

Connect+Funda PAIA Manual

Promotion of Access to Information Act Manual

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Information Officer: Godfery Marange - +27 (0) 74 220 7550

Deputy Information Officer: Moipone Ditsebe - +27 (0) 78 974 7735

1. Introduction and Company Information

Enthucate Tech (Proprietary) Limited trading as Connect+Funda Mobile is a South African educational technology company operating as a Mobile Virtual Network Operator (MVNO) with a specific focus on providing connectivity, educational content, and digital services to students and educational institutions. The company is committed to transparency and accountability in accordance with the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA).

Company Registration Details

- Full Company Name: Enthucate Tech (Proprietary) Limited trading as Connect+Funda Mobile
- Registration Number: 2022/777919/07
- VAT Registration Number: 4280314990
- Physical Address: Cube Workspace, 9 The Straight Street, Pineslopes AH 2191
- Postal Address: Cube Workspace, 9 The Straight Street, Pineslopes AH 2191
- Telephone: +27 (0) 74 220 7550
- Email: info@connectandfunda.com
- Website: www.connectandfunda.co.za/company

Business Description Connect+Funda operates as an educational technology platform combining mobile network services with educational content delivery, student engagement tools, and parental control systems. The company serves students, parents, educational institutions, and corporate partners through integrated digital solutions designed to enhance educational outcomes while ensuring digital safety and inclusion.

2. Information Officer Details

The Information Officer is responsible for ensuring compliance with PAIA requirements and processing all information access requests in accordance with statutory obligations.

Information Officer

- Name: Godfery Marange
- Position: Chief Technology Officer
- Physical Address: [Same as Company Address]
- Postal Address: [Same as Company Postal Address]
- Telephone: +27 (0) 74 220 7550
- Email: paia@connectfunda.com

Deputy Information Officer

- Name: Moipone Ditsebe
- Position: Administration Officer
- Telephone: +27 (0) 78 974 7735
- Email: paia.deputy@connectfunda.com

3. Guide to Using PAIA

The Promotion of Access to Information Act provides individuals with the right to access information held by public and private bodies, subject to certain limitations and procedures. This manual serves as a guide for requesting access to records held by Connect+Funda.

Who May Request Information Any person may request access to records held by Connect+Funda, provided the request complies with PAIA requirements. Requesters include individuals seeking their own personal information, third parties with legitimate interests, and organizations requiring information for lawful purposes.

How to Make a Request Information requests must be submitted using the prescribed Form 2 as specified in PAIA regulations. The form must be completed in full and submitted to the Information Officer along with the required request fee. Requests may be submitted by post, email, or hand delivery to the addresses specified in this manual.

Processing Timeframes Connect+Funda will acknowledge receipt of requests within five working days and provide a decision within thirty days of receipt. In complex cases, this period may be extended by an additional thirty days with written notification to the requester explaining the reasons for the extension.

4. Records Categories and Availability

Connect+Funda maintains various categories of records in the ordinary course of business. The following sections outline the main categories of records held by the company, their purposes, and general availability for access requests.

Student and Educational Records Connect+Funda maintains comprehensive records related to student registration, academic progress, and educational content access. These records include student profiles, parental consent documentation, academic performance data, and educational content usage analytics. Access to these records is generally restricted to the data subjects themselves (students and parents) and authorized educational personnel, with strict privacy protections in place.

Network and Connectivity Data As an MVNO, Connect+Funda maintains detailed records of network usage, connectivity patterns, and service delivery metrics. These records include call detail records, data usage logs, network performance statistics, and service quality measurements. Access to these records is typically limited to regulatory compliance purposes and individual subscriber inquiries.

Financial and Commercial Records The company maintains comprehensive financial records including billing information, payment processing data, supplier agreements, and commercial contracts. These records support business operations, regulatory compliance, and financial reporting requirements. Access is generally restricted to authorized personnel and regulatory authorities, with individual customers having access to their own billing and payment information.

Human Resources and Employment Records Connect+Funda maintains employee records including employment contracts, performance evaluations, training records, and personnel files. These records are maintained in accordance with employment law requirements and are generally accessible only to the employees themselves and authorized human resources personnel.

Regulatory and Compliance Documentation The company maintains extensive records related to regulatory compliance including ICASA licensing documentation, POPIA compliance records, consumer protection documentation, and audit reports. These records demonstrate ongoing compliance with applicable laws and regulations and may be accessible to regulatory authorities and, in some cases, to members of the public with legitimate interests.

Corporate Governance Records Connect+Funda maintains corporate governance documentation including board resolutions, shareholder agreements, company policies, and strategic planning documents. Access to these records is generally restricted to shareholders, directors, and authorized personnel, with certain information potentially available to stakeholders with legitimate interests.

5. Request Procedures and Requirements

Completing Form 2 All information requests must be submitted using the prescribed Form 2, which is available from the Information Officer or can be downloaded from the company website. The form must be completed accurately and in full, providing sufficient detail to enable identification of the requested records.

Required Information Requesters must provide their full name, contact details, and identification number or registration details. The request must specify the records sought with sufficient detail to enable location and identification. Where requesting personal information, proof of identity is required. Third-party requests must demonstrate legitimate interest in the requested information.

Request Fees and Costs A non-refundable request fee of R140 is payable upon submission of each request. Additional access fees may apply for reproduction and preparation of records, calculated at R2 per A4 page for photocopying, R70 per hour for search and preparation time, and actual postal costs for delivery. Payment must be made before access is granted to requested records.

Processing and Response Connect+Funda will acknowledge receipt of requests within five working days and provide a written decision within thirty days. The decision will either grant access, refuse access with reasons, or indicate that the requested records do not exist. Where access is granted, arrangements will be made for inspection or delivery of the records upon payment of applicable fees.

6. Grounds for Refusal of Access

Connect+Funda may refuse access to records on various grounds as specified in PAIA. These grounds are designed to protect legitimate interests while maintaining the principle of transparency and accountability.

Mandatory Protection of Privacy Access will be refused where disclosure would constitute an unreasonable invasion of personal privacy of third parties. This includes personal information of students, employees, and other individuals where consent has not been obtained and disclosure is not otherwise justified.

Commercial Information Protection The company may refuse access to records containing trade secrets, financial information, or commercial information that could harm competitive position or business interests. This includes proprietary educational content, pricing strategies, and confidential business relationships.

Confidential Information Records containing information provided in confidence by third parties will be protected from disclosure where such disclosure would breach confidentiality obligations or harm the provider's interests. This includes confidential supplier information, partner agreements, and sensitive commercial arrangements.

Legal Professional Privilege Communications with legal advisors and documents prepared for legal proceedings are protected from disclosure under legal professional privilege. This ensures the company can obtain confidential legal advice without fear of disclosure.

Safety and Security Considerations Information that could compromise the safety and security of individuals, systems, or operations will be protected from disclosure. This includes security procedures, system vulnerabilities, and information that could facilitate harmful activities.

7. Appeal and Review Procedures

Internal Review Process Requesters who are dissatisfied with decisions regarding their information requests may request internal review by submitting a written appeal to the Information Officer within thirty days of the decision. The appeal must specify the grounds for disagreement and any additional information supporting the request.

Information Regulator Review Following internal review, or where internal review is not requested, requesters may approach the Information Regulator for external review of decisions. The Information Regulator has powers to investigate complaints, conduct hearings, and make binding decisions regarding access to information.

Court Proceedings As a final recourse, requesters may approach the High Court for review of Information Regulator decisions or for direct relief where other remedies have been exhausted. Court proceedings must be instituted within specified timeframes and in accordance with applicable procedural requirements.

8. Contact Information and Submission Details

Postal Submissions Information Officer
Enhtucate Tech (Pty) Ltd trading as Connect+Funda
[Insert Postal Address – same as company]

Email Submissions paia@connectfunda.com

Hand Delivery Information Officer
Enhtucate Tech (Pty) Ltd trading as Connect+Funda
[Insert Physical Address - same as company]
Business Hours: Monday to Friday, 08:00 to 17:00

Telephone Inquiries Godfrey Marange
Available during business hours for procedural inquiries and assistance with completing request forms.

9. Fees Schedule

Request Fee: R140 per request (non-refundable)

Reproduction Fees: R2 per A4 page for photocopying

Search and Preparation: R70 per hour or part thereof

Postal Delivery: Actual cost of registered post

Electronic Delivery: No additional charge for email delivery

Payment Methods Electronic transfer to company banking details provided upon request, or cash payment for hand-delivered requests. Proof of payment must accompany all requests, and access will only be granted upon receipt of all applicable fees.

10. Updates and Amendments

This PAIA Manual is reviewed annually and updated as necessary to reflect changes in company operations, legal requirements, or regulatory guidance. Material changes will be published on the company website and communicated to relevant stakeholders.

Version Control

- Version 1.0: Initial publication 1 October 2025
- Next Review Date: 30 September 2025
- Amendment History: [To be updated with each revision]

Availability This manual is available on the Connect+Funda website at www.connectandfunda.com/paia-manual and in hard copy from the Information Officer upon request. The manual is provided free of charge for inspection and at cost for reproduction.

Document Approval This PAIA Manual has been approved by the Board of Directors of Enthucate Tech (Pty) Limited trading as Connect+Funda and is effective from 1 October 2025.

Information Officer Signature: _____



Date: 12/10/2025