



HOLLYWOOD SPORTSBOOK HOLDINGS (PTY) LTD

(and its associated and related entities)

MANUAL

PREPARED IN TERMS OF SECTION 51 OF

THE PROMOTION OF ACCESS TO INFORMATION ACT

2000

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|----------------|---|
| 1.1 | “CONSTITUTION” | Constitution of the Republic of South Africa, Act No. 108 of 1996 |
| 1.2 | “DIO” | Deputy Information Officer |
| 1.3 | “IO” | Information Officer |
| 1.4 | PAIA” | Promotion of Access to Information Act No. 2 of 2000 |
| 1.5 | POPIA” | Protection of Personal Information Act No.4 of 2013 |
| 1.6 | “IR” | Regulator” Information Regulator |
| 1.7 | “REPUBLIC” | Republic of South Africa. |

2. INTRODUCTION TO GROUP

The Hollywood Sportsbook Holdings Group began in 1986 as a small South African based publishing company, Winning Form, publishing and distributing horse racing form guides. It then branched into bookmaking and now operates an extensive retail branch network spread across seven of South Africa's provinces as well as an online gaming business. Hollywood Sportsbook Holdings is the holding company of a group of local subsidiaries companies, and also has a number of associated and related entities, which shall collectively be referred to as "the Group".

Whilst the primary business of the Group is gaming and entertainment in South Africa, there are also a number of other businesses that are conducted by the various related and associated entities, including, inter alia, software development, printing and publishing, courier and logistics and training.

3. PURPOSE OF PAIA MANUAL

The Promotion of Access to Information Act 2 of 2000 ("PAIA") was enacted with the purpose of giving effect to the constitutional right of access to information that is held by a private or public body and that is required for the exercise or protection of any rights.

Section 51 of the PAIA requires private bodies to compile a manual to enable a person to gain access to information held by such private body and stipulates the minimum requirements that the manual must comply with.

This Manual constitutes the PAIA manual of the Group and has been compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to the constitutional right to privacy.

The POPIA amends certain provisions of the PAIA, balancing the need for access to information against the need to ensure protection of personal information by providing for the establishment of an Information Regulator who is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of the POPIA. More information on how the Group processes and protects personal information can be found in each of the relevant entity's privacy policies which are available on each of the respective entity's websites.

The purpose of this Manual is to facilitate requests for access to information regarding Hollywood Sportsbook Holdings and it applies in respect of the Group of entities and each member, affiliate or subsidiary described in Annexure C.

4. INFORMATION AND AVAILABILITY OF THE MANUAL

One of the main requirements specified in PAIA is the compilation of an information manual that provides information on both the types and categories of records held by a private body.

This document serves as the Company's information manual. This Manual is compiled in accordance with section 51 of PAIA and the Schedule to POPIA. It is intended to give a description of the records held by and on behalf of the Company; to outline the procedure to be followed and the fees payable when requesting access to any of these records in the exercise of the right of access to information, with a view of enabling requesters to obtain records which they are entitled to in a quick, easy and accessible manner.

This Manual is available for public inspection:

- at the physical address of the Company, recorded in paragraph 5 below, free of charge; Monday to Friday during normal business hours, and
- is available in the South African English language, and
- on our website (www.hollywoodbets.net), free of charge; and
- on request by any person and upon the payment of a prescribed fee, and
- to the information regulator upon request.

The Manual is available from the designated Information Officer, whose details appear below.

5. CONTACT DETAILS OF INFORMATION OFFICER

The responsibility for administration of, and compliance with, PAIA and POPIA have been delegated to the Information Officer. Requests pursuant to the provisions of PAIA and/or POPIA should be directed to the Information Officer as follows:

Company contacts details in terms of PAIA, section 51	
Information Officer	Chanelle Beukes
Deputy Information Officers	Rowan Cross
Postal address:	P O Box 74234, Rochdale Park 4034
Street address:	18 Richefond Circle, Umhlanga Ridge, Umhlanga, Kwa-Zulu Natal, 431
Telephone Number	087 353 8930
Website	www.hollywoodbets.net
Email address for any PAIA/POPIA requests	compliance@hollywoodbets.net

6. INFORMATION REGULATORS INFORMATION

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information regulator (mandated in terms of PAIA section 10).

For further information, the requester may contact the Information Regulator whose details are as below:

Information Regulator	Advocate Pansy Tlakula
Street address:	Woodmead North Office Park, 54 Maxwell Dr Johannesburg
Telephone number	010 023 5200

Toll Free	0800 017 160
Email address	enquiries@infoeregulator.org.za
Website	www.infoeregulator.org.za

7. HOW TO USE PAIA AND OBTAIN ACCESS TO THE GUIDE

- The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- The Guide is available in each of the official languages and in braille.
- The aforesaid Guide contains the description of-
 - the objects of PAIA and POPIA;
 - the manner and form of a request for-
 - access to a record of a public body contemplated in section 11; and
 - access to a record of a private body contemplated in section 50;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of 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-
 - an internal appeal;
 - a complaint to the Regulator; and
 - an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.
- 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.
- The Guide can also be obtained-
 - upon request to the Information Officer;
 - from the website of the Regulator <https://infoeregulator.org.za/>

8. RECORDS AUTOMATICALLY AVAILABLE

Information that is available in the public domain and information obtainable via any of the below websites about Hollywood Sportsbook Holdings or any of its affiliates, managed entities,

or related companies, is automatically available and need not be formally requested in terms of this Manual. The website addresses are included in Annexure C.

9. ACCESS TO RECORDS SUBJECTS AND CATERGORIES HELD BY THE GROUP IN TERMS OF PAIA

The subjects on which the Group holds records and the categories on each subject in terms of Section 51(1)(e) are listed below. Please note that a requestor is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the PAIA. Please also refer to the relevant entity's privacy policies for further information.

The information is classified and grouped according to records relating to the following subjects and categories:

9.1 Financial information

- Accounting records
- Annual financial statements
- Agreements and contracts
- Asset register
- Banking records
- Correspondence
- Invoices and statements
- Insurance policies
- Licences
- Management reports
- Minute books
- Tax reports and returns
- Statistics SA returns
- Statutory records

9.2 Human Resources

- Employee records and information
- Training records, manuals, materials and reports
- Employment equity records and reports
- Disciplinary records
- Payroll records
- UIF/SDL/PAYE returns
- Leave records
- Policies and procedures
- Retirement benefit records
- Employee Contracts

9.3 Information management and technology

- Databases
- Computer software
- Registered Trademarks and Domains
- Consensually obtained member information and relationship history
- Software license agreements

9.4 Marketing

- Internet
- Marketing and advertising pamphlets and brochures

9.5 Operations

- Operational procedures
- Databases
- Computer software

9.6 Customer related records

- Full name
- Copies of national identity number or passport number
- Physical address
- Bank details
- Contact number
- Correspondence
- Any other documentation provided by the customer

Note that this may not be an exhaustive list, and that these records are not necessarily available for requestors.

10. RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION

A requester may request information that is available in terms of other legislation, such as:

10.1 Gambling Acts

- National Gambling Act, 2004
- National Gambling Amendment Act, 2008
- National Gambling Regulations
- Gauteng Gambling Act, 1995
- Gauteng Gambling Board Regulations
- Gauteng Gambling Board Rules, 2019
- KwaZulu-Natal Gambling Act, 1996
- Western Cape Gambling & Racing Act, 1996, as amended
- Western Cape Gambling & Racing Regulations
- Western Cape Racing and Betting Rules, 2003
- Western Cape Bookmaker Operational Rules, 2017
- Eastern Cape Gambling Act, 1997

- Eastern Cape Gambling Regulations
- Limpopo Gambling Act, 1996, as amended
- Limpopo Gambling Act, 2013
- Limpopo Gambling Regulations
- Mpumalanga Gambling Act, 5 of 1995
- Mpumalanga Gambling Rules, 2018
- Mpumalanga Gambling Regulations
- Mpumalanga Gambling Levies Act, 2007
- Mpumalanga Gambling Levies Regulations
- Free State Gambling and Liquor Act, 2010
- Free State Gambling and Liquor Amendment Act, 2011
- Free State Gambling Regulations

10.2 Human Resources

- Broad-Based Black Economic Empowerment Act, 2003
- Labour Relations Act, 1995
- Basic Conditions of Employment Act, 1997
- Employment Equity Act, 1998
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 1999
- Employment Equity Act, 1998
- Unemployment Insurance Act, 2001
- Occupational Health and Safety Act, 1993
- Occupational Health and Safety Regulations
- Unemployment Contributions Act, 2002
- Unemployment Insurance Act, 2001
- Compensation for Occupational Injuries and Diseases Act, 1993

10.3 Accounting and Finance

- Income Tax Act, 1962
- Value Added Tax Act, 1991
- Financial Intelligence Centre Act, 2001

10.4 Company, Legal and liquor

- Companies Act, 2008
- National Liquor Act, 2003
- Gauteng Liquor Act, 2003
- Free State Gambling, Liquor and Tourism Act, 2010 (Act No. 6 of 2010) KwaZulu-Natal Liquor Act, 1989
- KwaZulu-Natal Liquor Licensing Act, 2010 (Act No. 6 of 2010)
- KwaZulu-Natal Economic Regulatory Authority Act, 2024 (Act No. 2 of 2024)
- Western Cape Liquor Act, 2008
- Eastern Cape Liquor Act, 2003

- Mpumalanga Liquor Act, 2006
- Promotion of Access to Information Act, 2000
- Protection of Personal Information Act 4, of 2017
- Consumer Protection Act 68 of 2008
- Limpopo Liquor Act, 2009 (Act No. 5 of 2009)

Note that this may not be an exhaustive list, and that these records are not necessarily available for requestors.

11. PROCESSING DETAILS

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by the Company will depend on the nature of the data and the data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

11.1 PURPOSE OF PROCESSING

Employee data

The Company processes employee data for business administration purposes. For example, employee data is processed for payroll purposes. Employee data is also processed to the extent required by legislation and regulation. For example, the Company discloses employees' financial information to the Commissioner for the South African Revenue Service, in terms of the Income Tax Act 58 of 1962 and employee's sensitive personal information in terms of the Employment Equity Act 55 of 1998.

Client related data

The Company processes client related records for the purpose of conducting its business.

Customer related data

The Company may process customer related records for, without limitation, the purpose of betting, to propose psychological support or other support services to customers, or in the context of promotional purposes.

Third party data the Company processes third party records for business administration purposes.

Other party data

The Company processes "other party" records for business administration purposes. For example, personnel data may be processed in order to effect payment to contractors and/or suppliers.

In performing these various tasks, the Company may, amongst others, collect, collate, process, store and disclose personal information.

The lists of processing purposes are non-exhaustive.

11.2 CATEGORIES OF DATA SUBJECTS

The Company may hold information and records on the following category of data subject:

- Employees / personnel of the Company;
- Customers;

- Clients of the Company;
- Any third party with whom the Company conducts its business services;
- Contractors of the Company;
- Suppliers of the Company;
- Service providers of the Company;

This list of categories of data subjects is non-exhaustive.

11.3 RECIPIENT TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

Depending on the nature of the data, the Company may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (i.e. South African Revenue Services) or another similar body;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or the Company in terms of the applicable rules (i.e. the Competition Commission in terms of the Competition Act 89 of 1998);
- Third parties with whom the Company has a contractual relationship for the retention of data (for example, a third party archiving services);
 - Auditing and accounting bodies (internal and external);
 - Anyone making a successful application for access in terms of PAIA.

This list of categories of recipients is non-exhaustive.

SECURITY MEASURES

The Company takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in the Company's possession. The Company takes appropriate technical and organizational measures designed to ensure that personal data remain confidential and secure against unauthorized or unlawful processing and against accidental loss, destruction or damage.

12. GROUNDS FOR REFUSAL

The Company may refuse a request for information on the following basis:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person; Internal
- Mandatory by legislation to not dispose of records required by law for a specified time;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party;
 - Financial, commercial, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - Information disclosed in confidence by a third party to the Company, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- Mandatory protection of the safety of individuals and the protection of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;
- The commercial activities of the Company, which may include:
 - Trade secrets of the Company;
 - Financial, which, if disclosed, could put the Company at a disadvantage in negotiations or commercial competition;
 - A computer program which is owned by the Company, and which is protected by copyright.
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

13. UPDATING THE MANUAL

The Information Officer of Hollywood Sportsbook Holdings (Pty) Ltd will on a regular basis update this manual.

14. PROCEDURE FOR ACCESS

It is important to note that the successful completion and submission of an access request form does not automatically allow the requestor access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 of Chapter 4 of the Act. If it is reasonably suspected that the requestor has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requestor.

The following steps must be followed when a requester wishes to obtain access to information for the Group:

14.1 The requestor must complete Form C found in Annexure A. This Form must be submitted, together with a request fee (if applicable) and proof of the requestor's ID, to the Information Officer at the specified address or electronic email address listed in section 5 above. A request which does not comply with the formalities as prescribed by the PAIA will be returned to you.

14.2 The request must meet the following requirements:

- provide sufficient detail to enable the Information Officer to identify the record(s) requested and to identify the requestor;
- indicate which form of access is required;
- specify a postal address or e-mail address of the requester in the Republic of South Africa;
- identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right; and

- indicate if any other manner is to be used to inform the requestor and state the necessary particulars to be so informed.

14.3 If a request is made on behalf of another person, the requestor must then submit proof of the capacity in which the requestor is making the request to the satisfaction of the Group.

14.4 The fee that the requestor must pay to the Group is currently R 140.

14.5 After the Information Officer has decided on the request, the requestor must be notified whether access is granted or refused.

14.6 If the request is granted then an access fee is payable in respect of the search, reproduction, and preparation costs. These fees are set out in Annexure B.

ANNEXURE A - PRESCRIBED FORM C**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

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

(Regulation 10)

A. PARTICULARS OF PRIVATE BODY

The Head : _____

B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

- (a) *The particulars of the person who requests access to the record must be given below*

(b) *The address (postal and/or email) and/or fax number in the Republic to which the information is to be sent must be given*

(c) *Proof of the capacity in which the request is made, if applicable, must be attached*

Full names and surname : _____

Identity number : _____

Postal address : _____

Fax number : _____

Telephone number : _____

E-mail address : _____

Capacity in which request is made, when on behalf of another person : _____

C. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE

This section must be completed ONLY if a request for information is made on behalf of another person

Full names and surname : _____

Identity number : _____

D. PARTICULARS OF RECORD

- (a) *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*

(b) *If the provided space is inadequate, please continue on a separate sheet and attach it to this form. The requestor must sign all additional sheets*

Description of record or relevant part of record : _____

Reference number, if available : _____

Any further particulars of record : _____

E. FEES

- (a) A request for access to a record, other than a record containing personal information about you, will be processed only after a request fee has been paid
- (b) You will be notified of the amount required to be paid as the request fee
- (c) 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
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason for exemption from payment of fees : _____

F. FORM OF ACCESS TO RECORD

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required

Disability : _____

Form in which record is required : _____

Mark the appropriate box below with an X

NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1. If the record is in written or printed form							
☐	Copy of record*	☐	Inspection of record				
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches etc.)							
☐	View the images	☐	Copy of the images*				
☐		☐	Transcription of the images*				
3. If record consists of recorded words or information which can be reproduced in sound							
☐	Listen to the soundtrack (audio cassette)	☐	Transcription of soundtrack * (written or printed document)				
4. If record is held on computer or in an electronic or machine-readable form							
☐	Printed copy of record *	☐	Printed copy of information derived from the record*				
☐		☐	Copy in computer readable form *				
*If you requested a copy or transcript of a record (above) do you wish the copy or transcription to be posted to you? Postage is payable			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> <tr> <td>☐</td> <td>☐</td> </tr> </table>	YES	NO	☐	☐
YES	NO						
☐	☐						

G. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate sheet and attach it to this form. The requestor must sign all the additional sheets

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 : _____

H. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____

**SIGNATURE OF REQUESTOR/PERSON ON WHOSE BEHALF
REQUEST IS MADE**

ANNEXURE B - FEES IN RESPECT OF PRIVATE BODIES

Item	Description	Amount
1.	The request fee payable by every requester	R 140
2.	Photocopy/ printed black and white copy of A4-size page	R 2 per page or part thereof
3.	Printed copy of A4-size page	R 2 per page or part thereof
4.	For a copy in a computer-readable form on: iii. Flash drive (to be provided by requester) iv. Compact disc • If provided by requestor • If provided to the requester	R 40 R 40 R 60
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images per A4-size page	
7.	Transcription of an audio record, per A4-size page	R 24
8.	Copy of an audio recording on: v. Flash drive (to be provided by requester) vi. Compact disc • If provided by requestor • If provided to the requester	R 40 R 40 R 60
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R 435
10.	Deposit: if such exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

ANNEXURE C – HOLLYWOOD GROUP OF COMPANIES

The scope of this manual includes Hollywood Sportsbook Holdings (Pty) Ltd (“Hollywood”) and the following related entities in which Hollywood has a direct interest:

Hollywood Sportsbook Gauteng (Pty) Ltd	Registration Number 2008/012291/07
Hollywood Sportsbook KwaZulu-Natal (Pty) Ltd	Registration Number 2008/009721/07
Hollywood Sportsbook Western Cape (Pty) Ltd	Registration Number 2008/011557/07
Hollywood Sportsbook Eastern Cape (Pty) Ltd	Registration Number 2008/011560/07
Hollywood Sportsbook Limpopo (Pty) Ltd	Registration Number 2010/023778/07
Hollywood Sportsbook Mpumalanga (Pty) Ltd	Registration Number 2012/107236/07
Hollywood Sportsbook Free State (Pty) Ltd	Registration Number 2011/133890/07
Hollywood Sportsbook Northern Cape (Pty) Ltd	Registration Number 2015/128353/07
Hollywood Sportsbook North West (Pty) Ltd	Registration Number 2015/128297/07
Shirley Kruger Racing (Pty) Ltd	Registration Number 2011/145724/07
Hollywood Sportsbook KB (Pty) Ltd	Registration Number 2012/053556/07
Nemacron (Pty) Ltd	Registration Number 2013/012544/074
MHS Betting Mirror (Pty) Ltd	Registration Number 2014/232941/07
Ngunezi Racing and Sport (Pty) Ltd	Registration Number 238080/2014/07
Winning Form (Pty) Ltd	Registration Number 2008/011948/07
The Star Merchant (Pty) Ltd	Registration Number 2015/186157/07
Racing Distribution (Pty) Ltd	Registration Number 2008/014381/07
Winning Media (Pty) Ltd	Registration Number 2015/360122/07
The Star Factory (Pty) Ltd	Registration Number 2010/023976/07
Bonne Garde Support (Pty) Ltd	Registration Number 2012/017893/07
Hollywoodbets HQC (Pty) Ltd	Registration Number 2016/047070/07
Dynamic Product Technologies (Pty) Ltd	Registration Number 2917/092194/07
Hollywoodbets Brand (Pty) Ltd	Registration Number 2016/117229/07
TAH Properties (Pty) Ltd	Registration Number 2015/123443/07

Devin Properties (Pty) Ltd	Registration Number 2015/131701/07
Jashdety (Pty) Ltd	Registration Number 2016/208918/07
Curdar Properties (Pty) Ltd	Registration Number 2014/143622/07
Betgames (Pty) Ltd	Registration Number 2014/184514/07
OBH Properties (Pty) Ltd	Registration Number 2002/031586/07
Rollaball (Pty) Ltd	Registration Number 2021/620865/07
BET Software (Pty) Ltd	Registration Number 2009/019410/07
10 Oaklands Road CC	Registration Number 2002/048252/23
126 Intersite Avenue CC	Registration Number 1999/046003/23
8 Worraker Street CC	Registration Number 1998/069509/23
Hollywood Foundation NPC	Registration Number 2021/530322/08

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