



SOUTHCHESTER

MANUAL

PROMOTION OF ACCESS TO INFORMATION ACT

(“PAIA”)

PROTECTION OF PERSONAL INFORMATION ACT

(“POPIA”)

SOUTHCHESTER INVESTMENT MANAGERS PROPRIETARY LIMITED

FSP NUMBER 44868

This document will be reviewed once annually and whenever there is a significant change to the business, to ensure continual alignment with the current needs of the organisation.

Document owner	Catharina Stone
Date of current issue	September 2022
Review date	September 2025
Version	3

Contents

1. INTRODUCTION	3
2. BUSINESS DESCRIPTION	3
3. COMPANY CONTACT DETAILS (Section 51(1)(a))	3
4. THE OFFICIAL GUIDE FOR PAIA	4
5. RECORDS THAT ARE MAINTAINED UNDER PAIA (Section 51 (1)(d))	4
6. RECORDS THAT ARE MAINTAINED UNDER POPIA	5
7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(c))	6
8. PROCEDURE REQUESTING ACCESS TO ABOVE INFORMATION.....	6
9. PRESCRIBED FEES (Section 51(1)(f))	7
10. REMEDIES.....	8
11. AVAILABILITY OF THE MANUAL (Section 51(3))	8

1. INTRODUCTION

- 1.1. Southchester Investment Managers (Pty) Ltd is an authorised financial services provider in terms of the Financial Advisory & Intermediary Service Act and regulated by the Financial Sector Conduct Authority ("FSCA"). The FSP number is 44868.
- 1.2. This manual is applicable to the "**Southchester Group**". The companies in the group are as follows:
 - 1.2.1. Southchester Investment Managers (Pty) Ltd (reg. 2005/035006/07)
 - 1.2.2. Southchester Investment Products (Pty) Ltd (reg. 2016/209579/07)
 - 1.2.3. Northchester (RF) Ltd (reg. 2011/00839/06)
 - 1.2.4. Southchester (RF) Ltd (reg. 2010/021595/06)
 - 1.2.5. Southchester Finance (Pty) Ltd (reg. 2012/106571/07)
 - 1.2.6. SCRF Holdings (Pty) Ltd (reg. 2017/018173/07)
 - 1.2.7. Southchester Asset Management (Pty) Ltd (reg. 2013/179197/07)
 - 1.2.8. Southchester Venture Capital (Pty) Ltd (reg. 2014/090548/07)
 - 1.2.9. Eastlock (Pty) Ltd (reg. 2012/106559/07)

2. BUSINESS DESCRIPTION

The Southchester Group is engaged in proprietary investing and trading in tradable securities.

3. COMPANY CONTACT DETAILS (Section 51(1)(a))

- 3.1. Information Officer: Catharina Stone
- 3.2. Postal Address: PO Box 6613, Welgemoed, 7538
- 3.3. Street Address: Pinotage House, Vineyards Office Estate, 99 Jip de Jager Road, Bellville, Western Cape, RSA, 7530
- 3.4. Telephone Number: +27 87 094 2740
- 3.5. Email: inquiries@southchester.co.za
- 3.6. Website: www.southchester.co.za

4. THE OFFICIAL GUIDE FOR PAIA

This guide on how to use the Act has been compiled by the SAHRC in terms of Section 10 of the Act. Enquiries regarding the guide must be addressed to the SAHRC at the following contact details:

4.1. Postal : South African Human Rights Commission
Promotion of Access to Information Act
Research and Documentation Department
Private Bag 2700
2041 Johannesburg

4.2. Telephone : + 27 11 484 8300

4.3. Website : www.sahrc.org.za

4.4. Email : paia@sahrc.org.za

5. RECORDS THAT ARE MAINTAINED UNDER PAIA (Section 51 (1)(d))

The company maintains the following records:

- 5.1. Company statutory records
- 5.2. Accounting records
- 5.3. Employee statutory records
- 5.4. Company contracts and agreements
- 5.5. Employee contracts
- 5.6. Statutory reports (e.g., Employment Equity reports)
- 5.7. Income tax returns and other tax returns
- 5.8. Human resources related records other than employee contracts
- 5.9. Records pertaining to licenses, authorizations, applications and approvals
- 5.10. Records relating to information technology, hardware, software, operating systems, data collection and storage
- 5.11. Operational policies and procedures
- 5.12. Disaster recovery and business continuity plans
- 5.13. Insurance policies
- 5.14. Sales and marketing material in terms of presentation

6. RECORDS THAT ARE MAINTAINED UNDER POPIA

The relevance of records maintained for the purposes of POPIA is as follows:

- a) The organisations process personal information for the purposes of:
 - i) Maintaining employee records
 - ii) Fica requirements for investment products
- b) Categories of data subjects include:
 - i) Employees
 - ii) Institutional investors and counterparties
 - iii) Retail investors (including individuals and consultants)
 - iv) Providers of investment products
 - v) Suppliers of goods and services
- c) Types of personal data collected include:
 - i) Proof of registration / identity
 - ii) Proof of banking details
 - iii) Proof of address
 - iv) Tax clearance
- d) The personal information processed is shared with the following recipients:
 - i) Financial institutions
 - ii) Other, as required from time to time
- e) The organisations confirm that there is no planned trans-border flow of personal information
- f) Information security measures implemented by the responsible part to ensure confidentiality, integrity and availability of personal information include:
 - i) Appointing reputable Information System service providers
 - ii) Adequate password protection and other software measures to ensure protection from unauthorised access to computer systems (including virus, malware, spam protection)
 - iii) Confidentiality agreements with employees and external parties, and POPIA policy
 - iv) Promoting a culture of respect for privacy of information, and vigilance of potential risks (including cyber-security)
 - v) Having a storage period limitation in place.

Personal Information must be stored for no longer than necessary for the purposes for which it is Processed.

The group of companies deems the default retention period for Personal Information to be 5 (five) years, in the absence of any documented information or requirement by specific regulation. The default retention period of 5 (five) years will commence at the date of the termination of the business relationship

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(c))

- 7.1. Basic Conditions of Employment Act, 75 of 1997
- 7.2. Banks Act, 1990
- 7.3. Companies Act, 71 of 2008
- 7.4. Compensation for Occupational Injuries and Health Diseases Act, 130 of 1993
- 7.5. Copyright Act, 98 of 1978
- 7.6. Employment Equity Act, 55 of 1998
- 7.7. Employment Equity Act, 55 of 1998
- 7.8. Exchange Control Regulations, 1961
- 7.9. Financial Advisory and Intermediary Services Act, 37 of 2002
- 7.10. Financial Intelligence Centre Act, 38 of 2001
- 7.11. Income Tax Act, 95 of 1967
- 7.12. Labour Relations Act, 66 of 1995
- 7.13. Occupational Health & Safety Act, 85 of 1993
- 7.14. Skills Development Act, 9 of 1999
- 7.15. Unemployment Insurance Act, 63 of 2001
- 7.16. Value Added Tax Act, 89 of 1991

8. PROCEDURE REQUESTING ACCESS TO ABOVE INFORMATION

- 8.1. The Promotion of Access to Information Act (“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.
- 8.2. Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner, at the rates provided. The prescribed form and manner and the tariff are dealt with in section 6 and 7.
- 8.3. The South African Human Rights Commission (SAHRC) has complied and published a useful guide in terms of section 10 of PAIA, containing valuable information for the purposes of exercising any right in terms of PAIA.

- 8.4. The requester must utilise “Form 2” for PAIA requests or “Personal information access request form” for POPIA requests, as attached to this manual; or the “Personal information amendment / withdrawal form” for relevant POPIA requests:
<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>
- 8.5. The form must be addressed to the Information Officer
- 8.6. The form can be submitted via any of the contact details provided for the Southchester group of companies in this manual
- 8.7. The requester must provide information that will enable the Information Officer to identify both the requester and the requested record
- 8.8. The requester must indicate in which form access is required and specific appropriate contact details in the Republic
- 8.9. The requestor must identify the right that they are seeking to protect or to be exercised and an explanation as to why the requested record is required for the exercise of or protection of that right
- 8.10. Proof of identity must be attached by the requestor
- 8.11. If the request is being made on behalf of another person, the requester must submit proof of their capacity to act on behalf of that person

9. PRESCRIBED FEES (Section 51(1)(f))

- 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.
- 9.3. PAIA provides for two types of fees, namely –
 - 9.3.1. a request fee, which will be a standard non-refundable administration fee, payable prior to the request being considered; and
 - 9.3.2. an access fee, payable when access is granted which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.
- 9.4. Subsequent to a request being made, the Information Officer shall notify the requester of the prescribed request fee (if any) before attending to the request.
- 9.5. Records may be withheld until the fees have been paid.

9.6. Fees are applicable as published by the Information Regulator (South Africa).

10. REMEDIES

The response from the Information Officer is final.

If a requester is not satisfied by a decision made by the Information Officer, for example for refusing access, for imposing access fees, or for extending the time period in which the response is due, the requester may apply to court for relief within 180 days of receiving the decision for more information that has caused the grievance. The decision of the private body will be reviewed by a court and a decision will be made by the courts as to whether or not to provide access to the requested records

11. AVAILABILITY OF THE MANUAL (Section 51(3))

- 11.1. This manual is available for inspection at the offices of the company free of charge upon prior arrangement with the said contact person of the company as per section 3.
- 11.2. A copy is also made available on the website of the company www.southchester.co.za

Name : Gregg Bayly

Signature :

Designation : Director Date

Name : Catharina Stone

Signature :

Designation : Information Officer Date

FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (Mark the applicable box with an "X")

Record is in written or printed form	<input type="checkbox"/>
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	<input type="checkbox"/>
Record consists of recorded words or information which can be reproduced in sound	<input type="checkbox"/>
Record is held on a computer or in an electronic, or machine-readable form	<input type="checkbox"/>

FORM OF ACCESS
(Mark the applicable box with an "X")

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

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer