



SOUTHCHESTER

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

(“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
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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 compiled 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 C” 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
- 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. 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. 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 requestor 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. The fees can be downloaded from the following URL:

<https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

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

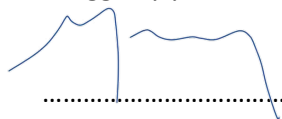
11. AVAILABILITY OF THE MANUAL (Section 51(3))

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 :



27 September 2022

Designation :

Director

Date

Name : Catharina Stone

Signature :



27 September 2022

Designation :

Information Officer

Date

FORM C
REQUEST FOR ACCESS TO A RECORD OF
THE SOUTHCHESTER GROUP OF COMPANIES
THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

A. Particulars of private body

Name of Private Body	
	Pinotage House Vineyard Office Estate 99 Jip de Jager Avenue 7530 Bellville
Information Officer	Catharina Stone

B. Particulars of person requesting access to the record

1. The particulars of the person who requests access to the record must be provided below.
2. The address and/or fax number in the Republic to which the information must be sent, must be provided below.
3. Proof of the capacity in which the request is made, if applicable, must be attached.

Full Names and Surname

Identity Number

Postal Address

Telephone Number

Email Address

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

C. Particulars of person on whose behalf request is made

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

Full Names and Surname

Identity Number

D. Particulars of record

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 space provided for is insufficient to complete this section, 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 request for access to the record will only be processed after the Request Fee has been paid, unless you are exempt from paying such fee.

You will be notified of the amount required to be paid as the Request Fee.

The fee payable for access to the record depends on the form in which access is required.

If you qualify for exemption of the payment of any fee, please state the reason for the exemption.

Reason for exemption from payment of fees

F. Form of access to record

Mark the appropriate box with an X

Notes:

- i. Your indication as to the required form of access is dependent on the form in which the record is available.
- ii. Access to 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.
- iii. 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:

<input type="checkbox"/>	Copy of record*	<input type="checkbox"/>	Inspection of record*
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2. If record consists of visual images: (This includes photographs, slides, video recordings, computer generated images, sketches, etc.):

<input type="checkbox"/>	View the images	<input type="checkbox"/>	Copy of the images	<input type="checkbox"/>	Transcription of images
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3. If record consists of recorded words or information which can be reproduced in sound:

<input type="checkbox"/>	Listen to the sound track (Audio cassette)	<input type="checkbox"/>	Transcription of soundtrack* (Written or printed document)
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4. If record is held on computer or in electronic or machine-readable form:

<input type="checkbox"/>	Printed copy of record*	<input type="checkbox"/>	Printed copy if information derived from the record*	<input type="checkbox"/>	Copy in computer readable form (Compact disc)
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*If you requested a copy of transcription of a record (above), do you wish the copy of transcription to be posted to you (postage is payable)? YES NO

G. Particulars of right to be exercised or protected

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

1. Indicate which right is to be exercised or protected

2. Explain why the requested record is required for the exercising 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. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

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

Signed at _____ this _____ day of _____ 20__

Signature of Requestor / Person on whose
Behalf request is made