MIX TELEMATICS

PAIA Manual

**As required in terms of section 51 of
the Promotion of Access to Information Act No 2 of 2000
(the "Act")**

Preamble

The Act seeks to give natural and/or juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.

Section 51 of the Act obliges private bodies to compile a manual which would assist a person to obtain access to information held by such a private body and stipulates the minimum requirements a manual has to comply with. In terms of section 51(2) of the Promotion of Access to Information Act (the "Act"), this manual will be updated as and when the need arises.

Objectives of Manual

The objectives of the Manual are:

- To provide a list of all records held by MiX Telematics ("Company");
- To set out the requirements with regard to who may request information in terms of the Act as well as the grounds on which a request may be denied;
- To define the manner and form in which a request for information must be submitted.

The reference, in this Manual, to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

The Act provides that a person may only request information in terms of the Act, if the information is required for the exercise or protection of a right. Information will therefore not be furnished unless a person clearly provides sufficient particulars to enable the Company to identify the right the requester is seeking to protect as well as an explanation of why the requested information is required for the exercise of protection of that right.

Revision History

Date	Version	Description	Author
January 2013	1	Promotion of access to information Act. Manual	Information Officer
December 2013	2	Change of Information Officer	Information Officer
December 2015	3	Revision information officer, Section 4.1	Information Officer

Approved by: _____
G Pretorius
EVP Business Systems

Date: 10/12/2015

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1. INTRODUCTION TO THE COMPANY

MiX Telematics ("Company") is a global provider of information and related services for the efficient and effective management of mobile assets. Founded in 1996, the Company emerged from a background in vehicle tracking and fleet management. Over a period of more than 15 years, the business has built a solid reputation for designing, developing and selling innovative fleet management technology and vehicle tracking services for the consumer and commercial vehicle market. The Company's activities span the globe and the Company employs over 800 people worldwide. The Company is listed on both the JSE in South Africa, share code "MIX" and the NYSE in New York, share code "MIXT", and is based on an ethos of partnership and entrepreneurship.

2. COMPANY DETAILS

Details of the Company entities to which this manual applies (does not apply to dormant companies):

Registered Name	Registration Number
MiX Telematics Limited*	1995/013858/06
MiX Telematics Africa (Pty) Ltd	2004/019797/07
MiX Telematics International (Pty) Ltd	1963/006970/07
MiX Telematics Enterprise SA (Pty) Ltd	2008/008530/07
MiX Telematics Fleet Support (Pty) Ltd	2008/001149/07

*Holding company

Contact Details:

Registered Address:	Matrix Corner Howick Close Waterfall Park Bekker Road Midrand 1682 Gauteng
Postal Address:	P.O. Box 12326 Vorna Valley, 1686 South Africa
Telephone Number	011 654 8000
Fax Number	011 654 8122
Chairman	Richard Bruyns
Chief Executive Officer	Stefan Joselowitz
Designated Information Officer	Gert Pretorius
Email address of Information Officer	gert.pretorius@mixtelematics.com
Website	www.mixtelematics.com

3. THE ACT

3.1 The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3.2 Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in Chapter 3 of Part 3 of the Act.

3.3 Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission (SAHRC), which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC. The contact details of the SAHRC are:

Postal Address:	Private Bag 2700 Houghton 2041
Telephone:	+27 11 877 3600
Fax:	+27 11 403 0625
Website:	www.sahrc.org.za

4. INFORMATION AVAILABLE IN TERMS OF THE ACT

The Company maintains records, including but not limited to the categories and subject matters outlined below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be successful.

All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act. There may be applicable grounds of refusal of such a request, as set out in the Act.

4.1 Company Secretarial:

- Memoranda of Incorporation of the Company
- Documents of Incorporation
- Securities registers and other statutory reports
- Board meeting minutes

4.2 Employees:

- Any personal records provided to us by our personnel
- Employment contracts
- Employment policies and procedures
- Internal evaluation and disciplinary records
- Employment Equity Policy
- Occupational Health and Safety

4.3 Customer and prospective customers:

- Customer contact details

- Credit bureau reports
- Voice recorded phone calls

4.4 Other records:

- Marketing records
- Insurance records
- Financial records
- Taxation and accounting records

4.5 Records which are available without a person having to request access:

The Company does make certain information freely available to the public in various brochures, press releases, and publications and on its website (www.mixtelematics.com).

5. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Where applicable to our operations, information is also available in terms of certain provisions of applicable statutes, including but not limited to:

- Basic Conditions of Employment Act 75 of 1997;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993;
- Diseases Act no 130 of 1993;
- Income Tax Act 58 of 1962;
- Insolvency Act 24 of 1936;
- Labour Relations Act 66 of 1995;
- Occupational Health & Safety Act 85 of 1993;
- Regional Service Council Act 109 of 1985;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Unemployment Contributions Act 4 of 2002;
- Value Added Tax Act 89 of 1991;
- Electronic Communication and Transactions Act 25 of 2002.

6. FORM OF REQUEST

6.1 Annexure 1 – Completion of From C

As prescribed by the Act, any request for information must be contained in Form C, which is available from the SAHRC website (www.sahrc.org.za). For the convenience of requesters, a copy of this form is included in this Manual (Annexure 1 – Form C).

Form C must be completed in full and returned to the Company for attention of the Designated Information Officer, together with any other information that the Company requires in order to consider and decide on the request. A request, which does not comply with the formalities, as

prescribed by the Act will be forwarded back to the requester with advice on the necessary steps for compliance (this includes forms that are not completed in full).

A requester needs to provide the Company with sufficient details to enable it to identify:

- The record(s) requested;
- The requester (and if an agent is lodging the request, proof of capacity);
- The form of access required;
- The postal address or fax number of the requester within South Africa;
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

The Company will not consider a request unless it is contained in Form C. The Company will make copies of the mentioned form available on request.

6.2 Proof of Identity

Proof of identity is required to authenticate the request and the requester. In view hereof a requester will, in addition to Form C, be required to submit acceptable proof of identity such as a certified copy of their identity document or other legal forms of identity.

6.3 Notification Period

All requests complying with the requirements set out above will be processed and considered expeditiously.

Whatever decision is taken, the requester will be given notice of the decision in writing. The Act requires that such notification be given within 30 days of the decision being made. In case of a request being refused, the notification will include the reasons for the refusal.

Please note that the Company may extend the 30 day notice period if it is necessary due to the nature of the request and the amount of time required to gather the requested information. The requester will however be given notice of the extension prior to the 30 day period's expiry.

The head of the private body will then make a decision on the request and notify the requester in the required form.

Kindly note that all requests to the Company will be evaluated and considered in accordance with the Act. Publication of this Manual and describing the categories and subject matter of information held by the Company does not give rise to any rights to access such information of records, except in terms of the Act.

7. FEES

7.1 Request Fee (not applicable to a personal requester)

The requester needs to pay the request fee as prescribed by the Minister for Justice and Constitutional Development, before the request will be processed.

7.2 Deposit (not applicable to a personal requester)

The requester needs to pay a deposit if the search and the preparation of the requested records, are estimated to take more than 6 hours.

7.3 Access Fee

The requester needs to pay an access fee as prescribed by the Minister for Justice and Constitutional Development to enable the company to recover the cost of processing a request and giving access to records in terms of the Act.

Please note: A request will not be processed until the prescribed fees have been paid and where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

For convenience, the fees schedule is included in this Manual (Annexure 2 – Fees).

8. AVAILABILITY OF THE MANUAL

This Manual is available free of charge at the offices of the Company, in electronic format at www.mixtelematics.com and from the SAHRC (as soon as it is published).

m'X TELEMATICS
MOBILE INFORMATION EXCHANGE

Annexure 1 – Form C

Request for Access to record of a Private Body
Section 53 (1) of the Promotion of Access to the Information Act 2 of 2000 - Regulation 10

A. Particulars of private body	
The Head:	
B. Particulars of person requesting access to the record	
a. The particulars of the person who requests access to the record must be given below. b. The address and/or fax number in the Republic to which the information is to be sent must be given. c. Proof of the capacity in which the request is made, if applicable, must be attached.	
Full names and surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email 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 be completed ONLY if a request for information is made on behalf of another person	
Full names and surname:	
Identity number:	
D. Particulars of record	
a. Provide full particulars of the record b. If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.**	
1. Description of record or relevant part of the record:	
2. Reference number if available:	
3. Any further particulars of record:	
E. Fees	
a. 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. b. You will be notified of the amount required to be paid as the request fee. c. 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. d. If you qualify for exemption of the payment of any fee, please state the reason for exemption.	
Reason for exemption from payment of fees:	

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**.

NOTES:

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

1. If record consists of visual images (this includes photographs, slides, video recording, computer-generated images, sketches, etc.)

	View the images		Copy of the images *		Transcription of the images *

1. 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)

2. 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 * (CD or DVD)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage payable.	**YES**	**NO**

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. 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

Annexure 2 – Fees

1. Access Fees for Reproduction		
1.1	For every photocopy of an A4 size page or part thereof	R1.10
1.2	For every photocopy of an A4 size page or part thereof held on a computer or in electronic or machine readable form	R0.75
1.3	For a copy in a computer –readable form on CD	R70.00
1.4	For a transcription of visual images	R40.00
1.5	For a copy of visual images	R60.00
1.6	For a transcription of an audio record for an A4-size page or part thereof	R20.00
1.7	For a copy of and audio record	R30.00
2. Access Fee for Time Spent		
2.1	The time reasonable required to search for the record for disclosure and preparation	R30.00 / hr or part of
3. Request fee		
3.1	Request fee for a person other than a personal requester	R50.00
4. Deposit		
4.1	One third of the access fee is payable as a deposit by the requester (other than a personal requester)	
5. Postal Fee		
5.1	When a copy of a record must be posted to the requester	Actual postal fee
6. Appeal Fees		
6.1	For lodging an internal appeal by a requester against the refusal of his/her request for access to a record	R50.00
7. VAT		
7.1	Private bodies registered under the Value Added Tax Act, 1991 may add VAT to all the above mentioned fees	