



Independent Alternatives

PAIA MANUAL

IAIM INVESTMENT MANAGERS (PTY) LTD ("IAIM")

Revised: JUNE 2024

1 Introduction

IAIM, a specialist discretionary investment management business, is committed to providing investment management services to institutional and retail investors while ensuring the highest level of security for your personal information. As an authorised financial service provider under the Financial Advisory & Intermediary Service Act (FSP 47402), we adhere to the strictest standards. This manual, published in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA") and the Protection of Personal Information Act, 2013 ("POPIA"), is a testament to our dedication to your constitutional right to access information for the exercise or protection of any rights.

This document serves as the manual required by PAIA and describes the categories of records held by IAIM and the procedures for requesting access to such records.

2 Key Contact Information

Information Officer	Mr. Grant Hogan 011 234 0187 grant@independentalternatives.co.za
Deputy Information Officer	Mr. Tatenda Chapinduka 011 234 1519 tatenda@independentalternatives.co.za
Registered Address	42 Homestead Road, Jupiter House, River Park, Rivonia, JHB, 2191
Telephone Number	011 234 0187
Email	info@independentalternatives.co.za
Website	independentalternatives.co.za

3 Guide To Use PAIA

An official guide has been compiled, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the Information Regulator. Any queries should be directed to:

The Information Regulator

Telephone Number	: 010 023 5200
Email	: PAIACompliance@inforegulator.org.za
Website	: www.inforegulator.org.za



4 Type Of Information

4.1 Types of Records Available

Records are kept in accordance with legislation, which includes, but is not limited to, the following legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Collective Investment Schemes Control Act 45 of 2002
- Companies Act 71 of 2008
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Copyrights Act, 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Markets Act, 19 of 2012
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

4.2 Records Available

The following categories of records, available on request, are maintained by IAIM:

4.2.1 Investor Records

Investors include any natural or juristic person who has received products or services from IAIM. Records include those generated by IAIM or provided by the investor to IAIM or a contracted third party or those provided by a contracted third party to IAIM with respect to the investor.



4.2.2 IAIM Staff Records

IAIM staff includes temporary and contractual staff, as well as FAIS representatives. Records include those generated by IAIM or provided by IAIM staff to IAIM or a third party, or those provided by a third party to IAIM in respect of IAIM staff, as well as internal records and correspondence.

4.2.3 IAIM Business Records

IAIM maintains records relating to its private internal affairs, including but not limited to the following:

- Financial records
- Operational records
- Information technology records
- Marketing records
- Internal correspondence
- Records related to products and services
- Statutory records
- Internal policies and procedures
- Records held by third-party IAIM officials

5 Purpose Of Processing

In terms of the POPI, data must be processed for a specified purpose. The purpose for which IAIM processes data will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

5.1 Purpose Of Processing

5.1.1 Personal Data

IAIM processes personnel data for business administration purposes. For example, personnel data is processed for payroll purposes. Personnel data is also processed to the extent required by legislation and regulation. For example, IAIM discloses employees' financial information to the Commissioner for the South African Revenue Service in terms of the Income Tax Act 58 of 1962 and employees' sensitive personal information in terms of the Employment Equity Act 55 of 1998.

5.1.2 Client-related data

IAIM processes client-related records as an integral part of its commercial services. For example, IAIM processes client-related records during the client application process and in assessing a client's profile and risk.



5.1.3 Third party data

IAIM processes third-party records for business administration purposes.

5.1.4 Other party data

IAIM processes "other party" records for business administration purposes. For example, personnel data may be processed to effect payment to contractors and/or suppliers. In performing these various tasks, IAIM may, amongst others, collect, collate, process, store and disclose personal information.

5.2 To Whom Personal Information is Provided

Depending on the nature of the data, IAIM may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry requesting data (e.g. the Financial Sector Conduct Authority in terms of the Collective Investments Schemes Control Act 45 of 2002).
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman requesting data or IAIM in terms of the applicable rules (i.e. the Competition Commission in terms of the Competition Act 89 of 1998).
- South African Revenue Services or another similar authority Third parties with whom IAIM have a contractual relationship for the retention of data (e.g. a third-party archiving service).
- Auditing and accounting service providers (internal and external).
- Anyone making a successful application for access in terms of the PAIA.

5.3 Security Measure

IAIM takes extensive information security measures to ensure the confidentiality, integrity, and availability of Personal Information in its possession. It also takes appropriate technical and organisational measures designed to ensure that personal data remain confidential and secure against unauthorised or unlawful processing and accidental loss, destruction, or damage.

6 The Request Procedure

To request access to any of the records listed in the manual, follow the process set out below. All records, whether specifically listed herein or not, shall only be made available subject to the provisions of POPIA and PAIA.

6.1 Form Of Request

The requester must use the prescribed form to request access to a record. This must be made to the Information Officer and sent to the address, fax number or electronic mail address contained in this manual. The requester must provide sufficient details on the request form to enable the information



officer to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address or fax number in the Republic. The requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the requester and state the necessary particulars to be so informed.

The requester must identify the right that is sought to be exercised or protected and explain why the requested record is required for the exercise or protection of that right. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is requesting the satisfaction of the head of the private body.

6.2 Our Response

Access to certain records may be denied on the grounds set out in PAIA. We will consider the request and respond with a decision in writing not more than 30 days after receiving the request. Mandatory grounds for refusal include but are not limited to:

- mandatory protection of the privacy of a third party who is a natural person or a deceased person (Section 63) or a juristic, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person.
- mandatory protection of personal information and disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of POPIA.
- mandatory protection of the commercial information of a third party (Section 64) if the records contain:
 - trade secrets of the third party.
 - financial, commercial, scientific or technical information whose disclosure could likely cause harm to the financial or commercial interests of that third party.
- Information for the protection of the privacy of individuals.
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information.

6.3 Fees

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester who is not a personal requester must pay the required request fee.

The Information Officer must, by notice, require the requester (other than a personal requester) to pay the prescribed request fee (if any) before further processing the request. The requester may lodge an application to the court against the tender or payment of the request fee. After the Information Officer has decided on the request, the requester must be notified in the required form.



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If the request is granted, a further access fee must be paid for reproduction, search, and preparation, as well as any time that exceeds the prescribed hours to search and prepare the record for disclosure.

7 Availability Of Manual

The public may inspect this manual upon request during office hours and free of charge at the offices of IAIM. Copies may be made, subject to the prescribed fees. The manual is also posted on the IAIM website www.IndependentAlternatives.co.za

Please visit www.inforegulator.org.za to download the forms as follows:

Form 2, the Request for Access to a Record form:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

Form 3, the Outcome of Request and Fees Payable form:

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>