

**PROMOTION OF ACCESS TO INFORMATION ACT MANUAL**



**MPANDE PROPERTY FUND MANAGER PROPRIETARY LIMITED**

**Registration Number: 2018/581471/07**

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## 1. INTRODUCTION

### 1.1. THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000 ("PAIA")

- 1.1.2. The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), seeks, among other things, to give effect to the constitutional right of access to any information held by the State, or by any other person, where such information is required for the exercise or protection of any right, and gives natural and juristic persons the right of access to Records held by either a Private Body or Public Body, subject to certain limitations, in order to enable them to exercise or protect their rights.
- 1.1.3. Section 51 of PAIA, as amended, by The Protection of Personal Information Act, No. 4 of 2013 ("POPIA") obliges private bodies to compile and make available a manual which contains prescribed information to enable any person to exercise their right to access to information in accordance with the provisions of PAIA.
- 1.1.4. This manual constitutes Mpande Property Fund Manager (Pty) Ltd ("Mpande")'s manual in compliance with its obligations imposed by section 51 of PAIA, read with the relevant provisions of POPIA.

### 1.2. ABOUT MPANDE

- 1.2.1. Mpande is an authorised financial services provider in terms of the Financial Advisory & Intermediary Service Act (FAIS) and regulated by the Financial Sector Conduct Authority ("FSCA"), with FSP number 51556.
- 1.2.2. Mpande is a majority Black owned and managed property fund and is focused on investments within the unlisted property sector with an asset allocation in Retail, Commercial Offices, Industrial and Residential sub-sectors.

## 2. DEFINITIONS

- 2.1. **"Consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;
- 2.2. **"Data Subject"** means the person to whom Personal Information relates, including all living individuals and juristic persons;
- 2.3. **"Information Officer"** means the individual identified in paragraph 4 of this manual;
- 2.4. **"Personal Information"** means information relating to an identifiable, living, natural person, and, where it is applicable, and identifiable, existing juristic person, and includes, but is not limited to: 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; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; the biometric information of the person; the personal opinions, views or preferences of the person; 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; the views or opinions of another individual about the person; and 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;

2.5. **“Record”** means any recorded information:

2.5.1. regardless of form or medium, including any of the following:

2.5.1.1. writing on any material;

2.5.1.2. information produced, recorded or stored by means of any tape- recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;

2.5.1.3. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;

2.5.1.4. book, map, plan, graph or drawing;

2.5.1.5. photograph, film, negative, tape, or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being so reproduced;

2.5.1.6. in the possession or under the control of a Responsible Party;

2.5.2. whether or not it was created by a Responsible Party; and

2.5.3. regardless of when it came into existence;

2.6. **“Special Personal Information”** means Personal Information as referred to in section 26 of POPIA and includes information pertaining to religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information, criminal behaviour concerning the commission of an alleged offence, or proceedings relating to an alleged offence, or disposal of proceedings.

### **3. PURPOSE OF THE PAIA MANUAL**

- 3.1. This PAIA manual may be used by the public to:
- 3.1.1. identify the categories of Records held by Mpande that are available without having to submit a formal PAIA request;
  - 3.1.2. understand how to make a request for access to a Record held by Mpande, by providing a description of the subjects on which Mpande holds Records and the categories of Records held on each subject;
  - 3.1.3. know which Records held by Mpande are available in accordance with other legislation;
  - 3.1.4. access the relevant contact details of the persons who will assist the public with the Records they intend to access;
  - 3.1.5. know all the remedies available from the body to which access to the Records is being requested, before approaching the Regulator or the Courts;
  - 3.1.6. know where to access the Information Regulators guide on how to use PAIA;
  - 3.1.7. know whether Mpande will process Personal Information, for what purpose Personal Information is processed and the description of the categories of Data Subjects and of the information or categories of information relating thereto;
  - 3.1.8. know the recipients or categories of recipients to whom the Personal Information may be supplied;
  - 3.1.9. know if Mpande has planned to transfer or process Personal Information outside the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be supplied; and
  - 3.1.10. know whether Mpande has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

### **4. COMPANY CONTACT DETAILS**

- 4.1. Information Officer: Ms. Nomzamo Letswele
- Postal Address: Fulham House, Ground Floor, Hampton Office Park, 20 Georgian Crescent, Bryanston, 2191
  - Physical (Street) Address: Fulham House, Ground Floor, Hampton Office Park, 20 Georgian Crescent, Bryanston, 2191
  - Telephone Number: +27 10 746 0410 (switchboard)

- Email Address: [nomzamo.letswele@mpandeasset.com](mailto:nomzamo.letswele@mpandeasset.com) or [info@mpandeasset.com](mailto:info@mpandeasset.com)

## 5. ACCESS TO RECORDS

- 5.1. PAIA grants a requester access to certain Records of a private body if the said Records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest.
- 5.2. Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner.
- 5.3. The contact details of the Information Regulator are as follows:
  - Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
  - E-mail address: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)
  - Website: <https://inforegulator.org.za>
- 5.4. The Information Regulator has, in terms of section 10(1) of PAIA, as amended, made available a Guide on how to use PAIA (the Guide), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille, and can be obtained from the Information Regulator's website at <https://inforegulator.org.za/paia-guidelines/>
- 5.5. The abovementioned Guide contains the following information:
  - 5.5.1. what the objects of PAIA and POPIA are;
  - 5.5.2. the relevant contact details of each public and private body (where possible);
  - 5.5.3. the process that needs to be followed to request access to records;
  - 5.5.4. assistance available from Information Officers in terms of both PAIA and POPIA;
  - 5.5.5. how to get access to the manual of a private body;
  - 5.5.6. all the remedies available in law to you; and
  - 5.5.7. details on prescribed fees payable in respect of requests for information.
- 5.6. If your PAIA request is denied, or there is no response from a public or private body for access to Records, a complaint can be lodged with [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)
- 5.7. The Information Officer is available to assist the Requester with any request with regards to a request for access to information.
- 5.8. Mpande will follow the following procedure with regards to requests received in terms of this policy:
  - 5.8.1. The Information Officer receives the request, which is internally co-ordinated.

- 5.8.2. When the Information Officer receives the request, he/she shall notify the requester to pay the prescribed fees, where applicable.
- 5.8.3. the request will be processed within 30 days, and the outcome thereof will be communicated to the requester as soon as is reasonably possible but within 30 days after receiving the request. Clear and detailed reasons will be provided to the requested where the request for access has been refused.
- 5.8.4. The 30-day period within which Mpande has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 5.8.5. There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. If requester is dissatisfied he/she can approach Info regulator or launch proceedings in court.
- 5.9. All requests for information will be assessed on their own merits, and according to applicable laws. The main grounds to refuse a request for information are as follows:
  - 5.9.1. mandatory protection of the privacy of a third party who is a natural person or deceased person, which would involve unreasonable disclosure of Personal Information of that natural or juristic person;
  - 5.9.2. mandatory protection of the commercial information of a third party, if the Record contains:
    - 5.9.2.1. trade secrets of that third party;
    - 5.9.2.2. financial, commercial, scientific or technical information, other than trade secrets, of a third party which disclosure could likely cause harm to the financial or commercial interest of that third party;
    - 5.9.2.3. information disclosed in confidence by a third party to Mpande if the disclosure could reasonably expected to put that third party at a disadvantage in contractual or other negotiations or prejudice that third party in commercial competition;
  - 5.9.3. mandatory protection of confidential information of a third party if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of any agreement;

- 5.9.4. mandatory protection of the life or physical safety of individuals and the protection of property;
- 5.9.5. mandatory protection of Records, which would be regarded as privileged from production in legal proceedings;
- 5.9.6. the protection of the commercial information of Mpande, which may include:
  - 5.9.6.1. trade secrets;
  - 5.9.6.2. financial, commercial, scientific or technical information, other than trade secrets, which disclosure would likely cause harm to the financial or commercial interests of Mpande;
  - 5.9.6.3. information which, if disclosed could reasonably be expected to put Mpande at a disadvantage in contractual or other negotiations or prejudice the institution in commercial competition; or
  - 5.9.6.4. computer programs which are owned by Mpande and protected by Copyright
- 5.9.7. mandatory protection of the research information of Mpande or a third party, if its disclosure would be likely to expose any such party, the researcher or the subject matter of the research to serious disadvantage;
- 5.9.8. Requests for information that are clearly frivolous or vexation, or which involve an unreasonable diversion of resources shall be refused.

## **6. SCHEDULE OF RECORDS AVAILABLE**

### **6.1. AUTOMATICALLY AVAILABLE INFORMATION**

- 6.1.1. PAIA provides that certain Records may automatically be made available. Should Records be automatically available, a formal request for such Records will not be necessary. These Records are automatically available to the public and the Information Regulator for inspection at Mpande's physical address during normal business hours.
- 6.1.2. The abovementioned information include may include, although not limited to, the following:
  - 6.1.2.1. Information available on Mpande's website
  - 6.1.2.2. Marketing materials

### **6.2. INFORMATION AVAILABLE IN TERMS OF LEGISLATION**

- 6.2.1. Mpande keeps, inter alia, Records in terms of various regulatory requirements that have an impact on its operations. These Records are not automatically

available and any request for access thereto will be assessed in accordance with the applicable internal policies and legislation requirements.

- 6.2.2. A non-exhaustive list of Records held by Mpande in accordance with legislation appears in **Annexure B**.

### 6.3. **THIRD PARTY RECORDS:**

- 6.3.1. Records held by Mpande pertaining to third parties, are set out in **Annexure A**.
- 6.3.2. In cases where information requested by the requester may impact on a third party, the Information Officer is obliged to comply with the requirements as set out in terms of the Act.

## 7. **PROCESSING OF PERSONAL INFORMATION**

### 7.1. **GENERAL:**

- 7.1.1. The type of Personal Information Processed by Mpande depends on the purpose for which such Personal Information is Processed.
- 7.1.2. Mpande will only process a Data Subject's Personal Information for a specific, lawful, and clear purpose and will make the Data Subject aware of such purpose(s) as far as possible.
- 7.1.3. Mpande will only process such Personal Information which it needs to fulfil the relevant purpose and as required by law.
- 7.1.4. Mpande will retain Personal Information only for as long as it is necessary to accomplish Mpande's legitimate business purposes, or as long is permitted or required by law.
- 7.1.5. Mpande uses Personal Information for one or more of the following non-exhaustive purposes:
  - 7.1.5.1. in compliance with the Financial Intelligence Centre Act No. 38 of 2001 (FICA);
  - 7.1.5.2. to register the Data Subject as a client or service provider, as the case may be;
  - 7.1.5.3. to respond to requests for cost estimates;
  - 7.1.5.4. to provide the Data Subject with the requested services;
  - 7.1.5.5. to verify the identity of the Data Subject or its beneficial owners;
  - 7.1.5.6. to manage the relationship between Mpande and the Data Subject, which may include notifying the Data Subject of any significant changes to Mpande's terms or contact details / structure;
  - 7.1.5.7. to monitor, keep record of and have access to correspondence between Mpande and the Data Subject;

- 7.1.5.8. To disclose Personal Information to third parties for reasons set out in this policy or where it is not unlawful to do so;
  - 7.1.5.9. In complying with applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
  - 7.1.5.10. Fulfilling contractual obligations;
  - 7.1.5.11. Fulfilling audit related obligations;
  - 7.1.5.12. In relation to employees and directors, information is collected/processed for recruitment processes, including evaluating and interviewing candidates, processing of payroll, reporting to SARS;
  - 7.1.5.13. BBBEE audit purposes.
- 7.1.6. Please refer to Mpande's POPIA policy, available for download from our website: <https://www.mpandeasset.com>.

## **7.2. CATEGORIES OF DATA SUBJECTS AND THE PERSONAL INFORMATION RELATING THERETO**

- 7.2.1. Mpande collects Personal Information directly from Data Subjects and/or third parties, and where it obtains Personal Information from third parties, Mpande will ensure that it obtains the Consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's Consent where Mpande is permitted to do so in terms of the applicable laws.
- 7.2.2. Data Subjects in respect of which Personal Information is Processed include customers of Mpande, contractors, suppliers, employees and candidates, and service providers, as set out in **Annexure A**.
- 7.2.3. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such Records would be honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.

## **7.3. CATEGORIES OF PERSONAL INFORMATION COLLECTED BY MPANDE**

- 7.3.1. Mpande may collect all types of Personal Information, including Special Personal Information, relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to the following:

- 7.3.1.1. Name, address, other contact details, gender, sex, pregnancy, marital status, sexual orientation, language, date and place of birth, age, nationality, disability, employer, job title, education Records (qualifications, student academic Records) financial Records and employment history, and family details, including confirmation of their relationship to the Data Subject
  - 7.3.1.2. Identification numbers issued by government bodies, or agents, such as identity number, passport number, tax identification number, company registration number
  - 7.3.1.3. Bank account, income or other financial information
  - 7.3.1.4. Special or sensitive information as defined in applicable data protection legislation, which may include information pertaining to
  - 7.3.1.5. Race or ethnic origin
  - 7.3.1.6. Religious or philosophical beliefs or political opinions
  - 7.3.1.7. Biometric information, such as fingerprints
  - 7.3.1.8. Criminal behaviour
  - 7.3.1.9. Trade union membership
  - 7.3.1.10. Relevant information as required by applicable laws, including anti-money laundering legislation, and as part of Mpande's client onboarding processes, including evidence of source of funds
- 7.4. **CROSS BORDER FLOW OF PERSONAL INFORMATION:**
- 7.4.1. Further processing and storage may require Mpande to send Personal Information to service providers outside the Republic of South Africa. Mpande will not share Personal Information to a country that does not have information protection legislation similar to that of the Republic of South Africa, unless the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.
  - 7.4.2. Where appropriate, we request the third parties with whom we share information, to take adequate measures and comply with applicable data protection laws and to protect the information that we are disclosing. This is done through contractual arrangements with third parties, as well as internal measures

to ensure that the third parties we appoint have appropriate measures to protect the information we provide to them.

#### **7.5. SECURITY MEASURES**

- 7.5.1. Mpande will ensure that the Data Subject's Personal Information is securely stored electronically, which will be accessible to certain, authorised persons within the Company on a need to know and operational basis, save that, where appropriate, some of the Data Subject's Personal Information may be retained in hard copy.
- 7.5.2. Considering the nature, purpose, scope, context of Processing, Mpande ensures implementation of appropriate technical and organisational measures designed to ensure the confidentiality, integrity and security of Personal Information against unlawful access and against accidental loss, destruction or damage as prescribed by POPIA.
- 7.5.3. The suitable measures in place to ensure that internal and external risks to Personal Information under its control and/or in its possession are identified and safeguarded.

#### **8. FORM OF A REQUEST FOR INFORMATION**

- 8.1. A request for information must be made on a form that corresponds substantially with Form 2 of Annexure A to the Regulations, to the Information Officer. The prescribed form can be accessed by using the following hyperlink: [InfoRegSA-PAIA-Form02-Reg7.pdf](#).
- 8.2. The request must be addressed to the Information Officer as indicated in paragraph 4 of this manual.
- 8.3. The requester must provide sufficient detail on the abovementioned form to enable the Information Officer of Mpande to establish who is requesting the said information as well as what information is being requested and in what format.
- 8.4. The requester must provide sufficient detail in respect of his/her contact details and if the requester wishes to be informed of the decision of the company in any manner (in addition to written) the manner and particulars thereof.

- 8.5. When submitting a request described above, the requester must state which right he or she is seeking to exercise or protect, with an explanation of the reason the Record is required to exercise or protect the right.
- 8.6. After the company has decided on the request, the requester must be notified in the required form.
- 8.7. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hour to search and prepare the Record for disclosure.

## **9. PRESCRIBED FEES**

- 9.1. A requester who seeks access to a Record containing Personal Information about that requester is not required to pay a request fee.
- 9.2. Every other requester, who is not a personal requester, must pay the required request fee, as prescribed from time to time. The prescribed fees are available on the website of the Information Regulator and can be accessed through the following hyperlink: [PAIA Fees Structure](#).
- 9.3. If the preparation of the Record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted). A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- 9.4. Records may be withheld until the fees have been paid.
- 9.5. Fees applicable in respect of private bodies are as per Annexure B of the regulations to PAIA. The prescribed fees can be found on the Regulator's website, as noted above.

## **10. AVAILABILITY OF THE MANUAL**

- 10.1. This manual is available for inspection at the offices of the company free of charge upon prior arrangement with the information officer of the company as set out in paragraph 4 above.
- 10.2. A copy of this manual is available on Mpande's website at <https://www.mpandeasset.com/>

|                      |              |
|----------------------|--------------|
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| Version Control:     | Version 2    |
|                      |              |

## ANNEXURE A

The categories of subjects that Mpande holds Records of and the type of Records that Mpande holds in respect of such subjects may include, although not limited to the information set out in the table below. These categories of Records are not exhaustive but is merely intended to give a broad indication of Records held by Mpande:

| Category                               | Data Subject                                   | Information category description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company Records                        | Internal Records                               | <ul style="list-style-type: none"> <li>• Statutory and other CIPC documentation</li> <li>• Internal Records relating to meetings with and appointment of officers</li> <li>• Audited Financial Statements</li> <li>• Operational Records</li> <li>• Intellectual Property</li> <li>• Marketing Records</li> <li>• Information technology, including agreements relating to software</li> </ul>                                                                                                                                                            |
| Human Resources /<br>Personnel Records | Employees, prospective employees and directors | <ul style="list-style-type: none"> <li>• Personal staff Records including contact details and banking details;</li> <li>• Biometric information</li> <li>• Identification numbers issued by government bodies, or agents, such as identity number, passport number, tax identification number, company registration number</li> <li>• Personnel related contractual Records</li> <li>• Disciplinary Records</li> <li>• Salary and other Remuneration- related Records</li> <li>• Disciplinary Code and /or procedures</li> <li>• Leave Records</li> </ul> |

|                          |                                                            |                                                                                                                                                                                                                                                                                                                                         |
|--------------------------|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          |                                                            | <ul style="list-style-type: none"> <li>• Training Records</li> <li>• Education, Qualification and academic Records</li> <li>• Records relating to employment history</li> <li>• Medical aid Records</li> <li>• Pension fund Records</li> <li>• Marital status</li> <li>• Disability status</li> <li>• Criminal Records.</li> </ul>      |
| Third Party Records      | Service providers<br>Third party suppliers,<br>Contractors | <ul style="list-style-type: none"> <li>• Contact details including telephone numbers, email addresses and addresses</li> <li>• Identity and/or company information and directors' information</li> <li>• Databases</li> <li>• Correspondence</li> <li>• Financial information</li> <li>• Agreements / contractual documents.</li> </ul> |
| Client-related documents | Clients and prospective clients                            | <ul style="list-style-type: none"> <li>• Contact details including telephone numbers, email addresses and address</li> <li>• Age, gender and marital status</li> <li>• Identification number</li> <li>• Databases</li> <li>• Correspondence</li> <li>• Financial information</li> <li>• Agreements / contractual documents</li> </ul>   |

## ANNEXURE B

A non-exhaustive list of information kept by Mpande in terms of other legislation are listed in the table below. These Records are not automatically available and any request for access thereto will be assessed in accordance with the applicable internal policies and legislation requirements.

| Legislation                                     | Category of Records | Records                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Basic Conditions of Employment Act, 75 of 1997  | Employee records    | Employee contact details<br>Personnel documents and Records<br>Employment contracts<br>Records of training<br>Disciplinary Records and information regarding dismissals<br>Leave Records<br>Information on disability, race, and religion and education<br>Background checks<br>Employee next of kin or emergency contact details<br>Internal evaluations and performance Records<br>Education Records |
| Broad-Based Economic Empowerment Act 53 of 2003 | Internal Records    | BBEE status<br>BBEE status of suppliers and contractors                                                                                                                                                                                                                                                                                                                                                |
| Companies' Act, 71 of 2008                      | Internal Records    | Memorandum of incorporation<br>Annual Financial Statements<br>Minutes of meeting of the Board of Directors                                                                                                                                                                                                                                                                                             |

|                                                               |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                               |                                                       | <p>Minutes of meetings of the Advisory Board of Directors</p> <p>Records relating to the appointment of directors, Auditors, Secretary, Fund managers or any other officers</p> <p>Share register and any other statutory registers and/or Records and/or documents</p> <p>Company registration Records</p> <p>Corporate governance documents</p> <p>Resolutions and their supporting documents</p> <p>Copies of reports presented at annual general meetings</p> |
| Consumer Protection Act, No. 68 of 2008                       | <p>Internal Records</p> <p>Client-related Records</p> | <p>Promotion and marketing material</p> <p>Terms and Conditions</p>                                                                                                                                                                                                                                                                                                                                                                                               |
| Electronic Communications and Transactions Act, No.25 of 2002 | <p>Internal Records</p> <p>Client-related Records</p> | Record of transactions                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Employment Equity Act, 55 of 1998                             | <p>Internal Records</p> <p>Client-related Records</p> | BBEE Certificates                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Financial Advisory and Intermediary Services Act, 37 of 2002  | Internal Records                                      | <p>Training and qualification records</p> <p>Registers of representatives and key individuals</p> <p>Records evidencing representatives' compliance with FAIS</p> <p>Records of Continued Professional Development (CPD)</p> <p>Records relating to supervision</p>                                                                                                                                                                                               |

|                                                  |                                                       |                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  |                                                       | <p>Records relating to giving advice where applicable</p> <p>Records relating to debarments of FAIS representatives and key individuals</p> <p>Records relating to business continuity plans</p> <p>Records relating to competency requirements</p> <p>Representative letters of authority</p> <p>Key-individual authorisation letters</p> <p>Compliance reports</p> <p>FSP licence</p> |
| Financial Intelligence Centre Act, No.38 of 2001 | <p>Internal Records</p> <p>Client-related Records</p> | <p>Risk management and compliance programme</p> <p>Identification and verification Records, including Records relating to beneficial ownership</p>                                                                                                                                                                                                                                      |
| Income Tax Act, No. 66 of 1995                   | <p>Client-related Records</p> <p>Employee records</p> | <p>Pay-as-you earn (PAYE) Records</p> <p>Documents issued to employees for income tax purposes</p> <p>Records of payments made to South African Revenue services on behalf of employees</p> <p>All or any statutory compliances</p> <p>Value added tax registration</p> <p><del>Skills development levies</del></p> <p>Unemployment Insurance Fund</p> <p>Workmens Compensation</p>     |
| Labour Relations Act, 66 of 1995;                | Employee Records                                      | <p>Disciplinary Records and outcomes</p> <p>Labour relations reports</p>                                                                                                                                                                                                                                                                                                                |

|                                                  |                                            |                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  |                                            | Code of Conduct                                                                                                                                                                                                                                                                        |
| Protection of Personal Information Act 4 of 2013 | Internal Records                           | Protection of Personal Information Policy<br>IT Governance Manual<br>Change Management Framework<br>Acceptable Use Policy<br>Third Party Service Provider Policy<br>ID and Access Management Framework<br>Incidents Response Framework<br>Information Security Cyber Resilience Policy |
| Skills Development Act, 97 of 1998               | Employee Records                           | Certificates of completion                                                                                                                                                                                                                                                             |
| Unemployment Insurance Act, 63 of 2001           | Employee Records                           | Employee details and employment contracts<br>Employer registration and contribution Records<br>UIF claims Records.<br>Audit and inspection Records<br>Records pertaining to salaries, including deductions and contributions where necessary.                                          |
| Value Added Tax Act, 89 of 1991                  | Client-related records<br>Internal records | VAT registration documents<br>Tax invoices and credit notes<br>VAT returns and filings<br>VAT payment Records<br>VAT exemption certificates<br>Input VAT documentation<br>VAT compliance Records                                                                                       |