GROCON FINANCIAL GROUP

For the purposes of this document, "we," "us," "our," or "the Company" refers to Grocon Financial Group, including its divisions, subsidiaries, and affiliates:

Holding Entity:
- Grocon Investments (Pty) Ltd

Subsidiaries & Affiliates:
- Efficace Fiduciary (Pty) Ltd – Compliance and Administration of Trusts
- Grocon Fiduciary (Pty) Ltd – Independent Trusteeship on Trusts
- Grocon Advisory (Pty) Ltd – Tax, Accounting, Payroll, and Assurance Services
- Grocon Consult (Pty) Ltd – Financial and Business consulting Services
- Journal & Sums Accountants – Tax, Accounting, Payroll, and Outsourced Services (Western Cape)
- Grocon Wealth (Pty) Ltd – FSCA Licensed Entity; Insurance Brokerage

This manual applies to all entities listed above and governs access to records and personal information in compliance with PAIA and POPIA.

PAIA Manual

This PAIA Manual is prepared in compliance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") and the Protection of Personal Information Act, No. 4 of 2013 ("POPIA").

Date of Compilation: 01/10/2021
Date of Revision: 20/05/2025
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1. DEFINITIONS

Client	Any natural or juristic person that received or receives services from the Company.
Conditions for Lawful Processing	The conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPI and in paragraph 12 of this Manual.
Data Subject	The person to whom Personal Information relates.
Information Officer	The individual who is identified in paragraph 3 of this manual.
Manual	This manual.
PAIA	The Promotion of Access to Information Act 2 of 2000.
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 – a. 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; b. Information relating to the education or the medical, financial, criminal or employment history of the person; c. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; d. The biometric information of the person; e. The personal opinions, views or preferences of the person; f. 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; g. The views or opinions of another individual about the person; and h. 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.
Personnel	Any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers.
POPI	The Protection of Personal Information Act 4 of 2013.
POPI Regulations	The regulations promulgated in terms of section 112(2) of POPI.
Private Body	Means – a. A natural person who carries or has carried on any trade, business or profession, but only in such capacity;

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	b. A partnership which carries or has carried on any trade, business or profession; or c. 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 – a. The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b. Dissemination by means of transmission, distribution or making available in any other form; or c. Merging, linking, as well as restriction, degradation, erasure or destruction of information.
SAHRC	The South African Human Rights Commission.

Any other terms not described herein will have the meaning as ascribed to it in terms of PAIA or POPI.

2. INTRODUCTION

2.1. For the purpose of POPI and PAIA, the Company is defined as a private body. In accordance with the Company obligations in terms of POPI and PAIA, the Company has produced this manual.
2.2. This manual sets out all information required by both PAIA and POPI.
2.3. This manual also deals with how requests are to be made in terms of PAIA.
2.4. This manual also establishes how compliance with POPI is to be achieved.

3. CONTACT DETAILS

Business Name	Grocon Investments (Pty) Ltd
Registration Number	2015/233206/07
Registered Office	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Contact Number	010 016 9126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Business Name	Efficace Fiduciary (Pty) Ltd
Registration Number	2020/025181/07
Registered Office	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Contact Number	010 016 9126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Business Name	Grocon Fiduciary (Pty) Ltd
Registration Number	2018/266079/07
Registered Office	71 Jochem Street, 762 Stone Village Rietvalleirand, Pretoria, GP, 0181.

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Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Contact Number	010 016 9126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Business Name	Grocon Advisory (Pty) Ltd
Registration Number	2023/829717/07
Registered Office	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181..
Contact Number	0100169126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Business Name	Grocon Consult (Pty) Ltd
Registration Number	2018/340166/07
Registered Office	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Contact Number	0100169126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Business Name	Grocon Wealth (Pty) Ltd
Registration Number	2018/355748/07
Registered Office	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Postal Address	71 Jochem Street, Stand 871 Stone Village, Reitvalleirand X48, GP, 0181.
Contact Number	0100169126
Information Officer	Marnus Van Heerden
Deputy Information Officer/s	Ruan Christiaan Dique
Email address/es	marnus@grocon.co.za

Background information of how the Company processes information can be found at: https://grocon.co.za/.

4. GUIDE OF INFORMATION REGULATOR

4.1. A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

4.2. The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

4.3. Should you wish to access the guide you may request a copy from the Information Officer by submitting **ANNEXURE A**, attached hereto, to the details specified above.

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4.4. You may also inspect the guide at the Company offices during ordinary working hours.

4.5. You may also request a copy of the guide from the Information Regulator at the following details:

Information Regulator:
Postal Address: P O Box 31533, Braamfontein, Johannesburg, 2017
Telephone: +27 (10) 023-5200
Website: https://inforegulator.org.za/
Email: PAIAComplaints@inforegulator.org.za

5. LATEST NOTICES IN TERMS OF SECTION 52(2) OF PAIA

5.1. At this stage no Notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

6. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

6.1. The Company holds and/or processes the following records for the purposes of PAIA and POPI.

6.2. The following records may be requested; however, it should be noted that there is no guarantee that the request will be honored. Each request will be evaluated in terms of PAIA and any other applicable legislation.

Products and/or Services:
- All products and/or services are available freely on the Company website as set out above.

Human Resources:
- Employment Contracts
- Employee Benefits
- Personnel Records and Correspondence
- Training Records
- Internal Policies
- Information pertaining to share options, share incentives, bonus or profit-sharing agreements of each employee
- Pension and Provident Fund Records

Legal:
- Service Contracts & Agreements with Clients - Contracts governing client engagements, advisory services, and fiduciary arrangements.
- Agreements with Suppliers
- Shareholder Agreements
- Partnership Agreements
- Licenses and Permits
- Power of Attorneys
- Sale Agreements
- Lease Agreements
- Confidential Due Diligence Reports (Restricted under PAIA exemptions.)

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Company Secretarial:

- Memorandum of Incorporation
- Secretarial Records
- Tradename Registrations
- Trademark Registrations
- the Company Registration Documents
- Statutory Registers
- Minutes of Shareholder's meetings
- Minutes of Director's meetings
- Register of Directors
- Share Certificates

Financial:

- Accounting Records
- Annual Reports
- Interim Reports
- Auditor Details and Reports
- Tax Returns
- Insurance Records
- Regulatory Filings & Compliance Reports – Financial Sector Conduct Authority (FSCA) compliance reports and financial services licenses.
- Fee Structures & Pricing Models – Internal documents detailing pricing models for services and advisory fees.
- Client Investment Portfolios & Fund Performance Reports (Restricted under POPIA; available only to authorized parties.)

Client:

- Client Database
- Credit Applications
- Correspondence with Clients
- Documentation prepared for Clients.
- Invoices, receipts, credit and debit notes
- Financial Planning Documents – Client education materials and financial planning tools.

Marketing:

- Published Marketing Material

Miscellaneous:

- Internal Correspondence
- Information Technology Records
- Trade secrets
- Domain Name Registrations
- Website Information
- Asset Registers
- Title Deeds
- Policy & Risk Management Frameworks – Internal risk assessments and financial advisory policies.

- Insurance Policy Documents – Standard insurance policy templates and claim procedures.
- Estate Planning & Trust Documentation – General templates for trust deeds, fiduciary structures, and wills.
- Wealth Management Strategies & Investment Prospectuses – Structured investment vehicles and legal fund prospectuses.

6.3. For clarity, the subjects to whom the above records relate are defined as Data Subjects and include:

- Employees (current and former);
- Clients (natural and juristic);
- Suppliers and service providers;
- Shareholders;
- Trustees and beneficiaries (in fiduciary or estate structures);
- Prospective clients and job applicants.

These Data Subject categories correspond with those described in Section 1 "Definitions" and throughout this Manual.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

7.1. General Business & Corporate Laws
7.1.1. Companies Act, No. 71 of 2008
7.1.2. Competition Act, No. 89 of 1998
7.1.3. Consumer Protection Act, No. 68 of 2008
7.1.4. Constitution of the Republic of South Africa Act, No. 108 of 1996
7.1.5. Electronic Communications and Transactions Act, No. 25 of 2002
7.1.6. Insolvency Act, No. 24 of 1936
7.1.7. Intellectual Property Laws Amendment Act, No. 38 of 1997
7.1.8. Trademark Act, No. 194 of 1993

7.2. Labour & Employment Laws
7.2.1. Basic Conditions of Employment Act, No. 75 of 1997
7.2.2. Basic Conditions of Employment Amendment Act, No. 20 of 2013
7.2.3. Employment Equity Act, No. 55 of 1998
7.2.4. Labour Relations Act, No. 66 of 1995
7.2.5. Employment Services Act, No. 4 of 2014
7.2.7. Unemployment Insurance Act, No. 63 of 2001
7.2.8. Skills Development Levies Act, No. 9 of 1999
7.2.9. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
7.2.10. Occupational Health and Safety Act, No. 85 of 1993
7.2.11. Machinery and Occupational Safety Amendment Act No. 181 of 1993
7.2.12. Protection of Employees in Business Transfers Act, No. 12 of 2002

7.3. Financial, Taxation & Accounting Laws
7.3.1. Financial Sector Regulation Act, No. 9 of 2017
7.3.2. Financial Advisory and Intermediary Services Act, No. 37 of 2002
7.3.3. Financial Intelligence Centre Act, No. 38 of 2001

7.3.4. Banks Act, No. 94 of 1990
7.3.5. Mutual Banks Act, No. 124 of 1993
7.3.6. Co-operative Banks Act, No. 40 of 2007
7.3.7. National Credit Act, No. 34 of 2005
7.3.8. National Payment Systems Act, No. 78 of 1998
7.3.9. Pension Funds Act, No. 24 of 1956
7.3.10. Financial Markets Act, No. 19 of 2012
7.3.11. Financial Institutions (Protection of Funds) Act, No. 28 of 2001
7.3.12. Public Accountants' and Auditors' Act, No. 80 of 1991
7.3.13. Auditing Profession Act, No. 26 of 2005
7.3.14. South African Revenue Service Act, No. 34 of 1997
7.3.15. Income Tax Act, No. 58 of 1962
7.3.16. Value Added Tax Act, No. 89 of 1991
7.3.17. Tax Administration Act, No. 28 of 2011
7.3.18. Long-Term Insurance Act, No. 52 of 1998
7.3.19. Short-Term Insurance Act, No. 53 of 1998
7.3.20. Insurance Act, No. 18 of 2017

7.4. Fiduciary & Estate Laws
7.4.1. Trust Property Control Act, No. 57 of 1988
7.4.2. Administration of Estates Act, No. 66 of 1965
7.4.3. Wills Act, No. 7 of 1953

7.5. Regulatory Compliance, Privacy & Financial Crime Laws
7.5.1. Promotion of Access to Information Act, No. 2 of 2000
7.5.2. Protection of Personal Information Act, No. 4 of 2013
7.5.3. Financial Intelligence Centre Act, No. 38 of 2001
7.5.4. Prevention of Organised Crime Act, No. 121 of 1998
7.5.5. Prevention and Combating of Corrupt Activities Act, No. 12 of 2004
7.5.6. Cybercrimes Act, No. 19 of 2020
7.5.7. General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Act, No. 22 of 2022
7.5.8. Protection of Constitutional Democracy against Terrorist and Related Activities Act, No. 23 of 2022
7.5.9. South African Reserve Bank Act, No. 90 of 1989
7.5.10. Exchange Control Regulations (Issued under Currency and Exchanges Act, No. 9 of 1933)

**Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

8. REQUEST PROCESS

8.1. An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

8.2. The requester must complete ANNEXURE B, which is attached hereto and submit it to the Information Officer at the details specified above.

8.3. The prescribed form must be submitted as well as payment of a request fee and a deposit, if applicable to the information officer at the postal or physical address, fax number or electronic mail as is stated herein.

8.4. The prescribed form must be completed with enough particularity to enable the information officer to determine:

8.4.1. The record(s) requested;

8.4.2. The identity of the requestor;

8.4.3. What form of access is required; and

8.4.4. The Postal address or fax number of the requestor.

8.5. The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records requested is required to exercise or protect the right.

8.6. The request for access will be dealt with within 30 days from date of receipt, unless the requestor has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.

8.7. The period of 30 days may be extended by not more than 30 additional days, if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company and the information cannot be reasonably obtained within 30 days. The information officer will notify the requestor in writing should an extension be necessary.

8.8. The Information Officer must communicate a response to the request for access using **"Annexure E"**, this communication shall inform the requestor of:

8.8.1. The decision;

8.8.2. Fees payable in terms of paragraph 11.

8.9. In the event that the Information Officer is of the opinion that the searching and preparation of the record for disclosure would amount to more than 6 hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.

8.10. Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the Information Officer for assistance.

8.11. An oral request can be made to the Information Officer should the requestor be unable to complete the form due to illiteracy or a disability. The Information Officer will complete the form on behalf of the requestor and provide a copy of the form to the requestor.

9. GROUNDS FOR REFUSAL

9.1. The following are grounds upon which the Company may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access in accordance with Chapter 4 of PAIA:

9.1.1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable.

9.1.2. Mandatory protection of the commercial information of a third party, if the Records contain:

9.1.2.1. Trade secrets of that third party;

9.1.2.2. Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or

9.1.2.3. Information disclosed in confidence by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;

9.1.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;

9.1.4. Mandatory protection of the safety of individuals and the protection of property;

9.1.5. Mandatory protection of Records that would be regarded as privileged in legal proceedings;

9.1.6. Protection of the commercial information of the Company, which may include:

9.1.6.1. Trade secrets;

9.1.6.2. Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;

9.1.6.3. Information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or

9.1.6.4. Computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws;

9.1.7. Research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and

9.1.8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10. REMEDIES SHOULD A REQUEST BE REFUSED

10.1. the Company does not have an internal appeal procedure in light of a denial of a request, decisions made by the information officer is final.

10.2. The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 days of notification of the decision for appropriate relief.

11. FEES

11.1. The following fees shall be payable upon request by a requestor:

Request fee (Payable on every request)	**R140.00**
Photocopy of an A4 page or part thereof	**R2.00**
Printed copy of an A4 page or part thereof	**R2.00**
Hard copy on flash drive (Flash drive to be provided by requestor)	**R40.00**
Hard copy on a compact disc (Compact disc to be provided by requestor)	**R40.00**
Hard copy on a compact disc (Compact disc to be provided by the Company)	**R60.00**

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Transcription of visual images per A4 page	**As per quotation of service provider**
Copy of visual images	**As per quotation of service provider**
Transcription of an audio record per A4 page	**R24.00**
Copy of an audio record on flash drive (Flash drive to be provided by requestor)	**R40.00**
Copy of an audio on a compact disc (Compact disc to be provided by requestor)	**R40.00**
Copy of an audio on a compact disc (Compact disc to be provided by the Company)	**R60.00**
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 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 (Cannot exceed total cost)	**R435.00**
Postage, email or any other electronic transfer	**Actual expense, if any**

12. POPI

12.1. Conditions fort lawful processing:

12.1.1. POPI has eight conditions for lawful processing and includes:

12.1.1.1. Accountability
12.1.1.2. Processing limitation
12.1.1.3. Purpose specification
12.1.1.4. Further processing limitation
12.1.1.5. Information quality
12.1.1.6. Openness
12.1.1.7. Security safeguards
12.1.1.8. Data subject participation

12.1.2. the Company is involved in the following types of processing:

12.1.2.1. Collection
12.1.2.2. Recording
12.1.2.3. Organization
12.1.2.4. Structuring
12.1.2.5. Storage
12.1.2.6. Adaptation or alteration
12.1.2.7. Retrieval
12.1.2.8. Consultation
12.1.2.9. Use
12.1.2.10. Disclosure by transmission

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12.1.2.11. Dissemination or otherwise making available
12.1.2.12. Alignment or combination
12.1.2.13. Restriction
12.1.2.14. Erasure
12.1.2.15. Destruction

12.1.3. the Company processes information for the following purposes:
12.1.3.1. To fulfil agreements in relation to its employees;
12.1.3.2. to provide services to its Clients in accordance with terms agreed to by the Clients;
12.1.3.3. to undertake activities related to the provision of services, such as
12.1.3.3.1. to fulfil domestic legal, regulatory and compliance requirements;
12.1.3.3.2. to verify the identity of Customer representatives who contact the Company or may be contacted by the Company;
12.1.3.3.3. for risk assessment, information security management, statistical, trend analysis and planning purposes;
12.1.3.3.4. to monitor and record calls and electronic communications with the Client for quality, training, investigation and fraud prevention purposes;
12.1.3.3.5. to enforce or defend the Company or the Company affiliates' rights;
12.1.3.3.6. to manage the Company relationship with its clients, which may include providing information to its clients and its clients affiliates about the Company and the Company affiliates' products and services;
12.1.3.4. the purposes related to any authorised disclosure made in terms of agreement, law or regulation;
12.1.3.5. any additional purposes expressly authorised by the Company client;
12.1.3.6. any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company.

12.2. the Company processes personal information the following categories of Data Subjects:
12.2.1. Juristic persons –
12.2.1.1. Corporate Clients
12.2.1.2. Suppliers
12.2.2. Natural persons –
12.2.2.1. Individuals
12.2.2.2. Staff
12.2.2.3. Clients
12.2.2.4. Suppliers

12.3. the Company process the following categories personal information:
12.3.1. Client profile information;
12.3.2. Bank account details;
12.3.3. Payment information;
12.3.4. Client representatives;
12.3.5. Names;
12.3.6. Email addresses;
12.3.7. Telephone numbers;
12.3.8. Facsimile numbers;

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12.3.9. Physical addresses;
12.3.10. Tax numbers;
12.3.11. Identity numbers;
12.3.12. Passport numbers;

12.4. Recipients of Personal Information;
12.4.1. the Company, the Company affiliates, their respective representatives.

12.5. When making authorised disclosures or transfers of personal information in terms of Section 72 of POPI, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as South Africa does.

12.6. The following Security measures are implemented by the Company:

12.7. the Company implements numerous Security measures to protect personal information that is stored electronically and physically.
12.7.1. the Company ensures that appropriate security measures are taken and updates these measures on a regular basis.
12.7.2. the Company have also implemented various policies for additional security for personal information stored both physically and electronically.

12.8. The personal information that is stored physically is protected as follows:
12.8.1. Where physical records of the data exist, such records will be stored in a secure area that can be 'locked-away' as to avoid a breach of the personal information.
12.8.2. Such physical data records will be 'locked-away' and secured when not in use.

12.9. the Company may share personal information with third parties and in certain instances this may result in cross border flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013.
12.10. Objection to the processing of personal information by a data subject:
12.10.1. Section 11(3) of POPI and regulation 2 of the POPI regulations provides that a data subject may, at any time object to the processing of their personal information in the prescribed form attached to this manual as **ANNEXURE "C".**

12.11. Request for correction or deletion of personal information:
12.11.1. Section 24 of POPI and regulation 3 of the POPI regulations provides that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as **ANNEXURE "D"**.
12.11.2. Regulation 8 of the POPI regulations provides for requests the outcomes of requests and of fees payable in the prescribed form attached hereto as **ANNEXURE "E"**.

12.12. Section 18 Notification:
12.12.1. In compliance with Section 18 of POPIA, the Company ensures that all data subjects are notified at the time of collection of their personal information.
12.12.1.1. This notification includes:

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12.12.1.1.1. The purpose of collection;
12.12.1.1.2. Whether the supply is voluntary or mandatory;
12.12.1.1.3. Consequences of failure to provide information;
12.12.1.1.4. The recipient(s) of the information;
12.12.1.1.5. The data subject's rights (access, objection, correction, deletion);
12.12.1.1.6. Information Officer contact details.
12.12.2. Notifications are provided through consent forms, client agreements, privacy policies, email footers, and oral disclosures where applicable.

12.13. Operator Agreements:
12.13.1. The Company ensures that all Operators processing personal information on its behalf are bound by written agreements.
12.13.1.1. Such agreements require Operators to:
12.13.1.1.1. Maintain confidentiality;
12.13.1.1.2. Implement appropriate technical and organisational measures;
12.13.1.1.3. Process personal information only with documented instructions from the Company.

12.14. Cross-Border Data Transfers:
12.14.1. In terms of Section 72 of POPIA, personal information may be disclosed to recipients in jurisdictions that may not have laws equivalent to South Africa.
12.14.2. Transfers occur only when:
12.14.2.1. The recipient jurisdiction provides adequate protection;
12.14.2.2. The data subject consents to the transfer;
12.14.2.3. It is necessary for contractual performance;
12.14.2.4. It benefits the data subject and it is impractical to obtain consent.

12.15. Personal Information Breach Notification:
12.15.1. In the event of a security compromise, the Company will notify the Information Regulator and affected data subjects in accordance with Section 22 of POPIA.
12.15.1.1. Notifications include:
12.15.1.1.1. A description of the nature of the breach;
12.15.1.1.2. Steps taken to mitigate its effects;
12.15.1.1.3. Recommendations for affected data subjects;
12.15.1.1.4. Contact details for queries and assistance.

12.16. Deputy Information Officer Responsibilities:
12.16.1. The Deputy Information Officer supports the Information Officer with:
12.16.1.1. Internal POPIA and PAIA training and compliance;
12.16.1.2. Responding to access and correction requests;
12.16.1.3. Updating PAIA and POPIA documentation;
12.16.1.4. Coordinating breach responses and record keeping;
12.16.1.5. Maintaining the data subject request register.

Signature Information Officer : _____

Date : 09/06/2025

Initial

ANNEXURE A

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

_____

_____

_____

_____

I,

Full Names:					
In my capacity as *(mark with "X")*:	Information Officer:		Other:		
Name of Public/Private Body (if applicable):					
Postal Address:					
Street Address:					
E-mail Address:					
Facsimile:					
Contact Numbers:	Tel. (B):		Cellular:		

Hereby request the following copy(ies) of the Guide:

Language *(mark with "X")*:	No of Copies	Language *(mark with "X")*:	No of Copies
Sepedi		Sesotho	
Setswana		siSwati	
Tshivenda		Xitsonga	
Afrikaans		English	
isiNdebele		isiXhosa	
isiZulu			

Manner of Collection *(mark with "X")*:

Personal Collection	**Postal Address**	**Facsimile**	**Electronic Communication (Please Specify)**

Signed at _____ this _____ day of _____ 20 ____.

_____

Signature of Requester

Initial

"Your wealth creation partner"

ANNEXURE B

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulations 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *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: _____

Fax Number: _____

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 *(when made on behalf of another person):*				
Postal Address:				
Street Address:				
E-mail Address:				
Contact Numbers:	Tel. (B):		Facsimile:	
	Cellular:			
Full Name of person on whose behalf request is made *(if applicable)*:				
Identity Number:				
Postal Address:				

Initial

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:	
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 *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)*	
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	

Initial

FORM OF ACCESS *(Mark the applicable box with an "X")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "X")*	
Personal inspection of record at registered address of public/private body *(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)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to the Form. The requester must sign all the additional pages.*	
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	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) 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.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.*	
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 (Please Specify)

Signed at _____ this _____ day of _____ 20 ____.

_____

Signature of Requester / Person on whose behalf request is made

_____

FOR OFFICAL USE

Reference Number:	
Request received by: *(State Rank, Name and Surname of Information Officer)*	
Date Received:	
Access Fees:	
Deposit (if any):	

_____

Signature of Information Officer

ANNEXURE C

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as anAnnexure to this Form and sign each page.*

Reference Number _____

DETAILS OF DATA SUBJECT	
Name and Surname of Data Subject	
Residential, postal or business address	
Contact number(s)	
Fax number:	
E-mail address:	

DETAILS OF RESPONSIBLE PARTY	
Name and Surname of Responsible Party (if the Responsible Party is a natural):	
Residential, postal or business address	

Initial

Contact number(s)	
Fax number:	
E-mail address:	
Name of Public Body or Private Body (if Responsible Party not a natural person):	
Business address:	Code ( )
Contact number(s):	
Fax number:	
e-mail address:	

REASONS FOR OBJECTION *(Please provide detailed reasons for the objection)*

Signed at _____ this _____ day of _____ 20 ____.

_____

Signature of Data Subject (Applicant)

Initial

ANNEXURE D

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 3(2)]

NOTE:

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to thisForm and sign each page.*

Reference Number _____

Mark the appropriate box with an "x"

1. Request For:

☐ Correction or deletion of personal information about the data subject which is in possession or under the control of the responsible party.

☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorized to retain the record of information.

DETAILS OF DATA SUBJECT	
Name and Surname of Data Subject	
Residential, postal or business address	
Contact number(s)	
Fax number:	
E-mail address:	

Initial

DETAILS OF RESPONSIBLE PARTY	
Name and Surname of Responsible Party (if the Responsible Party is a natural):	
Residential, postal or business address	
Contact number(s)	
Fax number:	
E-mail address:	
Name of Public Body or Private Body (if Responsible Party not a natural person):	
Business address:	Code ( )
Contact number(s):	
Fax number:	
e-mail address:	

REASONS FOR ***CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/** ***DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IN IN THE POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY** *(Please provide detailed reasons for the objection)*

Signed at _____ this _____ day of _____ 20 ____.

_____

Signature of Data Subject

Initial

ANNEXURE E

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

1. *If your request is granted –*
   (a) Amount of the deposit, if any, is payable before your request is processed; and Requested record/ portion of the record will only be released once proof of full payment is received.
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____
_____
_____
_____

Your request dated_____ refers.

1. You Requested

Personal Inspection of information at registered address of public/private body *(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)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees in Annexure B	

OR

2. You Requested

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription or virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

Initial

3. To be Submitted

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language: *(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)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

Initial

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor	R40.00		
(ii) Compact disc • If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-sizepage	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

1. Deposit payable (if search exceeds six hours):

☐ Yes
☐ No

Hours ofsearch		Amount of deposit *(calculated on one third of total amount perrequest)*	

The amount must be paid into the following Bank account:
Name of Bank:
Name of account holder:
Type of account:
Account number:
Branch Code:
Reference Nr:
Submit proof of payment to:

Signed at_____this_____day of_____20 _____

_____
Information officer

Initial