



PRIME
INVESTMENTS

Public Access to Information Manual

Version 1.03

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POLICY OWNERSHIP & REVISION HISTORY

POLICY OWNER

The Public Access to Information (“PAIA”) Manual is established by the Board of Prime Financial Services (Pty) Ltd, the holding company of the Prime Financial Services Group (the “Group”), for the implementation and benefit of the same. The policy is owned and maintained by the GRC Department.

POLICY APPLICATION & ADOPTIONS

The current version of the PAIA Manual is specifically applicable to and approved by the following entities within the Prime Financial Services Group, as detailed below:

GROUP ENTITY	APPROVAL DATE	RESOLUTION NO.
Prime Financial Services (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Capital Markets (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd	30 April 2026	Res. 4 of the 2027 Financial Year
Prime Fund Services (Pty) Ltd	30 April 2026	Res. 10 of the 2027 Financial Year
Prime Independent Nominees (RF) (Pty) Ltd	30 April 2026	Res. 7 of the 2026 Financial Year
Prime Independent Trustees (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Payroll Services (Pty) Ltd	30 April 2026	Res. 7 of the 2026 Financial Year
Prime Product Services (Pty) Ltd	30 April 2026	Res. 17 of the 2026 Financial Year
Global Administration Services (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Investments Life (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Real Estate (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year

POLICY REVISIONS

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	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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"> - Format changes - Prime Real Estate (Pty) Ltd. included in Group structure. - Orca Global Advisory (Pty) Ltd. included as an Associate.
Dec 2017	1.06	<ul style="list-style-type: none"> - Ascent Capital (Pty) Ltd reclassified as a Group entity.
Apr 2018	1.07	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - Address updated. - Format updated. - New heading “Application of the Manual” updated. - List of applicable companies updated.
May 2023	2.00	<ul style="list-style-type: none"> - Format updated. - Comprehensive simplification of the manual and accompanying processes.
Dec 2024	2.01	<ul style="list-style-type: none"> - 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.

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1. PURPOSE OF THE MANUAL

- 1.1 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).
- 1.2 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.

2. DEFINITIONS

- 2.1 **Commission:** South African Human Rights Commission.
- 2.2 **Constitution:** The Constitution of the Republic of South Africa Act, No. 108 of 1996.
- 2.3 **Data Subject:** A person to whom personal information relates.
- 2.4 **Head:** The Chief Executive Officer (CEO) of the Group or the person(s) authorised to act as their authorised representatives or with equivalent authority.
- 2.5 **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.
- 2.6 **PAIA:** The Promotion of Access to Information Act of 2000.
- 2.7 **Person:** A natural person.
- 2.8 **Personal Information:** Information relating to a living person or juristic person which can include, but is not limited to:
 - i) Race;
 - ii) Gender;
 - iii) Sexual affiliation and activity;
 - iv) Pregnancy;
 - v) Marital status;
 - vi) National, ethnic or social groups;
 - vii) Age;
 - viii) Physical and mental Health;
 - ix) Disability status;
 - x) Personal/Private correspondence;
 - xi) Religious and personal beliefs (including matters of conscience);
 - xii) Language;
 - xiii) Birth dates;
 - xiv) ID numbers;
 - xv) Physical and email addresses;
 - xvi) Contact numbers;
 - xvii) Personal/Private correspondence; and

xviii) Biometric information.

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

2.10 **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.

2.11 **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.

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

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

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

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

3. KEY CONTACT DETAILS

Contact Details to facilitate Access to Information:	
Head of the Group:	Shane Edward Peters
Information Officer of the Group:	Ivan Dabrowski
Deputy Information Officer of the Group:	Matthew Raubenheimer
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

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

4.1 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

5. REGULATOR DETAILS

- 5.1 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

6. CATEGORIES & TYPES OF RECORDS

- 6.1 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
	Product and Service Information
Supplier Records	Supplier Information
	Supplier Agreements & Contracts
	Billing Information
<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>	

- 6.2 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.
- 6.3 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.

- 6.4 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).

7. REQUESTING ACCESS TO RECORDS

- 7.1 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).
- 7.2 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.
- 7.3 The Information Officer of the Group, or their duly authorised representatives, will notify the Requester that their request has been received and whether any fees are payable prior to the Processing of the request. Please refer to [Annexure 2](#) for a breakdown of the fee structure.
- 7.4 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.
- 7.5 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.
- 7.6 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.
- 7.7 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:
- i) The protection of an individual’s privacy and interest.
 - ii) The unreasonable disclosure of Personal Information about a Third Party.
 - iii) The protection of commercial, contractual and/or confidential information of Third Parties.
 - iv) Confidential research, trade secrets, and or technical information.
 - v) Privileged information produced during legal proceedings.
 - vi) Instances where the public’s interest is not being served.

8. AVAILABILITY OF THE MANUAL

- 8.1 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

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

Proof of identity must be attached by the requester.

If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

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Fax number:

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Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made <i>(when made on behalf of another person)</i>				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td> </td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made <i>(if applicable)</i>				
Identity Number <i>(if applicable)</i>				
Postal Address <i>(if applicable)</i>				
Street Address				
E-mail Address				

Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			

PARTICULARS OF RECORD REQUESTED
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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	

Reference number, if available	
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Any further particulars of record	

TYPE OF RECORD
(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	

Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
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:	

FEES <i>A request fee must be paid before the request will be considered. You will be notified of the amount of the access fee to be paid. 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. If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 ____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

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.