

**Nagarro (PTY) LTD**

(Referred as Nagarro or Company)

**PAIA MANUAL**

In accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 as amended (PAIA)

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## Introduction

### Purpose of the PAIA Manual

This PAIA Manual is useful for the public to-

- check the categories of records held by a private body which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of the private body, by providing a description of the subjects on which the private body holds records and the categories of records held on each subject;
- know the description of the records of the private body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- know if the private 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- know if the private 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;
- know whether the private body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### Key Contact Details for Access to Information

Company Registration: Nagarro (Pty) Ltd	2018/11072/07
Information Officer ("IO") and Executive Director	Pauline-Wendy Kunene pauline-wendy.kunene@nagarro.com
Deputy Information Officer ("DIO")	Neeru Walia
Address 1	Suite 28, 106 Johan Avenue, Sandton, Johannesburg 2196, South Africa
Address 2	4th Floor 04-122,155 West St, Sandton, South Africa
Telephone	(010) 003-7479
Email	dpo@nagarro.com
Website	<a href="http://www.nagarro.com">www.nagarro.com</a>

### Availability of the Manual

A copy of the Manual is available-

- on ([www.nagarro.com](http://www.nagarro.com)), if any;
- office of the Nagarro (Pty) Ltd for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, shall be payable per each A4-size photocopy made in line with the prescribed fee section. Nagarro will regularly update this manual, and the updated Manual will be published on the website.

### Description of the PAIA Guide as described in the section 10 of PAIA

The Information Regulator (“Regulator”) has in terms of section 10(1) of PAIA, as amended, updated and made available the revised PAIA Guide (“Guide”) which provides information and guidance that is needed by any person who wishes to exercise any right contemplated in the PAIA and POPIA.

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- 1) an internal appeal; 2) a complaint to the Regulator.

The Guide has been published in 10 official languages on the Regulator's website on <https://info regulator.org.za/training/wp/paia-guidelines/>

Members of the public can also inspect or make copies of the Guide from the office of the Regulator, during normal working hours. Any questions or queries relating to the Guide published by the Information Regulator must be addressed to:

Physical Address	JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001.
Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Phone	+27 (0)10 023-5200 / +27 (0) 82 746-4173
Website	<a href="https://info regulator.org.za">https://info regulator.org.za</a>
E mail	<a href="mailto:enquiries@info regulator.org.za">enquiries@info regulator.org.za</a>

## Categories of records automatically available

The categories of information listed are not exhaustive but are merely meant to give a broad indication of the information subject and categories held by Nagarro, without specification. A category may therefore contain sub-categories and sub-sets of information, which are not specifically listed.

The following Records are automatically available without a person having to request access in terms of the Act:

The web page [www.nagarro.com](http://www.nagarro.com) is accessible to anyone who has access to the Internet. Nagarro's website hosts the following categories of information:

Category of records	Available on Website	Available upon request
Products and Services	X	X
Annual Report and Press releases	X	X
News and marketing information	X	X
Corporate communications	X	X
Privacy Statement and PAIA Manual	X	X
Job Advertisements	X	X

## Categories of records that are not readily available

Each request for information will be dealt with on a case-by-case basis and the mere fact that a record is listed below does not mean that access to that record will be granted and that access to them may be refused in accordance with Sections 62 to 69 of the Act. Please note that the below list is not exhaustive.

Subjects on which the body holds records	Categories of records
Human Resources	HR policies and procedures Job posting Employee database Disciplinary action Job profiles Performance management Staff benefits and incentives Training and skills development SETA/other accreditation
Compliance	BBBEE compliance Internal auditing and risk Legislative compliance Regulatory reports Policies and procedures Membership with industry bodies
Corporate Governance	Annual reports Board and Sub-Committee Administration Company Directorships Company Registrations Strategic Management
Financial	Audit management Financial Statements Budgets Creditors control Debtors control Insurance Management accounts Financial and Tax Records Asset Register
Marketing	Marketing and promotions Market research and surveys Product Brochures Member Handbook Sales Records Marketing strategies Customer Database Brand licencing Agreements Social Media activity
Public Affairs	Media statements NCAP Reports Road safety projects Research and Development projects Affiliations Donations/funding received
Operations	Vendor/supplier Database Membership of industry bodies and associations
IT	Information systems

Subjects on which the body holds records	Categories of records
	Network security Software licences Technology assets Disaster Recovery
Procurement	Contracts/Agreements Compliance documentation of service providers Procurement proposals and tenders Service provider records Service Level Agreements
Property Management	Building management Preventative and reactive maintenance Safety Audits Surveillance records

## Description of the record which are available in accordance with any other legislation

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
POPI Act	Protection of Personal Information Act No 4 of 2013
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Tax	Value-Added Tax Act No 89 of 1991 Income Tax Act No 58 of 1962
Governance	King IV Code Companies Act, 71 of 2008
Competition Law	Competition Act No 89 of 1998
Auditing	IFRS and various other codes and legislation (auditing)
Administration	Regulations for the Retention and Preservation of Company Records, 1983
Finance and Tax	Financial Sector Regulation Act 2017
Exports and Imports	Customs and Excise Act 91 of 1964
Company Intellectual Records / Property	Trademarks Act No 194 of 1993 Copyright Act 98 of 1978
Trade Name	Business Names Act 27 of 1960
Public Holidays	Public Holidays Act 36 of 1994
Intellectual Property	Copyright Act 98 of 1978
Disciplinary and Grievance Procedures	Arbitration Act, 1965 (Act 42 of 1965)
Transformation & Compliance	Broad Based Black Economic Empowerment Act 53 of 2003 BBBEE Codes of Good Practice
Privacy Policy / Disclaimer / Terms & Conditions	Consumer Protection Act 68 of 2008
Employment Equity Policy & EEA1 forms	Employment Equity Act No 55 of 1998
Disciplinary Policy Procedure	Labour Relations Act No 66 of 1995
Display of Human Rights Charter on Website	Constitution of South Africa Act No 108 of 1996
Leave Policy, Recruitment Policy, The Constitution	Basic Conditions of Employment Act No 75 of 1997
Non-Discrimination related Policies	Promotion of Equality and Prevention of Unfair Discriminations Act 4 of 2000
Display of Human Rights Charter on Website	Human Rights Commission Act, 1994 (Act 54 of 1994)
Display of Human Rights Charter on Website	South African Human Rights Commission Act, 2013 (Act 40 of 2013)
Learning Policy and Wage Bill towards Skills Development	Skills Development Levy Act No 9 of 1999
YES 4 Youth Programme	Skills Development Act No 97 of 1998
Proof of registration for UIF	Unemployment Insurance Act No 63 of 2001
Proof of registration for UIF	Unemployment Insurance Contributions Act 4 of 2002
Health and Safety Policy	Occupational Health and Safety Act No 85 of 1993



Health and Safety Policy	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Anti-Corruption	Prevention and Combating of Corrupt Activities Act 12 of 2004
Environmental Management Policies	National Environment Management Act 107 of 1998
Environmental Management Policies	National Environmental Management Waste Act 59 of 2008
Labour and Employment	Basic Conditions of Employment Act, 75 of 1997 Compensation for Occupational Injuries and Diseases Act, 130 of 1993 (COIDA) Occupational Health and Safety Act, 85 of 1993 (OHSA)

## Processing of Personal Information

Please visit the Nagarro Privacy Policy on Nagarro website ([www.nagarro.com](http://www.nagarro.com)) on how we process Personal Information of Data Subjects.

### Purpose of Processing Personal Information

The purpose for which personal information is processed by Nagarro will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

<b>Data subjects</b>	<b>Purpose of processing</b>
Applicants for employment	<ul style="list-style-type: none"><li>• To carry out interviews for consideration of an application for employment</li><li>• To carry out actions necessary for the conclusion of an employment contract</li></ul>
Employees	<ul style="list-style-type: none"><li>• To carry out actions necessary for the performance of the employment contract</li><li>• To ensure compliance with an obligation imposed by law on the Company</li><li>• To pursue the legitimate interests of the Company or a third party to whom the information is supplied</li></ul>
Former employees	<ul style="list-style-type: none"><li>• To ensure compliance with an obligation imposed by law on the Company;</li><li>• To pursue the legitimate interests of the Company.</li></ul>
Customers and Vendors	<ul style="list-style-type: none"><li>• To carry out actions necessary for the performance of the services contract;</li><li>• To ensure compliance with an obligation imposed by law on the Company;</li><li>• To pursue the legitimate interests of the Company or a third party to whom the information is supplied.</li></ul>
Website Visitor	<ul style="list-style-type: none"><li>• To pursue the legitimate interests of the Company.</li></ul>
Office Visitors	<ul style="list-style-type: none"><li>• To pursue the legitimate interests of the Company.</li></ul>

### Description of the categories of Data Subjects and categories of information

The following data subjects, and personal information processed, have been identified by the organisation:

<b>Data subjects</b>	<b>Categories of information</b>
Applicants for employment	Contact details Educational qualifications Recruitment records
Employees	Employment related information
Former employees	Human resources information, as required to be retained post-termination of employment (see above)
Customers and Vendors	Contact details, Email address, Office address and banking details
Marketing Leads	Name, contact details, online identifiers and cookies as per preference
Office Visitor	Name, contact details and identification document for verification, if required

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

<b>Data subjects</b>	<b>Likely recipients (including external third parties)</b>
Applicants for employment; Employees; Former employees Visitor	Human resources team Finance team Hiring team and agencies Nagarro Group
Customer / Service providers	Human resources team Finance team Nagarro Group
Marketing lead	Marketing and Sales team of the Group
Office visitors	Administration team Information Security team The Group

### Planned transborder flows of personal information

Nagarro transfers personal information to other companies within the Group. In this regard, the Company transfers personal information to, and stores personal information at, its head offices in India.

## General Information Security Measures

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

- Physical security measures
- Access controls
- Home and mobile measures
- Internal security measures
- Cyber security measures
- Anti-spam measures
- Anti-virus measures
- Firewalls
- Password control
- Training in information security and other POPO requirements
- Selective training of key staff
- Policies for information security
- Comprehensive coverage of all IT-related issues
- Audits of information security
- Provisions around security in all provider contracts/agreements

## Request procedure

- 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.
- The request must be made to the information officer of the Company at the address, or e-mail address specified in the section 2 above.
- The requester must provide sufficient detail on the prescribed form to enable the 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.
- 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.
- 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.
- 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.
- 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, that it is necessary to protect the commercial information of a third party or the Company itself, that it is necessary to protect the confidential information of a third party, that it is necessary to protect the safety of individuals or property, that a record constitutes privileged information for legal proceedings, or that it is necessary to protect the research information of a third party or the Company itself.
- 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 will, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to that record.
- The 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 as per 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.

- 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.

## Prescribed Fees

The Act entitles a Private Body to levy a prescribed fee to a Requester before further Processing the request.

According to section 23(3) of POPIA, a Responsible Party may require payment of a prescribed fee for the provision of a record of Personal Information about the Data Subject in its possession. Nagarro will provide the Requester a written estimate of the fee before providing the services; and may require the Requester to pay a deposit for all or part of the fee.

Please see below prescribed fees applicable that have been published in the Annexure B of PAIA Regulations, 2021.

Item	Description	Amount
1	Request fee payable by every Requester	R140.00
2	Photocopy/printed black and white copy of a A4-size page	R2.00 per page or part thereof
3	Printed copy of A4-size page	R2.00 per page or part thereof
4	For a copy in a computer-readable form on flash drive (provided by Requester)	R40.00
5	For a copy in a computer-readable form on compact disc (if provided by Requester)	R40.00
6	For a copy in a computer-readable form on compact disc (if provided to the Requester)	R60.00
7	For a transcription of visual images per A4-size page	Services to be outsourced, will depend on quotation from Service Provider
8	Copy of visual images	
9	Transcription of an audio record per A4-size page	R24.00
10	For a copy of an audio record on Flash drive (to be provided by Requester)	R40.00
11	For a copy of an audio record on compact disc (if provided by Requester)	R40.00

## **Remedies for refusal to request for information**

The Company does not have an internal appeal procedure. As such, the decision made by the information officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the information officer.

## **Lodgment of Complaints**

The Act makes provision for the lodgment of a complaint to the Information Regulator by any person who alleges that the decision was not in compliance with the Act for refusing access, aggrieved by a decision regarding fees prescribed, the extension of the period within which the request must be dealt; or refusing access in the form requested by the Requester. The complainant may also apply to a court with appropriate jurisdiction. The complaint to the Information Regulator must be in the prescribed manner and form as published on the website of the Information Regulator and lodged within 180 days of the decision from Nagarro.

## Definitions

The following words shall bear the same meaning as under POPIA:

- “Data Subject” means the person to whom Personal Information relates.
- “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person
- “Private body” means a natural person who carries or has carried on any trade, business or profession in that capacity, a partnership or juristic person.
- “Responsible party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.
- “Requester” in relation to a private body means any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body or any person acting on behalf of that person.
- “Minister” means Minister of Justice and Correctional Services;
- “PAIA” means Promotion of Access to Information Act No. 2 of 2000 (as Amended)
- “POPIA” means Protection of Personal Information Act No.4 of 2013;
- “Regulator” means Information Regulator
- “Republic” means Republic of South Africa



## Annexure A

### 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 align="center"><b>PARTICULARS OF RECORD REQUESTED</b></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				
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>				
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	
<b>FORM OF ACCESS</b> <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	

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

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

\_\_\_\_\_ **Signature**  
**of Information Officer**