

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of
Access to Information Act 2 of 2000 (as amended)

For the “Company” as reflected in the footer.



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Definitions

Company means Prime Meridian Direct t/a Prime South Africa (Pty) Ltd, FSP Number 41040 (“Prime SA”), PrimaryAsset Administrative Services (Pty) Ltd, FSP 3920 (“PAAS”) and PrimaryAsset Specialist Consulting t/a Advantage Rewards (Pty) Ltd.

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.

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

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.

1. Purpose of a PAIA Manual

PAIA 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 is to:

- Forster 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 exercise their rights.

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



Our PAIA Manual is useful for the public to:

- 1.1. Check the categories of records held by a body which are available without you 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. Who may request information

Any person who requires information for the exercise or protection of any rights may request information.

2.1. Key contact details for access to information

You may request access to information as follows:

Company Contact Details

| | |
|------------------------|---|
| <u>Postal Address:</u> | PostNet Suite 430 Private Bag X51 Bryanston 2021 |
| <u>Street Address:</u> | Building 6 Bryanston Gate Office Park 170 Curzon Road Bryanston 2021 |
| <u>Phone Number:</u> | 011 745 7800 |
| <u>Email:</u> | compliance@prime.co.za |



2.2. Prescribed access form

A request for access to a record held by the Company must be made in the prescribed form. The form requires you, as the requester to provide the following information:

- sufficient information to enable the identification of the requester;
- sufficient information to enable the identification of the record(s) requested;
- the form of access required;
- the requester's postal address or fax number;
- identification of the right sought to be exercised or protected;
- an explanation as to why the record is required to exercise or protect that right;
- the way the requester wishes to be informed of the decision on the request, if in a manner in addition to written notification; and
- if the request is made on behalf of a person, the submission of proof of the capacity in which the requester makes the request, to the satisfaction of the Information Officer.

Refer to **Annexure B: Request Form** to this manual for the format of the prescribed form. Requesters should please note that all the information as listed above should be provided, failing which the process will be delayed while the Company requests such additional information. The prescribed time periods will not commence until all pertinent information has been furnished to the Company by the requester.

2.3. Prescribed fees

Payment of fees is regulated in terms of section 54 of the Act. The Regulations to the Act provide for two types of fees:

- **Request fee:** This is a non-refundable administration fee paid by all requesters. It is paid before the request is considered.
- **Access fee:** This is paid by all requesters only when access is granted. This fee is intended to reimburse the private body for the costs involved in searching for a record and preparing it for delivery to the requester. The Company may withhold a record until the request fee, and the deposit (if applicable) have been paid.

Refer to **Annexure C** below for a list of applicable fees.

2.4. Requester

Written notice must be given to a requester of the request fee and amount to be paid before the request may be further processed. If the search for a record, or preparation of the record for disclosure will require more than the prescribed hours, the requester may be required to pay a deposit, not being more than one third of the access fee that would be payable if the request is granted. If the request is declined, the deposit must be repaid to the requester.

The notice given to the requester must advise the requester that s/he has a right to apply to court against the payment of the request fee or deposit and should also advise of the procedure of the application.



3. Categories of Information that can be Accessed

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

Before submitting a request in terms of PAIA, you should consider whether other mechanisms for receiving their information are available. You are allowed to access your 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 |

4. The Decision-Making Process

4.1. Notice

Unless the rules about notifying third parties apply, the Information Officer or Deputy Information Officer handling your request will respond as soon as reasonably possible. This will be done within 30 days of receiving your request in the required 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.



4.2. 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.

4.3. 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.

4.4. 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;

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.



4.5. 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.

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 Prime Meridian Direct t/a Prime South Africa are met.

6. Availability of the Manual

A copy of the Manual is available –

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

7. Acknowledgement of ownership

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

S. Benfield
S. Benfield (May 19, 2026 14:02:11 GMT+2)

Stuart Benfield (Prime SA)

Daryl Mulder
Daryl Mulder (May 20, 2026 17:14:59 GMT+2)

Daryl Mulder (PAAS)



Dane Matthews (Prime Advantage)



Annexure A: Availability and Category of Records

The following records may be accessed by request from the Company.

Human Resources division

Records found in this division contain information of employees that include the following:

- (i) any personal records provided to the Company by the employee/personnel;
- (ii) any records a third party has provided to the Company about its personnel;
- (iii) conditions of employment and other personnel-related contractual and quasi-legal records;
- (iv) internal evaluation records.

Other internal records and correspondence related to the employee.

Client-related records

Clients include individuals that receive a service from the Company. This information includes:

- (i) any records a client has provided to the Company;
- (ii) any records a third party has provided to the Company; and
- (iii) records generated by or within the Company pertaining to the client, including transactional records.

Records available in terms of other legislation

The requester may also request information that is available in terms of legislation, such as the following:

CATEGORY OF RECORDS APPLICABLE LEGISLATION

| CATEGORY OF RECORDS | APPLICABLE LEGISLATION |
|---|---|
| Personnel information as far as it is allowed in terms of these Acts | |
| | Basic Conditions of Employment Act 75 of 1997 |
| | Compensation for Occupational Injuries & Diseases Act 130 of 1993) |
| | Employment Equity Act 55 of 1998 |
| | Labour Relations Act 66 of 1995 |
| | Occupational Health and Safety Act 85 of 1993 |
| | Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 |
| | Skills Development Act 97 of 1998 |
| | Skills Development Levies Act 9 of 1999 |
| Company reporting and Company related records as far as is allowed in terms of these Acts | |
| | Companies Act 71 of 2008 |
| | Short-term Insurance Act 53 of 1998 |
| | Insurance Act 18 of 2017 |
| Tax information relating to employees and the Company as far as is allowed in terms of these Acts | |
| | Income Tax Act 58 of 1962 |
| | VAT Act 97 of 1991 |



Annexure B: Request Form [Regulation 7]

Note:

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

TO: The Information Officer

Address:

E-mail

address:

Fax

number:

Mark with an "X"

- Request is made in my own name Request is made on behalf of another person.

| PERSONAL INFORMATION | | | | |
|---|------------------|--|--------------|--|
| Full names | | | | |
| Identity number | | | | |
| Capacity in which request is made (<i>when made on behalf of another person</i>) | | | | |
| Street address | | | | |
| E-mail address | | | | |
| Contact numbers | Telephone number | | Cell number: | |
| Full names of person on whose behalf request is made (<i>if applicable</i>) | | | | |
| Identity number | | | | |
| Street address | | | | |
| E-mail address | | | | |
| Contact numbers | Telephone number | | Cell number: | |
| PARTICULARS OF RECORD REQUESTED | | | | |
| Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (<i>If the provided space is inadequate, please continue a separate page and attach it to this form. All additional pages must be signed.</i>) | | | | |
| Description of record or relevant part of the record: | | | | |



| | |
|------------------------------------|--|
| Reference number, if available | |
| Any further particulars of record: | |

| TYPE OF RECORD | |
|---|---------------------------------------|
| | (Mark the applicable box with an "X") |
| Record is in written or printed form | |
| Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>) | |
| Record consists of recorded words or information which can be reproduced in sound | |
| Record is held on a computer or in an electronic, or machine-readable form | |
| FORM OF ACCESS | |
| | (Mark the applicable box with an "X") |
| Printed copy of record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>) | |
| Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>) | |
| Transcription of soundtrack (<i>written or printed document</i>) | |
| Copy of record on flash drive (<i>including virtual images and soundtracks</i>) | |
| Copy of record on compact disc drive (<i>including virtual images and soundtracks</i>) | |
| Copy of record saved on cloud storage server | |
| MANNER OF ACCESS | |
| | (Mark the applicable box with an "X") |
| Personal inspection of record at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) | |
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| E-mail of information (including soundtracks if possible) | |
| Cloud share/file transfer | |
| Preferred language (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>) | |
| PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED | |
| If the provided space is inadequate, please continue a separate page and attach it to this form. The requester must sign all the additional pages. | |



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

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

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

| POSTAL ADDRESS | FACSIMILE | ELECTRONIC COMMUNICATION (Please specify) |
|----------------|-----------|---|
| | | |

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester/person on whose behalf request is made

FOR OFFICIAL USE

| | |
|--|--|
| Reference number: | |
| Request received by (State rank, name and surname of Information Officer): | |
| Date received: | |
| Access fees: | |
| Deposit (if any): | |

Signature of Information Officer

/ Prime Meridian Direct t/a Prime South Africa (Pty) Ltd. FSP41040.
 / PrimaryAsset Administrative Services (Pty) Ltd. FSP3920.
 / PrimaryAsset Specialist Consulting t/a Advantage Rewards (Pty) Ltd.
 / The companies' address: Prime Meridian House, Bryanston Gate, 170 Curzon Rd, Bryanston, 2191. PostNet Suite 430, Private Bag X51, Bryanston, 2021.



Annexure C: Outcome of Request & Fees Payable [Regulation 8]

NOTE:

- If your request is granted the
 - amount of the deposit, (if any), is payable before your request is processed; and
 - requested record/portion of the record will only be released once proof of full payment is received.
- Please use the reference number hereunder in all future correspondence.
 Reference number: _____
 TO: _____
 Your request dated _____, refers.

1. You Requested:

Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.

OR

2. You Requested:

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

3. To be submitted:

| | |
|--|--|
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format (<i>including transcriptions</i>) | |
| E-mail of information (<i>including soundtracks if possible</i>) | |
| Cloud share/file transfer | |
| Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>) | |



Kindly note that your request has been:

Approved

Denied, for the following reasons:

4. Fees Payable for your request:

| Item | Cost per A4- page /item | Number of pages/ items | Total |
|---|--|------------------------|-------|
| Photocopy | | | |
| Printed copy | | | |
| For a copy in a computer-readable form on: | | | |
| (i) Flash drive – To be provided by requestor | R40.00 | | |
| (ii) Compact disc – If provided by requestor | R40.00 | | |
| – If provided to the requestor | R60.00 | | |
| For a transcription of visual images per A4-size page | Service to be outsourced | | |
| Copy of visual images | Will depend on the quotation of the service provider | | |
| Transcription of an audio record, per A4-size | R24.00 | | |
| Copy of an audio record | | | |
| (i) Flash drive – To be provided by requestor | R40.00 | | |
| (ii) Compact disc – If provided by requestor | R40.00 | | |
| – If provided to the requestor | R60.00 | | |
| Postage, e-mail or any other electronic transfer: | Actual Costs | | |
| Total | | | |

5. Deposit Payable (if search exceeds six hours)

Yes

No

| Hours of search | Amount of deposit (calculated on one third of total amount per request) |
|-----------------|---|
| | |



The amount must be paid into the following Bank account:

Name of bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch code: _____
Reference number: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer



Annexure D: 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 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 E: 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 t/a Prime South Africa (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.

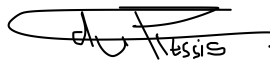
The Deputy Information Officer has the authority to approach all staff members of the FSP and to request all records held by the FSP. Where a manager is of the opinion that access to a record should not be granted to the Deputy Information Officer, reasons for this decision shall be given to the Information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

S. Benfield

S. Benfield (May 19, 2026 14:02:11 GMT+2)

Stuart Benfield
Information Officer (Prime SA)



Cornelle du Plessis
Deputy Information Officer

Annexure F: 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.

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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 (May 20, 2026 17:14:59 GMT+2)

Daryl Mulder
Information Officer (PAAS)



Nicholas Fernandes
Deputy Information Officer



Annexure G: 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 Specialist Consulting t/a Advantage Rewards (Pty) Ltd has appointed a Deputy Information Officer to facilitate any requests to access records held within the organisation. 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 organisation and to request all records held within the organisation. 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 PrimaryAsset Specialist Consulting t/a Advantage Rewards (Pty) Ltd, I, Dane Matthews, hereby appoint Lesley-Anne Borchardt as the Deputy Information Officer.



Dane Matthews
Information Officer (Advantage Rewards)



Lesley Borchardt (May 21, 2026 14:36:00 GMT+2)

Lesley-Anne Borchardt
Deputy Information Officer



Annexure G: Information Officer Contact Information

1. 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

PrimaryAsset Specialist Consulting t/a Advantage Rewards (Pty) Ltd

Name & Surname: Dane Matthews

2. 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

PrimaryAsset Specialist Consulting (Pty) Ltd

Name & Surname: Lesley-Anne Borchardt

Email Address: lesley@primaryasset.co.za

3. Business Type

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

Finance & Business Services

