

DENEB INVESTMENTS LIMITED
(Registration Number: 2013/091290/06)

INTRODUCTION

The Promotion of Access to Information Act, No 2 of 2000 (PAIA) came into effect on 9 March 2001. The purpose of PAIA is to (1) foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information and to (2) promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

This manual has been prepared and published in accordance with the requirements of section 51 of the PAIA and takes into consideration the requirements of the Protection of Personal Information Act, 2013 (POPIA). The purpose of POPIA is to respect the constitutional right to privacy, ensuring that personal information is lawfully processed, and when processed by a responsible person, is adequately safeguarded. POPIA further provides rights and remedies to protect personal information from processing not in accordance with the Act.

PAIA & POPIA Manual	PAIA Reference
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PAIA guidance	51(1)(b)(i)
Auto disclosure	51(1)(b)(ii)
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Category of records held & access requests	51(1)(b)(iv)
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The purpose of this manual is to facilitate access to records held by Deneb Investments Limited (“Deneb”). It provides reference to the records held and processed by Deneb, the reasons therefor and the process to request access to such records.

The manual is available to the public for inspection on the Deneb website at www.deneb.co.za or on request from the delegated official referred to in this manual.

DENEb INVESTMENTS LIMITED (“Deneb”)

Deneb Investments Limited is a diverse investment company operating predominantly in Southern Africa with subsidiaries in Switzerland, United Kingdom and Hong Kong. Deneb is listed on the Johannesburg Stock Exchange under the Diversified Financial Services sector.

CONTACT DETAILS. PAIA 51(1)(a).

The responsibility for administration of, and compliance with, the PAIA has been delegated by the Chief Executive Officer (CEO) of Deneb to the Information Officer. The Information Officer also oversees the duties and responsibilities in terms of section 55 of the POPIA.

Contact person: Gys Wege

Address: 5th Floor, Deneb House, Cnr Main and Browning Roads, Observatory, Western Cape, 7925

Contact Details: 021 – 486-1400

Email: gwege@deneb.co.za

PAIA GUIDANCE. PAIA 51(1)(b)(i).

PAIA grants a requestor access to records of a private body, if the record is required for the exercise of 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 PAIA shall be made in accordance with prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the PAIA.

AUTO DISCLOSURE. PAIA 51 (1)(b)(ii).

A section 52(2) notice regarding the categories of records, which are available without having to request access in terms of the PAIA, has to date not been published.

LEGISLATION. PAIA 51 (1)(b)(iii).

Where applicable to its operations, Deneb retains records and documents as prescribed by the following pieces of legislation. This list is not exhaustive.

- Basic Conditions of Employment Act, No. 75 of 1997
- Broad Based Black Economic Empowerment Act, No 53 of 2003
- Companies Act, No 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No 130 of 1993
- Constitution of South Africa Act, No 108 of 1996
- Electronic Communications and Transactions Act, No 2 of 2000
- Employment Equity Act, No 55 of 1998
- Income Tax Act, No 58 of 1962
- Labour Relations Act, No 66 of 1995
- Occupational Health and Safety Act, No 85 of 1993
- Promotional of Access to Information Act, No 2 of 2000
- Skills Development Act, No 97 of 1997
- Skills Development Levies Act, No 9 of 1999
- Unemployment Insurance Act, No 63 of 2001
- Value-added Tax Act, No 89 of 1991

RECORDS HELD. PAIA 51 (1)(b)(iv).

Categories of information held by Deneb include:

- Subsidiary and Associate Company Records
 - Annual financial statements
 - Correspondence
 - Audit files
 - Fees
 - Contacts
 - Statutory and tax records
 - Business information
 - Finding and recommendation reports
 - Investigative information and material
 - Legal documentation
 - Proposal and tender documents
 - Project plans and risk management
 - Working papers
- Corporate Governance
 - Codes of conduct
 - Minutes of meetings
 - Minutes of executive committee meetings
 - Enterprise-wide risk management records
 - Legal compliance records
- Finance and Administration
 - Accounting records
 - Annual financial statements

- Asset registers
- Accounting and banking records
- Supplier invoices and statements
- Management reports
- VAT, Tax and PAYE records and returns
- Human Resources
 - Accounting and payroll records
 - BEE statistics
 - Career development records
 - Personnel information
 - Employment equity reports
 - General terms of employment
 - Letters of employment
 - Leave records
 - PAYE records and returns
 - Performance management records
 - Policies and procedures
 - UIF returns
 - Company director information
 - Workplace Skills Development Plans
- Information Technology
 - Contracts and agreements
 - Equipment registers
 - IT governance records
 - Information policies and procedures

- Learning and Development
 - Training material
- Training records and statistics
 - Marketing
 - Media releases
 - Client proposals
 - New business development
 - Brand information
 - Marketing strategies
 - Communication strategies
 - Client relationship information
 - Marketing brochures
 - Conferencing advertising and branding
- Operations
 - General correspondence
 - Insurance documentation
 - Service level agreements
 - Travel documentation
 - Operational planning and resourcing
- Secretarial Services
 - Applicable statutory documents
 - Corporate structure diagrams
 - Share certificates
 - Shareholder agreements
 - Minutes of meetings

- Records relating to appointment of directors and auditors

ACCESS REQUESTS. PAIA 51 (1)(b)(iv).

To facilitate the processing of your request, kindly:

- Use the prescribed form attached to this manual as **PAIA Form 2 (Schedule 1)**.
- Address your request to the Information Officer
- Provide sufficient details as to enable Deneb to identify:
 - The records requested
 - The requestor (and if an agent is lodging the request, proof of capacity)
 - The form of access required
 - The postal address or fax number of the requestor in the Republic
 - If the requestor wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof
 - The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

The following applies to requests, **other than personal requests**:

- A requestor is required to pay the prescribed fees before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid of not more than one third of the access fee which would be payable if the request were granted.
- A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit.
- Records may be withheld until the fees have been paid.

Requests complying with the requirements set out above, will be processed and considered expeditiously. If the request for access is refused, Deneb will advise the requestor about the reasons for refusal of access and may, in the absence of an internal appeal process, advise the requestor to lodge an application with the court against the refusal of the request.

Requests for information may be refused on the following grounds:

- Protection of the privacy of a third party who is a natural person
- Protection of commercial information of a third party

- Protection of certain confidential information of a third party
- Protection of safety of individuals and protection of property
- Protection of records privileged from production in legal proceedings
- Commercial information of the private body
 - Protection of research information of a third party and of the private body.

Deneb will give the requestor a written notice of the decision within 30 days after a decision is made on their request to access information. In case of a request being refused, the notification will include the reasons for the refusal.

Deneb may extend the 30 days' notice period for a further period not exceeding 30 days after receiving the request, due to the nature of the request and the amount of time required to gather the requested information. The requestor will be notified of the extension prior to the expiry of the 30-day notice period.

PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY DENEb

Deneb requires personal information relating to both individual and juristic persons in order to carry out its business and operational functions. Deneb determines the purpose of and means for processing personal information, and as such, is considered a responsible party.

Deneb will ensure that personal information of data subjects is processed in line with the following conditions:

- Accountability
- Processing limitation
 - Personal information is lawfully processed, including data subject consent to processing of personal information and legal basis for processing.
 - Personal information is adequate, relevant and not excessive for the purposes for which it was collected.
 - Data subjects have the right to object to Deneb's use of their personal information and request deletion of such personal information (subject to Deneb's record keeping requirements) using the prescribed form attached to this manual as **POPIA Form 1 – Schedule 1**).
 - Data subjects have the right to object to the processing of personal information for purposes of direct marketing by means of unsolicited electronic communications.
- Purpose specification
 - Personal information is processed for only the purpose for which it was collected.

- Personal information will not be kept for longer than is necessary.
- Further processing limitation
 - Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- Information quality
 - Reasonable practical steps will be taken to ensure that personal information is complete, accurate, not misleading and updated where necessary.
- Openness
 - Data subjects have the right to be notified that their personal information is being collected by Deneb.
- Security safeguards
 - Data will be processed in accordance with integrity and confidentiality principals, this includes physical and organisational measures to ensure that personal information, in both physical and electronic form, are subject to appropriate level of security when stored, used and communicated by Deneb, in order to protect against access and acquisition by unauthorised person and accidental loss, destruction or damage.
- Data subjects have the right to be notified of security compromises.
- Data subject participation
 - Data subjects have the right to know whether Deneb holds personal information about them, and to access that information.
 - Data subjects have the right to request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information using the prescribed form attached to this manual as **POPIA Form 2 – Schedule 1**.

CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION AND PURPOSE FOR PROCESSING. PAIA 51(1)(c)(i)(ii).

Personal information may only be processed for a specific purpose. The purposes for which Deneb processes or will process personal information, as well as the categories of personal information, is set out below.

- Directors
 - Category of personal information
 - CIPC information

- Tax compliance information
- Postal / street address
- Title and name
- Contact number and / or email address
- Financial and business or operational information
- Purpose
 - Communicate with directors via email, SMS, letter, telephone or any other way about Deneb's services, unless clients indicate otherwise
 - Perform other administrative and operational purposes
 - Comply with Deneb's regulatory and other obligations
 - Verify and updating information
 - Any other reasonably required purpose relating to the Deneb business.
- Employees
 - Category of personal information
 - Name and contact details
 - Identify number and identify documents, including passports
 - Ethnic group
 - Age
 - Gender
 - Marital status
 - Nationality
 - Language
 - Employment history and references
 - Banking and financial details
 - Details of payments to third parties (salary deductions)

- Employment contracts
- Employment equity plans
- Medical aid records
- Pension fund records
- Remuneration / salary records
- Performance appraisals
- Disciplinary records
- Leave records
- Learnership agreements
- Training records
- Purpose
 - Verification of applicant / employees' information during recruitment process
 - General matters relating to employees' pension, medical aid, payroll, disciplinary action and training
 - Comply with Deneb's regulatory and other obligations
 - Any other reasonably required purpose for relating to the employment or possible employment relationship.
- Suppliers
 - Category of personal information
 - Name and contact details
 - Identity and / or company information and director information
 - B-BBEE Certificates
 - Banking and financial information
 - Information about products and services
 - Other information not specified, reasonably acquired to be processed for business purposes.

- Purpose
 - Verifying information and performing checks
 - Purpose relating to the agreement of business relationship or possible agreement or business relationships between the parties
 - Payment of invoices
 - Complying with Deneb regulatory and other obligations
 - Any other reasonably required purpose relating to the Deneb business.

RECIPIENTS OF PERSONAL INFORMATION. PAIA 51(1)(c)(iii).

Recipients of personal information include inter alia:

- Professional advisors, such as law firms, tax advisors or auditors
- Insurers
- Tax and customs, and excise authorities
- Regulatory and other professional bodies
- Public registries of company directors and shareholdings
- Providers of identity verification services
- Credit reference agencies
- The courts, police and law enforcement agencies
- Government departments and agencies
- Service providers
- Support providers.

TRANSBORDER FLOWS. PAIA 51(1)(c)(iv).

Personal information may be transmitted transborder to Deneb suppliers in other countries, and personal information may be stored in data servers hosted outside South Africa, which have data privacy laws consistent or aligned with the requirements of the POPIA.

Comprehensive service level agreements are established with all outsourced IT service providers that provide IT support or software solutions. The Service Level Agreements of the service providers, which deals with, inter alia, key deliverables such as system and user

support, system availability, cyber-risk management, virus protection, data protection, telephony and other general controls, is reviewed annually and its compliance monitored.

SECURITY MEASURES. PAIA 51(1)(c)(v).

Deneb undertakes to implement and maintain data protection measures to accomplish confidentiality, availability and integrity of personal information that is processed and stored.

Deneb has aligned its information security practices to best practice frameworks to ensure adequate organizational and technological measures are in place to protect any personal information stored and processed; and may use alternative practices to adapt to technological security developments, as needed, provided that the above objectives are achieved. Information security policies are in place throughout Deneb regulating, inter alia, the processing and protection of own and third-party information. When required, specialist skills are insourced to assist with information technology services.

SCHEDULE 1 - FORMS

PROMOTION OF ACCESS TO INFORMATION

- Access Requests: Use the prescribed form **PAIA Form 2**

PROTECTION OF PERSONAL INFORMATION

- Data subjects right to object to Deneb's use of their personal information and request deletion of such personal information **POPIA Form 1**.
- Data subjects have the right to request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information using the prescribed form **POPIA Form 2**.

The above forms are available on the website of Information Regulator at www.inforegulator.org.za

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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:

Fax number:

Mark with an "X"

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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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
(Mark the applicable box with an "X")

Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

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:	

FEEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 1

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN
TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2017**
[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

A		DETAILS OF DATA SUBJECT	
Name and surname of data subject:			
Residential, postal or business address:			
	Code ()		
Contact number(s):			
Fax number:			
E-mail address:			
B		DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural):			
Residential, postal or business address:			
	Code ()		
Contact number(s):			
Fax number:			
E-mail address:			

Name of public or private body <i>(if the responsible party is not a natural person)</i> :	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject (applicant)

FORM 2

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF
SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017
[Regulation 3(2)]**

Note:

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A		DETAILS OF THE DATA SUBJECT	
Surname:			
Full names:			
Identity number:			
Residential, postal or business address:			
			Code ()
Contact number(s):			
Fax number:			
E-mail address:			
B		DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (<i>if the responsible party is a natural person</i>):			
Residential, postal or business address:			
			Code ()
Contact number(s):			
Fax number:			
E-mail address:			

Name of public or private body (if the responsible party is not a natural person):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)

* *Delete whichever is not applicable*

Signed at this day of20.....

.....
Signature of Data subject