

**BETTING WORLD PROPRIETARY LIMITED TRADING AS BETFRED
PAIA MANUAL**

1. INTRODUCTION TO BETFRED

Betfred is part of a worldwide trading group originating in 1967 in England and owned by Fred and Peter Done and their families. The group started in bookmaking with one shop and now extends to over 1,250 betting shops or OTB (off track betting) shops worldwide, operating licensed betting shops (OTB) in the UK, USA, and 60 in South Africa across six provinces.

The company also owns a number of betting websites including www.betfred.com, www.betfred.co.za, www.betfredsports.com. The Done Family business also extends to operating a number of commercial service companies offering services worldwide to over 90,000 companies, and includes offices in Canada, UK, Gibraltar, South Africa, Hong Kong and Australia. Betfred South Africa Holdings (Proprietary) Limited is the holding company of the Betfred group of South African companies, and for the purposes of this manual collectively be referred to as “the Group”.

2. PURPOSE OF MANUAL

The Promotion of Access to Information Act 2 of 2000 (“PAIA”) was enacted with the purpose of giving effect to the constitutional right of access to information that is held by a private or public body and that is required for the exercise or protection of any rights.

In terms of Section 51 of PAIA the private body is required to compile a manual to enable a person to gain access to information held by such private body and stipulates the minimum requirements that the manual must comply with.

This Manual constitutes the PAIA manual of the Group and has been compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (“POPIA”), which gives effect to the constitutional right to privacy.

The POPIA amends certain provisions of the PAIA, balancing the need for access to information against the need to ensure protection of personal information by providing for the establishment of an Information Regulator who is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of the POPIA. More information on how the Group processes and protects personal information can be found in each of the relevant entity’s privacy policies which are available on each of the respective entity’s websites.

The purpose of this Manual is to facilitate requests for access to information regarding **Betfred South Africa Holdings (Propriety) Limited trading as Betfred** and it applies in respect of the Group of entities and each member, affiliate or subsidiary described in Annexure C.

3. CONTACT DETAILS

The following relevant contact details are provided as required by section 51(1)(a) of PAIA:

Information Officer	Marc Joubert
Deputy Information Officer	Lawrence Azar
Postal Address	345 Rivonia Road, Edenburg, Sandton Johannesburg, 2128 South Africa
Serving Address	345 Rivonia Road, Edenburg, Sandton Johannesburg, 2128 South Africa
Phone Number	+27 87 095 8862 (Customer Support) +27 10 880 8256 (Head Office)
Website	www.betfred.co.za
EMAIL	informationofficer@betfredsa.co.za

3. GUIDE ON HOW TO USE THE ACT

[Information required by section 51(1)(b)]

The South African Human Rights Commission has compiled a guide, in terms of Section 10 of the PAIA, to facilitate ease of use of the POPIA for requesters of information. This guide is available in all 11 official languages from the South African Human Rights Commission. Any queries can be directed to:

**The South African Human Rights Commission PAIA Unit
The Research and Documentation Department**

Physical Address	33 Hoofd Street Forum 3 3rd Floor Braamfontein, South Africa
Postal Address	Private Bag X2700 Houghton 2041
Tel:	011 – 877 3600
Website	www.sahr.org.za
EMAIL	PAIA@sahrc.org.sa

5. RECORDS AUTOMATICALLY AVAILABLE

Information that is available in the public domain and information obtainable via any of the below websites about or any of its affiliates, managed entities, or related companies, is

available and need not be formally requested in terms of this Manual. The website addresses are included in Annexure C.

6. ACCESS TO RECORD SUBJECTS AND CATEGORIES HELD BY THE GROUP IN TERMS OF PAIA

[Section 51(1)(c) and 51(1)(e)]

The subjects on which the Group holds records and the categories on each subject in terms of Section 51(1)(e) are listed below. Please note that a requestor is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the PAIA. Please also refer to the relevant entity's privacy policies for further information.

6.1 Financial information

- Accounting records
- Annual financial statements
- Agreements and contracts
- Asset register
- Banking records
- Correspondence
- Invoices and statements
- Insurance policies
- Licences
- Management reports
- Minute books
- Tax reports and returns
- Statistics SA returns
- Statutory records

6.2 Human Resources

- Employee records and information
- Training records, manuals, materials and reports
- Employment equity records and reports
- Disciplinary records
- Payroll records
- UIF/SDL/PAYE returns
- Leave records
- Policies and procedures
- Retirement benefit records

6.3 Information management and technology

- Databases
- Computer software
- Registered Trademarks and Domains
- Consensually obtained member information and relationship history
- Software license agreements

6.4 Marketing

- Internet
- Marketing and advertising pamphlets and brochures

6.5 Operations

- Operational procedures
- Databases
- Computer software

6.6 Customer related records

- Full name
- Copies of national identity number or passport number
- Physical address
- Bank details
- Contact number
- Correspondence
- Any other documentation provided by the customer

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

7. RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION

[Section 51(1)(d)]

The following records are available in accordance with the following legislation:

7.1 Gambling Acts

- National Gambling Act, 7 of 2004
- National Gambling Amendment Act, 2008
- National Gambling Regulations 2004
- National Gambling Policy, 2015
- Gauteng Gambling Act, 1995 (as amended)
- Gauteng Gambling Board Regulations, 1997 (as amended)
- Gauteng Gambling Board Rules, 2001 (as amended)
- KwaZulu-Natal Gaming and Betting Act, 8 of 2010
- Western Cape Gambling & Racing Act, 1996 (as amended)
- Western Cape Gambling & Racing Regulations
- Western Cape Racing and Betting Rules, 2003
- Western Cape Bookmaker Operational Rules, 2017
- Limpopo Gambling Act, 1996 (as amended)
- Limpopo Gambling Act, 2013
- Limpopo Gambling Regulations
- Mpumalanga Gambling Act, 5 of 1995
- Mpumalanga Economic Regulator Act, 2 of 2017
- Mpumalanga Gambling Rules, 2018
- Mpumalanga Gambling Regulations, 2014
- Mpumalanga Gambling Levies Act, 2007

- Mpumalanga Gambling Levies Regulations, 2012
- Northern Cape Gambling Act, 3 of 2008
- North West Gambling Act, 2 of 2001
- North West Gambling Board Rules, 2003
- Eastern Cape Gambling and Betting Act. 5 of 1997
- Free State Gambling Liquor Act, 6 of 2010

7.2 Human Resources

- Broad-Based Black Economic Empowerment Act, 2003
- Labour Relations Act, 1995
- Basic Conditions of Employment Act, 1997
- Employment Equity Act, 1998
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 1999
- Employment Equity Act, 1998
- Unemployment Insurance Act, 2001
- Occupational Health and Safety Act, 1993
- Occupational Health and Safety Regulations
- Unemployment Contributions Act, 2002
- Unemployment Insurance Act, 2001
- Compensation for Occupational Injuries and Diseases Act, 1993

7.3 Accounting and Finance

- Income Tax Act, 1962
- Value Added Tax Act, 1991
- Financial Intelligence Centre Act, 2001

7.4 Company, Legal and liquor

- Companies Act, 2008
- National Liquor Act, 2003
- Gauteng Liquor Act, 2003
- Free State Gambling Liquor Act, 6 of 2010
- Free State Liquor Act, 2007
- KwaZulu-Natal Liquor Act, 1989
- Western Cape Liquor Act, 2008
- Eastern Cape Liquor Act, 2003
- Mpumalanga Liquor Act, 2006Limpopo Liquor Act, 5 of 2009
- North West Liquor Licensing Regulations, 2018
- Northern Cape Liquor Act, 2008
- Promotion of Access to Information Act, 2000
- Protection of Personal Information Act 4, of 2013
- Consumer Protection Act 68 of 2008

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

8. PROCEDURE FOR ACCESS REQUEST

It is important to note that the successful completion and submission of an access request form does not automatically allow the requestor access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 of Chapter 4 of the Act. If it is reasonably suspected that the requestor has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requestor.

The following steps must be followed when a requester wishes to obtain access to information for the Group:

8.1 The requestor must complete the Form 2 found in Annexure A. This Form must be submitted, together with a request fee (if applicable) and proof of the requestor's ID, to the Information Officer at the specified address or electronic email address listed in section 3 above. A request which does not comply with the formalities as prescribed by PAIA will be returned to you.

8.2 The request must meet the following requirements:

- provide sufficient detail to enable the Information Officer to identify the record(s) requested and to identify the requestor;
- indicate which form of access is required;
- specify a postal address or e-mail address of the requester in the Republic of South Africa;
- identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right; and
- indicate if any other manner is to be used to inform the requestor and state the necessary particulars to be so informed.

8.3 If a request is made on behalf of another person, the requestor must then submit proof of the capacity in which the requestor is making the request to the satisfaction of the Group.

8.4 The fee payable by every requestor to the Group is currently R500

8.5 To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for search and preparation shall cost R500 per hour, subject to a maximum of R1,000.

8.6 After the Information Officer has made a decision on the request, Form 3 will be sent to the requestor to notify the requestor on the outcome of the request and on the fees payable, if any.

8.7 If the request is granted and access fees are payable in respect of the search, reproduction, and preparation costs. These fees are set out in Annexure B.

ANNEXURE A - FORM 2

REQUEST FOR ACCESS TO RECORD

[Download PDF](#)

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

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:
	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		
<p>PARTICULARS OF RECORD REQUESTED</p> <p><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></p>			
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 <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <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 record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record 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>	
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>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>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.</i>	

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:	

FEES	
<p>a) <i>A request fee must be paid before the request will be considered.</i></p> <p>b) <i>You will be notified of the amount of the access fee to be paid.</i></p> <p>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></p> <p>d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i></p>	
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

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

Signature of Information Officer

ANNEXURE B - FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

Download PDF

<https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

ANNEXURE B - 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:

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			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• 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			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• 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 <i>(calculated on one third of total amount per request)</i>	
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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 number: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information Officer

ANNEXURE C – BETFRED GROUP OF COMPANIES

The scope of this manual includes **Betfred South Africa Holdings (Propriety) Limited** (“**BETFRED**”) and the following related entities in which it has a direct interest:

S	COMPANY	REGISTRATION NUMBER
1	Betfred South Africa Holdings (Proprietary) Limited	2020/573584/07
2	Betting World (Pty) Ltd	2000/008649/07
3	Sepels Best Bets (Pty) Ltd	2021/976800/07
4	Sepel Sportsbet Gauteng (Pty) Ltd	2016/093722/07
5	Betfred SA Gauteng (Pty) Ltd	2022/825934/07
6	K2022825938 (South Africa) (Pty) Ltd	2022/825938/07
7		

	COMPANY	
1	BETFRED UK	WWW.BETFRED.COM
2	BETFRED SA	WWW.BETFRED.CO.ZA
3	BETFRED US	WWW.BETFREDSPO RTS.COM