

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

## Contents

1.INTRODUCTION.....	2
2.OBJECTIVES.....	2
3.SCOPE.....	2
4.DEFINITIONS .....	3
5.CONTACT DETAILS.....	5
5.1 General Contact Details.....	5
5.2 Information Officer and Deputy Information Officers' Contact Details.....	5
6.THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION.....	7
7.INFORMATION REQUEST PROCEDURE .....	8
8. TYPES OF REQUESTERS.....	8
8.1 Personal Requesters.....	9
8.2 Other Requesters .....	10
9. RECORDS .....	10
9.1 Company records .....	10
9.2 Business records.....	11
9.3 Financial records .....	11
9.4 Insurance records.....	11
9.5 Income tax records .....	11
9.6 Personnel records .....	12
9.7 Policies and directives .....	12
9.8 Agreements or contracts .....	12
9.9 Regulatory documents.....	13
9.10 Published information .....	13
9.11 Customer information .....	13
9.12 Reference materials .....	13
9.13 Other party records .....	13
10. AUTOMATICALLY AVAILABLE INFORMATION .....	14
11.FEES.....	14
12.DECISION.....	15
13.GROUNDS FOR REFUSAL OF ACCESS TO RECORDS .....	15
14.REMEDIES AVAILABLE WHEN SASFIN SECURITIES REFUSES A REQUEST FOR INFORMATION.....	16
15. LIST OF APPLICABLE LEGISLATION .....	17
16. PROTECTION OF PERSONAL INFORMATION .....	18
17. AVAILABILITY OF THE MANUAL .....	18

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

Appendix 1.....	19
Appendix 2.....	24

## 1.INTRODUCTION

The Promotion of Access to Information Act 2 of 2000 (the Act), as amended by the Promotion of Access to Information Amendment Act 54 of 2002, and the Protection of Personal Information Act 4 of 2013, requires Sasfin Holdings Limited (the Group) and/or each of its subsidiaries which are regarded as responsible persons, to each maintain a manual which contains information on how to use the Act to access its records. The Act gives effect to the constitutional right of access to information held by the state, another person or private body and this is required for the exercise or protection of any rights. Sasfin Securities (Pty) Ltd (Sasfin Securities) forms part of the Group. This PAIA manual outlines, *inter alia*, the types of records and Personal Information (PI) that is held by Sasfin Securities and provides the procedure to request access to these records and PI.

## 2.OBJECTIVES

This manual informs requesters of procedural and other requirements which a request must meet as prescribed by the Act. Its purpose is to help requesters access Sasfin Securities' information and any other information that Sasfin Securities has. The Act requires Sasfin Securities to make it available to requesters so that requesters:

- know what types of information Sasfin Securities has; and
- can request access to it.

The manual is intended to provide Sasfin Securities with a set of guidelines aimed at addressing access to information requests in terms of the Act. This manual serves to demonstrate Sasfin Securities' culture of transparency and accountability by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect their rights. The objectives of this manual must be balanced against the need to ensure confidentiality of information relating to but not limited to:

- Commercial confidentiality;
- Effective, efficient and good governance; and

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- The protection of privacy.

### 3.SCOPE

This manual applies to all Personnel.

### 4.DEFINITIONS

Term	Definition
<b>Board</b>	The Board of Directors of Sasfin Holdings Limited and Sasfin Securities (Pty) Ltd
<b>Court</b>	Any of the following: The Constitutional Court acting in terms of section 167(6)(a) of the Constitution; or (i) a High Court or another court of similar status; or (ii) a Magistrate's Court, either generally or in respect of a specified class of decisions in terms of this Act, designated by the Minister by notice in the Gazette and prescribed over by a magistrate or an additional magistrate designated in writing by the Minister (after consultation with the Magistrates Commission) terms of section 91A, within whose area of jurisdiction – (a) the decision of the information officer or relevant authority of the public body or the head of a private body has been taken; (b) the public body or private body concerned has its principal place of administration or business; or (c) the Requester or third party concerned is domiciled or ordinarily resident.
<b>Customer/ Client/Data Subject</b>	In respect of any particular goods or services, means: <ul style="list-style-type: none"> <li>a) a person to whom those particular goods or services are marketed in the ordinary course of the supplier's business;</li> <li>b) a person who has entered into a transaction with a supplier in the ordinary course of the supplier's business, unless the transaction is exempt from the application of the Consumer Protection Act by virtue of section 5 (2) or 5 (3) of the Act;</li> <li>c) if the context so requires or permits, a user of those particular goods or a recipient or beneficiary of those particular services, irrespective of whether that user, recipient or beneficiary was a party to a transaction concerning the supply of those particular goods or services; and</li> <li>d) a franchisee in terms of a franchise agreement, to the extent applicable in terms of section 5 (6) (b) to (e) of the Act</li> <li>e) means the person to whom personal information relates.</li> </ul>

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

<b>Business Unit</b>	Where applicable, this term is inter-changeable for division, department, company or any other logical unit within the Group
<b>Personnel</b>	Refers to all representatives of Sasfin Securities and includes (but is not limited to) temporary, permanent and contracted employees, agents, consultants, contractors, directors or affiliates
<b>Personal Information</b>	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.
<b>Private Body</b>	a) A natural person who carries or has carried on any trade, business or profession, but only in such capacity; 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.
<b>Record</b>	Means any recorded information regardless of form of medium, which is in the possession or under the control of the Group, whether or not it was created by the Group.
<b>Requester</b>	Can be a natural or juristic person, and includes public bodies or officials acting on behalf of public bodies. This means that both private individuals and entities, and public bodies, can make requests for access to records of the Group.

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

<b>Sasfin Securities</b>	Refers to Sasfin Securities (Pty) Ltd as a subsidiary of Sasfin Holdings Limited.
<b>The Group</b>	Sasfin Holdings Limited and all of its subsidiaries.

## 5.CONTACT DETAILS

### 5.1 General Contact Details

Company Name: **SASFIN SECURITIES (PTY) LTD**  
 Company Registration: 1996/005886/07  
 Postal Address: P.O. Box 95104, Grant Park, 2051  
 Physical Address: 29 Scott Street, Waverley, Johannesburg, 2090  
 Fax Number: 0872205557  
 E-mail: [privacy@sasfin.com](mailto:privacy@sasfin.com)  
 Website: [www.sasfin.com](http://www.sasfin.com)

### 5.2 Information Officer and Deputy Information Officers' Contact Details

Position: **Information Officer**  
 Name: **Mr. Timothy Kerr-Phillips**  
 Postal Address: P.O. Box 95104, Grant Park, 2051  
 Physical Address: 29 Scott Street, Waverley, Johannesburg, 2090  
 Tel: (011) 809-7500  
 Fax: 0872205557  
 E-mail: [privacy@sasfin.com](mailto:privacy@sasfin.com)

Position: **Deputy Information Officer**  
 Name: **Mr. Dewald Cornelius**  
 Postal Address: P.O. Box 95104, Grant Park, 2051  
 Physical Address: 29 Scott Street, Waverley, Johannesburg, 2090  
 Tel: (011) 809-7500  
 Fax: 0872205557  
 E-mail: [privacy@sasfin.com](mailto:privacy@sasfin.com)

Position: **Deputy Information Officer**

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

Name: **Mr. Maston Lane**  
Postal Address: P.O. Box 95104, Grant Park, 2051  
Physical Address: 29 Scott Street, Waverley, Johannesburg, 2090  
Tel: (011) 809-7500  
Fax: 0872205557  
E-mail: [privacy@sasfin.com](mailto:privacy@sasfin.com)

Position: **Deputy Information Officer**  
Name: **Mr. Andrew Josh Souchon**  
Postal Address: P.O. Box 95104, Grant Park, 2051  
Physical Address: 29 Scott Street, Waverley, Johannesburg, 2090  
Tel: (011) 809-7500  
Fax: 0872205557  
E-mail: [privacy@sasfin.com](mailto:privacy@sasfin.com)

## 6.THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

The South African Human Rights Commission (SAHRC) is mandated under the Act to:

- Promote the right to access to information;
- Monitor the implementation of the Act by the Group;
- Make recommendations to strengthen the Act; and
- Report annually to Parliament.

The SAHRC has compiled an easy-to-understand guide in terms of s10 of the Act, to assist Requesters in accessing records and documents in order to exercise or protect the right to information. The guide is available in each official language of South Africa.

The functions of the SAHRC in terms of the Act have been transferred to the Information Regulator in terms of s110 of the Protection of Personal Information Act.

To this end, a formal guide for Private Bodies (such as Sasfin Securities) may be requested from the SAHRC by addressing such requests to:

### The Information Regulator:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017  
Telephone Number: 010 023 5200 or 010 023 5207

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

Fax Number: 011 403 0668  
Website: <https://www.justice.gov.za/inforeg/index.html>  
<http://www.sahrc.org.za/index.php/understanding-paia>  
Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
Enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

## 7. INFORMATION REQUEST PROCEDURE

Considering the objectives of the Act and the need to give effect to the right of access to information, it is necessary to detail the manner in which information from Sasfin Securities can be accessed. In this regard, the Requester must comply with the procedural requirements contained in the Act relating to the request for access to a record, the following should be noted:

1. The Requester must complete the prescribed form enclosed herewith as "Appendix 1" and submit same, as well as a request fee and a deposit, if applicable, to the Information Officer or the Deputy Information Officer at the provided postal or physical address, fax number or electronic mail address. It must be noted that Appendix 1 is commonly known as "Form C" and is readily available at [www.SAHRC.org.za](http://www.SAHRC.org.za).
2. The prescribed form must be completed with enough detail to enable the Information Officer to identify –
  - the record requested;
  - the identity of the Requester;
  - the form of access required should the request be granted;
  - the email address, postal address or fax number of the Requester;
  - any other way the Requester would like to be informed of Sasfin Securities' decision other than in writing.
3. The Requester must state that he/she requires the information in order to exercise or protect a right, and clearly state the nature of the right that is so to be exercised or protected. In addition, the Requester must clearly specify why the record is necessary in order to exercise or protect such a right.
4. If a request is made on behalf of another person, then the Requester must submit proof of the capacity in which he/she is making the request to the reasonable satisfaction of the Information Officer.

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

5. The Requester must pay the prescribed fee before any further processing can take place.
6. If a Requester does not use Form C, Sasfin Securities may:
  - reject the request due to lack of procedural compliance;
  - refuse the request if the requester does not provide sufficient information; or
  - delay the request the record requested.
7. The Information Officer will notify the Requester within 30 days as to whether the request has been granted or not. The Information Officer may ask for an extension for a period of no more than 30 (thirty) additional days for specific reasons, which include the request involving:
  - a large volume of documents;
  - consultation with members of Sasfin Securities' or possibly the Group's Executives, Business Units and/ or other entities.
8. If the request is granted, the notice will describe any applicable access fees and procedures to be followed, unless the Requester has asked for access in a specific form. If the request is refused, the notice will describe the reasons for the refusal.
9. The Information Officer may decide to defer the release of the record to the Requester if the record is intended to be published within 90 days or if the record is required by law to be published.
10. If the Information Officer cannot find the requested record or if it does not exist, the Information Officer will notify the Requester, via an affidavit, that it is not possible to give access to the record.
11. This Manual does not grant any rights to access information records, except in terms of the Act.

## 8. TYPES OF REQUESTERS

Records, held by Sasfin Securities may be accessed after the prerequisite formalities in terms of the Act have been complied with. Two types of parties may act as Requesters in this process namely:

- Personal Requesters; and
- Other Requesters



## Sasfin Securities (Pty) Ltd Access to Information Manual (V8 of May 2021)

### 8.1 Personal Requesters

A personal Requester is a Requester who is seeking access to a record containing personal information about the Requester.

Sasfin Securities may voluntarily provide the requested information or give access to any record regarding the Requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

### 8.2 Other Requesters

This type of Requester is one who is entitled to request access to information pertaining to third parties. Sasfin Securities is not obliged to voluntarily grant access to these types of records. The Requester must, as such, fulfil the requirements for access in terms of the Act, including the payment of a request and access fee.

## 9. RECORDS

In order to facilitate a request in terms of the Act it is necessary to note the categories of records that Sasfin Securities holds and which, as a rule, are available upon request. The information held by Sasfin Securities is classified and grouped according to those categories as listed in 9.1 to 9.13 below.

The categories of records held by Sasfin Securities may pertain to personal information as classified by the Protection of Personal Information Act.

Cognizance must be taken of the fact that accessibility to the documents listed herein, may be subject to the grounds of refusal in accordance with justifiable limitations set out in the Act, including but not limited to:

- limitations aimed at the reasonable protection of privacy;
- commercial confidentiality; and
- effective, efficient and good governance.

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

### 9.1 Company records

- Memorandum of incorporation
- Directors' names
- Documents of incorporation
- Minutes of board of directors meetings
- Written resolutions
- Records relating to appointment of directors, auditor, secretary, public officer, or other officers
- Records held by officials of the Group
- Securities and equities
- Share register and other statutory registers
- Other statutory records

### 9.2 Business records

- Operational records
- Databases
- Published works
- Internal correspondence
- Product records
- Information technology
- Treasury-related records

### 9.3 Financial records

- Financial statements
- Tax returns
- Other documents relating to taxation of the company
- Accounting records
- Banking records
- Banking details
  
- Bank statements
- Electronic banking records
- Paid cheques
- Asset register
- Rental agreements

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- Invoices
- Financial agreements

#### 9.4 Insurance records

- Insurance policies held by the company
- Register of all immovable property owned by the company

#### 9.5 Income tax records

- PAYE Records
- Corporate tax records
- Customs tax
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- VAT records
- Regional Services Levies
- Skills Development Levies
- UIF
- Workmen's Compensation

#### 9.6 Personnel records

- List of employees
- Employee personal information
- Employee employment contracts
- Employment policies and procedures
- Employment Equity Plan
- Medical aid records
- Pension and provident fund records
- Salaries of employees
- Leave records
- Internal evaluations
- Disciplinary records
- Disciplinary codes
  
- Training records

## Sasfin Securities (Pty) Ltd Access to Information Manual (V8 of May 2021)

- Operating manuals
- Personal records provided by personnel
- Records provided by a third party relating to personnel
- Other personnel-related contractual and quasi-legal records
- Other statutory records
- Related correspondence
- Personnel records include records about our employees and contractors.

### 9.7 Policies and directives

- Internal relating to employees and the company
- External relating to clients and other third parties
- Information technology systems and documents

### 9.8 Agreements or contracts

- Standard Agreements
- Contracts concluded with customers
- NDAs
- Letters of Intent, MOUs
- Third party contracts (such as JV agreements, VAR Agreements, etc.)
- Office management contracts
- Supplier contracts

### 9.9 Regulatory documents

- Permits
- Licences
- Authorities

### 9.10 Published information

- External newsletters and circulars
- Internal newsletters and circulars
- Information on the company published by third parties

### 9.11 Customer information

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- Customer details
- Contact details of individuals within customers
  
- Communications with customers
- Sales records
- Transactional information
- Marketing records
- Records provided by a Customer to a third party acting for or on behalf of the Group
- Records provided by a third party

#### 9.12 Reference materials

- Books
- Newsletters and journals articles
- Magazines
- Newspaper articles

#### 9.13 Other party records

- Personnel, Customer or private body records which are held by another party, as opposed to the records held by Sasfin Securities itself;
- Records held by Sasfin Securities pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.
- Sasfin Securities may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary / holding / sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to Sasfin Securities.

## 10. AUTOMATICALLY AVAILABLE INFORMATION

The following records are automatically available:

- product information;
- campaigns;
- posters;

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- any public promotional material

## 11.FEES

The Act provides for two types of fees (Appendix 2), namely:

- a request fee, which will be a standard fee, and
- an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs.

When the request is received by the Information Officer, such officer shall by notice require the Requester, other than a personal Requester, to pay the prescribed request fee (if any), before further processing of the request.

If the search for the Record has been made and the preparation of the Record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the Requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the Requester has paid the fees as indicated in "Appendix 2".

A Requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including deciding to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is declined, then the Information Officer concerned must repay the deposit to the Requester. It must be noted that Requesters who earn less than R14 712 (fourteen thousand seven hundred and twelve Rand) per year (if single) and R27 192 (twenty seven thousand one hundred and ninety two Rand) per year (if married or in a life partnership), do not have to pay access fees.

## 12.DECISION

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

Sasfin Securities will, within 30 (thirty) days (calendar month) of receipt of the request, decide whether to grant or decline the request and give notice with reasons to that effect.

The 30 (thirty) day period with which Sasfin Securities has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 (thirty) days if the request is for a large number of information and the information cannot reasonably be obtained within the original 30 (thirty) day period.

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

The right of access to information is enshrined in the Bill of Rights of the South African Constitution. In order to give effect to this right, access to information should be granted as often as possible. Like many other rights contained in the Bill of Rights, the right of access to information can be limited or refused in certain circumstances. To this end, Sasfin Securities may refuse a request for access to information on any of the following grounds:

1. mandatory protection of a third party's privacy (natural person), which would involve the unreasonable disclosure of personal information of that natural person;
2. mandatory protection of the commercial information of a third party, if the record contains –
  - trade secrets of that third party;
  - financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
  - information disclosed in confidence by a third party to the Group;
3. mandatory protection of confidential information of third parties if it is protected in terms of any agreement: express, tacit or implied;
4. mandatory protection of the safety of individuals and the protection of property;
5. mandatory protection of records which would be regarded as privileged in legal proceedings;

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

6. the commercial activities of Sasfin Securities, which may include-
  - trade secrets of the institution;
  - financial, commercial, scientific or technical information which disclosure thereof could likely cause harm to the financial or commercial interests of Sasfin Securities;
  - information which, if disclosed could put Sasfin Securities at a disadvantage in negotiations or commercial competition;
  - a computer program which is owned by Sasfin Securities, and which is protected by copyright.
7. Sasfin Securities or a third party's research information, if its disclosure would disclose the identity of Sasfin Securities, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
8. Information which would provide an investor or potential investor with "inside information".

## 14. REMEDIES AVAILABLE WHEN SASFIN SECURITIES REFUSES A REQUEST FOR INFORMATION

### Internal Remedies

Sasfin Securities has no internal appeal procedure and the decision made by the Information Officer or her / his deputy is final. Requesters whose requests for information are declined, or who are not satisfied with the information supplied by the Information Officer, must make use of external remedies.

### External Remedies

A Requester who is dissatisfied with a decision by the Information Officer to grant access, to impose access fees or to extend the time period in which to respond, may apply to a Court for relief within 180 (one hundred and eighty) calendar days of receiving the decision/ notification. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or other courts of similar status.

## 15. LIST OF APPLICABLE LEGISLATION

The Group, where applicable Sasfin Securities, holds records in accordance with the following legislation:



Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- Administration of Estates Act 66 of 1965
- Short Term Insurance Act 53 of 1998
- Deeds Registries Act 47 of 1937
- The Long-Term Insurance Act 52 of 1998
- Designs Act no. 195 of 1993
- Financial Markets Act 19 of 2012
- The Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Sector Regulation Act 9 of 2017
- Debt Collectors' Act no. 114 of 1998
- The Custody and Administration of Securities Act no. 85 of 1992
- The Criminal Procedures Act no. 51 of 1977
- The Labour Relations Act 66 of 1995
- Employment Equity Act no. 55 of 1998
- The Basic Conditions of Employment Act 75 of 1997
- Firearms Control Act 60 of 2000
- Formalities in respect of Leases of Land Act 18 of 1969
- The Fund Raising Act 107 of 1978
- The Home Loan and Mortgage Disclosure Act 63 of 2000
- Identification Act 68 of 1997
- Inspection of Financials Institutions Act 18 of 1998
- Alienation of Land Act 68 of 1981
- Legislation Attorneys Act 53 of 1979
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Estate Agency Affairs Act 112 of 1976
- Competition Act 89 of 1998
- Collective Investment Schemes Control Act 45 of 2002
- Insolvency Act 24 of 1936
- Constitution of SA Act no. 108 of 1996
- Companies Act no. 61 of 1973
- Unemployment Insurance Act 63 of 2001
- The Banks Act 94 of 1990
- Financial Intelligence Centre Act 38 of 2001
- South African Reserve Bank Act 90 of 1989
- Stamp Duties Act 77 of 1968
- Unit Trust Control Act 54 of 1981
- Value Added Tax Act 89 of 1991

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

- Skills Development Levies Act 9 of 1999
- National Credit Act 34 of 2005
- Participation Bonds Act 55 of 1981
- Pension Funds Act 24 of 1956
- Income Tax Act 58 of 1962
- Protection of Personal Information Act 2013

## 16. PROTECTION OF PERSONAL INFORMATION

We process the personal information of various categories of people for various purposes as set out in our Privacy Notice (accessible at [www.sasfin.com/privacy-and-cookie-notice/](http://www.sasfin.com/privacy-and-cookie-notice/))

## 17. AVAILABILITY OF THE MANUAL

This manual is made available to Requesters in two ways, namely:

- A copy is available for inspection at the Group's operating address, reflected herein. Such inspections are only permitted during office hours.
- The manual is available on the Group's official website [www.sasfin.com/regulations](http://www.sasfin.com/regulations)

### APPENDIX 1

#### PREScribed FORM TO BE COMPLETED BY A REQUESTER

#### FORM C

#### REQUEST FOR ACCESS TO RECORDS OF THE SASFIN GROUP

*(Section 53(1) of the Promotion of Access to Information Act, No 2 of 2000)*

#### A. Particulars of private body

The Head

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

.....  
.....  
.....  
.....

**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 and when made on behalf of another person: .....

Sasfin Securities (Pty) Ltd  
 Access to Information Manual  
 (V8 of May 2021)

**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.***

Description of record or relevant part of the record: .....

.....  
 .....  
 .....  
 .....  
 .....  
 .....

Reference number, if available: .....

Any further particulars of record: .....

**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.*

**Sasfin Securities (Pty) Ltd**  
**Access to Information Manual**  
 (V8 of May 2021)

*(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: .....

.....

.....

.....

**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.*

**1. If the record is in written or printed form:**

**Sasfin Securities (Pty) Ltd**  
**Access to Information Manual**  
 (V8 of May 2021)

	copy of record		inspection of record
<p><b>2. If record consists of visual images</b></p> <p>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):</p>			
	view the images		copy of the images*
			transcription of the images*
<p><b>3. If record consists of recorded words or information which can be reproduced in sound:</b></p>			
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)
<p><b>4. If record is held on computer or in an electronic or machine-readable form:</b></p>			
	printed copy of record*		printed copy of information derived from the record*
			copy in computer readable form* (stiffy or compact disc)
<p>*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?</p> <p><b>Postage is payable.</b></p>			<p>YES</p>
			<p>NO</p>

**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.***

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.....

.....  
 .....  
 .....  
 .....

**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 particular to enable compliance with your request.*

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

.....  
 .....  
 .....

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

Signed at.....this.....day of.....20.....

## APPENDIX 2

### FEES

#### Reproduction Fees:

- |   |        |
|---|--------|
| • For every photocopy of an A4-size page or part thereof  | R 1.10 |
| • For every printed copy of an A4-size page or part thereof held<br>on a computer or in electronic or machine-readable form | R 0.75 |
| • For a copy in a computer-readable form on   |        |
| ○ Compact disc  | R70.00 |
| ○ A transcription of visual images, for an A4-size page or part thereof   | R40.00 |
| • For a copy of visual images   | R60.00 |
| • A transcription of an audio record, for an A4-size page or part thereof   | R20.00 |
| • For a copy of an audio record   | R30.00 |

#### Request Fees:

Where a Requester submits a legitimate request for access to information held by the Bank on a person other than the Requester himself/herself, a request fee in the amount of R50.00 is payable upfront before the request will be processed.

#### Access Fees:



Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of Section 54 (8).

The applicable access fees which will be payable are:

- For every photocopy of an A4-size or part thereof R 1.10
- For every printed copy of an A4-size page or part thereof held  
On a computer or in electronic or machine-readable form R 0.75
- For a copy in computer-readable form on
  - Compact disc R70.00
- A transcription of visual images, for an A4-size or part thereof R40.00
- For a copy of visual images R60.00
- To search for a record that must be disclosed R30.00 ph.  
(per hour of part of an hour reasonably required for such search)
- Where a copy or a record needs to be posted the actual postal fee is payable.

**Deposits:**

Where the Bank receives a legitimate request for access to information held on a person other than the Requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the Requester.

The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.

**Note:** In terms of Regulation 8, Value Added Tax (VAT) must be added to all fees prescribed in terms of the Regulations.

These fees are subject to amendment without notice

Sasfin Securities (Pty) Ltd  
Access to Information Manual  
(V8 of May 2021)