



PLAY SENSE (PTY) LTD

(Registration No: 2015/441814/07)
("Play Sense")

PAIA MANUAL

(of a private body)

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
("PAIA")

Version: 26 August 2024



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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|--------------------|--|
| 1.1 | “Minister” | Minister of Justice and Correctional Services; |
| 1.2 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.3 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.4 | “Regulator” | Information Regulator. |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer (if any) who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 2.6 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 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



2.10 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. PLAY SENSE KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

3.1. Information Officer:

Name: Meg Faure
Tel: +27 (0)71-588-8760
Email: info@playsense.org

3.3 Access to information general contacts

Email: info@ playsense.org

3.4 Head Office

Physical Address: 1st Floor Old Warehouse Building, Black River Park, Fir Street, Observatory, Western Cape, 7925

Telephone: +27 (0)71-588-8760

Email: info@ playsense.org

Website: <https://playsense.org/>

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

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, 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.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of:

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:

4.3.2.1. the Information Officer of every private body, and



- 4.3.2.2. every Deputy Information Officer of every private body (if any) designated in terms of section 56 of POPIA¹;
- 4.3.2.3. the manner and form of a request for access to a record of a private body contemplated in section 50²;
- 4.3.3. the assistance available from the Information Officer of a private body in terms of PAIA and POPIA;
- 4.3.4. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.5. 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-
 - 4.3.5.1. an internal appeal;
 - 4.3.5.2. a complaint to the Regulator; and
 - 4.3.5.3. an application with a court against a decision by the information officer of a private body, a decision on internal appeal or a decision by the Regulator;
- 4.3.6. the provisions of section 51³ requiring a private body to compile a manual, and how to obtain access to a manual;
- 4.3.7. the provisions of section 52⁴ providing for the voluntary disclosure of categories of records by a private body;
- 4.3.8. the notices issued in terms of section 54⁵ regarding fees to be paid in relation to requests for access; and

¹ Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

² Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁴ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁵ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.



- 4.3.9. the regulations made in terms of section 92⁶.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
- 4.5.1. upon request to the Information Officer;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6. A copy of the Guide is also available in the following three official languages, for public inspection during normal office hours-
- 4.6.1. English:
https://playsense.org/wp-content/uploads/2022/05/PAIA-Guide-English_202109051.pdf
- 4.6.2. Afrikaans:
https://playsense.org/wp-content/uploads/2022/05/PAIA-Guide-Afrikaans_20210905.pdf
- 4.6.3. isiXhosa:
https://playsense.org/wp-content/uploads/2022/05/PAIA-Guide-Xhosa_20210914.pdf

5. CATEGORIES OF RECORDS OF PLAY SENSE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

All information available to the public on the Play Sense website at <https://playsense.org/> which may be downloaded or requested via telephone, email or post.

6. DESCRIPTION OF THE RECORDS OF PLAY SENSE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Play Sense holds records in terms of the following legislation (this is not an exhaustive list):

- Basic Conditions of Employment Act No. 75 of 1997
- Children's Act No. 38 of 2005
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993

⁶ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”



- Consumer Protection Act No. 68 of 2008
- Electronic Communications and Transactions Act No. 25 of 2002
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No. 4 of 2013
- Short-term Insurance Act No. 53 of 1998
- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Insurance Contributions Act No. 4 of 2002
- Value Added Tax Act No. 89 of 1991

Only those authorities, individuals or organisations authorised in terms of the abovementioned legislation to have access to these records may request them.

7. DESCRIPTION OF THE SUBJECTS ON WHICH PLAY SENSE HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PLAY SENSE

Subject:	Category of Record:
Business and Legal Records	<ul style="list-style-type: none"> • Business plans and strategy documents • Company statutory records • Board and management records • Operational manuals • Company policies and procedures • Intellectual property records (including trade marks and copyright) • Insurance portfolio records • Internal correspondence • Regulatory records • Department of Social Development ECD programme registration records • Property and leasing records • Contracts with suppliers and service providers
Financial Records:	<ul style="list-style-type: none"> • Budget and financial performance records • Accounting records (including annual financial statements and management accounts) • Banking records



	<ul style="list-style-type: none"> • Financial contracts • Payment information from third party service providers
Tax Records:	<ul style="list-style-type: none"> • Corporate income and value-added tax records (including returns and payments to SARS) • Employee PAYE, SDL, UIF and Workmen's Compensation Records
Information Technology ("IT") Records:	<ul style="list-style-type: none"> • Technology hosts, hardware and software suppliers and service providers • IT Infrastructure and architecture information and manuals • Project implementation plans • Website information (including Internet protocol address/es, login data, browser type and version, time zone setting and location, geo-location data, GPS pings and calculations, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Play Sense website) • Social media content
Marketing Records:	<ul style="list-style-type: none"> • Marketing and advertising material • Marketing strategy and plans • Subscriber identification, contact details and marketing communication preferences • Website usage, analytics and third-party cookie information • Lead generation and referral information • Online surveys, webinars and events • Newsletter subscription records • Promotional campaigns • Promotional competition records
Playschool Records:	<ul style="list-style-type: none"> • Website Terms and Conditions of Use for Parents and Teachers; • Application and enrolment forms



	<ul style="list-style-type: none"> • Student records (including identification details, parent/guardian/emergency contact details, sibling student information, authorised photograph, programme attendance and report information, behavioural and assessment data, medical doctor identification and contact details, medical, health and accident records) • Parent/Guardian information (including identification and contact details, residential address and billing information) • Teacher records (identification and contact details, staff details, photograph, marital status, first aid certificates, CV's, billing information, credit and criminal record checks, administration records, contracts, training records and status and assignment information) • Playschool details (residential address, staff details, health and safety assessment records) • Contracts with Parents/Guardians, and Teachers • Trip/excursion and indemnity form information • General correspondence records (email and WhatsApp communications)
Staff Records	<ul style="list-style-type: none"> • Staff records (identification, emergency, next-of-kin, marital status, salary and payment details, CV and training information, assessments, disciplinary, medical health, grievance procedure, employment contracts and benefit information, leave records, accident information records and general correspondence) • Policy and procedure records • Recruitment records (job advertisements, applicant CV information, interview and feedback records)

Access to the abovementioned records may only be requested in terms of this PAIA Manual.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information



Play Sense processes the personal information of various categories of individuals and organisations (described in clause 8.2 below) in accordance with POPIA and for the purposes set out in its Privacy Policy for Children and Parents and its Privacy Policy for Third Parties and Educators available at <https://playsense.org/Privacy-policy/>.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Play Sense processes the personal information of the following data subjects:

Categories of Data Subjects:	Personal Information that may be processed:
Student (Child), Parent / Guardian Records	<ul style="list-style-type: none"> • Identity, gender, language and contact details (residential and email addresses, telephone and mobile numbers) as well as emergency contact details • Parent / guardian and emergency contact data • Application form and enrolment information • Medical information • Programme choice data • Website Terms & Conditions of Use for Parents • Attendance and assessment report data • Fees and fee refund transaction records • General correspondence
Teacher Records	<ul style="list-style-type: none"> • Identity, language and contact details (residential and email addresses, telephone and mobile numbers) as well as emergency contact details • Contracts • CV information • Police clearance and credit check records • First aid certification data • Insurance cover records • Billing and payment data • Website Terms & Conditions of Use for Teachers • Employee information • Ongoing education records • Business support information



	<ul style="list-style-type: none"> • General correspondence
Staff	<ul style="list-style-type: none"> • Identity, gender, language and contact details (residential and email addresses, telephone and mobile numbers) as well as emergency and next-of-kin contact details • Health information • First aid information • CV information (including marital status, employment history, education and qualifications and contacts for references) • Police clearance and credit check records • Bank details
Service Providers & Suppliers	<ul style="list-style-type: none"> • Supply and/or services agreements (names and registration or identification numbers) • Billing and payment data (bank account details, VAT numbers, address details) • Names and contact details of representatives • General correspondence
Play Sense Website Users	<ul style="list-style-type: none"> • Usage, analytics and third-party cookie information • Internet protocol address/es, login data, browser type and version, time zone setting and location, geo-location data, GPS pings and calculations, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Play Sense website

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

Category of personal information:	Recipients or categories of recipients to whom the personal information may be supplied:
Identity numbers and names for criminal and credit checks	<ul style="list-style-type: none"> • Recruitment service providers



Credit and payment history for credit information	<ul style="list-style-type: none"> Recruitment service providers
Verifications of Qualifications	<ul style="list-style-type: none"> South African Qualifications Authority National or Provincial Departments of Education Department of Social Development
Names, contact details, identity number, photographs, residential addresses of children and parents / guardians	<ul style="list-style-type: none"> Teachers
Company, Staff, Student (Child), Parent / Guardian, Teacher, Supplier and Service Provider Records	<ul style="list-style-type: none"> IT service providers who provide data capturing, processing, storage, email, payroll, communication, billing, marketing and security services Play Sense's affiliate, Play Sense Ltd (Jersey), in relation to marketing, website and online services

8.3 Planned transborder flows of personal information

Play Sense shares personal information with its affiliate, Play Sense Ltd (Jersey), and with third parties which may involve the transborder flow of personal information. When personal information is transferred outside of South Africa, Play Sense ensures that it complies with its obligations under POPIA when doing so. More specifically, it seeks to ensure that:

- its affiliate and the third parties are subject to laws, binding corporate rules or binding agreements which provide an adequate level of protection;
- the transfer is necessary for the performance of Play Sense's contractual obligations to the data subjects;
- the transfer is necessary for the performance of a contract concluded in the interest of the data subject between Play Sense, its affiliate and/or third parties; or
- upon any other basis permitted in terms of POPIA.

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



Play Sense has put in place appropriate security measures to prevent personal information processed by it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed by using coding best practices for its systems and keeping its software up to date. Play Sense also only captures data on an encrypted connection to secured private hosting, and backup data securely in the cloud with dual-authorisation access limited to system administrators only. In addition, it limits access to that personal information to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process personal information on the instructions of Play Sense and they are subject to a duty of confidentiality.

Play Sense has furthermore put in place procedures to deal with any suspected personal data breach and will notify the data subjects and any applicable regulator of any breach where legally required to do so.

9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of this PAIA Manual is available-
 - 9.1.1 on <https://playsense.org/paia-manual/>;
 - 9.1.2 at the head office of Play Sense for public inspection during normal business hours;
 - 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 9.1.4 to the Information Regulator upon request.
- 9.2 A fee for a copy of the PAIA Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Information Officer of Play Sense will on a regular basis update this manual.