

PAIA MANUAL

**Apollo Gaming Company
(PTY) LTD**

Trading as ZARBET

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

DATE OF COMPILATION: 10/05/2024

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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
1.9	SOF/SOW	Source of Funds/Wealth

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 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. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE (Apollo Gaming Company (PTY) LTD)

3.1. Deputy Information Officer:

Name: Thirren Rughubar
Tel: 0860 927 238
Email: compliance@apollogaming.co.za
Fax number: N/A
Website: www.apollogamingcompany.co.za

3.3 Access to information general contacts

Email: support@zarbet.co.za

3.4 National or Head Office

Postal Address: Corner Main Office Park, 2 Payne Rd, Bryanston, Sandton, 2191

Physical Address: Corner Main Office Park, 2 Payne Rd, Bryanston, Sandton, 2191

Telephone: 0860 927 238

Email: info@apollogaming.co.za

Website: www.apollogamingcompany.co.za

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 public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² 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.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ 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.*

- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ 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.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ 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

⁹ Section 22(1) of PAIA- The information officer of a public 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.

¹⁰ 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.

¹¹ 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;

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and 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/infoereg/>).

4.6 A copy of the Guide is also available in the following official language, for public inspection during normal office hours-

4.6.1 isiZulu

4.6.2 Afrikaans

4.7 The South African Human Rights Commission's handbook

4.7.1 According to Section 10 of the Act, the Human Rights Commission is required to create a guide that will help users understand the Act. The handbook includes information on the goals of the Act, how to get in touch with information officers at all public bodies, specifics about the public bodies, how to access their records, and legal recourse in the event that any of the Act's provisions are broken.

4.7.2 The South African Human Rights Commission

PAIA Unit Research and Documentation Department Private Bag 2700,
Houghton, 2041

Telephone Number: (011) 484-8300

Fax Number: (011) 484-0582

Email Address: PAIA@SAHRC.org.za

Website: www.sahrc.org.za

4.7.3 Information Regulator

For queries where you believe that Apollo Gaming Company (PTY) LTD has not

(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."

adequately dealt with your request, or to lodge a complaint should be directed to:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: www.justice.gov.za/inforeg/

Email: PAIA.IR@justice.gov.za Telephone

Number: (011) 484-8300

Fax Number: (011) 484-0582

Email Address: PAIA@SAHRC.org.za

Website: www.sahrc.org.za

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

Category of records	Types of the Record	Available on Website	Available upon request via email
All Policies as well as Terms & Conditions	Terms and Conditions, Privacy Policy, Cookie Policy, Responsible Gambling & Self Exclusion Policies	X	X
Deposit and withdrawal Banking Options	A list of all Banking options available, fees and processing times.	X	X
All General Information	Contact us, About Us, FAQ	X	X
Affiliate Program	Information on Program, Terms and Conditions as well as Commission Structure Details.	X	X

**6. DESCRIPTION OF THE RECORDS OF APOLLO GAMING COMPANY (PTY) LTD
 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
Vat Registration Certificate	Value Added Tax Act, 89 of 1991
Tax Compliance Pin	Income Tax Act, 58 of 1962
Employment Contracts	
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
Human Resources	<ul style="list-style-type: none"> • Basic Conditions of Employment Act, 1997 • Broad-Based Black Economic Empowerment Act, 2003 • Compensation for Occupational Injuries and Diseases Act, 1993 • Employment Equity Act, 1998 • Employment Equity Act, 1998 • Labour Relations Act, 1995

	<ul style="list-style-type: none"> • Occupational Health and Safety Act, 1993 • Occupational Health and Safety Regulations • Skills Development Act, 97 of 1998 • Skills Development Levies Act, 1999 • Unemployment Contributions Act, 2002 • Unemployment Insurance Act, 2001 • Unemployment Insurance Act, 2001
Proof of payment for COIDA	Compensation for Occupational Injuries and Diseases Act, 130 of 1993 (COIDA)
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 & Racing Act, 1996, as amended • Western Cape Gambling & Racing Regulations • Western Cape Racing and Betting Rules, 2003 • Western Cape Bookmaker Operational Rules, 2017
Complaints and Responses	Consumer Protection Act, 68 of 2008
Agreements	<ul style="list-style-type: none"> • Copyright Act, 98 of 1978 • Intellectual Property Laws Amendments Act, 38 of 1997 • Trademarks Act, 194 of 1993
Privacy Policy	Protection of Personal Information Act, 4 of 2017

Please be aware that this is not a complete list and that requestors may not always have access to these records.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE (INSERT THE NAME OF THE BODY)

NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used. .

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none">- HR policies and procedures- Advertised posts- Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

NB: Describe the purpose or reasons for processing personal information in your organisation.

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

NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be

processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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

NB: *Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.*

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

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

NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.zarbet.co.za

9.1.2 head office of Apollo Gaming Company (Pty) Ltd 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 Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of Apollo Gaming Company (PTY) LTD will on a regular basis update this manual.

Issued by

William Frederick Reyneke - CEO
