



PROMOTION OF ACCESS TO INFORMATION MANUAL

**prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

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1. INTRODUCTION

Calix, Inc. sells cloud services, software and hardware to broadband service providers internationally. Calix Networks UK Ltd, incorporated in England and Wales, is a subsidiary of Calix, Inc. that employs individuals residing in South Africa and has been registered as an external profit company in South Africa.

2. PURPOSE OF THIS MANUAL

This manual was prepared in accordance with section 51 of PAIA. This manual provides information about records maintained by Calix and how information contained in those records may be requested from Calix, as well as certain information regarding the processing of personal information and transfers of information outside South Africa.

3. LIST OF ACRONYMS AND ABBREVIATIONS

In this Manual, unless the context indicates a contrary intention, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings —

- | | | |
|-----|------------------------------|---|
| 3.1 | “Calix” | means Calix Inc., and Calix Networks UK Ltd; |
| 3.2 | “Data Subject” | has the meaning as defined in POPIA; |
| 3.3 | “Information Officer” | means the person identified as such in clause 4; |
| 3.4 | “Manual” | means the manual contained in this document; |
| 3.5 | “PAIA” | means the Promotion of Access to Information Act No. 2, as amended; |
| 3.6 | “POPIA” | means the Protection of Personal Information Act No. 4 of 2013; |
| 3.7 | “Regulations” | means the regulations issued pursuant to PAIA from time to time; |
| 3.8 | “Regulator” | means the Information Regulator of South Africa; and |
| 3.9 | “South Africa” | means the Republic of South Africa. |

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CALIX

4.1 Information Officer:

Name: Gerard Rebelo

Tel: +27 827720659

Email: Gerard.Rebelo@Calix.com with a copy to
privacy@calix.com

Fax number: N/A

4.2 Access to information general contact:

Email: privacy@calix.com or DPO@calix.com

4.3 Head Office:

Postal Address: PO Box 4803, Dainfern North, South Africa 2174

Physical Address: This manual is available on the website of Calix. If you require access to a physical copy of this manual, please contact our Information Officer with your request and we will assist to make it available to you.

Telephone: +27 827720659

Email: privacy@calix.com

Website: www.calix.com

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1 The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA (the “**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.

5.2 The Guide is available in each of the official languages of South Africa and in braille.

5.3 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal

working hours.

5.4 The Guide can also be obtained:

5.4.1 upon request from the Information Officer; and

5.4.2 from the website of the Regulator(<https://info regulator.org.za/paia-guidelines/>).

5.5 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:

5.5.1 English; and

5.5.2 Afrikaans.

6. PROCESS AND FEES FOR REQUESTING ACCESS TO INFORMATION

6.1 **Data Subject requests:** Data Subjects have a right to request that Calix confirm, free of charge, whether Calix holds any personal information about the Data Subject. Data Subjects may submit a request for confirmation free of charge to Calix using this [Request Form](#) (clicking the link will take you to TrustArc, whom we have engaged to assist with personal information requests). If Calix holds information regarding a Data Subject, access to that information may be subject to certain fees as provided for in PAIA.

6.2 **Process:** Requests for information (other than Data Subject requests) should be made by using the prescribed form available on the website of the Regulator at <https://info regulator.org.za/paia-forms/>, specifically the [Request for Access to Record](#) and the [Outcome of request and fees payable](#). The request should contain the following information, or such information as specified on the prescribed form:

6.2.1 **Contact details:** Requester full name, postal address, and email address. If a request is made on behalf of another person, also include: the full name of the other person, the capacity in which the request is made, and proof of that capacity (e.g., power of attorney).

6.2.2 **Proof of identity:** With the exception of Data Subject requests, that will be authenticated via Calix's privacy platform, requesters must supply a valid proof of identity.

6.2.3 **Particulars of record requested:** Description of record, and any information

that may be helpful to Calix in assessing the request, and locating records responsive to the request (e.g., if about a person, why the requester believes Calix may hold records about that person).

- 6.2.4 **Form of access to records:** If the requester requires records in a certain format because of a disability, please specify the disability and the format requested for the record.
- 6.2.5 **Particulars of right to be exercised or protected:** Indicate which right is being exercised or protected and why the record requested is required for the exercise or protection of that right.
- 6.3 **Fees:** The Information Officer to whom a request for access is made will by notice require the requester to pay the prescribed request fee (if any), before further processing the request.
- 6.4 **Calix response to requests:** Save where PAIA allows otherwise, Calix will respond to requests for information within thirty (30) days of receipt of the request, with Calix's decision whether to grant or decline the request and the reasons (if declined). If the request cannot be fulfilled within thirty (30) days and where permitted under PAIA, Calix may extend the time to respond for an additional thirty (30) days and will communicate that to the requester.
- 6.5 If a request is denied or no response to a request for access to records is received, a complaint may be lodged with the Regulator at this email address: paiacomplaints@info regulator.org.za

7. CATEGORIES OF RECORDS OF CALIX WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Calix makes certain information available voluntarily in the following manner and which can be accessed without a person having to request access or which can be requested telephonically, via mail or via email where applicable:

- 7.1 on the Calix website (www.calix.com);
- 7.2 via Calix accounts on social media such as LinkedIn, Twitter, Facebook and YouTube;
- 7.3 during exhibitions;

- 7.4 in publicly available marketing and promotional materials;
- 7.5 through its sales representatives and channels;
- 7.6 as part of public filings with United States state regulatory agencies, such as the Delaware Secretary of State's office or the Office of Corporations;
- 7.7 as part of public filings with United States federal regulatory agencies, such as the United States Securities and Exchange Commission, and patent and trademark agencies; and
- 7.8 as part of publicly available patents, trademark, and copyright applications filed by Calix.

8. DESCRIPTION OF THE RECORDS OF CALIX WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Where applicable to its operations, Calix retains records and documents as required by the legislation listed below. If disclosure is not prohibited by law, regulations, contractual agreement or otherwise, Calix will make records available for inspection as required by applicable law, upon receipt of an appropriate request for access and payment of fees (if required).

Applicable Legislation
Basic Conditions of Employment Act 75 of 1997
Broad-Based Black Economic Empowerment Act 53 of 2003
Compensation for Occupational Injuries and Diseases Act 130 of 1993
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Financial Intelligence Centre Act 38 of 2001
Income Tax Act 58 of 1962
Labour Relations Act 66 of 1995
Occupational Health and Safety Act 85 of 1993

Promotion of Access to Information Act 2 of 2000
Protection of Personal Information Act 4 of 2013
Skills Development Levies Act 9 of 1999
South African Revenue Services Act 34 of 1997
Unemployment Insurance Contributions Act 4 of 2002
Unemployment Insurance Act 30 of 1996

9. DESCRIPTION OF THE SUBJECTS ON WHICH CALIX HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CALIX

9.1 Calix holds records on the categories of information listed below. Certain categories of information listed below might not be accessible via a request for access where grounds for refusal as set out in PAIA apply to such a request. All requests for access will be evaluated on a case-by-case basis.

9.2 The inclusion of any subject or category of records below should not be taken as an indication that records falling within those subjects and/or categories will be made available under PAIA.

Subjects on which the body holds records	Categories of records
Company Records	Articles of Incorporation By-Laws Directors' Information Board Meeting Attendance, Minutes and Resolutions Company Register Shareholder Agreements Share Certificates Delegation of Authority

Subjects on which the body holds records	Categories of records
	Company Policies General Correspondence
Finance Records	Financial Statements Corporate Tax Records Accounting Records Banking Records Asset Register Auditor Reports Agreements General Correspondence
Product Development	Quarterly product improvement/update plans and records Product Source Code General Correspondence
Marketing	Marketing Plans Marketing Event/Campaign Records
Customer Records	Customer representative contact details Communications with customers Orders and records related to orders/service installation and turn-up/turn-down, maintenance, and termination Customer inquiries and trouble reports Recordings of customer calls Customer invoices and payment information
Customer subscriber	Billing and service entitlement information

Subjects on which the body holds records	Categories of records
records	Device telemetry data Sampled network traffic data
Talent and Culture	Employee personal information as described in the Calix Employee Privacy Notice Calix employment policies and procedures Advertised posts
Information Technology Records	Hardware, software, cloud asset and infrastructure records Security plans and operations System logs Network and equipment usage data
Legal and Regulatory	Contracts/Agreements Claims/Litigation Records License Fee Records Personal information records of processing activities and assessments General Correspondence

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of processing personal information:

Calix processes personal information for lawful purposes as outlined in its privacy policy, available at www.calix.com/pages/privacy-policy.html

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Data Subjects*	Personal Information that may be processed*
Current and former employees (and families/dependents of employees), candidates for employment, and contractors	Contact details, education and job history, benefits information, performance information, survey results, background check results, photograph (if uploaded by employee), passport number, nationality, place of birth, race, national identity number, immigration status
Customer representatives	Contact information, company, name and role, information related to cases/tickets submitted, Calix cloud user entitlements and credentials, Calix cloud user analytics, voice recordings of calls to Calix customer service/technical service, browser information and session cookies including session recordings within the Calix portal
Website visitors and prospective customers	Browser information and cookies, contact information if provided to Calix, communications with Calix
Customers' subscribers	Subscriber billing data, including contact data and account details, IP address and device information and cookie information, service purchase and usage data, sampled network flow data (packet header information), unique identifiers, insights, marketing opt-out selection, and marketing campaign information
Suppliers and service providers	Contact information, name and role, information related to products or services supplied to Calix, communications with Calix
Juristic entities	Name, registration number, tax information, contact details, physical and postal address, invoice and payment details, tax information

Categories of Data Subjects*	Personal Information that may be processed*
<i>*Note that the above lists are non-exhaustive.</i>	

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

Calix may supply personal information to the following categories of recipients, depending on the nature of the information:

- 10.3.1 Calix affiliates;
- 10.3.2 Suppliers and service providers;
- 10.3.3 Employee benefit providers;
- 10.3.4 Auditing, accounting and law firms or entities;
- 10.3.5 Data hosting providers;
- 10.3.6 Governmental authorities, departments, regulators as relevant; and
- 10.3.7 Courts, regulators, arbitrators, mediators, or statutory commissions that make valid legal requests, demands or orders for information.

**The above list is non-exhaustive.*

10.4 Planned transborder flows of personal information

- 10.4.1 Calix stores personal information regarding Calix employees and prospective employees in a service provider’s employment platform housed within the United States.
- 10.4.2 Calix stores personal information regarding Calix customers and prospective customers and website visitors in a customer relationship management platform housed within the United States.
- 10.4.3 Calix stores personal information regarding Calix customers’ subscribers within the Calix International Cloud hosted by Amazon Web Services in Canada.

10.4.4 Calix maintains data processing agreements with all service providers that host Calix's or Calix customers' personal information to protect the information.

10.5 **General description of information security measures to be implemented by Calix to ensure the confidentiality, integrity and availability of the information:**

10.5.1 To protect the ongoing confidentiality, integrity, and availability of Calix's information, Calix has implemented an Information Security Management System (ISMS), using principles from the National Institute of Standards and Technology's Cybersecurity Framework, that applies to all Calix employees and contractors with access to Calix's data environment (the "**Calix Enterprise**").

10.5.2 The Calix Cloud system that stores and processes all Calix customer personal information and Calix customer subscriber personal information for Calix Engagement Cloud, Calix Service Cloud, Calix Deployment Cloud and Calix Operations Cloud ("**Calix Cloud**") uses an ISMS and is governed by a security policy that applies to all Calix employees and vendors with access to the Calix Cloud. The Calix Cloud is hosted by Amazon Web Services. Calix has obtained a Type 1, SOC 2 report and a Type 2, SOC 2 report on controls relevant to security from an independent auditor for the Calix Cloud system. The Calix Cloud has implemented logical security controls.

10.5.3 Calix has implemented appropriate controls in the following areas to protect the Calix Enterprise and the Calix Cloud: Governance and organizational controls, personnel security, third party management, incident management, change management, identity and access management, vulnerability management, physical security, backups and secure disposal.

11. **AVAILABILITY OF THE MANUAL**

11.1 A copy of the Manual is available:

11.1.1 on [Privacy Policy \(calix.com\)](https://calix.com/privacy-policy);

11.1.2 We do not have a physical office in South Africa, but if you require access to a physical copy of this manual, please contact our Information Officer with your request and we will assist to make it available to you;

11.1.3 to any person upon request and upon the payment of the reasonable prescribed fee; and


11.1.4 to the Regulator upon request.

11.2 A fee for a copy of the Manual, as contemplated in the Regulations, shall be payable per each photocopy made.

12. **UPDATING OF THE MANUAL**

The Information Officer will on a regular basis update this manual.

Issued by

DocuSigned by:

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Name: Gerard Rebelo

Information Officer

Title: Regional Sales Director