

SECTION 51 MANUAL FOR A PRIVATE BODY

PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2000)



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PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2000)

SECTION 51 MANUAL FOR A PRIVATE BODY

(As amended by the Protection of Personal Information Act, 2013)

MONEYGRAM OVERSEAS (PTY) LTD

Registration Number: 2002/024858/07

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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 “POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7 “Regulator”	Information Regulator; and
1.8 “Republic”	Republic of South Africa

2. INTRODUCTION

This Manual is prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) (“PAIA”), as amended by the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (“POPIA”).

PAIA gives effect to Section 32 of the Constitution of the Republic of South Africa, 1996, which provides that everyone has the 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.

The purpose of this Manual is to:

- Assist members of the public to exercise their right to information by providing an outline of the types of records held by **MoneyGram Overseas (Pty) Ltd** and the procedure to be followed when requesting access to such records.
- Provide a description of the subjects on which the private body holds records and the categories of records held on each subject.
- Provide a description of the records of the private body which are available in accordance with any other legislation.
- Provide sufficient information to enable a person to understand the functions and structure of **MoneyGram Overseas (Pty) Ltd**.
- Detail the processing of personal information by **MoneyGram Overseas (Pty) Ltd** in accordance with POPIA.

3. COMPANY CONTACT DETAILS (SECTION 51(1)(a))

Full Name of Private Body:	MONEYGRAM OVERSEAS (PTY) LTD
Registration Number:	2002/024858/07
Postal Address:	P O BOX 688, GALLO MANOR, JOHANNESBURG, 2052
Physical Address:	THE WOODLANDS BUILDING 26, WOODLANDS DRIVE, WOODMEAD, 2191
Telephone Number:	+91919987644900
Email Address:	abhargava@MoneyGram.com
Website Address:	https://www.MoneyGram.com/r/za/en

4. CONTACT DETAILS OF THE INFORMATION OFFICER(S) (SECTION 51(1)(b))

The Information Officer is responsible for ensuring compliance with PAIA and POPIA, and for dealing with requests for access to records.

Information Officer:

Name: AMIT BHARGAVA
Designation: DIRECTOR
Telephone Number: +919987644900
Email Address: abhargava@MoneyGram.com

5. GUIDE ON HOW TO USE PAIA (SECTION 51(1)(b)(iii))

The Information Regulator has compiled a guide in terms of Section 10 of PAIA. This guide contains information to assist a person in exercising their rights under PAIA and POPIA.

The guide is available in all official languages and can be obtained from the Information Regulator's website:

Website: <https://inforegulator.org.za/paia-guidelines/>

Contact Details of the Information Regulator:

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
General Enquiries Email: enquiries@inforegulator.org.za
Complaints Email (POPIA): popiacomplaints@inforegulator.org.za
Telephone Number: +27 (0)10 023 5200

6. RECORDS HELD BY THE PRIVATE BODY (SECTION 51(1)(d))

MoneyGram Overseas (Pty) Ltd holds various categories of records. Access to these records may be subject to the grounds of refusal set out in PAIA.

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Company Records: - Memorandum of Incorporation (MOI) - Shareholder Agreements - Board Meeting Minutes - Statutory Registers - Licenses - Permits - Insurance Policies - Intellectual Property Registrations	- Companies Act, 2008 - Contract Law - National Business Act - Insurance Act, 2017 - Protection of Personal Information Act - Financial Advisory and Intermediary Services Act - Patents Act, 1978 - Trademarks Act, 1993 - Copyright Act, 1978 - Designs Act, 1993 - Companies and Intellectual Property Commission
Financial Records: - Annual Financial Statements - Audit Reports - Tax Returns - Bank Statements - Invoices, Payment Records - Asset Registers - Budgets	- Companies Act, 2008 - Tax Administration Act, 2011 - Value-Added Tax Act, 1991 - Financial Intelligence Centre Act, 2001 - National Credit Act, 2005

Operational Records: - Client/Customer Contracts - Service Agreements - Project Files - Operational Policies - IT System Documentation - Data Processing Records - R&D Reports - Marketing Materials - Sales Records	- Protection of Personal Information Act, 2013 - Companies Act, 2008 - Consumer Protection Act, 2008 - Tax Administration Act, 2011 - Common Law - Patents Act, 1978 - Trademarks Act, 1993 - Copyright Act, 1978 - Designs Act, 1993
Legal and Compliance Records: - Litigation Records - Legal Opinions - Regulatory Correspondence - Compliance Reports - Internal Audit Reports - Minutes Of Compliance Committee Meetings	- Companies Act, 2008 - Protection of Personal Information Act, 2013 - Tax Administration Act, 2011 - Financial Intelligence Centre Act, 2001 - Auditing Profession Act, 2005
Marketing and Sales Records: - Customer Relationship Management (CRM) Data - Sales Leads - Marketing Campaign Data - Advertising Materials - Market Research Reports - Sales Forecasts	- Protection of Personal Information Act, 2013 - Consumer Protection Act, 2008 - Electronic Communications and Transactions Act, 2002 - Advertising Regulatory Board (ARB) Code of Advertising Practice
Information Technology Records: - Software Licenses - Hardware Inventory - Network Configurations - System Logs - Data Backup and Recovery Plans - IT Security Policies	- The Protection of Personal Information Act, 2013 - The Promotion of Access to Information Act, 2000 - Electronic Communications and Transactions Act, 2002 - Companies Act, 2008 - National Archives and Records Service of South Africa Act, 1996
Risk Management Records: - Risk Assessments - Incident Reports - Disaster Recovery Plans - Business Continuity Plans	- Occupational Health and Safety Act, 1993 - Disaster Management Act, 2002 - Companies Act, 2008 - Public Finance Management Act, 1999 - Municipal Finance Management Act, 2003 - Protection of Personal Information Act, 2013
Customer Service Records: - Customer Complaints - Feedback - Service Requests - Call Recordings	- Protection of Personal Information Act, 2013 - Consumer Protection Act, 2008 - Financial Advisory and Intermediary Services Act, 2002 - Electronic Communications and Transactions Act, 2002 - National Credit Act, 2005

7. RECORDS AUTOMATICALLY AVAILABLE (SECTION 51(1)(c))

Certain records may be available without the need to submit a formal request in terms of PAIA and may be accessed through the Company's website or obtained upon request, subject to any applicable reproduction or administrative fees. These records may include publicly available information such as the Company profile, information relating to the Company's products and services, general terms and conditions, marketing and promotional materials, brochures, newsletters, publications, press releases, public announcements, and other information made available to the public.

8. PROCESSING OF PERSONAL INFORMATION (SECTION 51(1)(e) as per POPIA)

MoneyGram Overseas (Pty) Ltd is committed to protecting the personal information it processes in accordance with POPIA.

Purpose of Processing Personal Information:

The Company processes personal information only to the extent necessary for legitimate business, employment, legal, regulatory, and corporate administration purposes. This includes recruitment and onboarding, payroll and benefits administration, employee and employment management, compliance with applicable labour, tax, and other legal obligations, internal administration and record-keeping, security and access control, and responding to employee-related requests and enquiries. Personal information is processed solely for the effective administration and operation of the Company's business and in accordance with applicable data protection and privacy laws.

Description of Categories of Data Subjects and Personal Information Processed:

The Company processes personal information relating to a limited range of data subjects for legitimate employment, legal, regulatory, and business administration purposes. The South African entity does not process consumer or customer personal information. The categories of data subjects whose personal information may be processed include current and former employees, job applicants, directors, officers, representatives of corporate entities, and other business contacts where relevant. The types of personal information processed may include identification and contact information, employment and position-related information, payroll and employee benefits information, tax and banking details, right-to-work and verification information, training and development records, leave and absence information, and any other personal information reasonably required for employment administration, corporate governance, operational management, and compliance with applicable legal and regulatory obligations.

Recipients or Categories of Recipients of Personal Information:

Personal information may be disclosed or made available, where necessary and for legitimate business, employment, legal, regulatory, or operational purposes, to authorised personnel within the MoneyGram Group, approved third-party service providers, human resources, payroll and employee benefits administrators, information technology service providers, professional advisers, auditors, regulatory authorities, governmental and public bodies, and any other third parties where such disclosure is required or permitted by applicable law. The Company takes reasonable steps to ensure that such recipients are subject to appropriate confidentiality, security, and data protection obligations.

Planned Transborder Flows of Personal Information:

The Company may transfer personal information outside the Republic of South Africa, including to the United States of America, where such transfers are necessary for legitimate employment, administrative, legal, regulatory, or operational purposes. The South African entity does not process consumer or customer personal information. Personal information that may be transferred is limited to that relating to current and former employees, job applicants, directors, officers, representatives of corporate entities, and other business contacts where relevant. Such information may include identification and contact details, employment and role-related information, payroll and benefits information, tax and banking details, right-to-work and verification information, training records, leave and absence records, and other information required for employment administration and compliance with applicable

legal and regulatory obligations. The Company ensures that all cross-border transfers of personal information are conducted in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and are subject to appropriate contractual, technical, and organisational safeguards to ensure an adequate level of protection for the personal information transferred.

General Description of Information Security Measures:

The Company implements appropriate technical, organisational, and administrative measures to safeguard personal information against unauthorised access, disclosure, loss, destruction, alteration, or misuse. Such measures may include access controls, secure information systems, confidentiality obligations, employee awareness and training programmes, vendor due diligence and oversight, internal policies and procedures, monitoring activities, and other security measures appropriate to the nature and sensitivity of the personal information processed. The Company continually reviews and updates its security measures to ensure compliance with applicable data protection and privacy legislation.

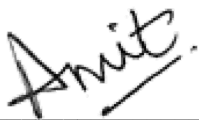
9. AVAILABILITY OF THE MANUAL (SECTION 51(3))

This Manual is available for inspection at the Company's physical premises and may be obtained from the Information Officer upon request, subject to the payment of any prescribed reproduction or administrative fees, where applicable. Copies of the Manual may also be made available through any other channels prescribed by applicable legislation or designated by the Company from time to time.

10. UPDATING OF THE MANUAL (SECTION 51(1)(e))

This Manual will be reviewed and updated regularly to ensure its accuracy and compliance with PAIA, POPIA, and any other relevant legislation. Any updates will be published on our website and made available as described above.

MONEYGRAM OVERSEAS (PTY) LTD



Amit Bhargava
18/08/2026