

PAIA MANUAL FOR INDEPENDENT ALTERNATIVES INVESTMENT MANAGERS

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2/2000
(THE "ACT")**

REVISED 30 JUNE 2025

The Promotion of Access to Information Act 2 of 2000 (commonly known as PAIA) is South Africa's access to information law and it enables the public to gain access to information held by company, Independent Alternatives Investment Managers ("IAIM") (Pty) Ltd.



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1. INTRODUCTION

This manual is 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") and gives effect to the public's constitutional right to have access to information that is required for the exercise or protection of any rights.

2. CONTACT DETAILS

Directors : Mr. G Hogan, Mr. T Chapinduka & Ms. D Mpeta (Executive Directors)
Mr. L Makhari & Mrs. T Foto (Independent Non-Executive Directors)

CEO : Mr. G Hogan

Postal Address : 3001 Winnie Mandela Drive, Parc Nicol Office Park, Bryanston, JHB, 2191

Street Address : 3001 Winnie Mandela Drive, Parc Nicol Office Park, Bryanston, JHB, 2191

Telephone Number : 011 234 0187

Email : grant@independentalternatives.co.za

Website : www.independentalternatives.co.za

3. INFORMATION OFFICER DETAILS

Information Officer : Mr. G Hogan

Telephone Number : 011 234 0187

Email : grant@independentalternatives.co.za

Deputy Information Officer : Mr. T Chapinduka

Telephone Number : 011 234 1519

Email : tatenda@independentalternatives.co.za

4. THE ACT

The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided.

5. GUIDE FOR HOW TO USE PAIA

An official guide has been created to provide information on exercising Constitutional Rights. The Guide is available from the Information Regulator. Any queries should be directed to:

The Information Regulator - Contact Details:

Tel: 010 023 5200

Email: PAIACompliance@inforegulator.org.za

Website: www.inforegulator.org.za



6. TYPES OF INFORMATION

6.1. RECORDS AVAILABLE IN TERMS OF 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
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- 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
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

6.2. RECORDS AVAILABLE

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

6.2.1. CLIENT RECORDS

Clients 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 in respect of the client.

6.2.2. EMPLOYEE RECORDS

IAIM staff includes temporary and contractual staff, and 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, and internal records and correspondence.



6.2.3. 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

7. PROCESSING OF PERSONAL INFORMATION

In terms of the POPI, data must be processed for a specified purpose. The purpose for which data is processed by IAIM 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.

7.1. PURPOSE OF PROCESSING

7.1.1. PERSONNEL 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 employee's sensitive personal information in terms of the Employment Equity Act 55 of 1998.

7.1.2. 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.

7.1.3. THIRD PARTY DATA / SERVICE PROVIDER DATA

IAIM processes third party records for business administration purposes.

7.1.4. 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.

7.2. TO WHOM PERSONAL INFORMATION WILL BE SUPPLIED

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 making a request for 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 making a request for 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.

7.3. SECURITY MEASURES

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

8. THE REQUEST PROCEDURE

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

8.1. FORM OF REQUEST

- The requester must use the prescribed form to make the request for 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 detail 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 provide an explanation of 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 making the request to the satisfaction of the head of the private body.

8.2. 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 for 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 which disclosure could likely cause harm to the financial or commercial interests of that third party.
 - information disclosed in confidence
- Information for the protection of the privacy of individuals;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Proprietary Research Information.

8.3. 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.
- If the request is granted, then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

9. AVAILABILITY OF THE MANUAL

This Manual is available for inspection by the public upon request, during office hours and free of charge, at the offices of IAIM. Copies of the Manual may be made, subject to the prescribed fees.

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>

