



GROUP PROMOTION OF ACCESS TO INFORMATION MANUAL

COMPILED IN TERMS OF SECTION 51 OF THE PROMOTION OF
ACCESS TO INFORMATION ACT, 2 OF 2000.

Approved by:	Signatures:
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NOTE: THIS POLICY REVOKES ALL PREVIOUS POLICIES WHICH ARE DIRECTLY OR INDIRECTLY LINKED TO THE SUBJECT MATTER OF THIS POLICY, AS AT THE DATE OF IMPLEMENTATION.

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1. Definitions

- 1.1 In this Policy, the following words shall have the following meaning unless the context clearly indicates otherwise:
- 1.1.1 “**Company**” means Fin South Africa (Pty) Ltd with registration number 2017/224500/07
 - 1.1.2 “**Group**” means the Company and its direct and indirect subsidiaries;
 - 1.1.3 “**Group Entity**” means any entity within the Group;
 - 1.1.4 “**Manual**” means this Promotion of Access to Information Manual, as amended from time to time;
 - 1.1.5 “**PAIA**” means Promotion of Access to Information Act No 2 of 2000;
 - 1.1.6 “**Requester**” means any person making a request for access to a record of the Group;
 - 1.1.7 “**Personal Requester**” means a Requester who is seeking access to a record containing personal information about the Requester;
 - 1.1.8 “**Other Requester**” means a Requester (other than a Personal Requester) who is entitled to request access to information pertaining to the third parties.

2. Introduction to PAIA

- 2.1 The Promotion of Access to Information Act, 2 of 2000 grants private and public bodies the right to request access to records. Private bodies (such as individuals) that request access to records will have to demonstrate that the record is required for the exercise or protection of a right. Public bodies (such as government departments) that request access to records must be able to demonstrate that the request is in the interest of the public.
- 2.2 Requests in terms of the PAIA must be made in accordance with the prescribed procedures and accompanied by payment of the prescribed fees. The prescribed procedure outlining how request to access a record is detailed in 10 below.

3. About Fin Group

- 3.1 Fin South Africa (Pty) Ltd is incorporated in the Republic of South Africa with registration number 2017/224500/07.
- 3.2 The Group offers safe and affordable financial solutions, artificial intelligence services and a wide range of insurance services through its Group Entities.

4. Scope and Purpose of this Manual

- 4.1 This document serves as the Group PAIA Manual and provides reference to the records held by the Group as well as the personal information processed by the Group from time to time.
- 4.2 This Manual applies to the entire Group, including all business units, operational units, and affiliate companies, wherever located.

5. Availability of this Manual

- 5.1 This Manual is available for inspection on the Fin SA website at <https://za.fin.africa> and during normal business hours at the office of the Chief Executive Officer, at Ground Floor, Podium@Menlyn, 43 Ingersol Street, Lynnwood Glen, Pretoria.

6. Guide of the South African Human Rights Commission

- 6.1 A Guide has been compiled in terms of Section 10 of the PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right contemplated by the PAIA. It is available in all of the official languages.
- 6.2 The Guide is available for inspection, inter alia, at the office of the offices of the Human Rights Commission at:
- Head Office: Braampark Forum 3, 33 Hoofd Street, Braamfontein
- Tel: +27 (0)11 877 3600
- Website: www.sahrc.co.za

7. The latest Notice in terms of Section 52(2) of PAIA

- 7.1 No Notice has been published on the categories of records automatically available without a person having to request access in terms of Section 52(2) of PAIA.

8. The Group Legislative Universe

- 8.1 The table below outlines the applicable pieces of legislation to which the Group must adhere.

No	Act
1	Basic Conditions of Employment Act 75 of 1997
2	Broad Based Black Economic Empowerment Act 53 of 2003
3	Companies Act 71 of 2008
4	Compensation for Occupational Injuries and Diseases Act 130 of 1993
5	Consumer Protection Act 68 of 2008
6	Electronic Communications and Transactions Act 25 of 2002
7	Employment Equity Act 55 of 1998
8	Financial Intelligence Centre Act 38 of 2001
9	National Credit Act 34 of 2005
10	Occupational Health and Safety Act 85 of 1993
11	Prevention and Combating of Corrupt Activities Act 12 of 2004
12	Prevention of Organised Crime Act 121 of 1998
13	Promotion of Access to Information Act 2 of 2000
14	Protected Disclosures Act 26 of 2000
15	Protection of Constitutional Democracy Against Terrorist and Related Activities Act 33 of 2004
16	Protection of Personal Information Act, 2013
17	Skills Development Act 97 of 1998

9. Categories of Records held by the Group

- 9.1 **Records available on Request**

9.1.1 The Group has under its control or in its possession the following categories of records detailed in the table below. The categories of records are not exhaustive and are subject to amendment. A request made for access to these records will not be automatically granted but will be evaluated in accordance with PAIA, any other legal requirements and Group policies.

Record Category	Description
Accounting	<ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Bank Statements • Electronic Banking Records • Asset Register • Rental Agreements • Debtors/Creditors Statements and Invoices • General Ledges and Subsidiary Ledges • General Reconciliation
Company	<ul style="list-style-type: none"> • Documents of Incorporation • Memorandum of Incorporation • Minutes of Board of Directors Meetings • Minutes of Shareholder Meetings • Records relating to appointment of directors, auditors, company secretary, public officer, and other officers • Share Register and other Statutory Registers • Share certificates
Income Tax	<ul style="list-style-type: none"> • PAYE Records • Documents issued to employees for income tax purposes • Records of payments made to SARS • All other Statutory compliances • VAT records • UIF Records
Personnel Documents and Records	<ul style="list-style-type: none"> • Address Lists • Disciplinary Code and Records • Employee Benefits Arrangements Rules and Records • Employee Contracts • Employment Equity Plan • Grievance Policies and Procedures

	<ul style="list-style-type: none"> • Leave Records • Payroll Reports/Wage Register • Pension Fund Records • Safety Health and Environment Records • Salary Records • Training Manuals • Training Records
Procurement	<ul style="list-style-type: none"> • Standard Terms and Conditions for Supply of Services and Products • Contractor, Client and Supplier Agreements • List of Suppliers, Products, Services and Distribution • Policies and Procedures
Sales	<ul style="list-style-type: none"> • Customer Details • Credit Application Information • Information and Records provided by Third Parties
Marketing	<ul style="list-style-type: none"> • Advertising and Promotional Material
Risk Management and Audit	<ul style="list-style-type: none"> • Audit Reports • Risk Management Frameworks • Risk Management Plans
Information Technology	<ul style="list-style-type: none"> • Computer/ Mobile Device Usage Policies • Disaster Recovery Plans • Hardware Asset Registers • Information Security Policies, Standards and Procedures • Information Technology Systems and User Manuals • Information Usage Policy Documentation • Policy Implementation Plans • Software Licensing • System Documentation and Manuals

9.2 Categories of data subjects and personal information processed by the group

9.2.1 categories of data subjects and personal information processed by the group include the following:

Categories of data subjects PI processed	PI processed
Shareholders	Shareholder personal information
Customers including potential	Customer personal/special PI, e.g. name, identity number (ID), race, etc.

and previous customers	Customer bank details, e.g. account number, products, etc.
	Customer contracts
	Customer location information
	Customer third-party information, such as information provided by credit
Suppliers	Supplier personal information
	Supplier contracts
	Supplier bank details
	Surveillance information of supplier representatives (e.g. CCTV footage)
	PI of supplier representatives
Employees (prospective, previous and existing employees)	Employee PI (e.g. name, ID, etc.)
	Employee education and psychometrics records
	Employee medical information
	Employee disability information
	Employee biometric information
	Employee pension and provident fund information
	Employee bank details
	Employee tax and financial information
	Employee contracts
	Employee beneficiary information
	Employee vehicle registration
	Employee performance records
	Payroll records
	Electronic access records
	Physical access records
	Surveillance records
	Training records
	Background checks
	Criminal checks
	Employment history
Job applicants	Curriculum vitae and application forms
	Criminal checks
	Background checks
Visitors	Physical access records
	Electronic access records, scans and photographs

	Surveillance records (such as CCTV footage)
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9.3 Records Automatically Available

- 9.3.1 Records relating to any promotional material for public viewing, posters, campaigns, and product information are automatically for inspection on payment of prescribed fees.
- 9.3.2 These records can be requested by emailing payrollinfo.za@fin.africa.

10. Access to Records held by the Group

- 10.1 Records held by the Group may be accessed on request only once the requirements for access have been met.

10.2 Request Procedure

To be granted access to a record in terms of section 51 of PAIA, the Requester must complete the prescribed form (**Annexure A**) and submit it to paia@fin.africa.

- 10.2.1 Details of the fees payable for the access to records are indicated in **Annexure B**.
- 10.2.2 All fields contained in **Annexure A** are to be completed in full, ensuring that the Requester provides the Group with the following information:
 - 10.2.2.1 Details of the record that is requested;
 - 10.2.2.2 A certified copy of a valid South African Identity Document of the Requester;
 - 10.2.2.3 A copy of a Power of Attorney (if applicable);
 - 10.2.2.4 A description of the right the Requester seeks to exercise or protect;
 - 10.2.2.5 Details of how the information is to be provided to the Requester if the request is granted; and
 - 10.2.2.6 The Requester's contact details.

11. Timelines for Consideration of Request

- 11.1 The Requests will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is needed.
- 11.2 If an extension is necessary, the Requester will be notified with reasons for the extension.

12. Grounds for Refusal of Access to Records

- 12.1 The main grounds on which the Group may refuse access to records relate to:
 - 12.1.1 the privacy of a third party who is a natural person;
 - 12.1.2 the commercial information of a third party;
 - 12.1.3 confidential information of a third party;
 - 12.1.4 the safety of individuals and property;
 - 12.1.5 legally privileged records; and
 - 12.1.6 commercial information of the Group, which may include without limitation:
 - 12.1.6.1 trade secrets;

- 12.1.6.2 financial, commercial, scientific, or technical information, the disclosure of which would likely harm the financial or commercial interests of Group;
- 12.1.6.3 information that, if disclosed, could put the Group at a disadvantage in negotiations or commercial competition;
- 12.1.6.4 computer programs and related information technology software that are owned by the Group and that are protected by copyright; and
- 12.1.6.5 research information compiled by the Group or a third party, if disclosure would expose the third party, researcher or subject matter of the research and therefore seriously disadvantage the Group.

13. Remedies available to a Requester on Refusal of Access

13.1 Internal Remedies

- 13.1.1 The Group does not have internal appeal procedures. As such, the decision of the Information Officer pertaining to the request is final, and the Requester will have to exercise such external remedies at their disposal if a request is refused, and the Requester is not satisfied with the response provided by the Information Officer.

13.2 External Remedies

- 13.2.1 A Requester that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a court for relief.
- 13.2.2 For the purpose of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court, or any other court of similar status.

14. Group Contact Person in terms of Section 51(1)(A)(I) of PAIA

- 14.1 The contact details of the Group Information Officer are:

Babylon Mukunga

Physical Address: Ground Floor, Podium@Menlyn

43 Ingersol Road

Lynnwood Glen

Pretoria

0081

Postal Address: PO Box 39660

Garsfontein East

Pretoria

Gauteng

0041

Email: paia@fin.africa

Website: <https://za.fin.africa>

ANNEXURE A: REQUEST FOR ACCESS TO RECORD OF A PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2 of 2000) [Regulation 10]

Particulars of Private Body

The Head:

Particulars of Person Requesting Access to the Record

1. The particulars of the person who requests access to the record must be given below.		
2. The address and/or fax number in the Republic to which the information is to be sent must be given.		
3. Proof of the capacity in which the request is made, if applicable, must be attached.		
Full names and surname:		ID:
Postal and code:		
Cell:	Tel:	Fax:
Email:		
Capacity in which request is made, when made on behalf of another person:		

Particulars of Person on Whose Behalf Request is Made

This section must be completed ONLY if a request for information is made on behalf of another person.	
Full names and surname:	ID:

Particulars of Record

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. If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios. Description of record or relevant part of the record
Reference number, if available:
Any further particulars of record:

Fees

1. 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.
2. You will be notified of the amount required to be paid as the request fee.
3. 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.
4. If you qualify for exemption of the payment of any fee, please state the reason for exemption.
Reason for exemption from payment of fees:

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 for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:

Form in which record is required:

Compliance with your request in the specified form may depend on the form in which the record is available. 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. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested. Please choose the best option regarding how you prefer your access to the required information:

1. If the record is in written or printed form?

Copy of Record ☐

Inspection of record ☐

2. If the record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)?

View the Images ☐

Copy of the Images ☐

Transcription of Images ☐

3. If record consists of recorded words or information which can be reproduced in sound?

Listen to Soundtrack (audio disc) ☐

Transcription of Soundtrack (written or printed) ☐

4. If record is held on computer or in an electronic or machine-readable form?

Printed copy of record ☐

Printed copy of information derived from record ☐

Copy in computer readable form (Compact disc) ☐

5. If you requested a copy or transcription of a record (above) , do you wish the copy or transcription be posted to you (postage is payable)?

Yes, I would it to be posted and I understand that postage is payable by me ☐

No, I do not want it posted ☐

Particulars of Right to be Exercised or Protected

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise of protection of the aforementioned right:

Notice of Decision regarding Request for Access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed 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?

Declaration

The information contained herein is to the best of my knowledge both true and correct

Signed at _____ on the _____ day of _____ 20____

Signature of Requester/Person on whose behalf request is made:

ANNEXURE B: FEES PAYABLE

Reproduction of documents	Fees (R)
For a copy of the manual as contemplated in regulation 9(2)(c) – for every photocopy of an A4-size page or part thereof	1,10
For every photocopy of an A4-size page or part thereof	1,10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
For a copy in computer-readable form on – Compact disc	70,00
For a transcription of visual images, or an A4-size page or part thereof	40,00
For a copy of visual images	60,00
For a transcription of an audio record, for an A4-size page or part Thereof	20,00
For a copy of an audio record	30,00
Access to records	Fees (R)
For every photocopy of an A4-size page or part thereof	1,10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0,75
For a copy in a computer-readable form on – Compact disc	70,00
For a transcription of visual images, for an A4-size page or part thereof	40,00
For a copy of visual images	60,00
For a transcription of an audio record, for an A4-size page or part Thereof	20,00
For a copy of an audio record	30,00
For a search for and prepare of the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	30,00

Additionally, for purposes of section 54(2) of the Act the following applies:

- A deposit is payable if the search for and preparation of the record would exceed six hours.
- One-third of the access fee is payable as a deposit by the requester.
- The postage for a copy of a record posted to a requester is payable. The postage fee payable by the requester will be the actual fee incurred by the Group.











Group PAIA Policy April 2023

Final Audit Report

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