



## **Access to Information Manual**

(VERSION 2 OF OCTOBER 2022)

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE  
PROMOTION  
OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 IN RESPECT OF THE FIRST  
EQUITY GROUP ENTITIES LISTED IN ANNEXURE B**

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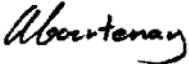

## Document administration

### Revision history

Revision date	Document version	Summary changes	Author
October 2022	V2	Review to align with POPIA and PAIA	Group Legal and Compliance

## Document approvals

This Manual was approved by

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**ANNEXURE "B" – LIST OF FIRST EQUITY GROUP ENTITIES**

## 1. INTRODUCTION

- 1.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("PAIA").
- 1.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from any of the firstEquity Group entities listed in Annexure B ("firstEquity Group entity/ies"), as contemplated under PAIA.
- 1.3 The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.
- 1.4 A Requester is invited to contact the Information Officer of the applicable firstEquity Group entity should he or she require any assistance in respect of the use or content of this Manual.
- 1.5 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

## 2. DEFINITIONS

The following words or expressions will bear the following meanings in this Manual –

- 2.1 **"Client"** means a natural or juristic person who or which receives services and/or products from a firstEquity Group entity.
- 2.2 **"Correspondence"** means any written and/or electronic communication exchanged between two or more parties.
- 2.3 **"Data Subject"** means the natural or juristic person to whom Personal Information relates provided that only an identified or identifiable natural person shall be deemed to constitute a Data Subject.
- 2.4 **"Deputy Information Officer"** means any or all the designated deputy information Officers of the firstEquity Group entities described in clause 6 of this Manual.
- 2.5 **"Employee"** means any person who works for, or provides services to, or on behalf of a firstEquity Group entity, and receives or is entitled to receive remuneration.
- 2.6 **"Information Officer"** means the designated information officer of the firstEquity Group entity as described in clause 6 of this Manual.
- 2.7 **"Manual"** means this manual, together with all annexures thereto as amended and made available on the website of the applicable firstEquity Group entity from time to time.
- 2.8 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder.
- 2.9 **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder.

- 2.10 **"Personal Information"** has the meaning ascribed thereto under POPIA, Personal Information shall be deemed to mean any information relating to an identified or identifiable natural person.
- 2.11 **"Processing"** means any operation or activity or any set of operations, whether by automatic means, concerning Personal Information, including – 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 by electronic communications or other means; or merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, "Process" has a corresponding meaning.
- 2.12 **"Requester"** means any person or entity (including any Data Subject) requesting access to a record that is under the control of the applicable firstEquity Group entity; and
- 2.13 **"Third-Party"** means any independent contractor, agent, consultant, sub-contractor, or other representative of the applicable firstEquity Group entity.

### 3. SCOPE OF THE MANUAL

This Manual has been prepared in respect of and applies to the firstEquity Group entities listed in Annexure B.

### 4. HOW TO USE PAIA TO ACCESS INFORMATION

*(Information provided in terms of section 51(1) of PAIA)*

- 4.1 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 a public body lodges a request in terms of PAIA, the public body must be acting in the public interest.
- 4.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 4.3 A guide on how to use PAIA is required to be compiled by the Information Regulator and when same is available, will be accessible (in various official languages) on the Information Regulator's website and on our website or you may request a copy of the guide from us by contacting our Information Officer. All queries should be directed to:

**Physical Address:** The Information Regulator (South Africa)

JD House, 27 Stiemens Street

Braamfontein

2001

**Postal Address :** PO Box 31533

Braamfontein

2017

**Telephone number :** 010 023 5200

**General enquiries email :** [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

**PAIA Complaints email :** [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**Website:** <https://www.justice.gov.za/infoereg/index.html>

## 5. OVERVIEW OF THE STRUCTURE AND FUNCTIONS OF FIRST EQUITY GROUP ENTITIES

- 5.1 For the purposes of this manual, the firstEquity Group entities comprise the entities outlined in Annexure B of this Agreement.
- 5.2 The Group comprises various holding companies and financial services providers with offices in South Africa's main commercial centres, Johannesburg (Sandton), Durban and Cape Town. There are also smaller branch offices in Grahamstown and Nelspruit.

## 6. CONTACT DETAILS

*(Information required under section 51(1)(a) of PAIA)*

<b>Name of Body:</b>	<b>African Risk Transfer (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	<a href="http://www.africanrisktransfer.com">www.africanrisktransfer.com</a>
<b>Head of Body</b>	<b>Name:</b> Anthony Courtenay <b>E:</b> <a href="mailto:anthony@africanrisktransfer.com">anthony@africanrisktransfer.com</a> <b>T:</b> 083 797 7475
<b>Information Officer</b>	<b>Name:</b> Anthony Courtenay <b>E:</b> <a href="mailto:anthony@africanrisktransfer.com">anthony@africanrisktransfer.com</a>

<b>Name of Body:</b>	<b>Everything Insure Digital Intermediaries (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	<a href="https://www.firstequity.co.za/eidi">https://www.firstequity.co.za/eidi</a>
<b>Head of Body</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a> <b>T:</b> 087 095 2813
<b>Information Officer</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a>

<b>Name of Body:</b>	<b>FE Credit Services (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Hendrik Bothma <b>E:</b> <a href="mailto:hendrikb@firstequity.co.za">hendrikb@firstequity.co.za</a> <b>T:</b> 011 510 1300

<b>Information Officer</b>	<b>Name:</b> Hendrik Bothma <b>E:</b> <a href="mailto:hendrikb@firstequity.co.za">hendrikb@firstequity.co.za</a>
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<b>Name of Body:</b>	<b>FEP Investments (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
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<b>Head of Body</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a> <b>T:</b> 011 510 1300
<b>Information Officer</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a>

<b>Name of Body:</b>	<b>First Equity Credit and Political Risk (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	<a href="https://www.firstequity.co.za/firstequity-credit-and-political-risk/fecpr-home">https://www.firstequity.co.za/firstequity-credit-and-political-risk/fecpr-home</a>
<b>Head of Body</b>	<b>Name:</b> Hendrik Bothma <b>E:</b> <a href="mailto:hendrikb@firstequity.co.za">hendrikb@firstequity.co.za</a> <b>T:</b> 011 510 1300
<b>Information Officer</b>	<b>Name:</b> Hendrik Bothma <b>E:</b> <a href="mailto:hendrikb@firstequity.co.za">hendrikb@firstequity.co.za</a>

<b>Name of Body:</b>	<b>First Equity Holdings SA (Pty) Ltd</b>
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<b>Head of Body</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a> <b>T:</b> 011 510 1359
<b>Information Officer</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevinw@firstequity.co.za">kevinw@firstequity.co.za</a>

<b>Name of Body:</b>	<b>First Equity Insurance Brokers (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	<a href="http://www.firstequity.co.za">www.firstequity.co.za</a>
<b>Head of Body</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a> <b>T:</b> 011 510 1359
<b>Information Officer</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a>

<b>Name of Body:</b>	<b>First Equity Professional Liability (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	<a href="https://www.firstequity.co.za/firstequity-professional-liability/fepl-products">https://www.firstequity.co.za/firstequity-professional-liability/fepl-products</a>
<b>Head of Body</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a> <b>T:</b> 011 510 1300
<b>Information Officer</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a>

<b>Name of Body:</b>	<b>First Equity Trust Holdings (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a> <b>T:</b> 011 510 1359
<b>Information Officer</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a>

<b>Name of Body:</b>	<b>Indemnity 360 (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	N/A



<b>Head of Body</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a> <b>T:</b> 011 510 1359
<b>Information Officer</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a>

<b>Name of Body:</b>	<b>Ivory Holdings (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevinw@firstequity.co.za">kevinw@firstequity.co.za</a> <b>T:</b> 087 095 2813
<b>Information Officer</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevinw@firstequity.co.za">kevinw@firstequity.co.za</a>

<b>Name of Body:</b>	<b>Ivory Propvest (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 71431, Bryanston, Johannesburg, Gauteng, 2196
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevinw@firstequity.co.za">kevinw@firstequity.co.za</a> <b>T:</b> 087 095 2813
<b>Information Officer</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevinw@firstequity.co.za">kevinw@firstequity.co.za</a>

<b>Name of Body:</b>	<b>Royal &amp; Ancient Financial Services (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 323 Lynnwood Road, Menlo Park, 0081 <b>Postal:</b> P.O Box 35465, Menlo Park, 0102
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a> <b>T:</b> 011 510 1359
<b>Information Officer</b>	<b>Name:</b> Visvanathan Allan Govender <b>E:</b> <a href="mailto:visg@firstequity.co.za">visg@firstequity.co.za</a>

<b>Name of Body:</b>	<b>SATIB Insurance Brokers (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Office Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal, 4019 <b>Postal:</b> P.O Box 250, Umhlanga Rocks, Kwa-Zulu Nata, 4320
<b>Website of Body</b>	<a href="http://www.satib.co.za">www.satib.co.za</a>
<b>Head of Body</b>	<b>Name:</b> Dewald Cillie <b>E:</b> <a href="mailto:dcillie@satib.co.za">dcillie@satib.co.za</a> <b>T:</b> 087 095 2826
<b>Information Officer</b>	<b>Name:</b> Natasha Parry <b>E:</b> <a href="mailto:nparry@satib.co.za">nparry@satib.co.za</a>

<b>Name of Body:</b>	<b>Sencerus Insurance Brokers (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 501 Jochemus Street, Erasmuskloof, Pretoria, Gauteng, 0002 <b>Postal:</b> 501 Jochemus Street, Erasmuskloof, Pretoria, Gauteng, 0002
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a> <b>T:</b> 011 510 1300
<b>Information Officer</b>	<b>Name:</b> Werner Slabbert <b>E:</b> <a href="mailto:werners@firstequity.co.za">werners@firstequity.co.za</a>

<b>Name of Body:</b>	<b>Sprout Business Consultants (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal <b>Postal:</b> P.O Box 250, Umhlanga Rocks, 4320
<b>Website of Body</b>	N/A
<b>Head of Body</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevin@sproutconsulting.co.za">kevin@sproutconsulting.co.za</a> <b>T:</b> 087 095 2813
<b>Information Officer</b>	<b>Name:</b> Kevin Watson <b>E:</b> <a href="mailto:kevin@sproutconsulting.co.za">kevin@sproutconsulting.co.za</a>

<b>Name of Body:</b>	<b>Trum Africa (Pty) Ltd</b>
<b>Physical and Postal Addresses:</b>	<b>Physical:</b> 10 Rydall Vale Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal <b>Postal:</b> 10 Rydall Vale Park, Douglas Saunders Drive, La Lucia Ridge, Kwa-Zulu Natal
<b>Website of Body</b>	<a href="http://www.trum.co.za">www.trum.co.za</a>
<b>Head of Body</b>	<b>Name:</b> Anthony Courtenay <b>E:</b> <a href="mailto:acourtenay@satib.co.za">acourtenay@satib.co.za</a>

	<b>T:</b> 087 095 2826
<b>Information Officer</b>	<b>Name:</b> Anthony Courtenay <b>E:</b> <a href="mailto:acourtenay@satib.co.za">acourtenay@satib.co.za</a>

## 7. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

*(Information required under section 51(1)(c) of PAIA)*

### 7.1 Purpose of Processing of Personal Information:

- 7.1.1 We will only Process a Data Subject's Personal Information for a specific, lawful, and clear purpose (or for specific, lawful and clear purposes) and will ensure that we make the Data Subject aware of such purpose(s) as far as possible.
- 7.1.2 We will ensure that there is a legal basis for the Processing of any Personal Information. Further, we will ensure that Processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).
- 7.1.3 We will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.
- 7.1.4 We will retain Personal Information only for as long as is necessary to accomplish our legitimate business purposes or for as long as may be permitted or required by applicable law.
- 7.1.5 We use Personal Information for one or more of the following non-exhaustive purposes –
  - 7.1.5.1 For the purposes of providing our services to the Data Subject from time to time.
  - 7.1.5.2 Personal Information is processed as part of the "Know Your Customer" / "KYC" process as per the requirements of the Financial Intelligence Centre Act No. 38 of 2001, where applicable.
  - 7.1.5.3 Personal Information is processed to conduct due diligence processes on our clients.
  - 7.1.5.4 Personal Information is processed to comply with obligations imposed on us under the Broad-Based Black Economic Empowerment Act No. 53 of 2003 ("BEE Act") read together with the Department of Trade and Industry's Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time.
  - 7.1.5.5 Personal Information is processed for the purposes of performing general information technology-related functions for all our business functions.
  - 7.1.5.6 For purposes of interacting with you on our website and generally monitoring your use of our website, including for purposes of improving same.

- 7.1.5.7 Personal Information is processed in connection with internal audit purposes (i.e., ensuring that the appropriate internal controls are in place to mitigate the relevant risks, as well as to carry out any investigations where this is required).
- 7.1.5.8 Personal Information is processed for employment-related purposes such as administering payroll, assessing credit and criminal history, and determining Employment Equity Act No. 55 of 1998 statistics.
- 7.1.5.9 To respond to any correspondence that the Data Subject may send to us, including via email, our site(s) or by telephone.
- 7.1.5.10 In connection with the execution of payment processing functions, including payment of our suppliers' invoices.
- 7.1.5.11 For such other purposes to which the Data Subject may consent from time to time; and
- 7.1.5.12 For such other purposes as authorised in terms of applicable law.

## **7.2 Categories of Data Subjects and of the Personal Information relating thereto:**

- 7.2.1 We collect Personal Information directly from the Data Subject and/or from Third Parties, and where we obtain Personal Information from Third Parties, we will ensure that we obtain the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where we are permitted to do so in terms of the applicable laws.
- 7.2.2 Data Subjects in respect of which Personal Information is Processed include our clients, employees and candidates, and service providers.
- 7.2.3 Examples of Third Parties from whom Personal Information is collected include our clients when we handle Personal Information on their behalf; regulatory bodies; credit reference agencies (such as, for example, Experian, TransUnion, Compuscan and XDS); other companies providing services to us (such as, for example, TIAL and other information technology services) and where we make use of publicly available sources of information.

## **7.3 Recipients or categories of recipients to whom Personal Information may be Supplied :**

- 7.3.1 We may share your Personal Information with third parties engaged by us, or our business partners, to assist us to provide our services to you. Such third parties or business partners may include but are not limited to –
  - 7.3.1.1 hosting, data storage or archiving service providers and payment processing.
  - 7.3.1.2 professional advisors; and
  - 7.3.1.3 marketing, research, and advertising agencies.
- 7.3.2 We may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose

Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of us, our Clients, or others.

7.3.3 We will comply with POPIA before transferring Personal Information to a Third-Party who is not a contractor of ours. Before transferring Personal Information to a Third-Party contractor, such as an authorised service provider, we will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where we learn that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, we will take reasonable steps to prevent such use or disclosure.

7.3.4 We reserve the right to disclose and transfer a Data Subject's information, including their Personal Information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

#### 7.4 **Planned Transborder Flows of Personal Information :**

In carrying out any cross-border transfers, we shall adhere to the provisions of POPIA.

#### 7.5 **Information Security Measures :**

7.5.1 The security and confidentiality of Personal Information is important to us. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.

7.5.2 We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.

7.5.3 In Processing any Personal Information, we shall comply with the following minimum technical and organisational security requirements –

7.5.3.1 **Physical Access** – Access to Personal Information is restricted in our offices and only to those Employees who need the Personal Information to perform a specific job / task.

7.5.3.2 **Employee Training** – All Employees with access to Personal Information are kept up to date on our security and privacy practices. After a new policy is added, these Employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Information of all Data Subjects.

7.5.3.3 **Unique User Identification** – Employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of our password and confidentiality policy.

7.5.3.4 **Passwords** – We shall ensure that there are passwords required for any access to Personal Information in line with its password policy.

7.5.3.5 **Physical access and privileges** – We ensure that access to Personal Information is limited to Employees on a "need to know" basis, and our Employees are required to strictly utilise their unique user ID and applicable passwords to access same.

- 7.5.3.6 **Back-ups** – We ensure that all Personal Information is backed-up regularly, based on operational or legal requirements, and that back up testing is conducted regularly in order to ensure that Personal Information can be recovered in the event that such Personal Information is lost, damaged or destroyed.
- 7.5.3.7 **Malware protection** – We ensure that our environment has comprehensive malware protection software employed, which software is specifically designed to protect us from the most recent malware infections.
- 7.5.3.8 **Vulnerability scanning** – We frequently conduct vulnerability scanning in order to assess whether Personal Information is adequately protected from external threats.
- 7.5.3.9 **Systems Review** – We conducts regular reviews of our technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

## 8. INFORMATION HELD BY US IN TERMS OF PAIA

*(Information required under section 51(1)(e) of PAIA)*

8.1 This section of the Manual sets out the categories and descriptions of records held by us. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records. This is a non exhaustive list of records held by us.

### 8.2 Financial / accounting records

- 8.2.1 Annual financial statements
- 8.2.2 Tax returns
- 8.2.3 Audit reports conducted for us
- 8.2.4 Invoices in respect of creditors and debtors of the firstEquity Group entities
- 8.2.5 Bank facilities and account details
- 8.2.6 Details of accounting officer or auditors
- 8.2.7 Formal books of account and other financial statements
- 8.2.8 Source documents
- 8.2.9 Banking records
- 8.2.10 Management reports

### 8.3 Company records

- 8.3.1 Company name documents

- 8.3.2 Company registration documents
- 8.3.3 Founding statement or Memorandum of Incorporation
- 8.3.4 Share register and other statutory registers
- 8.3.5 Minutes of meetings

#### **8.4 Human Resources records**

- 8.4.1 List of employees
- 8.4.2 Contracts of employment with our employees
- 8.4.3 Contracts with our Consultants
- 8.4.4 Personnel records of each of our employees and/or Consultants
- 8.4.5 Disciplinary records
- 8.4.6 Compensation or redundancy payments
- 8.4.7 Records relating to conditions of employment
- 8.4.8 Employment Equity Plans
- 8.4.9 Pension and provident fund records
- 8.4.10 Employee tax information
- 8.4.11 Training schedules and manuals
- 8.4.12 Agreements with our clients
- 8.4.13 Files relating to client matters
- 8.4.14 Payroll records
- 8.4.15 Internal policies and procedures

#### **8.5 Client records**

- 8.5.1 Client documentation in terms of Financial Intelligence Centre Act No. 38 of 2001, where applicable
- 8.5.2 Correspondence with clients
- 8.5.3 Correspondence with third parties
- 8.5.4 Research conducted on behalf of our clients
- 8.5.5 Other information relating to, or held on behalf of our clients

## **8.6 Intellectual property**

8.6.1 Trade-marks, copyrights and designs held by us.

8.6.2 Software licences

8.6.3 Records relating to domain names

## **8.7 Immovable and movable property records**

8.7.1 Agreements for the lease of immovable property by any of the firstEquity Group entities

8.7.2 Agreements for the lease or sale of movable property by any of the firstEquity Group entities

8.7.3 Records regarding insurance in respect of movable property

8.7.4 Records regarding insurance in respect of immovable property

8.7.5 Asset register

## **8.8 Information technology**

8.8.1 Records regarding computer systems and programmes held by us.

8.8.2 Computer / mobile device usage policy documentation;

8.8.3 Disaster recovery plans;

8.8.4 Hardware asset registers;

8.8.5 Information security policies/standards/procedures;

8.8.6 Information technology systems and user manuals

8.8.7 Information usage policy documentation;

8.8.8 Project implementation plans;

8.8.9 Software licensing; and

8.8.10 System documentation and manuals

## **8.9 Marketing**

8.9.1 Websites.

8.9.2 Marketing materials

8.9.3 Marketing campaign history

8.9.4 Marketing agreements



## **8.10 Miscellaneous**

- 8.10.1 Security agreements, guarantees and indemnities
- 8.10.2 Internal correspondence
- 8.10.3 Suretyship agreements
- 8.10.4 Agreements with our suppliers
- 8.10.5 Correspondence, including internal and external memoranda

## **9. INFORMATION KEPT BY US IN ACCORDANCE WITH OTHER LEGISLATION**

*(Information required under section 51(1)(b)(iii) of PAIA)*

- 9.1 Records are kept in accordance with legislation applicable to us, which includes but is not limited to the following:
  - 9.1.1 Basic Conditions of Employment Act
  - 9.1.2 Companies Act
  - 9.1.3 Compensation for Occupational Injuries and Diseases Act
  - 9.1.4 Employment Equity Act
  - 9.1.5 National Credit Act
  - 9.1.6 Pension Funds Act
  - 9.1.7 Financial Services Board Act
  - 9.1.8 Financial Intelligence Centre Act
  - 9.1.9 Financial Advisory and Intermediary Services Act
  - 9.1.10 Income Tax Act
  - 9.1.11 Labour Relations Act
  - 9.1.12 Unemployment Insurance Act
  - 9.1.13 Long-term Insurance Act
  - 9.1.14 Occupational Health and Safety Act
  - 9.1.15 Promotion of Equality and Prevention of Unfair Discrimination Act
  - 9.1.16 Electronic Communications and Transactions Act
  - 9.1.17 Short-term Insurance Act
  - 9.1.18 Skills Development Act

- 9.1.19 Skills Development Levies Act
- 9.1.20 South African Qualifications Authority Act
- 9.1.21 Value-Added Tax Act
- 9.1.22 Protection of Constitutional Democracy Against Terrorist and Related Activities Act
- 9.1.23 Promotion of Access to Information Act
- 9.1.24 Protection of Personal Information Act
- 9.2 Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of PAIA.

## **10. REQUEST PROCEDURES**

- 10.1 Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

### **10.2 Form of request**

- 10.2.1 The Requester must use the prescribed form to make the request for access to a record, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address or electronic mail address of the body concerned (*see s 53(1) of PAIA*).
- 10.2.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed (*see s 53(2)(a) and (b) and (c) and (e) of PAIA*).
- 10.2.3 The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (*see s 53(2)(d) of PAIA*).
- 10.2.4 If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (*See s 53(2)(f) of PAIA*).

### **10.3 Fees**

#### **10.3.1 Request fees:**

- 10.3.1.1 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (*see s 54(1) of PAIA*).

10.3.1.2 The fee that the Requester must pay to a private body is R50. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

**10.3.2 Access fees and fees for reproduction:**

10.3.2.1 If access to a record/s is granted by us, the Requester may be required to pay an access fee for the search for and preparation of the records and for reproduction of the record/s. (*See section 54(6) of PAIA*)

10.3.2.2 The access fees which apply are set out below. We can refuse access until such access fees have been paid. (*See section 54(5) of PAIA*).

	Reproduction	Fee (Rand)
1	Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email	R1.10 per page
2	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75 per page
3	A copy of, in a computer readable form on compact disc	R70.00
4	Transcription of visual images on an A4-size page or part thereof	R40.00 per page
5	Copy of visual images	R60.00
6	Transcription of an audio record on an A4-size page or part thereof	R20.00
7	Copy of an audio record	R30.00

**10.4 Decision on request**

10.4.1 After the Information Officer has made a decision on the request, the Requester will be notified using the required form. (*See section 56(1)(b) of PAIA*)

10.4.2 If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure (*see s 54(6) of PAIA*).

**11. TIMELINES FOR CONSIDERATION OF A REQUEST**

(*See section 56 and 57 of PAIA*)

11.1 Requests for access by a Requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

11.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);

11.1.2 where the request requires a search for records in, or collection of such records from, one of our branches located far away from Johannesburg;

- 11.1.3 consultation among our divisions or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
  - 11.1.4 more than one of the circumstances contemplated in clauses 11.1.1, 11.1.2 and 11.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or
  - 11.1.5 the Requester consents in writing to such extension.
- 11.2 If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

## **12. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS**

*(See chapter 4 of Part 3 of PAIA)*

- 12.1 Subject to Clause 12.1.2, requests for access by a Requestor must be refused by the Information Officer if –
- 12.1.1 the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (see section 63 of PAIA);
  - 12.1.2 the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (see section 64 of PAIA); the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (see section 65 of PAIA);
  - 12.1.3 the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);
  - 12.1.4 the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (see section 67 of PAIA); or
  - 12.1.5 the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (see section 69 of PAIA).
- 12.2 **Requests for access by a Requestor may be refused by the Information Officer if –**
- 12.2.1 the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (see section 66(b));
  - 12.2.2 **the record:**
    - 12.2.2.1 contains our trade secrets;
    - 12.2.2.2 contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of firstEquity Group entities;
    - 12.2.2.3 contains information, the disclosure of which could reasonably be expected:

- i. to put us at a disadvantage in contractual or other negotiations; or
  - ii. to prejudice us in commercial competition; or
  - iii. (d) is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by us, except insofar as it is required to give access to a
    - iv. record to which access is granted in terms of PAIA; or
- 12.2.3 the record contains information about research being or to be carried out by or on behalf of us, the disclosure of which would be likely to expose: (a) us; (b) a person that is or will be carrying out the research on our behalf of ; or (c) the subject matter of the research, to serious disadvantage.
- 12.3 A Data Subject's request to receive their personal data in a structured, commonly used, and machine-readable format must be complied with at a reasonable cost and within 30 (thirty) days from the date of the request.

### **13. REMEDIES AVAILABLE TO A REQUESTOR ON REFUSAL OF ACCESS**

- 13.1 We do not have any internal appeal procedures that may be followed once a request to access information has been refused.
- 13.2 The decision of the Information Officer or deputy information officer is final.
- 13.3 If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further. *(See section 78 of PAIA)*

### **14. OTHER INFORMATION HELD BY US AS PRESCRIBED**

*(Other information as may be prescribed under section 51(1)(a)(ii))*

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

### **15. AVAILABILITY OF THE MANUAL**

*(Availability of Manual under section 51(3))*

- 15.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at our offices as per the details in clause 6. Copies of the Manual may be made, subject to the prescribed fees.
- 15.2 The Manual is also posted on our websites as detailed in clause 6.

### **16. PRESCRIBED FORMS AND FEE STRUCTURE**

*(Prescribed forms and fee structure in respect of private bodies)*

The forms and fee structure prescribed under PAIA are available from the Government Gazette, or at the website of the Department of Justice and Constitutional Development ([www.doj.gov.za](http://www.doj.gov.za)), under the 'regulations' section as well as the SAHRC website ([www.sahrc.org.za](http://www.sahrc.org.za)).

## ANNEXURE "A" – FORM C – PRESCRIBED FORM TO MAKE REQUEST FOR ACCESS

### **Form C** **Request for access to record of private body**

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act 2 of 2000))  
[Regulation 10]

#### **A Particulars of private body**

The Head:

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#### **B Particulars of person requesting access to the record**

- (a) *The particulars of the person who requests access to the record must be given below.*

(b) *The address and/or fax number in the Republic to which the information is to be sent must be given.*

(c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Fax number: \_\_\_\_\_

Telephone number: \_\_\_\_\_ E-mail address: \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person: \_\_\_\_\_

\_\_\_\_\_

#### **C Particulars of person on whose behalf request is made**

*This section must be completed ONLY if a request for information is made on behalf of another person.*

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

#### D Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.**

- 1 Description of record or relevant part of the record: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- 2 Reference number, if available: \_\_\_\_\_
- 3 Any further particulars of record: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### F Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability: _____ _____ _____	Form in which record is required: _____ _____ _____
-------------------------------------	---

Mark the appropriate box with an X.

**NOTES:**

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

<b>1 If the record is in written or printed form:</b>			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
<b>2 If record consists of visual images</b> (this includes photographs, slides, video recordings, computer-generated images, sketches, etc):			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	Copy the images*
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*
<b>3 If record consists of recorded words or information which can be reproduced in sound:</b>			



## E Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees: \_\_\_\_\_

	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
<b>4 If record is held on computer or in an electronic or machine-readable form:</b>					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

## G Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.**

- 1 Indicate which right is to be exercised or protected: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- 2 Explain why the record requested is required for the exercise or protection of the  
aforementioned right: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_



#### **H Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

How would you prefer to be informed of the decision regarding your request for access to the record?

\_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF REQUESTER / PERSON  
ON WHOSE BEHALF REQUEST IS MADE

## **ANNEXURE "B" – LIST OF FIRST EQUITY GROUP ENTITIES**

1. AFRICAN RISK TRANSFER (PTY) LTD
2. EVERYTHING INSURE DIGITAL INTERMEDIARIES (PTY) LTD
3. FE CREDIT SERVICES (PTY) LTD
4. FEP INVESTMENTS (PTY) LTD
5. FIRST EQUITY CREDIT AND POLITICAL RISK (PTY) LTD
6. FIRST EQUITY HOLDINGS SA (PTY) LTD
7. FIRST EQUITY INSURANCE BROKERS (PTY) LTD
8. FIRST EQUITY PROFESSIONAL LIABILITY (PTY) LTD
9. FIRST EQUITY TRUST HOLDINGS (PTY) LTD
10. INDEMNITY 360 (PTY) LTD
11. IVORY HOLDINGS (PTY) LTD
12. IVORY PROPVEST (PTY) LTD
13. ROYAL AND ANCIENT FINANCIAL SERVICES (PTY) LTD
14. SATIB INSURANCE BROKERS (PTY) LTD
15. SENCERUS INSURANCE BROKERS (PTY) LTD
16. SPROUT BUSINESS CONSULTANTS (PTY) LTD
17. TRUM AFRICA (PTY) LTD