

MANUAL ON ACCESS TO INFORMATION HELD BY ANCHOR GROUP

COMPILED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT, NO 2 OF 2000 (AS AMENDED)

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THIS POLICY APPLIES TO:

Anchor Capital (Pty) Ltd	R Fisher and Associates (Pty) Ltd
Anchor Private Clients (Pty) Ltd	Wild Dog Capital (Pty) Ltd
Anchor Financial Services (Pty) Ltd	ENI Financial Services (Pty) Ltd
Anchor Capital Investments (Pty) Ltd	Southridge Global Capital (Pty) Ltd
Anchor Institutional (Pty) Ltd	Bryan Hirsch Colley and Associates (Pty) Ltd
Anchor Stockbrokers (Pty) Ltd	Retirement Planning Services (Pty) Ltd
Anchor Succession (Pty)Ltd	Retirement Planning Services International (Pty) Ltd
Apollo Trustees (Pty)Ltd	
Robert Cowen Investments (Pty) Ltd	
Erudite Financial Services (Pty) Ltd	

Hereinafter collectively referred to as “**Anchor**”.

1. DEFINITIONS

- “**Access fee**” means a fee prescribed for the purposes of section 22(6) or 54(6), as the case may be.
- “**Data Subject**” means the person to whom personal information relates.
- “**Deputy Information Officer**” means the designated individual in the organisation who is responsible for assisting the Information Officer with the PAIA Request.
- “**Form 2**” - This form is prescribed by regulation and should be used to request access to information held by a public or private body.
- “**Form 3**” - Outcome of request and of fees payable
- “**Guide**” means the guide on how to use PAIA by any person who wishes to exercise any right contemplated in Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 04 of 2013, as contemplated in section 10 of PAIA.
- “**Head**” of, in relation to, a private body means:
 - in the case of a natural person, including a person referred to in paragraph (c) of the definition of “political party”, that natural person or any person duly authorised by that natural person;
 - in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;

- in the case of a juristic person:
 - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - the person who is acting as such or any person duly authorised by such acting person.
 - in the case of political party, the leader of the political party or any person duly authorised by that leader.
- **“Information Officer”** means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act.
- **“Information Regulator”** means the Regulator established in terms of Section 39 of POPI.
- **“Internal appeal”** means an internal appeal to the relevant authority in terms of section 74
- **“PAIA”** means the Promotion of Access to Information Act 2 of 2000.
- **“Person”** means a natural person or a juristic person.
- **“Personal Information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
 - information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - information relating to the education or the medical, financial, criminal or employment history of the person;
 - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - the biometric information of the person;
 - the personal opinions, views or preferences of the person;
 - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - the views or opinions of another individual about the person; and
 - the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- **“Personal Requester”** means a requester seeking access to a record containing personal information about the requester.
- **“Private body means”:**
 - a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
 - a partnership which carries or has carried on any trade, business or profession; or
 - any former or existing juristic person, but excludes a public body
- **“POPI”** means the Protection of Personal Information Act 4 of 2013.
- **“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, organisation, 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, linking, as well as restriction, degradation, erasure or destruction of information.
- **“Record”** means any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation.
- **“Request”** for access means a request for access to a record of the organisation in terms of section 50 of PAIA.
- **“Requester”** in relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person.
- **“Responsible party”** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.
- **“Third Party”** in relation to a request for access to a record held by the organisation, means any person other than the requester.
- **“The Act”** means the Promotion of Access to Information Act 2 of 2000 as amended, and includes any regulation made and in force in terms of section 92.

2. Interpretation

- Any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time.
- If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this Manual.
- Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document.
- Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day.
- Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months, or years, as the case may be.
- The use of the word “including” followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the *eiusdem generis* rule shall not be applied in the interpretation of such general wording or such specific example/s;
- Insofar as there is a conflict in the interpretation of or application of this Manual and the Act, the Act shall prevail.

3. INTRODUCTION

On 23 November 2001, The Promotion of Access to Information Act No. 2 of 2000, (“the Act”) came into operation. Section 51 of the Act requires that we as a

private body compile a manual providing information to the public regarding the procedure to be followed in requesting information from us for the purpose of exercising or protecting the rights of those requesters.

When a request is made in terms of the Act, there is an obligation to release the information, except in those circumstances where the Act expressly provides that the information must not be released or may be withheld. The Act stipulates the requisite procedures to process any request for information. Members of the public will be able to:

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- access all the relevant contact details of the information and deputy Information Officers who will assist the public with the records they intend to access;
- know the description of the guide on how to use PAIA, as updated by the regulator and how to obtain access to it;
- 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;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- 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
- know whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information which is to be processed.

¹Please refer to Annexure D for a comprehensive list of contact information for Information Officers and Deputy Information Officers within the Anchor Group

4. CONTACT DETAILS¹

Name of private body: Anchor Group (Pty) Ltd
 Physical address: 25 Culross Road, Bryanston, Sandton, 2191 Postal address: PO Box 1337, Gallo Manor, Sandton, 2052
 Information Officer: Omair Khan
 Telephone: 011 591 0638
 E-mail: okhan@anchorcapital.co.za

5. THE ACT

The Act grants a requester access to records of a private body, if such records are 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. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide on how to use the Promotion of Access to Information Act 2 of 2000, in terms of Section 10 [Section 51(1)(b)] This guide, initially compiled by the South African Human Rights Commission, is now updated and made available by the Information Regulator, and contains information for the purposes of exercising constitutional rights. The guide can be obtained:

- Upon request from the Information Officer during office hours.
- From the regulator's website <https://inforegulator.org.za/>

Telephone: +27 (0) 10 023 5200

Website: www.inforegulator.org.za

E-mail address: enquiries@inforegulator.org.za

6. RECORDS OF THE RESPONSIBLE PARTY

This section serves as a reference to the records we hold to facilitate a request in terms of the Act. It is recorded that the accessibility of the documents listed below may be subject to the grounds of refusal set out hereinafter and in the Act. The information is classified and grouped according to records relating to the following subjects and categories:

6.1. Automatically Available Records [Section 51 (1) (C) of PAIA]

Records that are automatically available to the public are all records of the responsible party lodged in terms of government requirements with various regulatory and statutory bodies, including the Registrar of Companies, the Registrar of Deeds etc. Other records include but are not limited to:

- Anchor website: www.anchorcapital.co.za
- Confirmation of license in terms of the Financial Advisory and Intermediary Services Act (FAIS).

6.2. Records In Accordance with Other Legislation [Section 51 (1) (D) of PAIA]

Anchor retains several records in accordance with applicable legislation² including, but not limited to

PLEASE DIRECT ANY QUERIES TO:

The Information Regulator:

APPLICABLE LEGISLATION

Basic Conditions of Employment Act No 75 of 1997

Broad-Based Black Economic Empowerment Act 53 of 2003

Companies Act No 71 of 2008

Compensation for Occupational Injuries and Diseases Act No 130 of 1993

Consumer Protection Act No 68 of 2008

Competition Act, 1998

Electronic Communications and Transactions Act No 25 of 2002

Employment Equity Act No 55 of 1998

²The absence of any explicitly mentioned legislation does not imply irrelevance. Anchor Group is committed to compliance with all other relevant laws and regulations governing its business operations and data processing activities.

Financial Advisory and Intermediary Services Act, 2002

Financial Intelligence Centre Act No 38 of 2001

Income Tax Act No 58 of 1962

Labour Relations Act No 66 of 1995

Long-term Insurance Act, 1998

Medical Schemes Act No 131 of 1998

National Credit Act No 34 of 2005

Occupational Health and Safety Act No 85 of 1993

Prevention and Combating of Corrupt Activities Act, 2004

Prevention of Organised Crime Act, 1998

Promotion of Access to Information Act, 2000

Promotion of Equality and Prevention of Unfair Discrimination Act, 2000

Pension Funds Act No 24 of 1956

Protection of Personal Information Act No 4 of 2013

Regulation of Interception of Communications and Provision of Communication Related Information Act No 70 of 2002

Short-term Insurance Act, 1998

Skills Development Act No 97 of 1998

Skills Development Levies Act No 9 of 1999

Unemployment Insurance Act, 2001

Unemployment Insurance Contributions Act, 2002

Value Added Tax Act No 89 of 1991

Anchor will consider requests received although not covered in the aforementioned Acts.

6.3. Non-Automatically Available Records [Section 51 (1) (E) of PAIA]

The records mentioned below are not automatically available. A request for access must be made to the Information Officer and is subject to Section 63 (1) of the Act, which provides that for the head of a private body to refuse a request for access to a record of the body if such disclosure would involve the unreasonable disclosure or perusal of personal information regarding a third party. This includes a deceased individual. Therefore, by including the latter it does not imply that the request for the record will be granted.

a. Internal company records

CATEGORY OF INTERNAL COMPANY RECORDS	DESCRIPTION
Published financial records	Financial statements, reports, and documents made publicly available, such as annual reports or investor presentations.
Internal financial records and related documents	Confidential financial records, including budget reports, income statements, and financial planning documents.
Investor relations records	Records related to communications and interactions with investors, including investor inquiries and reports.
Employment equity reports	Reports and documentation related to employment equity and diversity initiatives within the organization.
Operational reports	Reports detailing operational performance, efficiency, and related metrics within the company.
Taxation	Records related to taxation, including tax returns, filings, and documents pertaining to tax compliance.
Agreements and contracts	Copies of contracts, agreements, and legal documents entered into by the company with various parties.
Databases	Electronic databases storing internal company data, including customer information, sales records, and more.
Financial records	Additional financial records, such as accounting ledgers, financial journals, and transaction records.
Fixed, movable, and intellectual property	Records related to assets, including property deeds, asset registers, intellectual property documentation, and leases.
Information technology	Documentation related to the company's IT infrastructure, systems, software, and technology-related records.
Insurance	Records of insurance policies, claims, coverage, and related documentation for company assets and liabilities.
Internal correspondence	Internal communications, including emails, memos, and other written exchanges within the company.
Internal policies and procedures	Documentation of company policies, procedures, and guidelines governing various aspects of company operations.
Marketing records	Records related to marketing initiatives, campaigns, advertising materials, and marketing strategy documents.

b. Human Resources records

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

CATEGORY OF HUMAN RESOURCES RECORDS	DESCRIPTION
Directors (executive and non-executive)	Records related to directors' appointments, qualifications, and board-related information.
Permanent, temporary, and part-time staff	Personnel records for all types of staff, including employment contracts and personal information.
Contract workers	Records related to contract workers, including contracts, payments, and work-related information.
Internal evaluation records and performance appraisals	Records of employee evaluations, performance appraisals, and feedback.
Personal records provided by, and to, personnel	Documentation exchanged between employees and the HR department, including personal information updates.
Records provided by a third party relating to personnel	Information received from third parties, such as background checks or references for personnel.
Conditions of employment and other personnel-related contractual and legal records	Employment contracts, legal agreements, and related documents.
Correspondence relating to personnel	Communications, emails, and letters related to HR matters, including employee inquiries and disputes.
Training schedules and materials	Records of employee training, including schedules, course materials, and training completion records.
Grievance procedures	Documents related to employee grievances, complaints, and dispute resolution procedures.
Additional internal records and correspondence	Any other internal HR-related records, correspondence, or documents pertinent to HR functions.
Payroll Records	Information related to employee compensation, including salary, bonuses, deductions, and tax-related documents.
Leave and Attendance Records	Details of employee leave requests, accruals, attendance records, and timesheets.
Health and Safety Records	Documentation related to workplace safety, accident reports, and occupational health records.
Employee Benefits Information	Records concerning employee benefits such as health insurance, retirement plans, and stock options.
Employee Surveys	Responses and results from employee satisfaction or engagement surveys.
Employee Disciplinary Records	Documentation of disciplinary actions, warnings, or investigations related to employee conduct.
Exit Interviews	Information gathered during exit interviews with departing employees.
Employee ID and Access Records	Records related to employee identification cards, access badges, and permissions.
Workplace Policies	Copies of company policies, including employee handbooks, code of conduct, and IT policies.
Recruitment and Hiring Records	Resumes, job applications, interview notes, and candidate assessments.
Employee Development Plans	Records of employee development and training plans.

c. Client-related records

This refers to any natural or juristic entity that utilises the products and services of the responsible party and includes:

CATEGORY OF CLIENT-RELATED RECORDS	DESCRIPTION
Records and correspondence provided by clients	Documents and communications submitted by clients, including applications, contracts, mandates and inquiries.
Records provided by a client to a third party or outsourced service provider acting for or on behalf of the responsible party	Information shared by clients with third-party service providers acting on behalf of the responsible party.
Records provided by a third party of a client	Information received from third parties, such as credit reports or references, regarding a client.
Records generated by or within the Anchor Group pertaining to the client (transactional records included)	Internal records and data related to client transactions, interactions, and service history.
Any other client-related record generated through the lifetime of the relationship or thereafter	Additional records and documentation created or acquired during the course of the client relationship and beyond.
Client Identification and Verification Records	Information used to verify the identity of clients, including copies of identification documents and proof of address.
Client Communication and Correspondence	Emails, letters, messages, and other communications exchanged with clients, including support requests and inquiries.
Client Account and Profile Information	Details about client accounts, preferences, and profiles, including investment goals and risk tolerance.
Complaints and Dispute Resolution Records	Records related to client complaints, disputes, resolutions, and actions taken to address client concerns.
Marketing and Communication Preferences	Client preferences regarding marketing communications, newsletters, and opt-in/opt-out choices.
Client Meeting and Interaction Records	Notes, summaries, and outcomes of meetings, calls, and interactions with clients, including meeting agendas and minutes.
Legal and Regulatory Compliance Records	Documents and records related to compliance with legal and regulatory requirements concerning client data.
Client Consent and Authorisation Records	Documentation of client consent for data processing activities, disclosures, and other consent-related records.

6.4. Other Party Records

Anchor 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 Anchor, such as:

- Personnel, customer, or private body records which are held by another party as opposed to being held by the company; and
- Records held by Anchor 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.

It is recorded that the accessibility of the records and documents listed above, may be subject to the grounds of refusal as set out in this manual below.

7. PROCESSING OF PERSONAL INFORMATION

7.1. Purpose Of Processing Personal Information

Chapter 3 of the POPI Act provides the minimum conditions for the lawful processing of personal information by a responsible party. The responsible party may not deviate from these conditions unless specific exclusions apply as outlined in the POPI Act.

Anchor requires personal information from its clients to render holistic financial services. Anchor remains the

responsible party for POPI, and it will therefore ensure that the personal information of the data subject is:

- processed lawfully, fairly, and transparently. Anchor will make sure that appropriate information pertaining to the data subject is collected as prescribed by data privacy and collection notices. Anchor will also have a legal basis to process such information;
- not further processed unless this is related to the original purpose;
- only relevant data being collected which is in line with the services which Anchor provides;
- accurate and regularly updated;
- not kept for longer than the prescribed period;

- processed with integrity and confidentiality. Measures will be taken to ensure that personal information stored in both physical and electronic form is subject to the appropriate level of security;
- processed in accordance with the rights of data subjects, where applicable.

7.2. Data Subject Categories

In terms of Section 1 of POPI, a data subject may be a natural or a legal person.

CATEGORIES OF DATA SUBJECTS ³	PERSONAL INFORMATION THAT MAY BE PROCESSED
Clients	Natural persons: ID number, FICA documentation, physical and postal address, as well as any information which is required to allow Anchor to render financial services to the client. Legal persons: Registration number, FICA documentation, physical and postal address, as well as any information which is required to allow Anchor to render financial services to the client.
Service providers	The entity's name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, B-BBEE certificates, invoices, internal policies and agreements.
Investors	Investment portfolios. Investment preferences. Dividend and interest earnings. Tax-related information related to investments.
Beneficiaries	Trust beneficiaries. Financial account details as beneficiaries
Directors and shareholders,	The name, surname, ID numbers, FICA documentation, and any additional information required for reporting purposes.
Employees	The physical and postal address, qualifications, gender, race, FICA documentation, and any other information required as per BN 194 of 2017. Bank account details for salary payments. Tax records related to employment.
Shareholders	Share ownership records (for publicly traded financial institutions). Dividend and distribution records (for publicly traded financial institutions).
Website visitors	Name, surname, contact details.
Visitors	Name, surname, contact details, electronic access records, and CCTV records.
Prospective Clients	Contact details. Information about their inquiry or interest.
Suppliers	Supplier company details. Contact information for supplier representatives Invoices and payment information.
Contractors	Contact details. Tax information. Agreements or contracts.
Job Applicants	Resumes and CVs. Contact details. References.
Subscribers	Email addresses. Subscription preferences.
Event Attendees	Names. Contact details. Attendance records.

³This is not a comprehensive list, and other instances that are not named but fall within these categories will also be covered under this section of the policy.

Survey Respondents	Responses to survey questions. Demographic information.
Research Participants	Consent forms. Research data.
App Users	User profiles. App usage data.
Members	Membership details. Payment information.
Compliance and Regulatory Bodies	Information required for regulatory reporting and compliance purposes (e.g., government agencies, financial regulatory bodies)
Trustees (for Trust Accounts)	Trust documentation. Trust account details. Beneficiary information related to trusts (if applicable)

7.3. Sharing Of Personal Information

CATEGORIES OF DATA⁴	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Identity number and names, for criminal checks	South African Police Service (SAPS) and third-party verification tools
Qualifications, for qualification verifications	South African Qualifications Authority (SAQA)
Credit-related information, for credit checks	Credit bureaus or credit reporting agencies (e.g., Experian, TransUnion). Financial institutions (if applicable).
Employment history, for employment verifications	Employers or former employers. Refinitiv (for due diligence checks).
Biometric data (if applicable), for access control	Security teams or access control systems.
Personal information of clients, for ongoing screening on Refinitiv	Refinitiv (for ongoing screening and due diligence checks on clients).
Risk Assessments and Profiles	Regulatory authorities (for risk assessment compliance). Clients (for disclosure and suitability assessments).
Client Communication Records	Internal compliance teams (for monitoring and audit purposes). Clients (for recordkeeping and dispute resolution).
Beneficial Ownership Information (FICA)	Financial Intelligence Centre (FIC) for anti-money laundering (AML) compliance. Regulatory authorities (if required).
Proof of Residence (FICA)	Regulatory authorities (for KYC and AML compliance). Clients (for verification purposes).
Tax-related Information	South African Revenue Service (SARS) for tax compliance. Clients (for tax reporting purposes).
Cloud service providers and information technology service provider	Used for data storage, communications, cybersecurity and business operation.
Custodians, investment platforms, administrators and other financial service providers	Involved in the provision of investment and financial services.
External legal advisers, auditors, consultants and tax advisers	Where required for legal, regulatory, audit, risk management or business purposes

⁴ This is not a comprehensive list, and other instances that are not named but fall within these categories will also be covered under this section of the policy.

Additionally, Anchor Group may also share information with:

- Entities forming part of Anchor's group of companies located in or outside of South Africa;
- Service providers in or outside of South Africa who perform services on behalf of Anchor; and
- Third party suppliers in or outside of South Africa.

7.4. Cross-Border Transfer of Personal Information

Anchor Group may be required to forward personal information across international borders to its group companies located outside of South Africa, as well as to supplier and third parties. The purpose thereof would be to render financial services to Anchor's clients.

Where personal information is transferred outside of South Africa, such transfer will only take place where permitted by section 72 of POPIA and subject to appropriate safeguards designed to protect the personal information and uphold the principles for lawful processing.

7.5. Information Security Measures

The Anchor Group has implemented and maintains reasonable technical and organisational measures to protect clients' personal information. This includes the implementation of policies, procedures, and controls aimed at preventing any unauthorised access, and the loss or destruction of personal information. A range of security measures has also been implemented to mitigate data security breaches, accidental loss or destruction of, or damage to, personal information. Steps will continuously be taken to ensure that the appropriate safeguards are in place.

8. REQUEST PROCEDURE

8.1. Access To Records Procedure

Section 18 of PAIA prescribes the procedure to be followed in making a request for access to information held by Anchor. Section 23(1) of POPIA⁵ also provides the procedure to access personal information. Manner of access to personal information in terms of section 23 of POPIA should be in accordance with section 18 of PAIA.⁶

The requester or data subject must complete the prescribed form, FORM 2, in Annexure A, enclosed herewith, when requesting access to a record or personal information.

The Form 2 must be addressed and submitted to the Information Officer by hand, post, per fax or e-mail, which details are set out above and in Annexure D.

The requester must provide sufficient information of the record(s) requested in order for the Information Officer or Deputy Information Officer, if any, to identify the record(s). The prescribed form must be filled in with enough particularity to at least enable the Information Officer to identify:

- The identity of the requester;
- Particulars of record requested;
- Type of record;
- Form of access; and
- Manner of access.

Some additional important points to remember when completing the request form:

- Each section of the form contains instructions that should be followed to improve the likelihood of the request being granted with minimal delay being experienced;
- If records are requested on behalf of another person, please provide a copy of the mandate authorising you to act on behalf of another person;
- A detailed description of the records being requested must be provided to enable the Information Officer or Deputy Information Officer to identify it accurately.

The requester must indicate, as per section 29(2) of PAIA⁷, the form of access that is required. The requester must indicate whether the requested record(s) is preferred in any particular language. The requester should indicate the manner in which he/she wishes to be informed of the decision on the request and the necessary particulars to be informed accordingly.

The requester must state that he/she/it requires the information to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

The responsible party will in terms of Section 25 of PAIA process the request within thirty (30) calendar days unless the requester has stated special reasons, which would satisfy the Information Officer, as to why circumstances dictate that the above time periods cannot be complied with.

The requester shall be informed by the Information Officer or Deputy Information Officer in writing, on a form that corresponds with Form 3 (See Annexure B) whether access was granted or denied and if any fees are payable.

⁵Section 23(1) of POPIA provides that a data subject, having provided adequate proof of identity, has the right to –

a. request a responsible party to confirm, free of charge, whether or not the responsible party holds personal information about the data subject; and
b. (b) request from a responsible party the record or a description of the personal information about the data subject held by the responsible party, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information

⁶Section 25 of POPIA

⁷Section 29(2)(a) of PAIA provides that "record must be provided in written or printed form or visual images or printed transcriptions, by supplying a copy of the record or by making arrangements for the inspection of the record."

8.2. Extension Request

Section 26 of PAIA prescribes the instances where the period of thirty (30) days referenced in Section 25 of PAIA, may be extended once for a further 30 days. The Information Officer has the option to extend the initial 30-day response period by an additional 30 days under certain circumstances, which include:

- When the request involves a substantial number of records or requires extensive searching.
- When consultation with different divisions within Anchor Group or with another private entity is necessary.
- When the requester consents to such an extension.

In such cases, the requester will be informed in writing within the initial 30-day period of the extension, along with the reasons for it. The notification will also explain the process for the requester to seek legal redress against the extension, should they choose to do so.

Failure by the Information Officer to respond within the stipulated 30-day period will be regarded as a deemed refusal of the request.

If the period has been extended, the Information Officer must as soon as possible and within 30 days of first receiving the request inform the requester of that extension.

- If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.
- If a requester is unable to complete the prescribed form because of illiteracy or a disability, such a person may make the request orally.
- The requester must pay the prescribed fee as detailed in this policy before any further processing can take place.

⁸Section 25 of PAIA deals with the requirement for a decision on request to be taken within 30 days and the requirement of notifying the requester about the decision to his or her request.

8.3. Decision Making Process

In accordance with Section 55 of the law, the Information Officer is committed to taking all reasonable steps to locate a requested record. If, for any reason, the record cannot be found or does not exist, the Information Officer will promptly notify the requester through an affidavit or affirmation. This notification will be considered as a refusal of the request. However, should the record be located at a later time, access will be granted as if the request had been approved initially.

Section 56 outlines the following key steps in our decision-making process, ensuring transparency and adherence to the law:

Granting Access: If the request is granted, the notification to the requester will include details about the applicable access fee, along with instructions on how to address the fee if the requester wishes to seek recourse through the court. Additionally, the notification will specify the format in which access will be provided.

Declining Access: In the event of a request being declined, the notification will contain comprehensive reasons for this decision, citing the relevant provisions of the law. The notification will also outline the procedure for the requester should they opt to challenge the decision in court.

Section 59 allows the Information Officer to separate a record and grant access solely to the portion that is legally permissible. When access is granted, it will be provided in the format reasonably requested by the requester. In cases where the requester has not indicated a preference, the format will be determined reasonably by the Information Officer.

Anchor Group retains the right, and in some cases, is obligated to deny access to records based on various grounds outlined in this PAIA manual. These grounds include, but are not limited to:

- Protecting the personal information of third parties, ensuring their privacy.
- Safeguarding the commercial and confidential information of third parties or Anchor Group itself.
- Ensuring the safety of individuals or property.
- Recognising records as privileged information in legal proceedings.
- Preserving the research information of third parties or Anchor Group.
- Refusing access based on professional privilege.

In situations where a request is declined, the requester has the option to file a written complaint with the Information Regulator or to approach the High Court within 180 days from being notified of the refusal. The court will assess whether the requested records should be made available or not. Information Regulator Details:

- by email at PAIAComplaints@inforegulator.org.za or
- to address P.O Box 3153, Braamfontein, Johannesburg, 2017

8.4. Grounds For Refusal of Access to Records

The main grounds for the responsible party to refuse a request for information relates to the following:

- In the event of the mandatory protection of privacy of a third party who is a natural person;
- The unreasonable disclosure of personal information of that natural person;
- The mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party;
 - Financial, commercial, scientific or technical information of which the disclosure could likely cause harm to the financial or commercial interests of that third party;
 - Information disclosed in confidence by a third party to the responsible party if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

The mandatory protection of confidential information of third parties if protected in terms of any agreement, including.

- Mandatory protection of the safety of individuals and the protection of property;
- Mandatory protection of records that would be regarded as privileged in legal proceedings;
- The commercial activities of the responsible party, which may include:
 - Trade secrets;
 - Financial, commercial, scientific or technical information of which the disclosure could likely cause harm to the financial or commercial interests of the responsible party;
 - Information, which, if disclosed, could put the responsible party at a disadvantage in negotiations or commercial competition;
 - A computer programme which is owned by the responsible party, and which is protected by copyright.

Mandatory Disclosure in the Public Interest;

- Despite the above grounds for refusal, the Information Officer must grant a request for access to a record if the disclosure would reveal evidence of a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in the disclosure clearly outweighs the harm.

8.5. Fees

The Act provides for two types of fees, namely:

- A request fee, which is a standard fee; and

- An access fee, which we calculate by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

When the Information Officer receives the request, they will inform the requester, to pay the prescribed request fee (if any), before processing the request further (See Annexure C)

The Information Officer withholds the records until the requester has paid the necessary fees. A requester who we grant the request to access a record, must pay an access fee for reproduction, for search and preparation, and for any time reasonably necessary that is more than the prescribed hours to search for and prepare the record for disclosure – including making arrangements to make it available in the requested form.

If the requester pays a deposit for a request for access that we refuse, then the Information Officer will refund the deposit to the requester.

8.5.1. Request fees

- The requester must complete the prescribed form and deposit the request fee of R140.00.
- The account details are available upon request.
- Please attach proof of payment to the request form.

8.5.2. Access fees

Should access to the records be granted, an access fee may be payable for:

- The time it takes for Anchor to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure.
- The costs of making the record, or transcribing the record, a postal fee (if applicable), and
- The reasonable time needed by Anchor to search for the record and prepare the record for you.
- You may be requested to pay a deposit for the access fee depending on the time and effort to retrieve records as well as manner of access.
- Access will not be granted without payment of the access fee.

9. REMEDIES IN THE CASE OF REFUSAL OF ACCESS TO INFORMATION REQUEST

The Information Officer's decision constitutes the final internal decision of the responsible party.

9.1.1. Internal remedies

Anchor does not provide for internal appeal procedures in respect of PAIA requests. Requesters who are dissatisfied with a decision may exercise the external remedies available under PAIA, including lodging a complaint with the Information Regulator or approaching a court of competent jurisdiction.

9.1.2. External remedies

A requester that is dissatisfied with the Information

Officer's refusal to disclose information may, within 180 calendar days of notification of the decision, apply to a court for relief.

Likewise, a third party dissatisfied with the Information Officer's decision to not grant a request for information, may within 30 calendar days of notification of the decision, apply to a court for relief. For purposes of the Act, the courts that have jurisdiction over these applications are the Constitutional Court of South Africa, the High Court, or another court of similar status.

10. AVAILABILITY OF THE MANUAL

The manual is made available in terms of Regulation No. R. 187 of 15 February 2002 and is available on our website, at our registered offices.

ANNEXURE A: PRESCRIBED FORM FOR THE REQUESTER TO COMPLETE

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: _____

Select relevant option: ☐ 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: _____
(when made on behalf of another person)

Postal Address: _____

Street Address: _____

E-mail Address: _____

Contact Numbers:

Tel. (B): _____

Cellular: _____

Facsimile: _____

PERSON ON WHOSE BEHALF REQUEST IS MADE (IF APPLICABLE):

Full Names: _____

Identity Number: _____

Postal Address: _____

Street Address: _____

E-mail Address: _____

Contact Numbers:

Tel. (B): _____

Cellular: _____

Facsimile: _____

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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:

Reference number, if available: _____

Any further particulars of record:

TYPE OF RECORD*(Select applicable circles)*

- ☐ Record is in written or printed form
- ☐ Record comprises virtual images
(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)
- ☐ 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*(Select applicable circles)*

- ☐ Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*

- ☐ Written or printed transcription of virtual images (*this includes photographs, slides, video recordings, computer-generated images, sketches, etc*)
- ☐ Transcription of soundtrack (*written or printed document*)
- ☐ Copy of record on flash drive (*including virtual images and soundtracks*)
- ☐ Copy of record on compact disc drive (*including virtual images and soundtracks*)
- ☐ Copy of record saved on cloud storage server

MANNER OF ACCESS

(Select applicable circles)

- ☐ Personal inspection of record 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*)
- ☐ Postal services to postal address
- ☐ Postal services to street address
- ☐ Courier service to street address
- ☐ Facsimile of information in written or printed format (*including transcriptions*)
- ☐ E-mail of information (*including soundtracks if possible*)
- ☐ Cloud share/file transfer
- ☐ Preferred language (*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*)

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 or protection of the aforementioned right:

FEES

- A request fee must be paid before the request will be considered.
- You will be notified of the amount of the access fee to be paid.
- 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.
- If you qualify for exemption of the payment of any fee, please state the reason for 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)

THUS, DONE AND SIGNED AT _____

ON 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)

Date received: _____

Access fees: _____

Deposit: _____
(if any)

Signature of Information Officer

ANNEXURE B: OUTCOME OF REQUEST AND OF FEES PAYABLE

NOTE:

1. If your request is granted the—
 - a. amount of the deposit, (if any), is payable before your request is processed; and
 - b. requested record/portion of the record will only be released once proof of full payment is received.
2. 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 (*including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form*)
- ☐ Written or printed transcription of virtual images (*this includes photographs, slides, video recordings, computer-generated images, sketches, etc*)
- ☐ Transcription of soundtrack (*written or printed document*)
- ☐ Copy of information on flash drive (*including virtual images and soundtracks*)
- ☐ Copy of information on compact disc drive (*including virtual images and soundtracks*)
- ☐ 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 (*including transcriptions*)

- ☐ E-mail of information *(including soundtracks if possible)*
- ☐ Cloud share/file transfer
- ☐ Preferred language: _____
(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)

KINDLY NOTE THAT YOUR REQUEST HAS BEEN:

- ☐ Approved
- ☐ Denied, for the following reasons:

4. FEES PAYABLE WITH REGARDS TO YOUR REQUEST:

ITEM	COST PER A4-SIZE PAGE OR PART THEREOF/ITEM	NUMBER OF PAGES/ITEMS	TOTAL
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
1. Flash drive			
• To be provided by requestor	R40.00		
2. 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. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record:			
1. Flash drive			
• To be provided by requestor	R40.00		
2. 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 Nr: _____

Submit proof of payment to: _____

THUS, DONE AND SIGNED AT _____

ON THIS _____ DAY OF _____ 20 _____

Information officer

ANNEXURE C: FEES

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted).
- A requestor may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.
- The fee structure is also available on the Information Regulator's website at www.inforegulator.org.za

Generally, fees need to be paid both for making a request, but also to cover the cost of providing access to records in terms of a request. There are, however, some exceptions. If the requester is granted access to the records he or she requested and he or she is not exempted from paying any fees, as indicated in paragraph below, the Information Officer or Deputy Information Officer Anchor can charge the prescribed fees relating to the following categories -

FEES IN RESPECT OF PRIVATE BODIES

TYPE OF RECORD	FEE
The request fee payable by every requester	R140.00
Every photocopy of an A4 page	R2.00 or part thereof
Every printed copy of an A4 page from a computer or in electronic or computer -readable form	R2.00 or part thereof
For a copy in a computer-readable form on: • Flash drive (to be provided by requestor) • Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
A transcript of visual images for an A4 page	R40.00
A copy of visual images	R60.00
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on: • Flash drive (to be provided by requestor) • Compact disc • If provided by requestor • If provided to the requestor	R40.00 R60.00 R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
To not exceed a total cost of	R435.00
Deposit: If search exceeds 6 hours (calculated on one third of total amount per request)	

ANNEXURE D: INFORMATION OFFICERS AND DEPUTY INFORMATION OFFICERS

Business	Information Officer	Contact Details	Deputy Information Officer (S)	Contact Details
Anchor Capital (Pty) Ltd	Omair Khan	Email okhan@anchorcapital.co.za Telephone no: 011 591 0638 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Nicole Marnewick	Email nmarnewick@anchorcapital.co.za Telephone no: 011 591 0635 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Anchor Private Clients (Pty) Ltd	Liza Maartens	Email лмаartens@anchorsecurities.co.za Telephone no: 011 591 0611 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Ronel van Niekerk	Email rvanniekerk@anchorsb.co.za Telephone no: 011 591 0663 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Anchor Financial Services (Pty) Ltd	Nadeem Ahmed	Email: nahmed@anchorcapital.co.za Telephone no: 011 591 0638 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng		
Anchor Capital Investments (Pty) Ltd	Andrew Haiden	Email: ahaiden@anchorcapital.co.za Telephone no: 011 591 0696 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Matthew Norwood- Young	Email: mnyoung@anchorcapital.co.za Telephone no: 011 591 0683 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
			Lara Meyer	Email: lmeyer@anchorcapital.co.za Telephone no: 011 591 0677 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Anchor Institutional (Pty) Ltd	Anastasia Mahona	Email: Amahona@corion.co.za Telephone no: 021 831 5400 Address: 705 Touchstone House, 7Bree Street, Cape Town		
Anchor Stockbrokers (Pty) Ltd	Liza Maartens	Email: лмаartens@anchorsecurities.co.za Telephone no: 011 591 0611 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Ronel van Niekerk	Email: rvanniekerk@anchorsb.co.za Telephone no: 011 591 0663 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Anchor Succession (Pty) Ltd	Andrew Lawson	Email: andrewl@rcinv.co.za Telephone no: 011 591 0553 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Christine Ulyate	Email: christine@rcinv.co.za Telephone no: 011 591 0569 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Apollo Trustees (Pty) Ltd	Di Haiden	Email: di@rcinv.co.za Telephone no: 011 591 0572 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Kirsty Lucas	Email: kirsty@rcinv.co.za Telephone no: 011 591 0576 Address: 25 Culross Road, Bryanston, Gauteng

		Gauteng		Sandton, 2191, Gauteng
R Fisher and Associates (Pty) Ltd	Brendan Gace	Email: bgace@anchorcapital.co.za Telephone no: 011 591 0691 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Michael Sarris	Email: msarris@anchorcapital.co.za Telephone no: 011 591 0690 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Erudite Financial Services (Pty) Ltd	Omair Khan	Email: okhan@anchorcapital.co.za Telephone no: 011 591 0638 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Brendan Gace	Email: bgace@anchorcapital.co.za Telephone no: 011 591 0691 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
Wild Dog Capital (Pty) Ltd	Andrew Haiden	Email: ahaiden@anchorcapital.co.za Telephone no: 011 591 0696 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Matthew Norwood-Young	Email: mnyoung@anchorcapital.co.za Telephone no: 011 591 0683 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
			Lara Meyer	Email: lmeyer@anchorcapital.co.za Telephone no: 011 591 0677 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng
ENI Financial Services (Pty) Ltd	Harold Hopking	Email: hhopking@anchorcapital.co.za Telephone no: 021 401 8966 Address: Office 201, Cape Quarter Square, 27 Somerset Road, Green Point, 8005, Cape Town		
Southridge Global Capital (Pty) Ltd	Nick Dennis	Email: ndennis@anchorcapital.co.za Telephone no: 021 401 8973 Address: Office 201, Cape Quarter Square, 27 Somerset Road, Green Point, 8005, Cape Town		
Bryan Hirsch Colley and Associates	Mark Colley	Email: markc@bhca.co.za Telephone no: 011 268 6908 Address: Office 201 Cape Quarter, 27 Somerset Road, Green Point, 8005/ First Floor, The Oval, West, Wanderers Office Park, Corlett Drive, Illovo	Julia Wiegele	Email: juliaw@bhca.co.za Telephone no: 011 268 6908 Address: Office 201 Cape Quarter, 27 Somerset Road, Green Point, 8005/ First Floor, The Oval, West, Wanderers Office Park, Corlett Drive, Illovo
Retirement Planning Services (Pty) Ltd	Ancia Van Der Mescht	Email: ancia@rps.co.za Telephone no: 021 946 3184 Address: Tijger Park 5, Office 0019, Ground floor, Willie van Schoor Drive, Bellville 7530, Cape Town, South Africa	Hendré De Vries	Email: hendre@rps.co.za Telephone no: 021 946 3184 Address: Tijger Park 5, Office 0019, Ground floor, Willie van Schoor Drive, Bellville 7530, Cape Town, South Africa
Retirement Planning Services International (Pty) Ltd	Ancia Van Der Mescht	Email: ancia@rps.co.za Telephone no: 021 946 3184 Address: Tijger Park 5, Office 0019,	Hendré De Vries	Email: hendre@rps.co.za Telephone no: 021 946 3184 Address: Tijger Park 5, Office 0019,

		Ground floor, Willie van Schoor Drive, Bellville 7530, Cape Town, South Africa		Ground floor, Willie van Schoor Drive, Bellville 7530, Cape Town, South Africa:
Robert Cowen Investments (Pty) Ltd	Di Haiden	Email: di@rcinv.co.za Telephone no: 011 591 0691 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng	Christine Ulyate	Email: christine@rcinv.co.za Telephone no: 011 591 0569 Address: 25 Culross Road, Bryanston, Sandton, 2191, Gauteng

