



# PAIA MANUAL

VERSION 2.00

THE PRIME FINANCIAL SERVICES GROUP

28 PETER PLACE  
LYME PARK  
SANDTON  
2060



**CONTENTS**

**1. APPLICATION OF THE MANUAL..... 3**

**2. PURPOSE OF THE MANUAL ..... 3**

**3. DEFINITIONS ..... 3**

**4. ACCESSING INFORMATION RECORDS ..... 4**

**5. SUBMITTING INFORMATION REQUESTS..... 4**

**6. TYPES OF RECORDS AVAILABLE..... 5**

**ANNEXURE 1 – OWNER, APPROVAL & REVISION HISTORY ..... 6**

    POLICY OWNER ..... 6

    POLICY APPROVAL..... 6

    POLICY REVISION ..... 6

## 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.

## 2. PURPOSE OF THE MANUAL

- 2.1 The purpose of this manual is to formally document the Group’s commitment to the Promotion of Access to Information Act of 2000 which gives effect to provisions within the South African Constitution, allowing one person or party to access information held by another person or party. This manual has been designed in such a way to facilitate and protect such rights in a practicable manner.

## 3. DEFINITIONS

- 3.1 **Constitution:** The Constitution of the Republic of South Africa Act, No. 108 of 1996.
- 3.2 **Information Officer:** The person authorised to provide information and enforce the provisions of PAIA and POPIA. The Information Officer is assisted in fulfilling these duties by appointed deputies (i.e. Deputy Information Officers).
- 3.3 **PAIA:** The Promotion of Access to Information Act of 2000.
- 3.4 **Personal Information:** Information relating to a living person or juristic person which can include, but is not limited to:
- 3.4.1 Race;
  - 3.4.2 Gender;
  - 3.4.3 Sexual affiliation and activity;
  - 3.4.4 Pregnancy;
  - 3.4.5 Marital status;
  - 3.4.6 National, ethnic or social groups;
  - 3.4.7 Age;
  - 3.4.8 Physical and mental Health;
  - 3.4.9 Disability status;
  - 3.4.10 Personal/Private correspondence;
  - 3.4.11 Religious and personal beliefs (including matters of conscience);
  - 3.4.12 Language;
  - 3.4.13 Birth dates;
  - 3.4.14 ID numbers;
  - 3.4.15 Physical and email addresses;
  - 3.4.16 Contact numbers;
  - 3.4.17 Personal/Private correspondence; and
  - 3.4.18 Biometric information.
- 3.5 **POPIA:** The Protection of Personal Information Act of 2013.
- 3.6 **Requester:** Any person acting in their own capacity or as a representative of a Public Body making a Request for Access.
- 3.7 **Request for Access:** A request for access to a record of an organization in terms of section 50 of PAIA.

#### 4. ACCESSING INFORMATION RECORDS

- 4.1 Section 32 of the Constitution addresses “Access to Information”. It states that each person has the right to access information held by the State or information held by other people if such information will be used to exercise or protect any rights. PAIA gives effect to this section of the Constitution. PAIA aims to promote a culture of transparency, accountability and effective governance in both private and public bodies.
- 4.2 While the right to information access is a constitutional right, it is not unlimited. PAIA recognizes that information requests are also subject to justifiable limitations which include, but is not limited to:
  - 4.2.1 Limitations aimed at the reasonable protection of privacy.
  - 4.2.2 Commercial confidentiality; and
  - 4.2.3 Effective, efficient, and good governance.
- 4.3 Information requests, and the fulfilment of the same, must therefore be done in such a way which weighs the Requester’s right to the access of information against to any other rights held by the person, private body, or public body holding the information at the time of request.

#### 5. SUBMITTING INFORMATION REQUESTS

- 5.1 Any Requester who would like to access information held by the Group may submit a Request for Access to our Information Officer and/or Deputy Information Officers, using the details below:

Street Address of the Group:	28 Peter Place Lyme Park Sandton 2060
Postal Address of the Group:	Postnet Suite 208 Private Bag X9 Benmore 2010
Contact Number of the Group:	Tel: 010-594-2100
Email Address:	<a href="mailto:popia@globaladmin.co.za">popia@globaladmin.co.za</a>

- 5.2 When submitting a Request for Access, please include the following information:
  - 5.2.1 The name of the requesting person and/or company;
  - 5.2.2 Motivate why the information is being requested; and
  - 5.2.3 How the requested information will be used.
- 5.3 Requesters are advised that while the Group will consider all Requests for Access, certain pieces of information (such as Personal Information) may be withheld to protect the information’s integrity and confidentiality.
- 5.4 Should Requesters have additional questions concerning their right to access information, please refer to the [PAIA Guide](#) prepared by the South African Human Right’s Commission which is available, free of charge.

## 6. TYPES OF RECORDS AVAILABLE

6.1 Requests for Access may be submitted for any of the following subjects and information categories<sup>1</sup>:

CATEGORY	INFORMATION SUBJECTS
<b>Client Records</b>	Company & Contact Information
	Client Records & Correspondence
	Billing Information
<b>Human Resource Records</b>	Human Resource Policies & Procedures
	Employee Records & References
	Performance Reviews
	Training Materials & Records
<b>Business Records</b>	Company Policies and Secretarial Records
	Corporate Correspondence
	Licenses & Certifications
	Financial & Accounting Records
	Marketing Information & Strategies
	Product and Service Information
<b>Supplier Records</b>	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>	

6.2 The Group recognises that it is an information custodian and takes its responsibility as such seriously. While business operations may require information to be shared with authorised persons or parties from time to time, the Group has implemented several data protection policies and procedures across its environment to ensure the confidentiality, accuracy, and validity of its records. For more information on these policies and procedures (including POPIA compliance measures), please refer to the Data Protection Policy, which will be made available on request.

<sup>1</sup> The subjects and categories listed in Section 6 provide an overview of available information records. They are not meant to be an exhaustive list and as such, may be amended from time to time.

## ANNEXURE 1 – 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 the Group’s Risk and Audit Committee on the 26th of May 2023 and formally ratified by management at the next board meeting of the holding company, Prime Financial Services (Pty) Ltd.

### 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"> <li>• Deputy Information Officer</li> <li>• Data Subject</li> <li>• Processing</li> <li>• Third Party</li> </ul> - 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	<ul style="list-style-type: none"> <li>- Format changes</li> <li>- Prime Real Estate (Pty) Ltd. included in Group structure.</li> <li>- Orca Global Advisory (Pty) Ltd. included as an Associate.</li> </ul>
Dec 2017	1.06	<ul style="list-style-type: none"> <li>- Ascent Capital (Pty) Ltd reclassified as a Group entity.</li> </ul>
Apr 2018	1.07	<ul style="list-style-type: none"> <li>- Group name amended to “Prime Financial Services Group”</li> <li>- Prime Trade Finance (RF) (Pty) Ltd removed as a Group company.</li> <li>- Mashamba Asset Managers (Pty) Ltd removed as an Associate company.</li> <li>- Orca Global Advisory removed as an Associate company.</li> <li>- Dormant companies removed from Group structure.</li> </ul>
Dec 2019	1.08	<ul style="list-style-type: none"> <li>- Address updated.</li> <li>- Format updated.</li> <li>- New heading “Application of the Manual” updated.</li> <li>- List of applicable companies updated.</li> </ul>
May 2023	2.00	<ul style="list-style-type: none"> <li>- Format updated.</li> <li>- Comprehensive simplification of the manual and accompanying processes.</li> </ul>