

VISTA INTERNATIONAL ENTERTAINMENT SOLUTIONS SOUTH AFRICA (PTY) LTD

(Registration number: 2016/329805/07)

MANUAL ISSUED IN TERMS OF:

**SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA") READ WITH
THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 ("POPIA")**

CONTENTS

1. Introduction
2. Contact details
3. Guide on how to use PAIA
4. Records available in terms of any other legislation
5. Access to records
6. The request procedure and fees
7. Other information as may be prescribed
8. Availability of the Manual
9. Acknowledgment

1. Introduction

This Manual (the **Manual**) has been compiled in accordance with the requirements of PAIA, read with the relevant sections of POPIA.

Vista International Entertainment Solutions South Africa (Pty) Ltd (the **Company**) is a private body as defined in PAIA, and this Manual contains the information specified in section 51 of PAIA, which is applicable to such a private body.

The Company forms part of the Vista Group of Companies headquartered in New Zealand (the **Vista Group**). The Vista Group provides software and technology solutions for the global film industry and has offices in South Africa, New Zealand, the United Kingdom, the United States, the Netherlands and Mexico.

A copy of the Manual will be made available to the Information Regulator, upon request, and any controlling body of which the Company is a member, if required, and will be published on the Company's website.

The Manual will be updated on a regular basis in accordance with the requirements of section 51(2) of PAIA.

2. Contact Details

In accordance with his letter of authorisation dated 25 March 2026, Kelvin Preston is regarded as the head of the Company for purposes of PAIA, as well as the Company's information officer for purposes of POPIA.

In addition, Ashley van Niekerk has been designated as deputy information officer for purposes of PAIA and POPIA (referred to as **deputy information officer** or **DIO**).

Their contact details are as follows:

Information Officer (IO):

Telephone: +64 9 984 4570

E-mail: privacy@vista.co

Deputy Information Officer (DIO):

Telephone: +27 21 300 2770

Email: privacy@vista.co

Company Postal address:

2 Heron Crescent, Century Square, Century City, Cape Town, 7441

Company Physical address:

2 Heron Crescent, Century Square, Century City, Cape Town, 7441

3. **Guide on how to use PAIA**

- 3.1 PAIA 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 for information from the Company, the public body must be acting in the public interest. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided.
- 3.2 The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised guide on how to use PAIA (the **Guide**), in an easily and comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 3.3 The Guide is available in each of the official languages and in braille.
- 3.4 The Guide contains a description of –
 - 3.4.1 the objects of PAIA and POPIA;
 - 3.4.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 3.4.2.1 the information officer of every public body, and
 - 3.4.2.2 every deputy information officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 3.4.3 the manner and form of a request for-
 - 3.4.3.1 access to a record of a public body contemplated in section 11 of PAIA; and
 - 3.4.3.2 access to a record of a private body contemplated in section 50 of PAIA;

- 3.4.4 the assistance available from the information officer of a public body in terms of PAIA and POPIA;
- 3.4.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 3.4.6 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-
 - 3.4.6.1 an internal appeal;
 - 3.4.6.2 a complaint to the Regulator; and
 - 3.4.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal, a decision by the Regulator, or a decision of the head of a private body;
- 3.4.7 the provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 3.4.8 the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 3.4.9 the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- 3.4.10 the regulations made in terms of section 92 of PAIA.
- 3.5 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.
- 3.6 The Guide can also be obtained-
 - 3.6.1 upon request to the Information Officer of the Company;
 - 3.6.2 from the website of the Regulator (<https://info regulator.org.za/>).
- 3.7 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours at the Company's premises - English and Afrikaans.
- 3.8 The contact details for the Information Regulator are (at present) as follows:

The Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Telephone number: +27 (0)10 023 5200 / +27 (0)800 017 160

Website: <https://info regulator.org.za/>

E-mail: enquiries@info regulator.org.za / PAIAComplaints@info regulator.org.za

4. **Records available in terms of any other legislation**

- 4.1 The Company holds details of its own registration, together with its financial statements, information pertaining to its directors and shareholders and other corporate information required to be retained in terms of the Companies Act, 2008.
- 4.2 It holds information relating to its tax affairs in terms of the Income Tax Act, 1962 (the **ITA**), the Tax Administration Act, 2011, the Value Added Tax Act, 1991 as well as the Unemployment Insurance Contributions Act, 2002 and the Skills Development Levies Act, 1999.
- 4.3 The Company holds information pertaining to its employees as required in terms of applicable employment and other relevant legislation including the Basic Conditions of Employment Act, 1997, the Labour Relations Act, 1995, the Employment Equity Act, 1998, the Occupational Health and Safety Act, 1993, the Compensation for Occupational Injuries and Diseases Act, 1993, the Immigration Act, 2002 and the ITA.
- 4.4 The Company holds information pertaining to its clients in terms of the Financial Intelligence Centre Act, 2001.

5. **Access to records**

- 5.1 For purposes of facilitating a request in terms of PAIA, the information below includes a description of the subjects on which the Company holds records and the categories into which these fall. This information is not exhaustive and may be amended from time to time.
- 5.2 Certain records are available without having to be requested in terms of the request procedures set out in PAIA and detailed in paragraph 6 of the Manual below.
- 5.3 Subject to the provisions of PAIA, information may be inspected, collected, purchased or copied at the offices of the Company and, unless the records are available on the Company's website, an appointment to view the records will have to be made with the information officer or the deputy information officer. The schedule of reproduction fees in relation to a section 52 information request are set out in paragraph 6.2.1 below.
- 5.4 Categories of record of the Company which are available to a person without having to request access in terms of PAIA:

Category	Description	Format	Maintained by	Stored at	Statutory Retention period*
Information in the public domain	Incorporation documents	Electronic copy	Vista Group Legal Team	Electronically available	7 years
	Annual reports	Electronic copy	Vista Group Finance Team	Electronically available including at https://vista.group.co.nz	7 years

Category	Description	Format	Maintained by	Stored at	Statutory Retention period*
				/investor-centre?_gl=1*uvvweo*up*MQ..*ga*MTUzOTU3OTc0MC4xNzcwMDYwODMw*_ga_E6HC587E4L*cze3NzAwNjA4MjkkbzEkZzEkdDE3NzAwNjA4MjkkajYwJGwwJGgw	
	Audited financial statements	Electronic copy	Vista Group Finance Team	Electronically available at https://vista-group.co.nz/investor-centre?_gl=1*uvvweo*up*MQ..*ga*MTUzOTU3OTc0MC4xNzcwMDYwODMw*_ga_E6HC587E4L*cze3NzAwNjA4MjkkbzEkZzEkdDE3NzAwNjA4MjkkajYwJGwwJGgw	7 years
	Public statements and communications	Electronic copy	Vista Group Finance and Legal Teams	Electronically available including at https://vista-group.co.nz/investor-centre?_gl=1*uvvweo*up*MQ..*ga*MTUzOTU3OTc0MC4xNzcwMDYwODMw*_ga_E6HC587E4L*cze3NzAwNjA4MjkkbzEkZzEkdDE3NzAwNjA4MjkkajYwJGwwJGgw	Indefinite

Category	Description	Format	Maintained by	Stored at	Statutory Retention period*
	General information pertaining to the Company and information regarding the services rendered	Electronic copy	Vista Group Marketing Team	Electronically available including at: https://vista.group.co.nz/?_gl=1*3wtmfa*_up*MQ_*_ga*MTUzOTU3OTc0MC4xNzcwMDYwODMw*_ga_E6HC587E4L*cZ_E3NzAwNjA4MjkkbzEkZzEkdDE3NzAwNjA5NzgkajYwJGwwwJGgw	Indefinite

** In appropriate circumstances, these records may be retained beyond the statutory retention period for historical, statistical and research purposes. This will be subject to security measures protecting the information against unauthorised access and preventing use of the records for another purpose.*

5.5 The records listed below, which need to be requested in terms of PAIA and/or POPIA, will not in all instances be provided to a requester. In other words, the records held under the various subjects are not automatically available and access to them is subject to the nature of the information contained in the record, as well as the grounds of refusal as set out in PAIA that may be applicable to a request for such records. (See also paragraph 6.1.6 below.) The procedure in terms of which such records may be requested from the Company is set out in paragraph 6.1 below.

5.6 Categories of records that may be requested in terms of PAIA and/or POPIA:

Subjects on which the body holds records	Category / description of record	Format	Maintained by	Retention period
Finance and administration	Company registration records; Bank account records; Books and records of account and financial statements; Annual budget; VAT, SITE and PAYE records; Asset registers; Details of auditors;	Hard copy and electronic copy	Vista Group Finance Team	As required in terms of applicable legislation / as required in terms of applicable contracts

Subjects on which the body holds records	Category / description of record	Format	Maintained by	Retention period
	External auditor reports; Information pertaining to clients as required in terms of the Financial Intelligence Centre Act.			
Management	Minutes of meetings of the Executive Committee and subcommittees; Internal correspondence; Resolutions and directives; internal investigation reports; Policies, procedures, and codes; Travel management and arrangements.	Hard copy and electronic copy	Vista Group Legal Team	As required in terms of applicable legislation / as required in terms of applicable contracts
People and Culture	Organisational information (organisational structure, etc.); Personnel files; Contracts, conditions of service and other agreements; Statutory employee records; Immigration documentation; Retirement fund records; Medical aid records; Employee leave records; Employee payments and benefits (statutory and contractual); Correspondence with or about employees; Performance management records;	Hard copy and electronic copy	Vista Group People & Culture Team	As required in terms of applicable legislation / contracts of employment

Subjects on which the body holds records	Category / description of record	Format	Maintained by	Retention period
	Records of disciplinary hearings and findings; Records of incapacity proceedings, including medical information; Records of occupational injuries and diseases.			
Relationships with third parties	Agreements with stakeholders; Service level agreements with suppliers; Contact details of suppliers; Tender and bid documentation; Service level agreements; Details of customers / clients including contact details, details pertaining to transactions, loyalty programmes, etc.	Hard copy and electronic copy	Vista Group Legal Team	As required in terms of applicable legislation / as required in terms of applicable contracts
Information technology	Computer software; Support and maintenance agreements; Licensing agreements; Records regarding computer systems and programmes.	Hard copy and electronic copy	Vista Group Legal Team and IT Team	As required in terms of applicable legislation / as required in terms of applicable contracts
Property	Asset registers; Lease agreements in respect of immovable property; Records regarding insurance in respect of movable or immovable property.	Hard copy and electronic copy	Vista Group Legal Team and Business Operations Team	As required in terms of applicable legislation / as required in terms of applicable contracts

Subjects on which the body holds records	Category / description of record	Format	Maintained by	Retention period
Legal	Contracts and memoranda of understanding; Regulatory permissions, licenses, and/or exemptions.	Hard copy and electronic copy	Vista Group Legal Team	As required in terms of applicable legislation / as required in terms of applicable contracts

5.7 For purposes of POPIA:

5.7.1 For the purposes of facilitating a request for personal information, the information below includes details of: the purpose of the processing of personal information by the Company; a description of the categories of data subjects; the information or categories of information relating to data subjects held by the Company; the recipients or categories of recipients to whom personal information may be supplied, planned transborder flows of personal information; and a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the Company to ensure the confidentiality, integrity and availability of the information which is to be processed.

5.7.2 In terms of POPIA, a requester (to whom certain personal information relates) may request the Company to confirm, free of charge, whether or not it holds personal information about that particular requester.

5.7.3 A requester may make a request that the Company provides the record or a description of the personal information about the requester which is held by it, including information about the identity of third parties, or categories of third parties, who have, or have had, access to the information. This request must be made within a reasonable time, in a reasonable manner and format, at a fee, and in a form that is generally understandable.

5.7.4 Categories of data subjects and categories of personal information relating thereto:

Data subjects	Categories of information
Employees	Human resources information (see above)
Applicants for employment	Contact details Recruitment records
Referees	Contact details Views or opinions provided about applicants for employment
Alumni / previous employees	Contact details

	Human resources information, as required to be retained post-termination of employment (see above)
Clients	Company registration details Contact details Take-on information in terms of the Financial Intelligence Centre Act, 2001 Details of services provided and fees charged Demographic information
Contractors / suppliers	Company registration details Contact details and banking details Details of services rendered and fees paid Demographic information

5.7.5

Purposes of processing:

Data subject category	Broad description of purposes of processing
Applicants for employment;	To carry out actions for the consideration of an application for employment; To carry out actions necessary for the conclusion of an employment contract; To ensure compliance with an obligation imposed by law on the Company; To pursue the legitimate interests of the Company.
Employees	To carry out actions necessary for the performance of the employment contract; To ensure compliance with an obligation imposed by law on the Company; To pursue the legitimate interests of the Company or a third party to whom the information is supplied.
Alumni	To ensure compliance with an obligation imposed by law on the Company; To pursue the legitimate interests of the Company or a third party to whom the information is supplied.
Referees	To carry out actions for the consideration of an application for employment.

Clients	To carry out actions necessary for the performance of the services contract; To ensure compliance with an obligation imposed by law on the Company; To pursue the legitimate interests of the Company or a third party to whom the information is supplied.
Contractors / service providers	To carry out actions necessary for the performance of the services contract; To ensure compliance with an obligation imposed by law on the Company; To pursue the legitimate interests of the Company or a third party to whom the information is supplied.

5.7.6

Likely recipients:

Data subjects	Likely recipients (including external third parties)
Applicants for employment; Employees; Alumni.	People and Culture department Finance department Line management Regulatory bodies Benefit providers
Referees	Human resources department Line management
Clients	Employees working on client mandates Regulatory bodies
Contractors / Service providers	People and Culture department Finance department Legal department

5.7.7

Planned transborder flows of personal information:

Yes	
The Company transfers personal information to other Vista Group entities located outside South Africa, including to Vista offices in New Zealand, the United Kingdom, the United States, the Netherlands, Mexico, and any other jurisdictions in which the Vista Group has offices. The Company also transfers personal information to its third party sub-processors located outside of South Africa to facilitate the provision of the Vista services to its customers. The categories of information transferred and the purposes of transfer include the following: Employee, applicant and referee data • Transferred to: Vista Group's People & Culture Team in New Zealand, and where necessary, other authorised Vista Group personnel in other jurisdictions. • Purpose: Centralised recruitment, People & Culture administration, performance management, to carry out actions necessary for the performance of the employment contract. Customer and end-user data • Transferred to: Vista Group entities in New Zealand, the United Kingdom, the United States, the Netherlands and Mexico under the Vista Group's intra-group processing agreement. • Purpose: Provision of follow-the-sun support, technical troubleshooting, maintenance and enhancement of Vista software. Customer and supplier data transferred to third-party sub-processors • Transferred to external third party sub-processors as permitted under customer or supplier agreements. • Purpose: To aid the provision of Vista services including hosting, infrastructure and other features and support necessary for delivering Vista's services, and to aid the provision of services by suppliers to the Company.	

5.7.8

General description of information security measures:

Technical measures	Organisational measures
Role-based access controls and authorized-device access; encryption, pseudonymisation where feasible, and encrypted data transfers; physical security controls and secure disposal of	Access removal for role changes and leavers; no access for former staff/consultants; secure handling, approval, and destruction of anonymised and non-anonymised databases in accordance with customer contracts;

media/devices; best-practice passwords, hard-drive encryption, firewalls and logging of failed logins; backup, restoration capability, scans, penetration testing and patching.	employee onboarding training in security and data protection; incident response procedures, breach awareness training, and maintenance of internal Security Incident Response Plan.
---	---

6. The request procedure

6.1 Form of request

- 6.1.1 A request for access to records held by the Company in terms of section 53 of PAIA must be made on a form that corresponds substantially with Form 2 of Annexure A to the Regulations Relating to the Promotion of Access to Information, 2021. A copy of the form is provided as a link in Schedule A to the Manual. The request must be made to the information officer / deputy information officer of the Company at the address, telefax number or e-mail address specified in paragraph 2 above.
- 6.1.2 The requester must provide sufficient detail on the prescribed form to enable the information officer / deputy information officer of the Company to identify the record and the identity of the requester. The requester must submit details of the capacity in which the requester is making the request and indicate whether the request is made in their own name or on behalf of another person. Proof of identity of the requester must be attached to the request if it is in their own name. If a request is made on behalf of another person or entity, the requester must attach proof of authorisation to make the request.
- 6.1.3 The requester is also required to indicate what type of record s/he/it is requesting and what form of access to the relevant records is required. Additionally, the requester must provide her/his/its contact details and indicate what manner of access is requested.
- 6.1.4 The requester must provide particulars of the right to be exercised or protected and explain why the record requested is required for the exercise and protection of the aforementioned right.
- 6.1.5 For the purposes of Form 2, the requester must comply with all the procedural requirements in PAIA relating to a request for access to the relevant records.
- 6.1.6 The Company may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA. These grounds include that: access would result in the unreasonable disclosure of personal information about a third party; it is necessary to protect the commercial information of a third party or the Company itself; it is necessary to protect the confidential information of a third party; it is necessary to protect the safety of individuals or property; a record constitutes privileged information for legal proceedings; or it is necessary to protect the research information of a third party or the Company itself.
- 6.1.7 If all reasonable steps have been taken to find a record that a requester has requested, and there are reasonable grounds for believing that the record is in the Company's possession but cannot be found, or it does not exist, then the information officer or deputy information officer will, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to that record.

6.1.8 The information officer/deputy information officer must, if a request for access to a record is granted or refused, inform a requester of her/his decision and the fees payable. This must be done on a form that corresponds substantially with Form 3 of Annexure A to the Regulations. A request for a copy of the Guide may not be refused. If the requester wishes to be informed of the Company's decision in another manner as well, this must be set out in the request and the relevant details included in order to allow the Company to inform the requester in the preferred manner.

6.1.9 The Company will make a decision in relation to a request for records within 30 days of receiving it, unless a third party notification and intervention, as contemplated in Chapter 5 of PAIA, applies. This period may be extended in appropriate circumstances, in accordance with section 57 of PAIA.

6.2 Fees

6.2.1 The access fees for reproduction of information that is automatically available from the Company (a section 52 request), are as follows:

(a)	For every photocopy/printed black and white copy of an A4-size page or part thereof.	R2,00
(b)	For every printed copy of an A4-size page or part thereof	R2,00
(c)	For copy in a computer-readable form on: (i) flash drive (to be provided by requestor) (ii) compact disc - If provided by requestor - If provided to the requestor	R40,00 R40,00 R60,00
(d)	For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
(e)	For a copy of visual images	Service to be outsourced, will depend on quotation from service provider.
(f)	For a transcription of an audio record, for an A4-size page	R24,00
(g)	Copy of an audio record, per A4-size page (i) flash drive (to be provided by requestor) (ii) compact disc - If provided by requestor - If provided to be requestor	R40,00 R40,00 R60,00

6.2.2

The request fee and access fees for information which needs to be requested in terms of PAIA and/or POPIA (a section 53 request) are as follows:

(a)	Request fee payable by every requester	R140.00
(b)	For every photocopy/printed black and white copy of an A4-size page or part thereof	R2,00
(c)	For every printed copy of an A4-size page or part thereof	R2,00
(d)	For copy in a computer-readable form on: (i) flash drive (to be provided by requestor) (ii) compact disc - If provided by requestor - If provided to the requestor	R40,00 R40,00 R60,00
(e)	For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
(f)	For a copy of visual images	Service to be outsourced, will depend on quotation from service provider.
(g)	For a transcription of an audio record, for an A4-size page	R24,00
(h)	For a copy of an audio record (i) Flash drive (to be provided by requestor) (ii) Compact disc - If provided by requestor - If provided to the requestor	R40,00 R40,00 R60,00
(i)	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably. To not exceed a total cost of:	R145,00 R435,00
(j)	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items (b) to (h).
(k)	Postage, e-mail or any other electronic transfer	Actual expense, if any.

- 6.2.3 The request fee must be paid before the request will be considered.
- 6.2.4 Where a request for access to a record or records held by the Company is granted, the requester also has to pay an access fee for the reproduction of the record or records and for the search for and the preparation of the records for disclosure. The access fee amount depends on the form in which access is required and the reasonable time required to search for and prepare the record. The requester will be notified of the amount of the access fee. The Company is entitled to withhold a record until the required access fees have been paid.
- 6.2.5 The information officer may inform the requester to pay, as a deposit, a portion of the access fee (not exceeding one third of the amount payable) if the request is granted and if the search for the record and the preparation of the record for disclosure would in the information officer's opinion require more than six hours.
- 6.2.6 If a request is granted, the deposit (if any), is payable before the request will be processed and the requested record or portion thereof will only be released once proof of full payment is received.

6.3 Remedies for refusal to request for information

6.3.1 *Internal remedy*

- 6.3.2 The Company does not have an internal appeal procedure. As such, the decision made by the information officer or deputy information officer is final. In the event that the request for information is refused and requestor is not satisfied with the answer supplied by the information officer or deputy information officer, requestor will have to exercise the external remedy at their disposal (described below). *External remedy*

Where a requester is not satisfied by a decision made by information officer or deputy information officer of the Company, s/he/it may submit a complaint to the Information Regulator, or apply to court for relief, within 180 days of receiving the decision that has caused the grievance. The court application can be made to a Magistrate's Court or High Court.

7. **Other information as may be prescribed**

The amended Regulations published in terms of PAIA, under Government Notice R757 in *Government Gazette* 45057 of 27 August 2021, set out, among other things, the fees which may be charged by private bodies for the reproduction of records (provided in the table above).

8. **Availability of the Manual**

This Manual is available at the offices of the Company at the address set out in paragraph 2 above, as well as on the Company's website (<https://vistagroup.co.nz/investor-centre>).

9. **Acknowledgement**

The Manual has been based on an original template supplied by the SAHRC and amended accordingly based on a template supplied by the Information Regulator.

FORM 2

REQUEST FOR ACCESS TO RECORD

(Section 53(1) of the Promotion of Access to Information Act, 2000)

[Regulation 7]

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

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

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

**FORM 5
COMPLAINT FORM
[Regulation 10]**

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>