



PAIA MANUAL

VERSION 2.01

THE PRIME FINANCIAL SERVICES GROUP

28 PETER PLACE
LYME PARK
SANDTON
2060



CONTENTS

| | |
|--|---|
| 1. APPLICATION OF THE MANUAL..... | 2 |
| 2. PURPOSE OF THE MANUAL | 2 |
| 3. DEFINITIONS | 2 |
| 4. KEY CONTACT DETAILS | 3 |
| 5. GUIDE TO SECTION 10 OF THE PROMOTION OF ACCESS TO INFORMATION ACT | 3 |
| 6. REGULATOR DETAILS | 4 |
| 7. CATEGORIES & TYPES OF RECORDS | 4 |
| 8. REQUESTING ACCESS TO RECORDS | 5 |
| 9. AVAILABILITY OF THE MANUAL | 5 |
| ANNEXURE 1 – REQUEST FOR ACCESS TO INFORMATION RECORDS | 6 |
| ANNEXURE 2 – FEE STRUCTURE FOR INFORMATION REQUESTS | 8 |
| ANNEXURE 3 – OWNER, APPROVAL & REVISION HISTORY | 9 |
| POLICY OWNER | 9 |
| POLICY APPROVAL | 9 |
| POLICY REVISION | 9 |

1. APPLICATION OF THE MANUAL

- 1.1 This policy is applicable to the legal entities within the Prime Financial Services Group (hereinafter referred to as “the Group”), as shown on the Group’s corporate organogram and amended from time to time (excluding Automated Outsourcing Services (Pty) Ltd).

2. PURPOSE OF THE MANUAL

- 2.1 The Promotion of Access to Information Act 2 of 2000 gives effect to the constitutional right of a person (as per Section 32 of the South African Constitution) to access information held by private bodies when such information is required for the protection or exercise of their rights. In such circumstances, private bodies must make the information available but at the same time, access to such information must be limited to what is reasonable and justifiable (as per Section 36 of the South African Constitution).
- 2.2 The PAIA Manual of the Group is has been designed to meet these requirements (which are specifically outlined in Section 51 of the Promotion of Access to Information Act of 2000). In its entirety, this manual is intended to provide the public with descriptions of the Group’s business records and provide necessary guidance to accessing the same, should they wish to make a request for access to such information.

3. DEFINITIONS

- 3.1 **Commission:** South African Human Rights Commission.
- 3.2 **Constitution:** The Constitution of the Republic of South Africa Act, No. 108 of 1996.
- 3.3 **Data Subject:** A person to whom personal information relates.
- 3.4 **Head:** The Chief Executive Officer (CEO) of the Group or the person(s) authorised to act as their authorised representatives or with equivalent authority.
- 3.5 **Information Officer:** As outlined in the Protection of Personal Information Act of 2013, the person responsible for encouraging compliance with the conditions for the lawful processing of personal information. In terms of this manual, the Information Officer (and their appointed deputies) are also responsible for providing access to information
- 3.6 **PAIA:** The Promotion of Access to Information Act of 2000.
- 3.7 **Person:** A natural person.
- 3.8 **Personal Information:** Information relating to a living person or juristic person which can include, but is not limited to:
- 3.8.1 Race;
 - 3.8.2 Gender;
 - 3.8.3 Sexual affiliation and activity;
 - 3.8.4 Pregnancy;
 - 3.8.5 Marital status;
 - 3.8.6 National, ethnic or social groups;
 - 3.8.7 Age;
 - 3.8.8 Physical and mental Health;
 - 3.8.9 Disability status;
 - 3.8.10 Personal/Private correspondence;
 - 3.8.11 Religious and personal beliefs (including matters of conscience);
 - 3.8.12 Language;

- 3.8.13 Birth dates;
- 3.8.14 ID numbers;
- 3.8.15 Physical and email addresses;
- 3.8.16 Contact numbers;
- 3.8.17 Personal/Private correspondence; and
- 3.8.18 Biometric information.

3.9 **POPIA:** The Protection of Personal Information Act of 2013.

3.10 **Processing:** Any activity or set of operations (whether automatic or manual) concerning a person’s personal information. This will include 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.

3.11 **Record:** A record of information in the possession of a public or private body as defined by the Promotion of Access to Information Act of 2000..

3.12 **Regulator:** The Information Regulator established in terms of POPIA.

3.13 **Requester:** Any person acting in their own capacity or as a representative of a Public Body making a Request for Access.

3.14 **Request for Access:** A request for access to a record of an organization in terms of section 50 of PAIA.

3.15 **Third Party:** In relation to a request for information, a “third party” is any person other than the requester.

4. KEY CONTACT DETAILS

| Contact Details to facilitate Access to Information: | |
|--|--|
| Head of the Group: | Shane Edward Peters |
| Information Officer of the Group: | Simore Visser |
| Deputy Information Officer of the Group: | Ivan Dabrowski |
| Physical Address: | 28 Peter Place, Lyme Park, Sandton, Gauteng, 2060 |
| Postal Address: | Postnet Suite 208, Private Bag X9, Benmore, Gauteng, 2010 |
| Tel No: | +27 (0)10 594 2100 |
| Email address: | POPIA@primeinvestments.africa |
| Website: | www.primeinvestments.co.za |

5. GUIDE TO SECTION 10 OF THE PROMOTION OF ACCESS TO INFORMATION ACT

5.1 The Commission has compiled a guide (in terms of Section 10 of PAIA) which will assist people in making requests for information, and provides examples of how PAIA has been used in the past to advance human rights. This guide is accessible through the Commission’s website (www.sahrc.org.za/understanding-paia). Additional contact details for the Commission are as follows:

Gauteng Office Address: Sentinel House, Sunnyside Office Park
32 Princess of Wales Terrace
Parktown, Johannesburg

Contact Numbers: 011 877 3600

Email Address: paia@sahrc.co.za

6. REGULATOR DETAILS

- 6.1 As of 30 June 2021, the Regulator has assumed the regulatory duties and functions associated with both POPIA and PAIA. Their contact details are as follows:

| | |
|-------------------------|--|
| Postal Address: | PO Box 31533 Braamfontein 2017 |
| Contact Numbers: | 010 023 5207 |
| Email Address: | General enquiries: infoereg@justice.gov.za POPIA complaints: POPIAComplaints.IR@justice.gov.za PAIA complaints: PAIAComplaints.IR@justice.gov.za |

7. CATEGORIES & TYPES OF RECORDS

- 7.1 Records (including those kept in terms of other legislation) are kept and made available in accordance with legal requirements, that apply to the business activities and environment of the Group. In keeping with such legislation, the Group maintains several categories and types of Records which include (but are not limited to)¹:

| CATEGORY | INFORMATION SUBJECTS |
|---|--|
| Client Records | Company & Contact Information |
| | Client Records & Correspondence |
| | Billing Information |
| Human Resource Records | Human Resource Policies & Procedures |
| | Employee Records & References |
| | Performance Reviews |
| | Training Materials & Records |
| Business Records | Company Policies and Secretarial Records |
| | Corporate Correspondence |
| | Licenses & Certifications |
| | Financial & Accounting Records |
| | Marketing Information & Strategies |
| Supplier Records | Product and Service Information |
| | Supplier Information |
| | Supplier Agreements & Contracts |
| | Billing Information |
| <p><i>The noted information categories and subjects are maintained to facilitate the Group's operations, client and supplier relationships, and ensure legislative and regulatory compliance with prevailing laws in South Africa (including The Companies Act, the Basic Conditions of Employment Act, the Financial Intelligence Centre Act, the Income Tax Act and the Pension Funds Act to name but a few).</i></p> | |

- 7.2 Records are held solely for the purpose they were collected and/or internally created and, within the bounds of legislative requirements and timeframes, may be updated or removed by the Data Subjects concerned unless otherwise prohibited by legal obligations.
- 7.3 In instances where the Group is required to share Records with third parties for the purpose of business activity, measures and agreements are in place to ensure that the Third Parties have information controls and the necessary infrastructure to the information processing requirements set out in POPIA.

¹ The categories detailed in this manual may be updated from time to time in keeping with new and revised legislation.

- 7.4 For additional information concerning the Group’s policies and procedures concerning the collection, Processing, and use of Personal Information and a Person’s rights in connection with such information, please refer to our Privacy Policy (which is available through the [Group’s website](#)).

8. REQUESTING ACCESS TO RECORDS

- 8.1 Should a Requester request a copy of their Personal Information from the Group or confirm that such information is held by the same, such a copy and/or confirmation will be provided free of charge (subject to the Requester confirming their identity).
- 8.2 In all other cases, any person wishing to access the Records of the Group and must complete the necessary request form which can be found in [Annexure 1](#) of this manual. The completed form must be emailed to POPIA@primeinvestments.africa.
- 8.3 The Information Officer of the Group, or their duly authorised representatives, will notify the Requester that their request has been received and whether or not any fees are payable prior to the Processing of the request. Please refer to [Annexure 2](#) for a breakdown of the fee structure.
- 8.4 Once the request has been processed, the Requester will be informed of the request’s outcome. The Group will work through any Request for Access within 30 days of receipt.² However, in instances where such a request relates to a large volume of Records (which may be in archived storage or potentially held offsite) and these Records cannot be reasonably obtained within 30 days, the Group reserves the right to extend the timeframe by a further 30 days and notify the Requester.
- 8.5 If at any time, a Request for Access relates to a Record which, in part, contains information which may or must be refused, reasonable efforts shall be made to grant access to information and/or elements within the Record which can reasonably be severed from that which cannot be disclosed.
- 8.6 If at any time, a Request for Access relates to a Record which cannot be found or which no longer exists, the Head of the Group, or the Information Officer, will provide an affidavit notifying the Requester that it is not possible to give access to that Record. Such an affidavit will only be issued after all reasonable steps have been taken to find / confirm the status of the Record in question.
- 8.7 Please note that access to certain records may or must be denied as set out in PAIA. Mandatory grounds for refusal include but are not limited to:
- 8.7.1 The protection of an individual’s privacy and interest.
 - 8.7.2 The unreasonable disclosure of Personal Information about a Third Party.
 - 8.7.3 The protection of commercial, contractual and/or confidential information of Third Parties.
 - 8.7.4 Confidential research, trade secrets, and or technical information.
 - 8.7.5 Privileged information produced during legal proceedings.
 - 8.7.6 Instances where the public’s interest is not being served.

9. AVAILABILITY OF THE MANUAL

- 9.1 Copies of this manual (as updated from time to time) are available for inspection, free of charge, at the offices of the Group. Alternatively, the manual can be downloaded from the Group’s website.

² If the Group fails to respond to a Request for Access within 30 days of receipt and no extension was granted, the request in question (for purposes of PAIA) shall be deemed to have been refused.

ANNEXURE 1 – REQUEST FOR ACCESS TO INFORMATION RECORDS

Particulars of Private Body (if the requester is a juristic entity):

The Head³ of the Private Body: _____

Particulars of Person requesting access to information records:

Full Name and Surname: _____

ID Number: _____

Telephone Number: _____

Cell Phone Number: _____

Fax Number: _____

Email Address: _____

Postal Address: _____

Are you making this request on behalf of another person: Yes No

If the answer to the above is “Yes”, please complete the box below:

| |
|---|
| Capacity in which Request is made: _____ |
| Particulars of Person on whose behalf the Request is made: |
| Full Name and Surname: _____ |
| ID Number: _____ |

Particulars of the Record requested:

Description of Record: _____

Reference Number (if available): _____

Additional Particulars: _____

³ Please refer to the definition of a “Head” as detailed in [Section 3](#) of this manual.

Form of Access to the requested Record:

Please mark the appropriate box with an “x”:

| | | | |
|--|--------------------------|--------------------------|--------------------------|
| Written or Printed records: | | | |
| Copy of the record | <input type="checkbox"/> | Inspection of the record | <input type="checkbox"/> |
| Record containing Visual Images: | | | |
| View images | <input type="checkbox"/> | Copy of images: | <input type="checkbox"/> |
| Transcription of images | <input type="checkbox"/> | | <input type="checkbox"/> |
| Please indicate the preferred method of delivery: | | | |
| By hand | <input type="checkbox"/> | Post | <input type="checkbox"/> |
| Email | <input type="checkbox"/> | Fax | <input type="checkbox"/> |

If you are disabled in such a way that you cannot read, view or listen to the requested record of information in any of the forms of access listed above, please provide the following details:

Nature of Disability: _____

Form in which Information is required: _____

Particulars of Right to be exercised or protected:

Please indicate which right is to be exercised or protected:

Explain why the requested record is required to exercise/protect the afore mentioned right:

Fees Payable

You will be notified of any and all fees payable to facilitate the request for access. For a full breakdown of the fee structure, please refer to [Annexure 2](#) of this manual.

Notice of Decision regarding the Request for Access:

You will be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, please specify the manner preferred and provide the relevant particulars to facilitate the request:

Signature of the Requester

Signed at _____ on the _____ day of _____ 20____

ANNEXURE 2 – FEE STRUCTURE FOR INFORMATION REQUESTS

| Request Fees | |
|--|--------------|
| Payable by a Requester to facilitate the request application for access to information records. <i>Please note: No fee is payable if the Requester submits an application regarding their own information. This fee is only payable by Third Parties.</i> | R50 |
| Reproduction of Documents | |
| Photocopy of an A4 page or part thereof | R1.10 |
| Digital copy of an A4 page or part thereof in machine-readable form | R0.75 |
| Transcription of visual images | R40 |
| Copy of visual images | R60 |
| Transcription of an audio record | R20 |
| Copy of an audio record | R30 |
| Computer Readable Format | |
| All information requested in electronic format will be delivered through email at no additional charge. | |
| Postage | |
| Postage fees will be charged when the requested records must be posted to the requester. Charges may vary depending on postal services used, speed of delivery and requester location. | |

Exemption of the Request Fee

The Requester may lodge an application with a court against the payment of the request fee in the Requester believes the fee is not required.

ANNEXURE 3 – OWNER, APPROVAL & REVISION HISTORY

POLICY OWNER

The Promotion of Access to Information Manual is owned and maintained by the Corporate Governance Department.

POLICY APPROVAL

The manual was reviewed and approved by means of a round-robin resolution passed on the 21st of February 2025 by the Board of Prime Financial Services (Pty) Ltd, holding company of the Prime Investments Group, for distribution and implementation within the Group.

POLICY REVISION

Detailed below is a list of policy versions and the changes/amendments/additions made to the policy with each new version:

| DATE | VERSION | CHANGES |
|----------|---------|---|
| Sep 2015 | 1.00 | “PAIA” policy established. |
| Nov 2015 | 1.01 | - Inclusion of Annexure 3 – Revision History |
| Dec 2015 | 1.02 | - Definitions amended to include: <ul style="list-style-type: none"> • Deputy Information Officer • Data Subject • Processing • Third Party - Reference to lists of categorised records periodically published in the Government Gazette removed from Section 51(1)(c). The section was further amended to include reference to The Collective Investment Schemes Control Act, the Occupational Health and Safety Act, the Prevention and Combatting of Corrupt Activities Act and the Value Added Tax Act. - Section 51(1)(d) revised in tabular format. - Annexure 1 amended. The form of access will no longer include reference to Audio Recordings. - Annexure 2: Fee Structure amended to reflect revised charges. - Annexure 3: Deputy Information Officer Appointment added |
| Aug 2016 | 1.03 | - Global Employee Benefits (Pty) Ltd included in Group structure. - Inclusion of “Associates” in Group Structure. Policy reworded to make reference to both the Group and Associates where applicable. - Group structure amended to refer to “Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd” and “Prime Alternative Investments (RF) (Pty) Ltd”. - Header formatting. - Section 1 Heading amended to refer to “Manual”. - Format changes. Section 4 amended to include: “For the purposes of this manual, any person wishing to contact the Group and/or its Associates can do so by using the Group’s contact details as specified below”. |
| Aug 2016 | 1.04 | - Global Financial Administrators (Pty) Ltd included in Group structure. - Global Investment Administrators (Pty) Ltd. included in Group structure. - Global Payroll Services (Pty) Ltd included in Group structure. - Global Nominees (Pty) Ltd - Ascent Capital (Pty) Ltd reclassified as an Associate company. - Numbering & format changes throughout document. |
| Nov 2017 | 1.05 | - Format changes - Prime Real Estate (Pty) Ltd. included in Group structure. |

| | | |
|----------|------|--|
| | | - Orca Global Advisory (Pty) Ltd. included as an Associate. |
| Dec 2017 | 1.06 | - Ascent Capital (Pty) Ltd reclassified as a Group entity. |
| Apr 2018 | 1.07 | - Group name amended to “Prime Financial Services Group” - Prime Trade Finance (RF) (Pty) Ltd removed as a Group company. - Mashamba Asset Managers (Pty) Ltd removed as an Associate company. - Orca Global Advisory removed as an Associate company. - Dormant companies removed from Group structure. |
| Dec 2019 | 1.08 | - Address updated. - Format updated. - New heading “Application of the Manual” updated. - List of applicable companies updated. |
| May 2023 | 2.00 | - Format updated. - Comprehensive simplification of the manual and accompanying processes. |
| Dec 2024 | 2.01 | - Complete review of the PAIA Manual, incorporating information concerning appointed Information Officer, the Information Regulator, and updates concerning the processes for requesting access to information. |