

PAIA MANUAL



This policy is owned by **Portfolio Analytics Proprietary Limited**

The processes contained herein form part of the organisation's internal control structures and procedures.

As the Head of the aforementioned organisation, I James Towell, hereby confirm the adoption of the processes set out in this document.

Head Signature

A handwritten signature in black ink, appearing to read 'James Towell', is written over a horizontal line. The signature is stylized and includes a vertical line extending downwards from the end of the signature.

20 OCTOBER 2022

Date

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1. DEFINITIONS

Data Subject means the person to whom personal information relates;

Deputy Information Officer means the person to whom any power or duty conferred or imposed on an Information Officer by PoPI has been delegated;

Head, in relation to, a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
 - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - the person who is acting as such or any person duly authorised by such acting person;

Information Officer means the head of a private body;

Information Regulator means the Regulator established in terms of Section 39 of PoPI;

PAIA means the Promotion of Access to Information Act, No 2 of 2000;

Person means a natural person or a juristic person;

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

Personal Requester means a requester seeking access to a record containing personal information about the requester;

PoPI means the Promotion of Personal Information Act, No 4 of 2013;

Private body means:

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information;

Public body means:

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- any other functionary or institution when:
 - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - exercising a public power or performing a public function in terms of any legislation;

Record means any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation;

Requester in relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person;

Request for access means a request for access to a record of the organisation in terms of section 50 of PAIA;

Third Party in relation to a request for access to a record held by the organisation, means any person other than the requester.

2. PURPOSE OF A PAIA MANUAL

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.

The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and PoPI have been met.

The organisation's PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

Annexure A: Contact Details & Business Type

This section provides the organisation's postal and street address, phone and fax number and, if available, the e-mail address of the head of the organisation.

Annexure B: Section 10 PAIA Guide

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.

Annexure C: Statutory Records

This section provides a description of the various statutes in terms of which the organisation is required to maintain records.

Annexure D: Availability of Records

This section provides a list of records held by the organisation along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to who the respective records relate along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated

Annexure E: Request Procedure

This section sets out the procedure required to obtain access to a record indicated as a "PAIA Request" in Annexure D.

Annexure F: Prescribed Fees

This section sets out the fees that are payable to the organisation prior to processing a request to obtain access to a record held by the organisation.

Annexure G: Processing of Personal Information

This section sets out the applicable aspects for the processing of personal information.

Annexure H: Deputy Information Officer Appointment

This section provides for the formal appointment of a Deputy Information Officer where so required.

3. DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating policy awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the policy for accuracy and communicating any amendments.

Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which:

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person
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Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information that is already publicly available;
- The record consists of information that was given to the organisation by the individual to whom it relates and the individual was informed by or on behalf of the organisation, before it is given, that the information belongs to a class of information that would or might be made available to the public;
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest;
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin;
- The record consists of information about an individual who is or was an official of the organisation and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual and the name of the individual on a record prepared by the individual in the course of employment.

B: Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D: Mandatory Protection of Safety of Individuals and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual;
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property;
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

E: Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

F: Commercial Information of the organisation

Grounds for Refusal

- The record consists of information that contains trade secrets of the organisation;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation;
- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition;
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the organisation, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by the organisation or the results of any such testing or investigation carried out by or on behalf of the organisation and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

G: Mandatory Protection of Research Information of a Third Party and the Organisation

Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage;
- The record consists of information that contains information about research being or to be carried out by or on behalf of the organisation, the disclosure of which would be likely to expose the organisation, a person that is or will be carrying out the research on behalf of the organisation, or the subject matter of the research to serious disadvantage.

4. NOTICE

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be;
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude, from any such reasons, any reference to the content of the records; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in the organisation's possession, but cannot be found, or
- Simply does not exist,

the head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

5. AVAILABILITY OF THE MANUAL

A copy of the Manual is available:

- on www.analytics.co.za, if any;
- head office of Portfolio Analytics for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

ANNEXURE A: CONTACT DETAILS AND BUSINESS TYPE

A. Organisation Contact Details

Postal address: PO Box 411939; Craighall; 2024
 Street address: 54 Peter Place; 1st Floor Blackburn House; Peter Place Park; Bryanston; 2196
 Phone number: +27 11 463 9600
 Fax number: +27 11 463 8279

B. Head of Organisation

Full names & surname: James Towell
 Email address: james@analytics.co.za

C. Deputy Information Officer

Full names & surname Brenda Ainsworth, Ross Scott, Candace Turkington
 Email address: brenda@cicollective.co.za; ross@analytics.co.za; candace@analytics.co.za
 Phone number: +27 21 936 9500

D. Business Type

The organisation conducts its main type of business in the following sector(s):

- Agriculture
- Mining and Quarrying
- Manufacturing
- Electricity, Gas & Water
- Construction
- Retail & Motor Trade and Repair Services
- Wholesale Trade, Commercial Agents & Allied Services
- Catering, Accommodation & Other Trade
- Finance & Business Services
- Community, Special & Personal Services
- If other, please specify:

ANNEXURE B: SECTION 10 PAIA 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 postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of 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://www.justice.gov.za/inforeg/>).

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Requesters are referred to the guide in terms of section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

ANNEXURE C: STATUTORY RECORDS

The organisation maintains statutory records and information in terms of the following legislation:

Administration of Estates Act	<input type="checkbox"/>
Arbitration Act	<input type="checkbox"/>
Auditing Professions Act	<input type="checkbox"/>
Basic Conditions of Employment Act	<input type="checkbox"/>
Closed Corporations Act	<input type="checkbox"/>
Collective Investment Schemes Control Act	<input type="checkbox"/>
Companies Act	<input checked="" type="checkbox"/>
Compensation of Occupational Injuries & Diseases Act	<input type="checkbox"/>
Consumer Protection Act	<input type="checkbox"/>
Copyright Act	<input type="checkbox"/>
Customs and Excise Act	<input type="checkbox"/>
Electronic Communications and Transactions Act	<input type="checkbox"/>
Employment Equity Act	<input type="checkbox"/>
Financial Advisory & Intermediary Services Act	<input checked="" type="checkbox"/>
Financial Institutions (Protection of Funds) Act	<input checked="" type="checkbox"/>
Financial Intelligence Centre Act	<input checked="" type="checkbox"/>
Friendly Societies Act	<input type="checkbox"/>
Income Tax Act	<input checked="" type="checkbox"/>
Insolvency Act	<input type="checkbox"/>
Labour Relations Act	<input type="checkbox"/>
Long-term Insurance Act	<input type="checkbox"/>
Medical Schemes Act	<input type="checkbox"/>
National Credit Act	<input type="checkbox"/>
Occupational Health and Safety Act	<input type="checkbox"/>
Patents Act	<input type="checkbox"/>
Pension Funds Act	<input checked="" type="checkbox"/>
Prevention of Organised Crime Act	<input checked="" type="checkbox"/>
Prevention and Combatting of Corrupt Activities Act	<input checked="" type="checkbox"/>
Promotion of Equality and Prevention of Unfair Discrimination Act	<input type="checkbox"/>
Protection of Constitutional Democracy against Terrorist and related Activities Act	<input checked="" type="checkbox"/>
Short-term Insurance Act	<input type="checkbox"/>
Skills Development Act	<input type="checkbox"/>
Trademarks Act	<input type="checkbox"/>
Unemployment Insurance Act	<input type="checkbox"/>
Value Added Tax Act	<input checked="" type="checkbox"/>

ANNEXURE D: AVAILABILITY OF RECORDS

The organisation maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-Insurance Policies held by organisation	PAIA Request	Internal Communications Risk Management	Employees Organisation
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees

	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

ANNEXURE E: REQUEST PROCEDURE

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Deputy Information Officer indicated in Annexure A.

The Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Deputy Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

A. Particulars of Private Body
The Head: _____
B. Particulars of person requesting access to the record
(i) The particulars of the person who requests access to the record must be recorded below (ii) Furnish an address and/or fax number in the Republic to which information must be sent (iii) Proof of the capacity in which the request is made, if applicable, must be attached
Full names & surname: Identity number: Postal address: Fax number: Telephone number: Email address: Capacity:
C. Particulars of person on whose behalf request is made
This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person _____

ANNEXURE F: PRESCRIBED FEES

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted)
- A requestor may lodge an application with a court against the tender / payment of the request fee and/or deposit
- Records may be withheld until the fees have been paid

No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
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.	R145.00
	To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request into items 2-8
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."

ANNEXURE G: PROCESSING OF PERSONAL INFORMATION

1. Purpose of Processing Personal Information

The organisation may process the personal information for the following purposes:

- for the administration of funds and products, client investments and agreements in a manner that meets regulatory, compliance and operational requirements. This includes sharing personal information with other entities for the efficient servicing and/or administration of client investments and/or agreements.
- for keeping and maintaining financial, client and operational records which includes sharing personal information with third parties that provide professional services and record keeping services to the organisation.
- to meet the organisation's responsibilities to clients, including sharing personal information with third parties which require the personal information to process the client's instructions or to otherwise provide a service to the organisation and its clients.
- to help identify data subjects when they contact the organisation and for communicating with data subjects (including for the purposes of sending required reports and other information and responding to data subject requests).
- for using personal information to provide clients and other data subjects, with publications which include articles, newsletters, bulletins and webinars and/or invitations to attend and/or participate in any events.
- to enable the organisation to trace data subjects when necessary.
- to help the organisation detect and prevent fraud, money laundering, terrorist financing and financial crimes. This includes the recording of calls for regulatory purposes and providing personal information to third parties who assist with the verification of client information or the obtaining of additional information that may be needed by the organization to meet its regulatory obligations.
- for using personal information to meet the contractual, legal, and regulatory obligations, including providing personal information to third parties and to governmental, regulatory & non-regulatory bodies, law enforcement agencies and any other person with whom the organisation is required, by law, to share the personal information.
- for using personal information to conduct research for internal purposes or to help the organisation improve the quality of their products and services, including sharing personal information with third parties that assist the organisation with research and servicing the products or improving the quality of their products and services.
- for any purpose related to the organisation conducting their business, which includes:
 - recruitment and employment purposes.
 - general administration, financial and tax purposes, and to enable the organisation to engage with third party suppliers.
 - the management and auditing of the organisation's business.
 - reviewing the safety, usability, use and availability of the website.
 - health and safety purposes and to enable the organisation to monitor access, secure and manage their premises.
 - business continuity and disaster recovery purposes.

2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

The categories of data subjects in respect of whom the organisation processes personal information and the nature or categories of the personal information being processed. The nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services.

Categories of Data Subjects	Personal Information that may be processed
Clients	name, address, registration numbers / identity number, employment status, bank details, shareholders, beneficiaries, authorized persons
Service Providers	names, address, registration number, Vat numbers, trade secrets, bank details, authorized persons
Employees	Name, address, identity number, qualifications, gender, race, beneficiaries

3. Planned transborder flows of personal information

In fulfilling the purpose for collecting personal information, there may be transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic.

4. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The organisation will manage the security of its filing system to ensure that personal information is adequately protected. To this end, security controls will be implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification or destruction.

Security measures also need to be applied in a context-sensitive manner. For example, the more sensitive the personal information, such as medical information or credit card details, the greater the security required.

The organisation will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on the organisation's IT network.

The organisation will ensure that all paper and electronic records comprising personal information are securely stored and made accessible only to authorised individuals.

The organisation's operators and third-party service providers will be required to enter into service level agreements with the organisation where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement.

ANNEXURE H: DEPUTY INFORMATION OFFICER APPOINTMENT

In terms of the Protection of Personal Information Act the head of a private body is the designated Information Officer for that private body. The Information Officer may delegate any power or duty conferred or imposed in terms of PoPI to the Deputy Information Officer.

The organisation has appointed Deputy Information Officers to facilitate any requests to access records held by the organisation. This delegation does not prohibit the person who made the delegation from exercising power concerned or performing the duty concerned himself or herself. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.

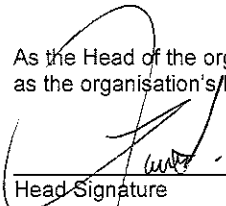
The Deputy Information Officers need not have any specific qualifications but must have a thorough knowledge of the organisation’s functional departments and business processes.

The Deputy Information Officers have the authority to approach all staff members of the organisation and to request all records held by the organisation. Where a manager is of the opinion that access to a record should not be granted to the Deputy Information Officers, reasons for this decision shall be given to the Information Officer who will make a final decision on the matter.

Together with the Information Officer, the Deputy Information Officers are responsible for:

- Publishing and proper communication of the manual i.e. creating policy awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the policy for accuracy and communicating any amendments

As the Head of the organisation I, James Towell, hereby appoint Brenda Ainsworth, Ross Scott and Candace Turkington as the organisation's Deputy Information Officers.



 Head Signature

20 October 2022
 Date



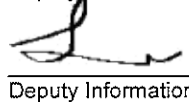
 Deputy Information Officer Signature

20 October 2022
 Date



 Deputy Information Officer Signature

21 October 2022
 Date



 Deputy Information Officer Signature

21 October 2022
 Date