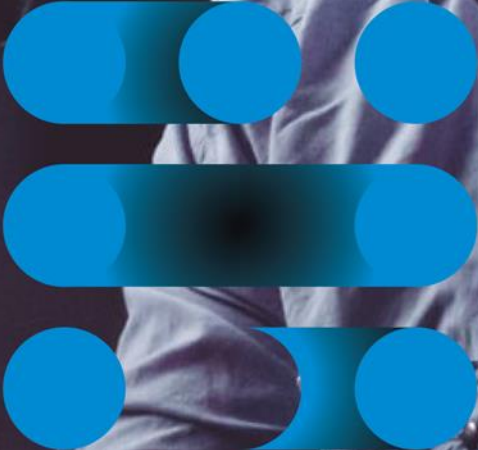


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Promotion of access to information manual for Sanlam Investment Holdings (Pty) Ltd

and the entities listed in Annexure “A”

Prepared in terms of section 51 of the Promotion
of Access to Information Act, no. 2 of 2000, as
amended

Issued: Information Officer

Date of revision: January 2025



1 Introduction

The Promotion of Access to Information Act, No. 2 of 2000 (**“PAIA”**) gives effect to the constitutional right of access to information held by the State or by another person or private body when such privately held information is required for the exercise or protection of any rights.

PAIA requires a manual (**“this Manual”**) to be compiled outlining information about the subjects and categories of information held by the public or private body in question to assist requestors of information by providing for the procedural and other requirements that need to be met in order to facilitate an efficient, transparent and accessible process.

Where a request is made in terms of PAIA, the body to whom the request is made is obliged to release the information, subject to justifiable limitations, including limitations aimed at the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. A “private body” as referred to in PAIA includes any existing or former juristic person.

A copy of this Manual is available:

- on the internet at the below website, <http://www.sanlam.com/legal/Pages/promotion-of-access-to-information-act.aspx>
- for inspection during normal business hours at the offices specified in 3 below,
- to any person on request and upon the payment of a reasonable prescribed fee payable per each A4 size photocopy made as contemplated in annexure B of the PAIA regulations.

2 Overview

The private bodies listed in Annexure A to this Manual, (hereinafter referred to as **“the Sanlam entity/entities”**) provide investment management, financial planning, consulting and other related financial services and products to its clients and form part of the bigger Sanlam Group. This Manual only applies to the private bodies listed in Annexure A hereto and separate PAIA manuals may be applicable in respect of other Sanlam related private bodies not listed in Annexure A.



3 Contact details

Information requests relating to the Sanlam entities can be directed using the below particulars:

Information officer	Lesego Moepi
Postal address	Private Bag X8, Tygervalley, 7536
Physical address	Sanlam Investments Building, 55 Willie van Schoor Avenue, 7530
Telephone	021 950 2058
Email	SIGDataOffice@sanlaminvestments.com

4 Guide on how to use PAIA

The Information Regulator (“IR”) has amended, updated and made available a “**Guide**” (as contemplated in section 10 of PAIA) which is available in each of the official languages and in braille and contain information as may be reasonably required by a person who wishes to exercise any rights in terms of PAIA.

Members of the public can inspect Afrikaans, English and isiZulu copies of the Guide at the offices of the Information Officer (“IO”) during normal business hours, as well as the office of the IR and can obtain a copy of the guide from the website of the IR or on request to the IO by completing & submitting Form 2 of the PAIA Regulations.

Information Regulator

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
P.O. Box 31533, Braamfontein, Johannesburg, 2017

General email:	infoereg@justice.gov.za
Complaints:	POPIAComplaints.IR@justice.gov.za PAIAComplaints.IR@justice.gov.za
Website:	https://www.justice.gov.za/infoereg/



5 Who may request access to the information held

- A requester, in relation to a private body, means:
 - any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
 - a person acting on behalf of the person contemplated above.
- Should a request be made on behalf of another person or private body, the requester must submit details and proof of the capacity in which the requester is making a request, to the satisfaction of the private body.
- This Manual is designed to facilitate any request for information from a requester (which includes a data subject as defined in the Protection of Personal Information Act, No. 4 of 2013 (“**POPIA**”). In terms of section 50 of PAIA, a requester must be given access to any record held by a private body where:
 - that record is required for the exercise or protection of any rights;
 - the requester complies with the procedural requirements in terms of PAIA pertaining to a request for access; and
 - access to that record is not refused in terms of any of the grounds for refusal listed in PAIA.
- The above-mentioned request includes access to a record containing personal information of the requester or the person on whose behalf the request is being made.
- A requester has the right to ask the private body to confirm whether or not it holds personal information of the requester, free of charge. Additionally, a requester may request that the private body provide a record or description of the personal information of the requester held by it as well as the information regarding the private body of all third parties or categories of third parties, who have, or have had, access to the personal information:
 - within a reasonable time;
 - at the prescribed fee, if any;
 - in a reasonable manner and format; and
 - in a form that is generally understandable.
- Please note that if a requester requires a record or description of the personal information held by the private body, a written estimate of the fee (determined in accordance with the Regulations of PAIA) will be provided to the requester and a deposit may be required.

6 Records

This clause serves as a reference to the records that the Sanlam entity/entities hold in order to facilitate a request in terms of PAIA.



Records available in accordance with legislation

Records are kept in accordance with legislation and to the extent that it is applicable to the specific private body in question. Refer to “Annexure B” for more details.

Records available on request

It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds for refusal. The information is classified and grouped according to records relating to the following subjects and categories:

6.1 Staff records

- Personal records provided by staff;
- Records provided by a third party relating to staff;
- Conditions of employment and other staff-related contractual and quasi-legal records;
- Internal evaluation records and other internal records;
- Correspondence relating to staff;
- Training schedules and material.

“**Staff**” refers to any person who works for or provide services to or on behalf of the Sanlam entity/entities, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the specific private body in question.

This includes, without limitation, directors (executive and Non-executive), all permanent, temporary and part-time staff, as well as contract workers.

6.2. Client related records

- Records provided by a client to a third party acting on behalf of the specific private body;
- Records provided by a third party;
- Records generated by or within the specific private body pertaining to its clients, including transactional records.

A “**client**” refers to any natural or juristic private body that receives services from any one of the Sanlam entities.

6.3 Private body records

- Financial records;
- Operational records;
- Databases;
- Information technology;



- Marketing records;
- Internal correspondence
- Product records;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and Equities, and
- Records held by officials of the Sanlam entity/-ies.

These records include, but are not limited to the records which pertain to the private bodies' own affairs.

6.4 Other party records

- Staff, client or private body records which are held by another party, as opposed to the records held by the private body itself;
- Records held by the private body pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party and records third parties have provided about the contractors/suppliers.
- A private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/ holding/sister companies, joint venture companies and service providers. Alternatively, such other parties may possess records that can be said to belong to the private body.

7 Fees

The tariffs relating to a request are determined in accordance with PAIA and Regulations.

8 Request procedure

- The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.
- The requester must complete the prescribed form/s with sufficient details.
- The completed form/s must be sent to the Information Officer whose details are provided in this Manual.
- Once the completed form/s has been submitted, the Information Officer will advise the requester if any fees will be payable, the payment methods and provide the requester with a written estimate of the fees.
- Please note that a request will not be processed until the request fee and the deposit (where applicable) has been paid.



9 Decision

- The Information Officer will as soon as reasonably possible, but within 30 days (or such other extended period determined and notified by the Information Officer, subject to the provisions of PAIA) after the request has been received or after the requisite information pertaining to the request has been received:
 - decide, in accordance with PAIA, whether to grant the request;
 - inform the requester of their right to correct any personal information; and
 - notify the requester of the aforementioned decision.
- Where the request is granted, the notice must contain the access fee applicable, the form in which access will be given; and outline the requisite dispute resolution procedures available to the requester should they be dissatisfied with the outcome.
- Information, or parts thereof, may be refused in accordance with the grounds for refusal listed in Part 3, Chapter 4 of PAIA.
- Information which does not fall within the ambit of a recognised ground for refusal must be disclosed.
- If all reasonable steps have been taken to find a record, and such a record cannot be found or do not exist, then the Information Officer will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

10 The processing of personal information

10.1 The Purpose of the processing

The Sanlam entities collect and processes personal information:

- to meet their responsibilities to clients;
- to meet responsibilities to employees;
- to meet contractual responsibilities to third-party service providers;
- to inform clients of products and/or services;
- to comply with all legal and regulatory requirements, including industry codes of conduct;
- to protect and pursue the legitimate interests of the Sanlam entities and bigger Sanlam Group or third parties to whom personal information is provided; and
- for any further purposes related to the above.



10.2 Categories of data subjects

Share holders	Subsidiary companies	Joint ventures
Advisors	Subsidiary companies	Joint ventures
Employees	Independent brokers	Joint ventures
Banking institutions	Consultants	Officials
Offenders and suspected offenders	Suppliers and service providers	Investors
Policyholders and beneficiaries	Complainants	Professional advisers
Trustees	Pension Funds	Employers and employee of other organisations
Prospective employees	Prospective clients	Board members

10.3 Classes of personal information processed

Personal details	Medical information	Products or services provided
Education details	Employment details	Special Personal Information
Financial details	Personal Opinions and Preferences	

10.4 Personal information may be received from or supplied to:

- any regulatory authority (such as the Financial Sector Conduct Authority) and the regulators they appoint for the various financial sectors;
- comply with any regulation passed under the relevant legislation, or any other legal process;
- any legal or juristic person with an appropriate legal basis;
- an executor of an estate, beneficiaries, or any other authorised representative;
- pension fund administrators;
- brokers, advisers, or intermediaries;
- companies within the Sanlam Group;
- law enforcement agencies;
- media outlets; and
- third-party service providers



10.5 Trans border flow of Information

Further processing and storage may require that the Sanlam entities send personal information to service providers outside of the Republic of South Africa. The Sanlam entities 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.

10.6 Security practices

Information Security deals with the Sanlam group's information and IT security capability and practices. Information Security deals specifically with the preservation of:

- Confidentiality: ensuring that information is accessible only to those authorised to have access;
- Integrity: safeguarding the accuracy and completeness of information and processing methods; and
- Availability: ensuring that authorised users have access to information and associated assets when required.

Information Security is achieved by implementing a suitable set of responsibilities, controls, standards, processes and systems to ensure that the Information Security objectives of Sanlam group are met, and as such Information Security is a tight domain that ensures:

- Rules are set for secure conduct and earning trust.
- The rules are followed by participants.
- Trust is established between parties, notably:
 - Client and Partner trust in Sanlam's reputation through trust in Sanlam's systems; and
 - Sanlam trust in interacting Client and Partner in Sanlam and their reputation.
- The security intelligence network that extends outside the organisation.
- Business is enabled because participants know it is safe to participate and know what is expected from them and what can be expected from other participants.
- Adequate monitoring and detection capabilities are maintained.
- Organised responses to incidents are effective and followed through into learning.

11 Requests in terms of POPIA

11.1 POPIA allows a data subject, after having provided adequate proof of their identity, the right to:

- Request the Sanlam entity to confirm, free of charge, whether or not it holds their personal information;
- Submit a request for a record or description of their personal information;
- Submit a request for access to their own personal information (by completing Form 2 of the PAIA Regulations);



- Object to their personal information being processed (by completing Form 1 of the POPIA Regulations); and
- Submit a request for the correct or deletion of their personal information (by completing Form 2 of the POPIA Regulations).

11.2 Please send your completed form/s to the information officer indicated in this manual.

11.3 Before submitting a request in terms of POPIA, a data subject who is a client of the Sanlam entity should consider whether other mechanisms for receiving their information are available from the specific private body in question.



ANNEXURE A

Sanlam entities to which this manual apply

Sanlam Investment Holdings (Pty) Ltd (1998/022648/07)

Sanlam Investment Management (Pty) Ltd (1967/011973/07)

Sanlam Multi Manager International (Pty) Ltd (2002/030939/07)

Graviton Wealth Management (Pty) Ltd (2000/029158/07)

Cognitio Investments (Pty) Ltd (2010/023310/07)

Denker Capital (Pty) Ltd (2015/174919/07)

Satrix Managers (RF) (Pty) Ltd (2004/009205/07)

Graviton Financial partners (Pty) Ltd (1998/025253/07)

Sanlam Collective Investments (RF) (Pty) Ltd (1967/002865/07)

Amplify Investment Partners (Pty) Ltd (1995/003170/07)

Sanlam Investments General Partner (Pty) Ltd (2005/014670/07)

Sanlam Private Wealth (Pty) Ltd (2000/023234/07)

Agulhas Nominees (Pty) Ltd 2000/026993/07

Satrix Investments (Pty) Ltd 2011/006611/07

Simeka Wealth (Pty) Ltd 2015/387985/07

Sanlam Credit Fund Advisor (Pty) Ltd 2012/035665/07

Sanlam Africa Real Estate Advisor (Pty) Ltd 2012/090295/07

Sanlam Specialised Finance (Pty) Ltd 1996/004744/07



ANNEXURE B

Records held in accordance with legislation*

*This is not an exhaustive list

No	Ref	Act
1	No. 66 of 1965	Administration of Estates Act
2	No. 42 of 1965	Arbitration Act
3	No. 53 of 2003	Broad Based Black Economic Empowerment Act
4	No. 75 of 1997	Basic Conditions of Employment
5	No. 71 of 2008	Companies Act
6	No. 130 of 1993	Compensation for Occupational Injuries and Diseases Act
7	No. 68 of 2008	Consumer Protection Act
8	No. 89 of 1998	Competition Act
9	No. 108 of 1996	Constitution of South Africa
10	No. 98 of 1978	Copyright Act
11	No. 54 of 2002	Collective Investments Schemes Control Act
12	No. 51 of 1977	Criminal procedures Act
13	No. 91 of 2020	Cybercrimes Act
14	No. 25 of 2002	Electronic Communications and Transactions Act
15	No. 85 of 1993	Occupational Health and Safety Act
16	No. 37 of 2002	Financial Advisory and Intermediary Services Act
17	No. 38 of 2001	Financial Intelligence Centre Act
18	No. 60 of 2000	Firearms Control Act
19		Foreign Account Tax Compliance Act
20	No. 19 of 2012	Financial Markets Act
21	No. 9 of 2017	Financial Sector Regulation Act
22	No. 28 of 2001	Financial Institutions Protection of Funds Act
23	No. 58 of 1962	Income Tax Act



24	No. 80 of 1998	Inspection of Financial Institutions Act
25	No. 24 of 1936	Insolvency Act
26	No. 66 of 1995	Labour Relations Act
27	No. 131 of 1998	Medical Schemes Act
28	No. 34 of 2005	National Credit Act
29	No. 24 of 1956	Pension Funds Act
30	No. 2 of 2000	Promotion of Access to Information Act
31	No. 4 of 2013	Protection of Personal Information Act
32	No. 12 of 2004	Prevention and Combating of Corrupt Activities Act
33	No. 33 of 2004	Protection of Constitutional Democracy Against Terrorist and Related Activities Act
34	No. 121 of 1998	Prevention of Organised Crimes Act
35	No. 109 of 1985	Regional Services Councils Act
36	No. 9 of 1999	Skills development Levies Act
37	No. 57 of 1998	Trust Property Control Act
38	No. 63 of 2001	Unemployment Insurance Act
39	No. 4 of 2002	Unemployment Contributions Act
40	No. 89 of 1991	Value Added Tax Act

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