



# PAIA MANUAL

THE GLOBAL ADMINISTRATORS & PRIME INVESTMENTS GROUP OF  
COMPANIES

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59 WOODLANDS AVENUE  
HURLINGHAM MANOR  
SANDTON, 2196



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This policy is applicable to the following legal entities within the Global Administrators and Prime Investments Group of Companies (hereinafter referred to as “the Group”):

- **Global Administration Companies:**
  - Global Employee Benefits (Pty) Ltd
  - Global Financial Administrators (Pty) Ltd
  - Global Fund Administrators (Pty) Ltd
  - Global Independent Administrators (Pty) Ltd
  - Global Investment Administrators (Pty) Ltd
  - Global Nominees (Pty) Ltd
  - Global Payroll Services (Pty) Ltd
  - Ascent Capital (Pty) Ltd
  
- **Prime Investment Companies:**
  - PAI Holdings (Pty) Ltd
  - Prime Alternative Investments (RF) (Pty) Ltd
  - Prime Asset Managers (Pty) Ltd
  - Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd
  - Prime Investment Management Services (Pty) Ltd
  - Prime Real Estate (Pty) Ltd
  - Prime Trade Finance (RF) (Pty) Ltd

This policy is also applicable to associate companies (hereinafter referred to as “Associates”) in which the Group holds a limited shareholding, namely:

- Mashamba Asset Managers (Pty) Ltd
- Orca Global Advisory (Pty) Ltd

## 1. PURPOSE OF THE MANUAL

- 1.1 The purpose of this manual is to formally document the Group and its Associates’ commitment to the Promotion of Access to Information Act of 2000 which gives effect to Section 32 of the South African Constitution.
- 1.2 The manual is designed to meet the requirements as outlined in Section 51 of the Promotion of Access to Information Act of 2000.

## 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 **Deputy Information Officer:** The person to whom any power or duty imposed on an Information Officer by POPIA has been delegated.
- 2.5 **Head:** A “Head” encompasses the following:
  - 2.5.1 In the case of a natural person, that person or their duly authorised representative.

- 2.5.2 In the case of a partnership, any of the partners or their duly authorised representatives.
- 2.5.3 In the case of a juristic person, the CEO, a person acting in a capacity equivalent to the CEO or their authorised representatives.
- 2.6 **Information Officer:** The Head of a Private Body.
- 2.7 **Minister:** The Cabinet member responsible for the administration of justice.
- 2.8 **PAIA:** The Promotion of Access to Information Act of 2000.
- 2.9 **Person:** A natural person.
- 2.10 **Personal Information:** Information relating to a living person or juristic person which can include, but is not limited to:
  - 2.10.1 Race;
  - 2.10.2 Gender;
  - 2.10.3 Sexual affiliation and activity;
  - 2.10.4 Pregnancy;
  - 2.10.5 Marital status;
  - 2.10.6 National, ethnic or social groups;
  - 2.10.7 Age;
  - 2.10.8 Physical and mental Health;
  - 2.10.9 Disability status;
  - 2.10.10 Personal/Private correspondence;
  - 2.10.11 Religious and personal beliefs (including matters of conscience);
  - 2.10.12 Language;
  - 2.10.13 Birth dates;
  - 2.10.14 ID numbers;
  - 2.10.15 Physical and email addresses;
  - 2.10.16 Contact numbers;
  - 2.10.17 Personal/Private correspondence; and
  - 2.10.18 Biometric information.
- 2.11 **POPIA:** The Protection of Personal Information Act of 2013.
- 2.12 **Private Body:** A “Private Body” encompasses the following:
  - 2.12.1 A person who carries on a business, trade or profession in his/her personal capacity.
  - 2.12.2 A partnership which carries on a business, trade or profession.
  - 2.12.3 Any former or existing juristic person, specifically excluding Public Bodies.
- 2.13 **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.
- 2.14 **Public Body:** A “Public Body” encompasses the following:
  - 2.14.1 A governmental or provincial department.
  - 2.14.2 A local municipality.
  - 2.14.3 Any institution performing duties in terms of the Constitution.
  - 2.14.4 Any institution exercising public power and performing a public function in terms of the law.
- 2.15 **Record:** A record of information in the possession of a Public or Private Body.

- 2.16 **Regulator:** The Information Regulator established in terms of POPIA.
- 2.17 **Requester:** Any person acting in their own capacity or as a representative of a Public Body making a Request for Access.
- 2.18 **Request for Access:** A request for access to a record of an organization in terms of section 50 of PAIA.
- 2.19 **Third Party:** In relation to a request for information, a “third party” is any person other than the requester.

### 3. INTRODUCTION TO PAIA

- 3.1 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.
- 3.2 PAIA aims to promote a culture of transparency, accountability and effective governance in both private and public bodies.

### 4. SECTION 51 OF PAIA

#### SECTION 51(1)(a) – CONTACT DETAILS OF THE GROUP AND ITS ASSOCIATES

- 4.1 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:

Street Address of the Group:	Building B – Hurlingham Office Park 59 Woodlands Avenue, Hurlingham Manor Sandton 2196
Postal Address of the Group:	Postnet Suite 208 Private Bag X9 Benmore 2010
Contact Numbers of the Group:	Tel: 010-594-2100 Fax: 086-642-1880
Email Address:	<a href="mailto:compliance@globaladmin.co.za">compliance@globaladmin.co.za</a>

#### SECTION 51(1)(b) – SOUTH AFRICAN HUMAN RIGHTS COMMISSION GUIDE

- 4.2 PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If the requester is a public body as defined, the public body must be acting in the public interest.
- 4.3 All requests shall be considered in accordance with the prescribed procedures and fees as outlined in PAIA.
- 4.4 Requesters are referred to the guide in terms of Section 10 of PAIA which has been compiled by the Commission, which contains information for the purposes of exercising Constitutional Rights. The guide is available in all official languages of South Africa and any person may request a copy, free of charge.

4.5 The contact details of the Commission are as follows:

Postal Address: Private Bag 2700  
Houghton  
2041

Contact Numbers: Tel: 011-877-3600  
Fax: 011-403-0625

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

## SECTION 51(1)(c) – STATUTORY LEGISLATION

4.6 Records in terms of any other legislation are kept and made available in accordance with the applicable legislation, as it applied to the specific environment in which the Group and its Associates operate. The Group and its Associates maintain a number of records in line with legislation which includes but is not limited to:

- 4.6.1 Basic Conditions of Employment Act
- 4.6.2 The Collective Investment Schemes Control Act
- 4.6.3 The Companies Act
- 4.6.4 Employment Equity Act
- 4.6.5 Financial Advisory and Intermediary Services Act
- 4.6.6 Financial Intelligence Centre Act
- 4.6.7 Income Tax Act
- 4.6.8 Labour Relations Act
- 4.6.9 Occupational Health & Safety Act
- 4.6.10 Prevention and Combatting of Corrupt Activities Act
- 4.6.11 Protection of Personal Information
- 4.6.12 Unemployment Insurance Act
- 4.6.13 Value Added Tax Act

## SECTION 51(1)(d) – TYPES OF RECORDS AVAILABLE

4.7 Set out below is a number of categorised records that are, subject to access being denied, available in terms of PAIA.

Category	Record	Availability	Purpose
Public Affairs & Information	Public Product Information	Freely Available	Convey Public Information
	Public Corporate Records		
	Media Releases		
	Published Newsletters		
	Magazine Articles		
Regulatory & Administrative	Permits and Licences	Freely Available	Statutory Requirement
	Conflict of Interest Policy	Freely Available	Statutory Requirement
	Complaints Resolution Policy	Freely Available	Statutory Requirement
	FICA Policy	Freely Available	Statutory Requirement
	CRISA Policy	Freely Available	Statutory Requirement
	Treating Customers Fairly	Freely Available	Statutory Requirement
	Privacy Policy	Freely Available	Statutory Requirement
	Code of Ethics	Freely Available	Statutory Requirement
Memorandum of Incorporation	PAIA Request	Statutory Requirement	

	Director Meeting Minutes	PAIA Request	Statutory Requirement
	Register of Board of Directors	PAIA Request	Statutory Requirement
	Internal Correspondence	PAIA Request	Internal Communication
	Insurance Policies	PAIA Request	Risk Management
Human Resources	Employment Applications	PAIA Request	Internal Reference
	Employment Contracts	PAIA Request	Contractual Agreement
	Personal Information of Employees	PAIA Request	Internal Reference
	Employment Equity Plan	PAIA Request	Statutory Requirement
	Disciplinary Records	PAIA Request	Statutory Requirement
	Performance Records	PAIA Request	Internal Reference
	Salary Records	PAIA Request	Internal Reference
	Employee Benefit Records	PAIA Request	Internal Reference
	PAYE Records	PAIA Request	Statutory Requirement
	SETA Records	PAIA Request	Statutory Requirement
	Disciplinary Code	PAIA Request	Statutory Requirement
	Leave Records	PAIA Request	Internal Reference
	Training Records	PAIA Request	Internal Reference
	Training Manual	PAIA Request	Internal Reference
HR Policies and Procedures	PAIA Request	Internal Reference	
Finance	Financial Statements	PAIA Request	Internal Reference
	Tax Records	PAIA Request	Statutory Requirement
	Asset Register	PAIA Request	Internal Reference
	Management Accounts and Reports	PAIA Request	Internal Reference
	Accounting Records	PAIA Request	Internal Reference
	Banking Records	PAIA Request	Internal Reference
	Electronic Banking Records	PAIA Request	Internal Reference
Marketing	Marketing Information	PAIA Request	Internal Reference
	Product Brochures		
	Advertisements		
	Product/Service Sales Records		
	Marketing Strategies		
Client Information	Client Database	PAIA Request	Internal Reference
	Client Agreements	PAIA Request	Internal Reference
	Client Files	PAIA Request	Internal Reference
	Client FICA	PAIA Request	Internal Reference
	Client Instructions	PAIA Request	Internal Communication
	Client Correspondence	PAIA Request	External Communication
Third Party	Rental Agreements	PAIA Request	Contractual Agreement
	Non-Disclosure Agreements		
	Supplier Contracts		

4.8 The above categories may be amended from time to time in accordance with new and revised legislation.

## SECTION 51(1)(e) – REQUESTING ACCESS TO RECORDS

4.9 Any person wishing to access the records of the Group and/or its Associates must complete the necessary request form which can be found in [Annexure 1](#) of this manual. The completed form must be emailed to [compliance@globaladmin.co.za](mailto:compliance@globaladmin.co.za) as detailed in [Section 4](#) of this manual.

- 4.10 The Information Officer of the Group and its Associates, 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.
- 4.11 Once the request has been processed, the requester will be informed of the request's outcome.
- 4.12 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:
- 4.12.1 The protection of an individual's privacy and interest.
  - 4.12.2 The protection of commercial information and the confidential information of third parties.
  - 4.12.3 Confidential research.
  - 4.12.4 Privileged information produced during legal proceedings.
  - 4.12.5 Information which already forms part of the public record.
  - 4.12.6 Instances where the public's interest is not being served.

## 5. AVAILABILITY OF THE MANUAL

- 5.1 Copies of this manual are available for inspection, free of charge, at the offices of the Group and its Associates as detailed in [Section 4](#) of this manual. Alternatively, the manual can be downloaded from the Group's website: [www.primeinvestments.co.za](http://www.primeinvestments.co.za)



## ANNEXURE 1 – REQUEST FOR ACCESS TO INFORMATION RECORDS

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

The Head<sup>1</sup> 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: _____
<b>Particulars of Person on whose behalf the Request is made:</b>
Full Name and Surname: _____
ID Number: _____

### Particulars of the Record requested:

Description of Record: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Reference Number: \_\_\_\_\_

\_\_\_\_\_

<sup>1</sup> Please refer to the definition of a “Head” as detailed in [Section 2](#) of this manual.

Additional Particulars: \_\_\_\_\_

**Form of Access to the requested Record:**

Please mark the appropriate box with an “x”:

<b>Written or Printed records:</b>			
Copy of the record	<input type="checkbox"/>	Inspection of the record	<input type="checkbox"/>
<b>Record containing Visual Images:</b>			
View images	<input type="checkbox"/>	Copy of images:	<input type="checkbox"/>
Transcription of images	<input type="checkbox"/>		<input type="checkbox"/>
<b>Please indicate the preferred method of delivery:</b>			
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:

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**Signature of the Requester**

Signed at \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

## ANNEXURE 2 – FEE STRUCTURE FOR INFORMATION REQUESTS

<b>Request Fees</b>	
Payable by a requester to facilitate the request application for access to information records. Please note: no fee is payable if the requester submits an application regarding their own information. This fee is only payable by third-parties.	<b>R50</b>
<b>Reproduction of Documents</b>	
Photocopy of an A4 page or part thereof	<b>R1.10</b>
Digital copy of an A4 page or part thereof in machine-readable form	<b>R0.75</b>
Transcription of visual images	<b>R40</b>
Copy of visual images	<b>R60</b>
Transcription of an audio record	<b>R20</b>
Copy of an audio record	<b>R30</b>
<b>Computer Readable Format</b>	
All information requested in electronic format will be delivered through email at no additional charge.	
<b>Postage</b>	
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 – DEPUTY INFORMATION OFFICER APPOINTMENT

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

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

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

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

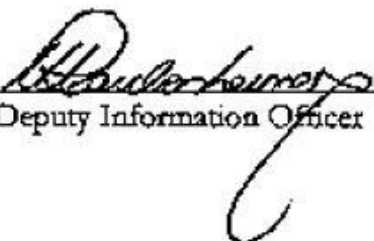
Together with the Information Officer, the Deputy Information Officer is responsible for:

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

As Head of the Group, I **Shane Edward Peters** hereby appoint **Matthew Raubenheimer** as the Group's Deputy Information Officer.

  
\_\_\_\_\_  
Head Signature

08/12/2015  
Date

  
\_\_\_\_\_  
Deputy Information Officer

08/12/2015  
Date

## ANNEXURE 4 – REVISION HISTORY

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	1.0	“PAIA” policy established.
Nov 2015	1.1	- Inclusion of Annexure 3 – Revision History
Dec 2015	1.2	- 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	1.3	- 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	1.4	- 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	1.5	- Format changes - Prime Real Estate (Pty) Ltd. included in Group structure. - Orca Global Advisory (Pty) Ltd. included as an Associate.
Dec 2018	1.6	- Ascent Capital (Pty) Ltd reclassified as a Group entity.