



# 24 Bit Games Access to Information Manual

## Note:

We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).

## Introduction

We are 24 Bit Games, we conduct business as a video game development and services studio, and this is our 'Access to Information Manual'. Its purpose is to help you access our information and any other information that we have. PAIA requires us to make it available to you so that you:

- know what types of information we have; and
- can request access to it.

## Our details

Our details are as follows:

- **Company name:** 24 Bit Games (Pty) Ltd
- **Registration number:** 2012/046665/07
- **Postal address:** 69 St Andrews Garden Villas, 1 St Francis Road, St Andrews, Bedfordview, South Africa, 2007
- **Physical address:** 1st Floor Skeen Office Park, 16 Skeen Boulevard, Bedfordview, Johannesburg, South Africa, 2007
- **Information officer:** Luke Lamothe (CEO)
- **Designated Information Officer:** Pieter Koornhof (COO)
- **Designated Information officer email:** pieter@24bitgames.com
- **Contact email:** info@24bitgames.com
- **Website:** www.24bitgames.com

## Further guidance

If you would like further guidance on how you can get access to information under PAIA, you may contact the Information Regulator to find out more information about PAIA. The Information Regulator is required to compile a guide in each official language of South Africa on how to exercise any right under PAIA. The current guide compiled by the South African Human Rights Commission is available here: <https://www.sahrc.org.za/home/21/files/SAHRC%20PAIA%20Section%2010%20Guide%202020%20FINAL%20WEB.pdf>. In terms of Section 110 of the Protection of Personal Information Act 4 of 2013 the

functions of the Human Rights Commission have transferred to the Information Regulator. Their contact details are as follows:

- **Postal address:** P.O Box 3153, Braamfontein, Johannesburg, 2017
- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Phone number:** 010 023 5200
- **Website:** <https://www.justice.gov.za/inforeg/index.html> and <http://www.sahrc.org.za/index.php/understanding-paia>
- General e-mail: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)
- Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

## Records we hold

We hold a variety of subjects and categories of records as detailed below. Some of these are automatically available (either from us, or through other entities), whereas others are marked as 'Not automatically available.' Such records must be requested using the process outlined in the 'How to request access' section of this manual.

### Company records

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

<b>Memorandum of incorporation</b>	Automatically available from CIPC
<b>Directors' names</b>	Automatically available from CIPC
<b>Documents of incorporation</b>	Automatically available from CIPC
<b>Minutes of board of directors meetings</b>	Not automatically available
<b>Written resolutions</b>	Not automatically available
<b>Records relating to appointment of directors, auditor, secretary, public officer, or other officers</b>	Not automatically available
<b>Share register and other statutory registers</b>	Not automatically available
<b>Other statutory records</b>	Not automatically available

### Business records

Business records include any documents that have economic value to the business.

<b>Operational records</b>	Not automatically available
<b>Databases</b>	Not automatically available
<b>Published works</b>	Not automatically available
<b>Internal correspondence</b>	Not automatically available
<b>Product records</b>	Not automatically available

### Financial records

Financial records are all our records related to our finances.

<b>Financial statements</b>	Not automatically available (NDA required)
<b>Tax returns</b>	Not automatically available
<b>Other documents relating to taxation of the company</b>	Not automatically available
<b>Accounting records</b>	Not automatically available
<b>Auditor reports</b>	Not automatically available
<b>Banking records</b>	Not automatically available
<b>Banking details</b>	Automatically available on request
<b>Bank statements</b>	Not automatically available
<b>Electronic banking records</b>	Not automatically available
<b>Paid cheques</b>	Not automatically available
<b>Asset register</b>	Not automatically available
<b>Invoices</b>	Not automatically available
<b>Financial agreements</b>	Not automatically available

### Insurance records

Insurance records are all our records related to our insurable assets.

<b>Insurance policies held by the company</b>	Not automatically available
<b>Records of insurance claims</b>	Not automatically available
<b>Register of all immovable property owned by the company</b>	Not automatically available

### Income tax records

Income tax records are all our records related to our income tax obligations.

<b>PAYE Records</b>	Not automatically available
<b>Corporate tax records</b>	Not automatically available
<b>Customs tax</b>	Not automatically available
<b>Documents issued to employees for income tax purposes</b>	Not automatically available
<b>Records of payments made to SARS on behalf of employees</b>	Not automatically available
<b>VAT records</b>	Not automatically available
<b>Regional Services Levies</b>	Not automatically available
<b>Skills Development Levies</b>	Not automatically available
<b>UIF</b>	Not automatically available
<b>Workmen's Compensation</b>	Not automatically available

### Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

<b>List of employees</b>	Not automatically available
<b>Employee personal information</b>	Not automatically available
<b>Employee employment contracts</b>	Not automatically available

<b>Employment applications and appointment letters</b>	Not automatically available
<b>Employment policies and procedures</b>	Not automatically available
<b>Employment Equity Plan</b>	Not automatically available
<b>Health and safety records</b>	Not automatically available
<b>Medical aid records</b>	Not automatically available
<b>Pension and provident fund records</b>	Not automatically available
<b>Salaries or wages of employees</b>	Not automatically available
<b>Leave records</b>	Not automatically available
<b>Internal evaluations and performance records</b>	Not automatically available
<b>Disciplinary records</b>	Not automatically available
<b>Disciplinary codes</b>	Not automatically available
<b>Training records</b>	Not automatically available
<b>Operating manuals</b>	Not automatically available
<b>Personal records provided by personnel</b>	Not automatically available
<b>Other statutory records</b>	Not automatically available
<b>Related correspondence</b>	Not automatically available

## **Policies and directives**

Policies and directives include both internal and external documents.

<b>Internal relating to employees and the company</b>	Not automatically available
<b>External relating to clients and other third parties</b>	Not automatically available
<b>Information technology systems and documents</b>	Not automatically available

## **Agreements or contracts**

Agreements or contracts include the documents themselves and all related documents.

<b>Standard Agreements</b>	Not automatically available
<b>Contracts concluded with customers</b>	Not automatically available
<b>NDAs</b>	Not automatically available
<b>Letters of Intent, MOUs</b>	Not automatically available
<b>Third party contracts (such as JV agreements, VAR Agreements, etc.)</b>	Not automatically available
<b>Office management contracts</b>	Not automatically available
<b>Bond agreements</b>	Not automatically available
<b>Rental agreements</b>	Not automatically available
<b>Supplier or service contracts</b>	Not automatically available

## **Regulatory documents**

Regulatory documents include any documents required to comply with any laws.

<b>Permits</b>	Not automatically available
<b>Licences</b>	Not automatically available

<b>Authorities</b>	Not automatically available
--------------------	-----------------------------

## Published information

Published information includes any document that we prepare and produce.

<b>Brochures</b>	Automatically available on request
<b>External newsletters and circulars</b>	Automatically available
<b>Information available on the website</b>	Automatically available
<b>Internal newsletters and circulars</b>	Not automatically available
<b>Information on the company published by third parties</b>	Not automatically available

## Customer information

Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

<b>Customer details</b>	Not automatically available
<b>Contact details of individuals within customers</b>	Not automatically available
<b>Communications with customers</b>	Not automatically available
<b>Sales records</b>	Not automatically available
<b>Transactional information</b>	Not automatically available
<b>Marketing records</b>	Not automatically available

## Reference materials

Reference materials include any sources of information that we contribute to.

<b>Books</b>	Not automatically available
<b>Newsletters and journals articles</b>	Not automatically available
<b>Magazines</b>	Not automatically available
<b>Newspaper articles</b>	Not automatically available

## Information we hold to comply with the law

We may hold records for the purposes of PAIA in terms of a variety of laws, including but not limited to company laws, taxation laws, employment laws, electronic commerce, consumer protection, monitoring and interception, protection of personal information, and related matters.

## How to request access

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete Form C which is available from:

- The Information Regulator website at [https://www.justice.gov.za/forms/paia/J752\\_paia\\_Form%20C.pdf](https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf)

Please submit the completed form to our information officer together with the relevant request fee at our information officer's email address or our physical address in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address and postal address;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

## **Grounds for refusal**

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

## **How we will give you access**

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

## **How much it will cost you**

You must pay us a request fee as required by law when submitting a request for access to information. The prescribed fees are as set out in the Fee Schedule which is available here:

<http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>. You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

## How we process and protect personal information

We process the personal information of various categories of people for various purposes. Details of this may be found in our privacy policy, which is available via our website.

## Remedies

If your request for access is denied, you may:

- apply to a court with appropriate jurisdiction, or
- lodge a complaint with the Information Regulator, for the necessary relief.

## Availability of this Manual

This manual is available in English. It may be requested via email and may be posted on our website.

## Updates to this Manual

This manual will be updated whenever we make material changes to the current information.

<b><u>Drafted on:</u></b>	October 2021
<b><u>Approved by board on:</u></b>	15 December 2021
<b><u>Date of last revision:</u></b>	18 October 2023