.za)
- iii. Provide sufficient detail to enable Jackpotstar 777 or any authorised person dealing with a request to identify:
 - a) The record(s) requested;
 - b) The requestor (and, if an agent is lodging the request or behalf of someone, proof of capacity and authorisation);
 - c) The South African postal address, email address or fax number of the requestor;
 - d) The form of access required;
 - e) If the requester wishes to be informed of the decision in any manner (in addition to being informed in writing) the manner and particulars thereof;
 - f) The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required in order to exercise or protect the right.

4.2 Prescribed fees

The following applies to requests (other than personal requests):

- i. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- ii. If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- iii. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- iv. Records may be withheld until the fees have been paid.

The detailed Fee Structure as prescribed in terms of section 54 of the PAIA is attached hereto as **Annexure C** and is also available on Jackpotstar 777's website - <https://www.lotto247.co.za>

4.3 Access to prescribed forms and fees

Prescribed forms and fees are published on Jackpotstar 777's website or, alternatively, copies can be requested from the Information Officer or Deputy Information Officer (dpo@lotto247.co.za). Prescribed forms and fees can be found on Jackpotstar 777's website.

5. REMEDIES & DECISION

5.1 Internal Remedies

Jackpotstar 777 does not have an internal appeal procedure regarding PAIA and POPIA requests for access to information. As such, the decision made by the Information Officer, is final.

If a request is denied and the requester is dissatisfied with the Information Officer's decision, the requestor will be required to exercise such external remedies at their disposal if a request for information is refused.



5.2 External Remedies

A requestor who is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision apply to a competent Court, with jurisdiction over these applications in terms of the PAIA Act, for appropriate relief.

6. Time Afforded to Jackpotstar 777

- 6.1 Jackpotstar 777 is required to, within 30 (thirty) days of receipt of a request, decide whether to grant or decline the request and, if required, provide the requester with reasons to that effect.
- 6.2 The 30 (thirty) day period stipulated in paragraph 6.1 above, may be extended for a further period of not more than 30 (thirty) days if the request is for a large amount of information, or the request requires an extensive search for information which cannot reasonably be obtained within the originally stipulated 30 (thirty) day period.
- 6.3 In circumstances contemplated in paragraph 6.2, Jackpotstar 777 will notify the requester in writing should an extension be sought.

COMPILED BY JACKPOTSTAR 777 (PTY) LTD

HEAD OF OPERATIONS

DATE: 10 May 2021



ANNEXURE A

SCHEDULE OF SUBSIDIARIES AND GROUP ENTITES

None

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

[Section 53(1) of the Promotion of Access to
Information Act, 2000(Act No. 2 of 2000)]

[Regulation 10]**A. Particulars of private body**

Name of private body:	Jackpotstar 777 (Pty) Ltd
Industry:	Bookmaker
Registration number:	2019/582022/07
VAT registration number:	4620124729
Postal address:	P O Box 12499, Mill Street Gardens, Cape Town, 8010
Physical address/ Place of business:	Ground Floor, 17 Queenspark Avenue, Salt River, 7925
Telephone:	021 123 4567
E-mail address:	<u>dpo@lotto247.co.za</u>
Website:	<u>https://www.lotto247.co.za</u>

Request to be addressed to:

The Information Officer / Deputy Information Officer:

Information Officer: _____
Email: _____
Telephone Number: _____

Deputy Information Officer: _____
Email: _____
Telephone Number: _____

B. Particulars of person requesting access to the record

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____ Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person: _____

C. Particulars of person on whose behalf request is made

This section must only be completed if a request for information is being made on behalf of another person.

Full names and surname: _____

Identity number: _____

D. Particulars of record

The requestor must provide full particulars of the record to which access is requested, including any reference number if that is known to the requestor, to enable the record to be located. You are welcome to attach an annexure (which must be signed) to this request form should the space provided herein be insufficient.

Description of record or relevant part of the record: _____

Reference number, if available: _____

Any further particulars of record: _____

E. Fees

A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid. Jackpotstar 777 will, upon receipt of your request notify you of the amount required to be paid as the request fee. 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. If you qualify for exemption of the payment of any fee, please state the reason for exemption.

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:

! Form in which record is required:

Mark the appropriate box with an X.

(a) Compliance with your request in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:			
	copy of record*		inspection of record
2. If record consists of visual images (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
	View the images	copy of the images*	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
	Listen to the soundtrack(audio cassette)		Transcription of soundtrack* (written or printed document)
4. If record is held on computer or in an electronic or machine-readable form:			
	printed copy of record*	printed copy of information derived from the record*	copy in computer readable form* (compact disc)
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES NO

G. Particulars of right to be exercised or protected

You are welcome to attach an annexure (which must be signed) to this request form should the space provided herein be insufficient.

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: _____

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record? _____

Signed at _____ this _____ day of _____ 20

SIGNATURE OF REQUESTER/ PERSON ON
WHOSE BEHALF REQUEST IS MADE

PRESCRIBED FEE TARIFF

GENERAL

The following applies to requests (other than personal requests):

1. A requester is required to pay the prescribed fees (R50.00) before a request will be processed;
2. If the preparation of the record requested requires more than the prescribed hours determined by Jackpotstar 777's Information Officer, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
3. A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
4. Records may be withheld until the fees have been paid. Payments should be made to the business account of Jackpotstar 777, the particulars of which account details will be made available to a requestor upon lodging a request for access to information.

FEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the Manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on - Stiffy disc Compact disc	R7.50 R70.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof	R20.00
For a copy of an audio record	R30.00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on - Compact disc	R7.50 R70.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof	R20.00
For a copy of an audio record	R30.00

5. To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
6. For purposes of section 54(2) of the Act, the following applies:

5 hours as the hours to be exceeded before a deposit is payable; and
One third of the access fee is payable as a deposit by the requester.

7. Postage fees are payable when a copy of a record must be posted to a requester.