

PAIA Manual

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1. Acknowledgement of ownership

This Policy is owned by Prime Meridian Direct (Pty) Ltd, FSP Number 41040, a duly authorised Financial Services Provider (hereunder referred to as the FSP).

As Key Individual of the aforementioned FSP, I, Stuart Benfield, hereby confirm the adoption of this document as part of the FSP's internal Policies.



Key Individual Signature

1 June 2021

Date

2. Reviewing of Policy

The PAIA Manual is a working document that must be reviewed periodically.

It is advisable to review the document on an annual basis. Any amendments must be indicated on the document review roster and relevant staff members must be informed of any updates.

3. Document Review Roster

Review Date	1 June 2021
Comments/ Amendments	Finalisation of Manual
Next Review Date	June 2022
Responsible Person Signature	Stuart Benfield
Review Date	
Comments/ Amendments	
Next Review Date	
Responsible Person Signature	

4. Policy Availability

The most recent version of the Manual will be made to the public free of charge on the FSP's website www.prime.co.za and a PDF copy can also be inspected at the 4 premises of the FSP at Building 6, Bryanston Gate, 170 Curzon Road, Bryanston during normal business hours. Upon request any reproduction of the Manual will incur a fee as prescribed under PAIA for the reproduction of a document.

5. Definitions

PAIA means the Promotion of Access to Information Act 2 of 2000.

POPI means the Promotion of Personal Information Act 4 of 2013.

Information Regulator means the Regulator established in terms of section 39 of POPI.

Person means a natural or juristic person.

Private Body means:

- A natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- A partnership which carries or has carried on any trade, business or profession; or
- Any former or existing juristic person, but excludes a public body.

Public Body means:

- Any department of state or administration in the national or provincial sphere or government or any municipality in the local sphere of government; or
- Any other functionary or institution; when:
 - Exercising a power or performing a duty in terms of the Constitution or a provincial institution; or
 - Exercising a public power or performing a public function in terms of any legislation.

Head, in relation to, a private body means:

- In the case of a natural person, that natural person or any person duly authorised by that natural person;
- In the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- In the case of a juristic person;
 - The chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - The person who is acting as such or any person duly authorised by such acting person

Information Officer means that head of a private body.

Deputy Information Officer means the person to whom any power or duty conferred or imposed on an Information Officer by POPI has been delegated.

Requester in relation to a private body, means any person, including, but not limited to public body or official thereof, making a request for access to a record of the FSP or a person acting on behalf of such person.

Personal Requester means a requester seeking access to a record containing personal information about the Requester

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but 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, email 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.

Request for access means a request for access to a record of the FSP in terms of Section 50 of PAIA.

Record means any recorded information regardless of the form or medium, in the possession or under the control of the FSP irrespective of whether or not it was created by the FSP.

Data Subject means the person to whom personal information relates.

Third Party in relation to a request for access to a record held by the FSP, means a person other than the requester.

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, FSP, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, or linking, as well as restriction, degradation, erasure or destruction of information.

6. Purpose of a PAIA Manual

The Promotion of Access to Information Act, 2000, gives effect to Section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- Foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, 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 all of their rights.

The FSP recognises everyone's right to access information and is committed to provide access to the FSP's records where the proper procedural requirements as set out by PAIA and POPI have been met.

The FSP's PAIA manual is compiled in accordance with Section 51 of the Act and contains the following provisions:

Annexure A: Contact Details & Business Type

This section provides the FSP's postal and street address, phone and fax number and, if available, the e-mail address of the head of the FSP.

Annexure B: Section 10 PAIA Guide

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.

Annexure C: Statutory Records

This section provides a description of various statutes in terms of which the FSP is required to maintain records.

Annexure D: Availability of Records

This section provides a list of records held by the FSP along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to who the respective records relates along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely available" can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request as provided for in Annexure E.

Annexure E: Request

This section sets out the procedure required to obtain access to a record indicated as a "PAIA Request" in Annexure D.

Annexure F: Prescribed Fees

This section sets out the fees that are payable to the FSP prior to processing a request to obtain access to a record held by the FSP.

Annexure G: Deputy Information Officer Appointment

This section provides for the formal appointment of a Deputy Information Officer where so required.

7. Duties of the Information Officer

The Information Officer and/or the Deputy Information Officer of the FSP are responsible for:

- Publishing and proper communication of the manual;
- The facilitation of any request of access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format;
- Reviewing the policy for accuracy ad communicating any amendments.

7.1. Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the FSP to a requester if:

- The record is required for the exercise or protection of any right; and
- The requester complies with the procedural requirements relating to a request for access to that record; and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

7.2. Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to record(s) will be provided where:

- The disclosure of the record will clearly outweigh the harm contemplated in the provision in question.
- The public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which:

- Does not contain; and
- Can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The ground for refusal, or absence thereof, are set out below:

7.2.1. Mandatory Protection of privacy of the Third Party who is a Natural Person

Grounds for Refusal:

The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information that is already publicly available.
- The record consists of information that was given to the FSP by the individual to whom it relates and the individual was informed by or on behalf of the FSP, before it is given, that the information belongs to a class of information that would or might be available to the public.
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, if giving access would be in the individual's best interest.
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the request with the written consent of the individual's next of kin.
- The record consists of information about an individual who is or was an official of the FSP and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual and the name of the individual on a record prepared by the individual in the course of employment.

7.2.2. Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal:

- The record consists of information that contains trade secrets of a third party.
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that party.
- The record consists of information supplied in confidence by a third party, the disclosure which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.

No Grounds for Refusal:

- The record consists of information about a third party who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information about the results of any product or environment testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its discloser would reveal a serious public safety or environmental risk.

7.2.3. Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal:

The record consists of information that the disclosure thereof would constitute an action for breach of a duty of confidence owed to a third party in terms of any agreement.

7.2.4. Mandatory Protection of the Safety of Individuals and Protection of Property

Grounds for Refusal:

- The record consists of information that if disclosed, could reasonably be expected to endanger the life or physical safety of any individual.
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, or any other property.
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

7.2.5. Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal:

The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived same.

7.2.6. Commercial Information of the FSP

Grounds for Refusal:

- The record consists of information that contains trade secrets of the FSP.
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the FSP, the disclosure of which would likely cause harm to the commercial or financial interests of the FSP.
- The record consists of information, the disclosure of which, could reasonably be expected to put the FSP at a disadvantage in contractual or other negotiations or prejudice the FSP in commercial competition.
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the DSP, except insofar as it is required to give access to a record in terms of PAIA

No Grounds for Refusal:

The record consists of information about the results of any product or environmental testing or other investigation supplied by the FSP or the results of any such testing or investigation carried out by or on behalf of the FSP and its disclosure would reveal a serious public safety or environmental risk.

7.2.7. Mandatory Protection of Research Information of a Third Party and the FSP

Grounds for Refusal:

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would likely expose the third party, a party that is or will be carrying out the research on behalf of the third party.
- The record consists of information that contains information about research being or to be carried out by or on behalf of the FSP, the disclosure of which would be likely to expose the FSP, a person that is or will be carrying out the research on behalf of the FSP.

7.3. Notice

Where a request for access has been received, the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be; and
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request; and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given; and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied;
- Exclude, from any such reasons, any reference to the content of the records; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the proceeding (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is the FSP's possession, but cannot be found, or
- Simply does not exist,

The head of the FSP, must be way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide a full account of all steps taken to find the record in question or to determine whether the records exist, as the case may be, including all communication with every person who conducted the search on behalf of the head.

Annexure A: Contact Details & Business Type

1. FSP Contact Details

Postal Address: PostNet Suite 430
Private Bag X51
Bryanston
2021

Street Address: Building 6 Bryanston Gate Office Park
170 Curzon Road
Bryanston
2021

Phone Number: 011 745 7800

2. Head of FSP

Name & Surname: Stuart Benfield

3. Deputy Information Officer

Name & Surname: Cathryn Lowery

Email Address: cathryn.lowery@primaryasset.co.za

4. Business Type

The FSP conducts its main type of business in the following sector:

Finance & Business Services

Annexure B: Section 10 PAIA Guide

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Requesters are referred to the guide in terms of Section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

The guide is available in all South African languages, free of charge, and any person may request a copy of the guide.

A copy of the guide may be obtained by contacting the South African Human Rights Commission at:

Postal Address: The South African Human Rights Commission, PAIA Unit,
Private Bag 2700,
Houghton,
2041

Telephone Number: 077 877 3600

Website: www.sahrc.org.za

Annexure C: Statutory Records

The FSP maintains statutory records and information in terms of the following legislation:

1. Basic Conditions of Employment Act;
2. Companies Act;
3. Compensation of Occupational Injuries and Diseases Act;
4. Consumer Protection Act;
5. Electronic Communications and Transaction Act;
6. Employment Equity Act;
7. Financial Advisory & Intermediary Services Act;
8. Financial Intelligence Centre Act;
9. Income Tax Act;
10. Insolvency Act;
11. Labour Relations Act;
12. Occupational Health and Safety Act;
13. Prevention of Organised Crime Act;
14. Prevention and combating of Corrupt Activities Act;
15. Promotion of Equality and Prevention of Unfair Discrimination Act;
16. Protection of Constitutional Democracy against Terrorist and related Activities Act;
17. Short-term Insurance Act;
18. Skills Development Act;
19. Unemployment Insurance Act;
20. Value Added Tax Act

Annexure D: Availability of Records

The following records may be accessed by request from the FSP. The grounds of refusal are set out in paragraph 7.2 of the Manual.

1. Personnel Records – Requested by the FSP personnel only:
 - 1.1 Personal Records supplied by the employees;
 - 1.2 Records provided by a third party relating to employees;
 - 1.3 Conditions of employment and other personnel-related contractual and quasi legal records;
 - 1.4 Correspondence related to personnel;
 - 1.5 Training records and material
2. Client Related Records – Requested by the FSP clients only:
 - 2.1 Records provided by a client to a third party acting for or on behalf of the FSP;
 - 2.2 Records provided by a third party;
 - 2.3 Records generated within the FSP related to its clients; and
 - 2.4 Records provided by the FSP to client.
3. Records related to the FSP

Record	Subject	Availability
Public Affairs	Public Product Information	1
	Public Corporate Records	1
	Media Releases	1
	Published newsletters	1
	Magazine Articles	1
Regulatory & Administrative	Permits, Licenses or Authorities	1
	Conflict of Interest Management Policy	1
	Complaints Policy	1

Financial Matters	Financial Statements	12
	VAT, TAX and PAYE records (company and employees)	12
	Accounting and banking details	12
	Invoices	12
	Asset register	12
	Management accounts	12
Company Secretarial and Legal	Statutory records not available at Companies and Intellectual Property Commission (CIPC)	12
	Minutes and related meeting information	12
	Record of executive, board and shareholder decisions taken and related information	1,12
	Trademark information	1
	General contract documentation	6,12
	Working papers	10,12,13
Marketing	Market information	12,13
	Public customer information	12
	Performance and sales records	2,12
	Marketing strategies	12
	Customer database	12
	Brand related information	12
Human Resources	Personal Information of Employees	12
	Employment contracts	12
	Employment Equity Plan	12
	Disciplinary Records	12
	Performance Management Records	12
	Salary Records	12
	Employee Benefit Records	12
	PAYE Records	12
	Disciplinary Code	12
	Leave Records	12
	Training Records	12
	Policies and procedures	12
	Disaster recovery	12
Third Party	IT governance records	12
	Rental Agreements	6,12
	Non-disclosure Agreements	6,12
	Supplier Contracts	6,12

Key:

1	May be disclosed	Publicly accessible
2	May not be disclosed	Request after the commencement of criminal or civil (Section 7)
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the Requester of information (Section 61)
5	May not be disclosed	Unreasonable disclosure
6	May not be disclosed	Likely to harm the commercial or financial interest of third parties (Section 64(a)(b))
7	May not be disclosed	Likely to harm the company or Third Party in contract or other negotiations (Section 64(c))
8	May not be disclosed	Would breach a duty of confidence to a Third Party in terms of an agreement (Section 65)
9	May not be disclosed	Likely to compromise the safety of individuals or protection of private property (Section 66)
10	May not be disclosed	Legally privileged documents (Section 67)
11	May not be disclosed	Environmental testing/investigation which reveals public safety/environmental risks (Section 64 and 68(2))
12	May not be disclosed	Commercial information of Private Body (Section 68)
13	May not be disclosed	Likely to prejudice research and development information of the company or a Third Party (Section 69)
14	May not be refused	Disclosure in public interest (Section 70)

Annexure E: Request Procedure

To facilitate the processing of your request, kindly complete and submit the form below to the email address of the Deputy Information Officer indicated in Annexure A.

The Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to the processing of the request. Please refer to Annexure F for a full breakdown of the fees payable.

Once the request has been processed, the Deputy Information Officer will inform you of the outcome of your request and any additional fees that may be due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. Please see paragraph 7.2 for further information.

When completing the form below please:

- Indicate the identity of the person seeking access to the information;
- Provide sufficient particulars to enable the Deputy Information Officer to identify the information requested;
- Specify the format in which the information is required;
- Indicate the contact details of the person requiring the information;
- Indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right.
- Where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and the particulars to be so informed.
- If the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

Request Form

A. Particulars of Private Body

The Head:

B. Particulars of person requesting access to the record

- (i) The particulars of the person who requests access to the record must be recorded below
- (ii) Furnish an address in the Republic to which information must be sent
- (iii) Proof of the capacity in which the request is made, if applicable, must be attached

Full Name & Surname:	
Identity Number:	
Postal Address:	
Telephone Number:	
Email Address:	
Capacity:	

C. Particulars of person whose behalf request is made

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

Full Name & Surname:	
Identity Number:	

D. Particulars of Record

- (i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you
- (ii) If the provided space is inadequate, please continue on a separate page and attach to this form.
Please sign any additional pages

Description of record:	
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Reference Number:	
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Any further particulars:	
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E. Fees

- (i) 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
- (ii) You will be notified of the amount required to be paid as the request fee
- (iii) 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
- (iv) If you qualify for exemption of the payment of any fee, please state the reason therefor

Reason for exemption:
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 hereunder, please state your disability and indicate in which form the record is required

Disability:
Form in which required:

Mark the appropriate box with an "X"

- (i) Your indication as to the required form of access depends on the form in which the record is available
- (ii) 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
- (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:

- Copy of record
- Inspection of record

2) If record consists of visual images:

- View of the images
- Copy of the images
- Transcription of the images

3) If the record consists of recorded words or information which can be reproduced in sound:

• Listen to the soundtrack	
• Transcription of the soundtrack	

4) If the record is held on computer or in an electronic or machine-readable form:

• Printed copy of record	
• Copy in computer readable form	

Please indicate the preferred method of delivery

• By hand	
• Email	
• Post	

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages

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

H. Notice of decision regarding the request for access

You will be notified in writing whether your request has been approved/ denied. 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?

I. Signature

Signed at:

Date:

Signature of Requester/ Person whose behalf request is made:

Annexure F: Prescribed Fees

The following applies to requests (other than personal requests):

www.prime.co.za

- A requester is required to pay a preliminary request fee before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid.
- A requestor may lodge an application with a court against the render/ payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid
- The fee structure is also available on the South African Human Rights Commission's website at www.sahrc.org.za

1. ACCESS FEES FOR REPRODUCTION

For every photocopy of an A4-sized page or part thereof	R1.10
For every photocopy of an A4-sized page or part thereof held on a computer or in electronic or machine-readable form.	R0.75
For a copy in a computer-readable form on memory stick	R7.50
For a copy in a computer-readable form on compact disk	R70.00
For a transcription of visual images for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record for an A4-sized page of part thereof	R20.00
For a copy of an audio record	R30.00

2. ACCESS FEE FOR TIME SPENT

The time reasonably required to search for the record for disclosure and preparation	R30.00/hr or part thereof
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3. REQUEST FEE

For a request for access to a record by a person other than a personal Requester	R50.00
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4. DEPOSIT

One third of the access fee is payable as a deposit by the Requester

5. TOTAL FEE

When a copy of a record must be posted to the Requester	R9.75
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6. APPEAL FEES

For lodging an internal appeal against the refusal of a request for access to a record	R50.00
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7. VAT

Prime Meridian Direct, is a Private Body registered under the Value Added Tax Act, 1991 will add VAT to all of the above-mentioned fees

Annexure G: Information Officer Duties

Section 55(1) of POPIA sets out the duties and responsibilities of an Information Officer which include the follows:

1. Information Officer and Deputy Information Officer to keep abreast of the latest developments in POPIA and PAIA;
2. The information Officer has an in depth understanding of the business operations and procedures of the body;
3. The encouragement of compliance by the Body with the conditions for the lawful processing of personal information;
4. Dealing with requests made to the FSP pursuant to POPIA;
5. Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 of POPIA in relation to the FSP;
6. The additional duties and responsibilities of the Information Officers, in terms of regulation 4 of POPIA, are to ensure that:
 - 6.1 A compliance framework is developed, implemented, monitored and maintained;
 - 6.2 A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;
 - 6.3 A manual is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of PAIA, as amended;
 - 6.4 Internal measures are developed together with adequate systems to process requests for information or access thereto;
 - 6.5 Internal awareness sessions are conducted regarding the provisions of POPIA, regulations made in terms of POPIA, codes of conduct, or information obtained from the Regulator; and
 - 6.6 Upon request by any person, copies of the manual are provided to that person upon the payment of a fee to be determined by the Regulator from time to time.

Annexure H: Deputy Information Officer Appointment

In terms of the Protection of Personal Information Act the head of a private body is the designated Information Officer for that private body. The Information Officer may delegate any power or duty conferred or imposed in terms of POPI to the Deputy Information Officer.

Prime Meridian Direct (Pty) Ltd has appointed a Deputy Information Officer to facilitate any requests to access records held by the FSP. This delegation does not prohibit the person who made the delegation from exercising power concerned or performing the duty concerned himself. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.

The Deputy Information Officer has the authority to approach all staff members of the FSP and to request all records held by the FSP. Where a manager is of the opinion that access to a record should not be granted to the Deputy Information Officer, reasons for this decision shall be given to the Information officer who will make the final decision on the matter.

As Head of the FSP, I, Stuart Benfield, hereby appoint Cathryn Lowery as the FSP's Deputy Information Officer.



Stuart Benfield
Head Signature

1 June 2021

Date



Cathryn Lowery
Deputy Information Officer Signature

1 June 2021

Date