

PAIA MANUAL

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1. Definitions

Company means Prime Meridian Direct t/a Prime South Africa (Pty) Ltd (FSP Number 41040) and PrimaryAsset Administrative Services (Pty) Ltd (FSP 3920) duly authorised Financial Services Providers (hereunder referred to as the FSP).

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 Company 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 Company 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 Company irrespective of whether or not it was created by the Company.

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 Company, 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, Company, 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.

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



This PAIA Manual is useful for the public to:

- 1.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.3. know the description of the records of the body which are available in accordance with any other legislation
- 1.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. know if the body 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
- 1.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. Right of Access and Categories of Information Records

2.1. Right of Access

The Information Officers and/or Deputy Information Officers may only provide access to any record held by the Company 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.

Please refer to **Annexure D** for a complete list of the Categories of Information Records which may be requested and whether these are available.

2.2. Categories of Information Records available without request

Before submitting a request in terms of PAIA, a data subject who is a customer of the Company should consider whether other mechanisms for receiving their information are available. All Company customers are allowed to access their own policy related information without lodging a formal PAIA request.

CATEGORY OF RECORDS	TYPE OF RECORDS	Available on Request	Available on portal
Records policyholders are entitled to.	Policy information relating to client's policy i.e. policy schedule, policy wording, premium payment and claims history.	X	X
Information employees are entitled to.	Employment contract information	X	X



3. The Decision-Making Process

3.1. 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) the 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 is for a record pertaining to a third party, the Information Officer must cause all reasonable steps to be taken to inform that third party of the request.

- This must be done within 21 days of receipt of the request.
- The third party may within 21 days thereafter either make representation to the Company as to why the request should be refused, alternatively grant written consent to the disclosure of the record.
- The third party must be advised of the decision taken on whether to grant or decline the request and must also be advised of his/her right to appeal against the decision by way of application to court within 30 days after the notice.

3.2. Request Granted

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.



3.3. Request Refused

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 Company's possession, but cannot be found, or
- Simply does not exist,

The head of the Company, 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 including all communication with every person who conducted the search on behalf of the head.

3.4. 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. The grounds for refusal, or absence thereof, are set out below:

- The Act prohibits the unreasonable disclosure of the personal information of natural-person third parties to requesters. This includes the personal information of deceased persons. However, section 63 (2) of the Act does provide an exception to this.
- A request must be refused if it relates to records containing third party information pertaining to:
 - Trade secrets;
 - Financial, commercial, scientific or technical information where disclosure would be likely to cause harm to the commercial or financial interests of that third party; or
 - Information, supplied in confidence by the third party, the disclosure of which could reasonably be expected to put the third party at a disadvantage in contractual or other negotiations, or prejudice the third party in commercial competition.

The information must, however, be released if it pertains to the result of product or environmental testing, the disclosure of which would reveal a serious public safety or environmental risk.

- The Act prohibits the disclosure of information if such disclosure would constitute a break of any duty of confidentiality owed to a third party in terms of an agreement.
- A request for access to a record held by the Company must be refused if disclosure could be reasonably expected to:



- Endanger the life or physical safety of an individual;
- Prejudice or impair the security of a building, structure or system, including but not limited to a computer or communication systems, means of transport or any other property

The Company may also refuse a request for access to information that would prejudice methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme or safety of the public.

- A refusal of a request is mandatory if the record is privileged from production in legal proceedings, unless the person entitled to the privilege has waived the privilege.
- Access to records containing information about the Company itself is not mandatory, but rather discretionary. The Company may refuse access to a record if:
 - contains trade secrets of the Company;
 - contains financial, commercial, scientific or technical information, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Company;
 - contains information which, if disclosed, could reasonably be expected to put the Company at a disadvantage in contractual or other negotiations, or prejudice the Company in commercial competition, or consists of a computer program owned by the Company;

Notwithstanding the above, the information must be released if it pertains to the results or product or environmental testing, the disclosure of which would reveal a serious public safety or environmental risk.

- This disclosure of information about research where disclosure is like to expose the third party, the person conducting the research on behalf of the third party, or the subject matter of the research to serious disadvantage is prohibited. Disclosure is discretionary if such research pertains to the Company itself.

Notwithstanding any of the above-mentioned provisions, a record must be disclosed if its disclosure would:

- Reveal evidence of a substantial contravention of or failure to comply with the law, imminent and serious public safety or environmental risk; and
- If the public interest in the disclosure clearly outweighs the harm.

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.



3.5. Right to Appeal

A requester that is dissatisfied with the refusal to grant access to any information may, within 30 days of notification of the decision, apply to court for relief. Likewise, a third party dissatisfied with the decision to grant a request may, within 30 days of notification of the decision apply to court for relief.

It should be noted that notwithstanding any provision in this Act, the court may examine the record(s) in question. No record may be withheld from the court on any grounds. The court may not, however, disclose the contents of the record(s).

The court is empowered to grant any order that is just and equitable, including:

- Confirming, amending, or setting aside the decision.
- Requiring the information officer to take any action, or refrain from taking any action as identified by the court within a specified period.
- Granting an interdict, interim or special relief, declaratory order or compensation.
- An order as to cost

4. Processing of Personal Information in terms of the Protection of Personal Information Act 4 of 2013

The Company must collect and use information, including personal information as defined in the Protection of Personal Information Act, to the extent that it is necessary to properly perform the functions, obligation and duties and its obligations towards data subjects and as a financial firm.

The Company processes personal information of the following data subject categories:

- Employees and job applicants
- Third party suppliers
- Regulatory bodies
- Business partners with whom the Company has a business arrangement
- Policyholders

4.1. The purpose of processing personal information

The Company collects and processes personal information:

- To meet our responsibilities to our customers;
- To meet our responsibilities to our employees;
- To meet our contractual responsibilities to third party service providers;
- To inform customers of products and services;
- To comply with all legal and regulatory requirements, including industry codes of conduct;
- To protect and pursue the legitimate interests of the Company in the conducting of its business with third parties to whom personal information is not provided; and
- For any purpose related to the above.



4.2. To whom personal information may be provided:

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Policyholder policy information, Company documents, Annual financial statements, statutorily required reports	Regulatory Authorities
Contracts with third party partners	Any legal or juristic person with an appropriate legal basis & Third-party service provider
Product performance, policy documentation	Insurer
Investigation	Law enforcement agencies

4.3. Categories of personal information processed to fulfil the functions:

1. First name 2. Middle name 3. Last name 4. Initials 5. If disclosure of the name itself would reveal information about the person.	GENERAL IDENTIFICATION INFORMATION
6. E-mail address 7. Physical address 8. Telephone number 9. Location information 10. Online identifier	GENERAL CONTACT DETAILS
11. Any identifying number 12. Identifying symbol 13. Other particular assignment to a person 14. The name of the person if it appears with other personal information relating to the person 15. Birth of the person 16. Age	ID/PASSPORT NUMBER/POLICY NUMBER/ SHAREHOLDER NUMBER/DATE OF BIRTH/PAY CODE
17. Personal opinions 18. Personal views 19. Personal preferences 20. Views/opinions of/another individual about a person 21. Beliefs/philosophical beliefs 22. Conscience 23. Political persuasion	VIEWS, ASSESSMENTS, OPINIONS, RECOMMENDATIONS
24. Marital status	MARITAL STATUS
25. Financial history	FINANCIAL HISTORY
26. Employment history	EMPLOYMENT HISTORY
27. Correspondence sent of a private or confidential nature	CORRESPONDENCE SENT OF A PRIVATE OR CONFIDENTIAL NATURE



28. Medical history 29. Physical health 30. Mental health 31. Well-being 32. Disability 33. Blood type 34. Pregnancy	MEDICAL INFORMATION
35. Race/Colour 36. Gender 37. Nationality 38. Ethnic origin 39. Social origin	GENDER/ETHNICITY/NATIONALITY
40. Criminal history	CRIMINAL HISTORY
41. Culture 42. Language 43. Education 44. Religion	LANGUAGE/EDUCATION/CULTURE/ RELIGION
45. Sex life 46. Sexual orientation	SEX ORIENTATION/LIFE
47. Biometric information	BIOMETRIC INFORMATION

4.4. Planned transborder flows of personal information

Further processing and storage may require that the Company send personal information to service providers outside of the Republic of South Africa. The Company will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with the Protection of Personal Information Act No 4 of 2013. Where appropriate, we request the third parties with whom we share information, to take adequate measures and comply with applicable data protection laws and protect the information we are disclosing to them. We do this through contractual arrangements with these third parties. We also take internal measures to ensure that the third parties we appoint have appropriate measures to protect the information we provide to them.

The Company employs security controls, electronic and physical that are designed to maintain confidentiality, prevent loss of unauthorised access and damage to information by unauthorised parties. The cyber security strategy of the Company is aligned to industry standard frameworks to ensure effective cyber security risk management for the organisation.

Data subjects have the following remedies where there's interference with the protection of their personal information by the Company:

- Lodge a complaint with the Company's Market Conduct Department at legal@primaryasset.co.za, or with the Company's Deputy Information Officers (as per Annexure A); and
- Where unsatisfied, lodge the complaint with the Information Regulator in the prescribed manner and form.
- Institute civil action for damages in a court having jurisdiction.

The Company's Information Privacy Policy is available on its website at www.prime.co.za.

/ Prime Meridian Direct t/a Prime South Africa (Pty) Ltd. Directors: R. Fihrer, S. Benfield and D. Matthews. Registration No.: 2004/032998/07. VAT Reg No.: 4720216763, FSP41040. Your policy is administered by PrimaryAsset Administrative Services (Pty) Ltd. PrimaryAsset Administrative Services (Pty) Ltd. Director: N. Fernandes Registration No.: 1992/001306/07. VAT Reg No.: 4680179829, FSP3920. The companies' address: Prime Meridian House, Bryanston Gate, 170 Curzon Rd, Bryanston, 2191. PostNet Suite 430, Private Bag X51, Bryanston, 2021.

/ Underwritten by Santam Structured Insurance Limited, a Registered non-life Insurer and Authorised Financial Services Provider, FSP 1027.



5. Information Security Measures

The Company employs security controls, electronic and physical that are designed to maintain confidentiality, integrity and availability of information as well as prevent loss or unauthorised access and damage to information by unauthorised parties. The Company's cyber security strategy is aligned to industry standard frameworks to ensure effective cyber security risk management for the organisation. Information security is achieved by implementing a suitable set of responsibilities, controls, standards, processes and systems to ensure that the information security objectives and measures of Santam are met.

6. Availability of the Manual

A copy of the Manual is available –

- 6.1. On the Company website at www.prime.co.za
- 6.2. At the Company's premises at Building 6, Bryanston Gate, 170 Curzon Road, Bryanston during normal business hours.
- 6.3. to any person upon request and upon the payment of a reasonable prescribed fee.
- 6.4. to the Information Regulator upon request.

7. Updating of the Manual and Annexures

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

The Company's Information Officers will on a regular basis update this manual as and when required.

The Company'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 Company's postal and street address, phone and fax number and, if available, the e-mail address of the head of the Company.
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 Company is required to maintain records.
Annexure D: Availability and Category of Records
This section provides a list of records held by the Company 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 relate 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 Procedure and Form
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 Company prior to processing a request to obtain access to a record held by the Company.

/ Prime Meridian Direct t/a Prime South Africa (Pty) Ltd. Directors: R. Fihrer, S. Benfield and D. Matthews. Registration No.: 2004/032998/07. VAT Reg No.: 4720216763, FSP41040. Your policy is administered by PrimaryAsset Administrative Services (Pty) Ltd. PrimaryAsset Administrative Services (Pty) Ltd. Director: N. Fernandes Registration No.: 1992/001306/07. VAT Reg No.: 4680179829, FSP3920. The companies' address: Prime Meridian House, Bryanston Gate, 170 Curzon Rd, Bryanston, 2191. PostNet Suite 430, Private Bag X51, Bryanston, 2021.

/ Underwritten by Santam Structured Insurance Limited, a Registered non-life Insurer and Authorised Financial Services Provider, FSP 1027.



Annexure G: Duty of Information Officer
This section provides the duties of the Company's Information Officer.
Annexure H & I: Deputy Information Officer Appointment
This section provides for the formal appointment of a Deputy Information Officer where so required.

8. Acknowledgement of ownership

This Policy is owned by the Company as defined above.

As Information Officers of the Company, we, Stuart Benfield and Daryl Mulder, hereby confirm the adoption of this document as part of the Company's internal Policies.

Stuart Benfield

Stuart Benfield (Jun 3, 2024 15:03 GMT+2)

Information Officer: Stuart Benfield
Date:

Daryl Mulder

Daryl Mulder (Jun 3, 2024 17:45 GMT+2)

Information Officer: Daryl Mulder
Date:



Annexure A: Contact Details & Business Type

1. Company 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 Company

Prime Meridian Direct t/a Prime South Africa (Pty) Ltd (FSP Number 41040)
Name & Surname: Stuart Benfield

PrimaryAsset Administrative Services (Pty) Ltd (FSP 3920)
Name & Surname: Daryl Mulder

3. Deputy Information Officer

Prime Meridian Direct t/a Prime South Africa (Pty) Ltd (FSP Number 41040)
Name & Surname: Cornelle du Plessis

Email Address: cornelle.duplessis@prime.co.za

PrimaryAsset Administrative Services (Pty) Ltd (FSP 3920)
Name & Surname: Nicholas Fernades

Email Address: nick@primaryasset.co.za

4. Business Type

The Company 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 Company 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 and Category of Records

The following records may be accessed by request from the Company. The grounds of refusal are set out in paragraph 3.2 of the Manual.

1. Personnel Records – Requested by the Company’s 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 Company’s clients only:
 - 2.1. Records provided by a client to a third party acting for or on behalf of the Company;
 - 2.2. Records provided by a third party;
 - 2.3. Records generated within the Company related to its clients; and
 - 2.4. Records provided by the Company to client.

3. Records related to the Company

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
	Disciplinary Code	12
	Leave Records	12
	Training Records	12
	Policies and procedures	12
	Disaster recovery	12
	IT governance records	12
Third Party	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)

/ Prime Meridian Direct t/a Prime South Africa (Pty) Ltd. Directors: R. Fihrer, S. Benfield and D. Matthews. Registration No.: 2004/032998/07. VAT Reg No.: 4720216763, FSP41040. Your policy is administered by PrimaryAsset Administrative Services (Pty) Ltd. PrimaryAsset Administrative Services (Pty) Ltd. Director: N. Fernandes Registration No.: 1992/001306/07. VAT Reg No.: 4680179829, FSP3920. The companies' address: Prime Meridian House, Bryanston Gate, 170 Curzon Rd, Bryanston, 2191. PostNet Suite 430, Private Bag X51, Bryanston, 2021.

/ Underwritten by Santam Structured Insurance Limited, a Registered non-life Insurer and Authorised Financial Services Provider, FSP 1027.



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 and Form

To facilitate the processing of your request, kindly complete and submit the form below to the email addresses of the Deputy Information Officers 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:	
Reference Number:	
Any further particulars:	
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:	
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):

- 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
3. REQUEST FEE	
For a request for access to a record by a person other than a personal Requester	R50.00
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
6. APPEAL FEES	
For lodging an internal appeal against the refusal of a request for access to a record	R50.00
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 Company pursuant to POPIA;
5. Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 of POPIA in relation to the Company;
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.

PrimaryAsset Administrative Services (Pty) Ltd has appointed a Deputy Information Officer to facilitate any requests to access records held by the Financial Service Provider ("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, Daryl Mulder, hereby appoint Nicholas Fernandes as the FSP's Deputy Information Officer.

Daryl Mulder

Daryl Mulder (Jun 3, 2024 17:45 GMT+2)

Daryl Mulder
Head Signature

Nicholas Fernandes

Nicholas Fernandes
Deputy Information Officer Signature



Annexure I: 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 Financial Service Provider ("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.

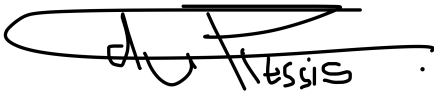
The Deputy Information Officer has the authority to approach all staff members of the FSP and to request all records held by the FSP. Where a manager is of the opinion that access to a record should not be granted to the Deputy Information Officer, reasons for this decision shall be given to the Information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

As Head of the FSP, I, Stuart Benfield, hereby appoint Cornelle du Plessis as the FSP's Deputy Information Officer.

Stuart Benfield

Stuart Benfield (Jun 3, 2024 15:03 GMT+2)

Stuart Benfield
Head Signature



Cornelle du Plessis
Deputy Information Officer Signature

