



PROMOTION OF ACCESS TO INFORMATION

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

Private body	MediaLens Intelligence (Pty) Ltd
Document owner	Information Officer / Head of Private Body
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This document should be reviewed by the appointed Information Officer before publication.

PAIA MANUAL

Document control and approval Legal entity MediaLens Intelligence (Pty) Ltd

Registration number [Insert company registration number]

B-BBEE status Level 1 B-BBEE Contributor | EME | 100% Black-Owned Entity

Physical address [Insert registered / principal business address]

Postal address [Insert postal address, if different]

Website www.medialens.media

Information Officer / Head Balungile Mteto - subject to formal designation confirmation

PAIA request email [Insert monitored PAIA / privacy email address]

Telephone [Insert telephone number]

Approval Role Name Signature Date

Head of private body Balungile Mteto

Information Officer T.B.A

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1. Purpose and scope

This manual explains how a person may request access to records held by MediaLens Intelligence. MediaLens Intelligence is the media monitoring, intelligence and reporting platform operated by MediaLens Intelligence (Pty) Ltd. The manual has been prepared for a private body under section 51 of the Promotion of Access to Information Act, 2000 (PAIA). PAIA gives a requester access to a record held by a private body where that record is required for the exercise or protection of a right, subject to the Act. A request is for an existing record - it does not require MediaLens to create a new record, answer questions, conduct research, or provide opinions.

2. About MediaLens Intelligence

MediaLens Intelligence is a Level 1 B-BBEE Contributor, an Exempted Micro Enterprise (EME) and a 100% Black-Owned Entity. It provides media monitoring, reporting and communications intelligence services. The platform may collect, organise and analyse publicly available media references and client-supplied information across online news, print, radio, television and selected social platforms. Services may include alerting, reporting, analytics, reputation and sentiment indicators, media contact management, campaign measurement and workflow support. MediaLens is committed to handling records responsibly. Client records, source-content extracts, licensed content, personal information, security records, methodologies and commercially sensitive material are treated with appropriate confidentiality and access controls.

3. PAIA and POPIA guide

PAIA and the Protection of Personal Information Act, 2013 (POPIA) operate alongside one another. PAIA governs access to records. POPIA regulates the lawful processing of personal information and gives data subjects rights in relation to their own personal information.

- A PAIA request for a private body must identify the right the requester seeks to exercise or protect, and explain why the requested record is required for that purpose.
- A data subject seeking correction, deletion or objection to processing of personal information should use the relevant POPIA process, as set out in MediaLens privacy documentation or through the Information Officer.
- This manual does not override intellectual-property, copyright, licence, confidentiality, client-contract or security obligations.

4. Information Officer contact details

The Head of the private body is responsible for PAIA compliance and may formally designate an Information Officer and Deputy Information Officer(s). Requests must be submitted in writing to the contact details below.

Information Officer / Head Balungile Mteto -

Email: bmteto@medialens.media

Tel: 043 023 0577

Important: Before publishing this manual, replace every bracketed field and ensure the nominated inbox is monitored. Do not publish an unmonitored request address.

5. Records available under other legislation

MediaLens may hold records required by applicable law. This list is not exhaustive and does not mean every listed record is automatically available.

- Companies Act 71 of 2008
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Electronic Communications and Transactions Act 25 of 2002
- Copyright Act 98 of 1978
- Income Tax Act 58 of 1962 and Value-Added Tax Act 89 of 1991
- Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Occupational Health and Safety Act 85 of 1993

6. Automatically available records

The following information may be made available without a formal PAIA request, subject to availability, website publication status, reasonable copying charges and applicable restrictions: • Public website content, product information and published thought-leadership material • Published privacy notices, website terms and publicly available policies • Public company profile and marketing collateral • Current Level 1 B-BBEE Contributor, EME and 100% Black-Owned Entity status documentation, where approved for public release • Job advertisements

and publicly published supplier or partnership notices No client dashboard data, client reports, media-contact databases, source-content extracts or internal analytics are automatically available.

7. Record categories held by MediaLens

The table below identifies categories of records that may be held. Availability depends on retention periods, relevance, applicable law, contracts and PAIA grounds for refusal.

Subject Categories of records

Company registration, governance records, policies, Corporate and governance approvals, shareholder and director records, correspondence.

Accounting records, invoices, quotations, banking and tax Financial and tax documentation, asset records, budgets and financial statements.

Employment contracts, payroll-related records, recruitment, People and employment performance, training, disciplinary and health-and-safety records.

Client agreements, proposals, onboarding records, service Clients and commercial scopes, account correspondence, deliverables, billing and support records.

Monitoring configurations, search queries, alerting records, Media intelligence and reporting reports, analytics, trend summaries, audience metrics and campaign measurements.

Media contact details, client contacts, suppliers, users, Personal information and contacts candidates and other personal information processed in the course of business.

System architecture, access logs, audit trails, incident Technology and security records, backups, software configurations, vendor documentation and security controls.

Licences, copyright and content-use records, insurance, Legal and compliance legal advice, disputes, compliance assessments and regulator correspondence.

Brand assets, public announcements, social-media content, Marketing and communications newsletters, presentations and media releases.

8. How to request access

Use the current prescribed PAIA Form 2 for a request to a private body. The form is available from the Information Regulator. Send the completed form to the Information Officer using the contact details in section 4, with any proof of authority and applicable fee.

- Describe the record clearly enough for MediaLens to identify it. Include dates, names, account or project references where relevant.
- State the right you seek to exercise or protect and why the requested record is required for that purpose.
- Select the access format requested - inspection, copy, electronic copy or another available format.
- If applying for another person, attach written authority or other satisfactory proof of capacity.
- Keep a copy of your request and proof of submission.

MediaLens will acknowledge a valid request, may ask for clarification or proof of authority, and will consider it within the period prescribed by PAIA. Where an extension is permitted and necessary, the requester will be notified with reasons. Access may be granted in full, granted in part, deferred pending fees, or refused with reasons.

9. Fees and access decisions

Fees are governed by PAIA and the regulations as amended from time to time. A personal requester seeking their own personal information is generally not required to pay a request fee, although reproduction or access fees may still apply where lawfully payable. Other requesters may be required to pay the prescribed request fee and, where applicable, access, reproduction, search, preparation and postage fees. The Information Officer will provide written notice of any applicable fee or deposit before releasing records. MediaLens does not rely on the older fee amounts reproduced in the reference manuals; the current prescribed tariff must be checked at the time of request.

10. Grounds for refusal and third-party consultation

PAIA permits or requires refusal in specified circumstances. Depending on the record, this may include:

- unreasonable disclosure of a third party's personal information;
- third-party trade secrets, confidential information or commercially sensitive information;
- information supplied in confidence where disclosure could prejudice the third party;
- safety, security or property interests;
- legally privileged records;
- MediaLens trade secrets or commercially sensitive financial, technical, research, operational or strategic information;
- research information where disclosure could cause serious disadvantage; and
- a request that is manifestly frivolous or vexatious, or would involve a substantial and unreasonable diversion of resources. Where a request affects a third party's rights, MediaLens may be required to notify and consult that party before deciding the request. If only part of a record is protected, access to the reasonably severable remainder may be considered.

11. Complaints and remedies

If a requester is dissatisfied with a decision, failure to respond, fee, extension or access format, they may lodge a complaint with the Information Regulator or apply to a court, subject to PAIA's requirements and time limits. The Information Regulator advises using the prescribed complaint form (Form 5) and retaining a copy of the original PAIA request and response. Information Regulator: www.inforegulator.org.za | email: infoereg@justice.gov.za | telephone: 010 023 5200. Contact details and forms may change; requesters should verify the current details on the Regulator's website.

12. Review and availability

This manual is reviewed annually and whenever there is a material change to MediaLens operations, record categories, legal requirements or Information Officer details. A current copy will be available on www.medialens.media and on request from the Information Officer, subject to any lawful fee for a hard copy.

Appendix A - PAIA request checklist Use this checklist with the current prescribed PAIA Form 2. The official form and complaint forms are available from the Information Regulator at www.inforegulator.org.za.

- Identify the private body: MediaLens Intelligence (Pty) Ltd.
- Provide the requester's name, contact details and preferred communication method.
- Describe the exact existing record requested, not a question or a request for new analysis.
- State the right to be exercised or protected and why the record is required for that right.
- Indicate the requested access form and language, where applicable.

- Attach authority to act for another person, if applicable.
- Submit to the Information Officer and retain proof of submission.
- Pay any fee only after receiving the relevant written request or notice from MediaLens.

Internal publication checklist Before issue, the Head of the private body should confirm:

- the legal entity, registration number and registered address;
- the Information Officer designation and delegated Deputy Information Officer(s), if any;
- a dedicated, monitored request email address;
- record-retention, licensing and client-confidentiality controls;
- the current prescribed forms, fees and Information Regulator details; and
- the publication location on the MediaLens website. Prepared as an original MediaLens Intelligence manual, informed by the two supplied PAIA manuals and aligned to the Information Regulator's current public guidance. Legal review is recommended before public publication.