

TreasuryONE

Optimising Your Cash Flows

PAIA and POPIA Manual

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This PAIA and POPIA Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013

This PAIA and POPIA Manual applies to TreasuryONE (Pty) Ltd, Registration Number: 2000/020822/07 and its Subsidiaries [Refer Section 6 – Scope] (Hereinafter “The TreasuryONE Group”)

Approved:

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CEO

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1. INTRODUCTION

The Promotion of Access to Information Act, 2000 (the “PAIA”) gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless the PAIA expressly states that the records containing such information may or must not be released. This PAIA and POPIA Manual informs requestors of procedural and other requirements which a request must meet as prescribed by the PAIA.

The Protection of Personal Information Act, 2013 (the “POPIA”) provides for:

- (a) promotion the protection of Personal Information processed by public and private bodies;
- (b) certain conditions so as to establish minimum requirements for the processing of Personal Information;
- (c) to provide for the establishment of an Information Regulator to exercise certain powers and to perform certain duties and functions in terms of the POPIA and the PAIA;
- (d) to provide for the issuing of codes of conduct;
- (e) to provide for the rights of persons regarding unsolicited electronic communications and automated decision making;
- (f) to regulate the flow of Personal Information across the borders of the Republic; and
- (g) to provide for matters connected therewith.

Section 14 of the Constitution of the Republic of South Africa, 1996, provides “**that everyone has the right to privacy**”. The right to privacy includes a right to protection against the unlawful collection, retention, dissemination and use of personal information.

The POPIA gives Data Subjects the right to, in the prescribed manner, request a Responsible Party to correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of Personal Information about the Data Subject that the Responsible Party is no longer authorised to retain access and/or request the correction or deletion of any Personal Information held about them that may be inaccurate, misleading or outdated.

The TreasuryONE Group endorses the spirit of the PAIA and POPIA and believes that This PAIA and POPIA Manual will assist requesters in exercising their rights. The PAIA seeks, inter alia, to give effect to the constitutional right of access to any information held by the state or by any other person where such information is required for the exercise or protection of any right. This PAIA Manual was compiled in terms of Section 51 of the PAIA to facilitate access to records held by the TreasuryONE Group. It contains information required by a person wishing to exercise any right, contemplated by the PAIA. It is available in English.

A copy of this PAIA and POPIA Manual is available to the public in a PDF (“Portable Document Format”) version on the TreasuryONE Group website or on request from the Deputy Information Officer referred to in this PAIA and POPIA Manual. This PAIA Manual is also available for inspection, at the office of the offices of the Human Rights Commission at Braampark Forum 3, 33 Hoofd St, Johannesburg, 2017, South Africa and on its website at www.sahrc.org.za.

2. PURPOSE OF PAIA

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.

In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.

Section 9 of the PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- (a) Limitations aimed at the reasonable protection of privacy;
- (b) Commercial confidentiality; and
- (c) Effective, efficient and good governance; and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

This PAIA Manual complies with the requirements of guide mentioned in section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its regulations by private and public bodies.

3. BACKGROUND OF THE COMPANY

The TreasuryONE Group is the leading treasury solutions company in South Africa. In operation since May 2000, with offices in Pretoria and Cape Town. The TreasuryONE Group offers a broad range of best practice treasury solutions to organisations of all sizes. TreasuryONE (Pty) Ltd is an authorised financial services provider (FSP: 22433) and has South Africa Reserve Bank authorisation to act as a foreign exchange intermediary.

The TreasuryONE Group is committed to conducting its business in a manner that ensures long-term sustainability for the benefit of communities and all stakeholders. Sustainability is a continuous journey and requires a multi-disciplinary approach.

3.1 Contact Details TreasuryONE

Name of body:	TreasuryONE (Pty) Ltd
Registration Number:	2000/020822/07
Physical Address:	Lynnwood Bridge Office Park, Bloukrans Building - 1st Floor, Cnr Daventry and Hilden Streets, Pretoria, 0081, Republic of South Africa
Postal Address:	Lynnwood Bridge Office Park, Bloukrans Building - 1st Floor, Cnr Daventry and Hilden Streets, Pretoria, 0081, Republic of South Africa
Telephone Number:	086 111 4088 or +27 12 003 2059
Website:	https://www.treasuryone.co.za

This PAIA Manual complies with the requirements of guide mentioned in section 10 of the PAIA and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Officer will be responsible to regulate compliance with the PAIA and its regulations by private and public bodies.

3.2 Scope

This PAIA and POPIA Manual has been prepared in respect of the TreasuryONE Group.

Group of Companies, which includes the following related entities:

- (a) TreasuryONE (Pty) Ltd (Co Reg: 2000/020822/07)
- (b) TreasuryONE Automation (Pty) Ltd (Co Reg: 2019/301760/07)
- (c) TreasuryONE CTS (Pty) Ltd (Co Reg: 2016/475614/07)
- (d) TreasuryONE Dealing (Pty) Ltd (Co Reg: 2016/304913/07)
- (e) TreasuryONE Investments (Pty) Ltd (Co Reg: 2012/113189/07)
- (f) TreasuryONE Supply Chain Finance Services (Pty) Ltd (Co Reg: 2020/581375/07)
- (g) TreasuryONE Technologies (Pty) Ltd (Co Reg: 2014/113586/07)
- (h) TreasuryONE TMS (Pty) Ltd (Co Reg: 2016/390984/07)
- (i) TreasuryONE Payments HUB (Pty) Ltd (Co Reg: 2021/770016/07)

The scope of PAIA manuals exclude the TreasuryONE Group's operations outside the Republic of South Africa and provide a reference regarding the records held by the TreasuryONE Group at its Registered Office and various operations within the borders of the Republic of South Africa.

4. DETAILS OF THE INFORMATION OFFICER

The Information Officer of the TreasuryONE Group is:

Name:	Shaun De Villiers
Physical Address:	Lynnwood Bridge Office Park, Bloukrans Building - 1st Floor, Cnr Daventry and Hilden Streets, Pretoria, 0081, Republic of South Africa
Postal Address:	Lynnwood Bridge Office Park, Bloukrans Building - 1st Floor, Cnr Daventry and Hilden Streets, Pretoria, 0081, Republic of South Africa
Telephone Number:	086 111 4088 or +27 12 003 2059
E-mail:	PAIA@treasuryone.co.za

- (a) The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information. The head of a private body fulfils such a function in terms of section 51. Adept Advisory has opted to appoint an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of the Act.
- (b) The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.
- (c) The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Adept Advisory as accessible as reasonable possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All request for information in terms of this Act must be addressed to the Information Officer.

5. POLICY WITH REGARD TO CONFIDENTIALITY AND ACCESS TO INFORMATION

The TreasuryONE Group will protect the confidentiality of information provided to it by third parties, subject to the TreasuryONE Group's obligations to disclose information in terms of any applicable law or regulation or a court order requiring disclosure of information. If access is requested to a record that contains information about a third party, the TreasuryONE Group is obliged to attempt to contact such third party to inform him/her/it of the request.

The TreasuryONE Group will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Deputy Information Officer will consider these reasons in determining whether access should be granted to the requestor or not.

6. GUIDE ON HOW TO USE THE PAIA – [SECTION 10]

The Human Rights Commission has been tasked with the administration of the PAIA.

In terms of Section 10 of the PAIA, the Human Rights Commission has compiled a guide which is intended to assist users in the interpretation of the PAIA and how to access the records of private and public bodies and the remedies available in law regarding a breach of any of the provisions of the PAIA.

Should any person have queries or concerns relating to their rights and in particular their right to access information from a private or public body, such queries should be directed to:

The South African Human Rights Commission PAIA Unit	
Address:	Private Bag X2700, Houghton, 2041, Republic of South Africa
Business phone:	+27 11 877 3600
Fax:	+27 11 403 0625
Email address:	section51.paia@sahrc.org.za
Website:	www.sahrc.org.za

7. SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE TREASURYONE GROUP: [SECTION 51(1)(E)]

The list(s) below depict records of information which the TreasuryONE Group has available in terms of laws applicable to the TreasuryONE Group and its Subsidiary companies listed under section 5 above (jointly referred to as the TreasuryONE Group):

(a) Corporate Secretariat and Governance:

- ✓ Applicable Statutory Documents
- ✓ Policies and Procedures
- ✓ Code of Conduct
- ✓ Records relating to the appointment of directors and auditor
- ✓ Health & Safety Records
- ✓ Share Certificates
- ✓ Legal Compliance Records
- ✓ Share Register and other statutory registers

- ✓ Memoranda of Incorporation
- ✓ Statutory Returns to Relevant Authorities

(b) Finance and Taxation:

- ✓ Accounting Records
- ✓ Leases
- ✓ Annual Financial Statements
- ✓ PAYE Records
- ✓ Audit Reports
- ✓ Payment Terms
- ✓ Banking Records Bank Statements
- ✓ Records of payments made to SARS on behalf of employees
- ✓ Business Plan and Budgets
- ✓ Tax Records and Returns
- ✓ Debtors and Creditors Statements and Invoices
- ✓ Transaction Records
- ✓ Documents issued to employees for income tax purposes
- ✓ Treasury Dealing
- ✓ Electronic banking records
- ✓ All other statutory compliances
 - Income Tax Returns
 - Skills Development Levies Returns
 - UIF Returns
 - VAT Returns
- ✓ General Ledger and Sub Ledgers
- ✓ Workmen's Compensation Returns
- ✓ General Ledger Reconciliations

(c) Personnel Documents and Records:

- ✓ CV's, application details
- ✓ Job Profiles
- ✓ Disciplinary Code and Records
- ✓ Leave Records
- ✓ Disciplinary Procedures and CCMA matters
- ✓ Letters of Appointment and Employment Contracts
- ✓ EE Submissions
- ✓ Organisational Structures
- ✓ Employee Benefit Records
- ✓ PAYE Returns
- ✓ Employment Contracts

- ✓ Payroll Reports
- ✓ Employee FSCA Compliance Documents
- ✓ Performance Records
- ✓ Employee Information
- ✓ Personal Records
- ✓ Employee Relations
- ✓ Psychometric Assessments
- ✓ Employee Termination documentation
- ✓ Qualifications
- ✓ Forms and Applications
- ✓ SDL Returns
- ✓ Grievance Procedure
- ✓ Training and Development
- ✓ Group HR Policies and Procedures
- ✓ UIF Returns
- ✓ IRP5's

(d) Information Technology and Infrastructure:

- ✓ Disaster Recovery Policy and Plans
- ✓ Root Cause Analyses
- ✓ Facilities
- ✓ Security Access
- ✓ ICT Policies, Standards, Procedures and Templates
- ✓ Software Licences
- ✓ Information, Communication and Technology Policies
- ✓ Supplier Agreements/ Vendor Agreements

(e) Intellectual Property:

- ✓ Intellectual property pertaining to solutions and products develop
- ✓ Know-how

(f) Corporate Affairs and Investor Relations / Communications:

- ✓ Media Releases
- ✓ Newsletters and Publications

(g) Legal:

- ✓ Agreement and Contracts
- ✓ Health and Safety Records

(h) Sales, Marketing and Communication:

- ✓ Actual Sales
- ✓ Press releases / Communique
- ✓ Branding

- ✓ Products and Services Brochures
- ✓ External Publications
- ✓ Proposals and Tenders
- ✓ Marketing Brochures
- ✓ Media and Advertising
- ✓ Media and Advertising
- (i) Business Interactions with other entities:
 - ✓ Agreements with third parties (Clients, Vendors and Suppliers)
 - ✓ Licensing and Support Agreements
 - ✓ Customer Satisfaction Surveys
 - ✓ Service Level Agreements
- (j) Insurance:
 - ✓ Insurance Declarations
 - ✓ Insurance Claim Files
 - ✓ Insurance Policies
- (k) Regulatory:
 - ✓ Applications
 - ✓ Registrations
 - ✓ Licenses
 - ✓ Submissions

8. RECORDS AUTOMATICALLY AVAILABLE – [SECTION 51(1)(C)]

At this stage, no notice(s) has/have been published in terms of section 52 of the PAIA on the categories of records that are automatically available without a person having to request access in terms of the PAIA.

Records that are is automatically available at the registered office of the TreasuryONE Group on payment of the prescribed fee for reproduction:

- (a) Records of the TreasuryONE Group lodged in terms of government requirements such as the Registrar of Deeds;
- (b) Documentation and information relating to the TreasuryONE Group which is held by the Companies and Intellectual Properties Commission (CIPC) in accordance with the requirements set out in section 25 of the Companies Act 71 of 2008;
- (c) Services and Product Brochures;
- (d) Market Reports; and
- (e) News and other Marketing Information.

Certain other information relating to the TreasuryONE Group is also made available on said website from time to time.

9. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION: [SECTION 51(1)(D)]

Records are kept in accordance with such other legislation as applicable to the TreasuryONE Group, which includes, but is not limited to:

- (a) Arbitration Act 42 of 1965
- (b) Banks Act 94 of 1990
- (c) Basic Conditions of Employment Act 75 of 1997
- (d) Broad-Based Black Economic Empowerment Act 53 of 2003
- (e) Companies Act 61 of 1973
- (f) Compensation for Occupational Injuries and Diseases Act 130 of 1993
- (g) Competition Act 89 of 1998
- (h) Constitution of South Africa Act 108 of 1996
- (i) Consumer Protection Act 68 of 2008
- (j) Copyright Act 98 of 1987
- (k) Criminal Procedure Act 51 of 1977
- (l) Currency and Exchanges Act 9 of 1933
- (m) Debt Collectors Act 114 of 1998
- (n) Electronic Communications and Transactions Act 25 of 2002
- (o) Employment Equity Act 55 of 1998
- (p) Financial Intelligence Centre Act 38 of 2001
- (q) Income Tax Act 58 of 1962
- (r) Insider Trading Act 135 of 1998
- (s) Intellectual Property Laws Amendments Act 38 of 1997
- (t) Labour Relations Act 66 of 1995
- (u) Occupational Health and Safety Act 85 of 1993
- (v) Prevention of Organised Crime Act 14 of 1998
- (w) Promotion of Access to Information Act 2 of 2000
- (x) Protected Disclosures Act 26 of 2000
- (y) Unemployment Contributions Act 4 of 2002
- (z) Unemployment Insurance Act 63 of 2001
- (aa) Value Added Tax Act 89 of 1991

While the TreasuryONE Group has used its best endeavours to supply you with a list of applicable legislation it is possible that the above list may be incomplete. Wherever it comes to the TreasuryONE Group's attention that existing or new legislation allows a requester access on a basis other than that set out in the PAIA, we shall update the list accordingly.

If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

10. PARTICULARS IN TERMS OF SECTION 51 OF THE PAIA

On 9 March 2001, the PAIA came into effect. The PAIA seeks to advance a culture of transparency and accountability in both public and private bodies. The legislation was enacted as a direct response to Section 32(2) of the Constitution of South Africa – the right of access to information – which requires that the Government implements laws in an effort to make information pertaining to public and private bodies more accessible to all.

The PAIA gives effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of the PAIA, the body to whom the request is made is obliged to release the information, except where the PAIA expressly provides that the information may or must not be released.

One of the main requirements specified in the PAIA is the compilation of a manual that provides information on both the types and categories of records held by the public or private body. In terms of the PAIA, the TreasuryONE Group is regarded as a “private body” and therefore the requirements regarding access must be in compliance with the provisions of the PAIA relevant to private bodies and more in particular Section 51 of the PAIA.

In compliance with Section 51 of the PAIA this PAIA Manual sets out the following details:

- (a) The TreasuryONE Group’s contact details including, physical and postal addresses, telephone and fax numbers, electronic mail address of the person tasked in terms of this Code of Conduct;
- (b) Information on how to obtain and access this Code of Conduct and a guide on how to use it;
- (c) Categories of information held by the TreasuryONE Group that is available without a person having to formally request such details in terms of the PAIA;
- (d) Categories of information held by the TreasuryONE Group that is available in accordance with other legislation and which, subject to the PAIA, may be made available by the TreasuryONE Group on receipt of and consideration of a formal request, made in terms of the PAIA;
- (e) Sufficient information to facilitate a request for access to records and a description of the subjects on which records are available from the TreasuryONE Group;

Adherence to these requirements entails not only compilation of the external manual but also compliance with the general provisions stated in the PAIA.

11. RECORDS THAT ARE NOT AUTOMATICALLY AVAILABLE

Records of the TreasuryONE Group which are not automatically available must be requested in terms of the procedure set out in section 8 of this PAIA Manual and which may be subject to the restrictions and right of refusal to access as provided for in the PAIA.

11.1 Request procedure

- (a) Please be aware that the TreasuryONE Group is very concerned about protecting the confidential information of its Data Subjects. Please motivate any request for Personal Information very carefully, having regard to the POPIA
- (b) Any person making a request for access to records of the TreasuryONE Group is referred to as a “requester”.

- (c) The requester must comply with all the procedural requirements contained in the PAIA relating to the request for access to records.
- (d) The requester must complete the prescribed form application form attached hereto as **Annexure A** marked **Form C** and submit the form as well as payment of the request fee and a deposit, if applicable, to the Deputy Information Officer of the TreasuryONE Group at the postal or physical, fax or electronic mail address as stated above.
- (e) The prescribed form must be filled in with sufficient particulars to at least enable the Deputy Information Officer of the TreasuryONE Group to identify:
 - ✓ record or records requested;
 - ✓ identity of the requester;
 - ✓ which form of access is required, if the request is granted; and
 - ✓ postal address, telephone number and fax number of the requester.
- (f) The requester must state that he/she requires the information to exercise or protect her/his right and clearly state what the nature of the right is to be exercised or protected. In addition, the requester must clearly specify why the records are necessary to exercise or protect such a right.
- (g) Such request must be processed within 30 (thirty) days after the request has been received.
- (h) The requester shall be informed whether the access has been granted or denied within 30 (thirty) days of receipt of the request and give notice with reasons to that effect.
- (i) The 30 (thirty) day period within which the TreasuryONE Group has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 (thirty) days if the request is for a vast amount of information, or the information cannot reasonably be obtained within the original 30 (thirty) day period. The Deputy Information Officer will notify the requester in writing should an extension be sought.
- (j) If the request for access is granted, the Deputy Information Officer of the TreasuryONE Group must advise the requestor:
 - ✓ the access fee (if any) to be paid upon access;
 - ✓ the form in which access will be given; and
 - ✓ that the requester may lodge an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging the application.
- (k) If the request for access is refused, the Deputy Information Officer of the TreasuryONE Group must:
 - ✓ state adequate reasons for the refusal, including the provisions of this Act relied on;
 - ✓ exclude, from any such reasons, any reference to the content of the record; and
 - ✓ state that the requester may lodge an application with a court against the refusal of the request, and the procedure (including the period) for lodging the application.
- (l) In terms of Section 54 of the PAIA, if all reasonable steps have been taken to find the record requested and there are reasonable grounds to believe that the record is in possession of the TreasuryONE Group but cannot be found, and if it does not exist, then the Deputy Information Officer of the TreasuryONE Group must notify by way of affidavit or affirmation, the requester that it is not possible to give access to that record.
- (m) If after notice is given, the record in question is found, the requester must be given access thereto unless the ground for the refusal of access exists.

- (n) If the request is declined for any reason the notice must include adequate reasons for the decision, together with the relevant provisions of the PAIA relied upon and provide the procedure to be followed should the requester wish appeal the decision.
- (o) Section 59 provides that the Deputy Information Officer of the TreasuryONE Group may serve a record and grant access only to that portion which the law does not prohibit access to.
- (p) The requester must pay the prescribed fee, before any further processing can take place.

11.2 Fees

- (a) The PAIA provides for two types of fees, namely:
 - ✓ (a) A request fee, which will be a standard fee; and
 - ✓ (b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and costs, as well as postal costs.
- (b) When the request is received by the Deputy Information Officer of the TreasuryONE Group, such person shall by notice require the requester to pay the prescribed request fee, if any, before further processing of the request.
- (c) If a requester requires access to records of his/her Personal Information, there shall be no request fee payable. However, the requester must pay the prescribed access and reproduction fees for such Personal Information.
- (d) If the search for the record has been made and the preparation of the record for disclosure including arrangements to make it available in the request form, requires more than the hours prescribed in the regulations for this purpose, the Deputy Information Officer of the TreasuryONE Group shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
- (e) The Deputy Information Officer of the TreasuryONE Group shall withhold the record until the requester has paid the fees as indicated in Annexure B hereto.
- (f) A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the records for disclosure including making arrangements to make it available in the request form.
- (g) If a deposit has been paid in respect of a request for access, which is refused, then the Deputy Information Officer of the TreasuryONE Group must repay the deposit to the requester with interest at the prescribed rate.

11.3 Third parties

- (a) If the request is for the record pertaining to the third party, the Deputy Information Officer of the TreasuryONE Group must take all reasonable steps to inform the third party of the request. This must be done within 21 (twenty-one) days of receipt of the request. The manner in which this is done must be by the fastest means reasonably possible, but if orally, the Deputy Information Officer of the TreasuryONE Group must thereafter give the third party a written confirmation of the notification.
- (b) The third party may within 21 (twenty-one) days thereafter either make representation to the TreasuryONE Group as to why the request should be refused; alternatively grant written consent to the disclosure of the record.
- (c) The third party must be advised of the decision taken by the Deputy Information Officer of the TreasuryONE Group whether to grant or to decline the request. A third party who is dissatisfied with the Deputy Information Officer of the TreasuryONE Group's decision to grant

a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

12. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF SECTION 62 – 69 OF THE PAIA

The TreasuryONE Group has the right to refuse access to information on one or more of the following grounds:

- (a) Mandatory protection of the privacy of a third party who is a natural person, if such disclosure would involve the unreasonable disclosure of Personal Information about a third party, including a deceased individual, subject to the provisions of section 63 (2).
- (b) Mandatory protection of the commercial information of a third party, if the record contains:
 - ✓ Trade secrets of that party;
 - ✓ Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interest of that third party;
 - ✓ Information disclosed in confidence by a third party, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - ✓ Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- (c) Mandatory protection of certain confidential information of third party, where the head of a private body must refuse a request for access to a record of the body if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.
- (d) Mandatory protection of the safety of individuals and the protection of property, where such disclosure could endanger the life or physical safety of an individual, or prejudice or impair the security of:
 - ✓ a building, structure or any system
 - ✓ a means of transport, or
 - ✓ any other property.
- (e) Mandatory protection of records, which would be regarded as privileged from production in legal proceedings.
- (f) Commercial information of private body, in that a request for access to a record may be refused if the record contains:
 - ✓ trade secrets, financial, commercial, scientific or technical information of the institution, which disclosure, could likely cause harm to the financial or commercial interest of the institution;
 - ✓ Information which, if disclosed could prejudice or put the institution at a disadvantage in negotiations or commercial competition; and
 - ✓ A computer program which is owned by the institution and which is protected by copyright.
- (g) Mandatory protection of research information of the institution. A request will be refused if this disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the researcher at a serious disadvantage.
- (h) Mandatory disclosure in public interest. Despite any of the protections mentioned above, the Director of the TreasuryONE Group shall grant a request for access to a record if:
 - ✓ the disclosure of the record would reveal evidence of-

- (i) a substantial contravention of, or failure to comply with, the law; or
- (ii) imminent and serious public safety or environmental risk; and
- ✓ the public interest in the disclosure of the record clearly outweighs the harm contemplated in the provision in question.

13. APPEAL – REMEDIES [SECTION 57(1)]

The TreasuryONE Group does not have an internal appeal procedure. As such, the decision made by the Deputy Information Officer of the TreasuryONE Group is final and requesters will have to exercise such external remedies at their disposal if the request for information is refused and the requester is not satisfied with the answer supplied by the Deputy Information Officer of the TreasuryONE Group.

If a requester is aggrieved by the refusal of the Deputy Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Deputy Information Officer's decision, apply to court for appropriate relief.

The court will review the request and decide whether in fact the Deputy Information Officer of the TreasuryONE Group should give the requester the information requested or not. A court hearing an application in terms of the PAIA may grant any order that is just and equitable including orders:

- (a) confirming, amending or setting aside the decision which is the subject of the application;
- (b) requiring the Deputy Information Officer of the TreasuryONE Group or relevant authority of a public body or the head of a private body to take such action or to refrain from taking such action, as the court considers necessary within the period mentioned in the court order;
- (c) granting an interdict, interim or specific relief, a declaratory order or compensation; or
- (d) granting an order as to costs.

FORM C

**Request for access to records of TreasuryONE (Pty) Ltd Registration Number
2000/020822/07**

Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000)

A. Particulars of TreasuryONE

The Deputy Information Officer
TreasuryONE Proprietary Limited
Lynnwood Bridge Office Park
Bloukrans Building - 1st Floor
Cnr Daventry and Hilden Streets
Pretoria, 0081
Republic of South Africa

E-mail address: PAIA@treasuryone.co.za

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the records must be recorded below.
- (b) Furnish an address and/or fax number in the Republic South Africa to which information must be sent must be given.
- (c) Proof of identity and the capacity in which the request is made must be attached.

Full names and surname:					
Identity Number:					
Postal address:					
Telephone number:	()		Fax Number:	()	
E-mail address:					

Capacity in which request is made, when made on behalf of another person:

--

C. Particulars of person on whose behalf request is made:

This section must be completed *ONLY* if a request for information is made on behalf of another person.

Full names and surname:					
Identity Number:					
Postal address:					
Telephone number:	()		Fax Number:	()	
E-mail address:					

D. Particulars of record:

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. **[The requester must sign all the additional folios.]**

1. Description of record or relevant part of the record:

--

2. Reference number, if available:

--

3. Any further particulars of record:

--

E. Fees

- (a) A request for access to a record, other than record containing Personal Information about yourself, will be processed only after a **request fee** has been paid.
- (b) You will be notified of the amount required to be paid.

- (c) 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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Note: Refer Annexure A for Fees

Reason for exemption from payment of fees:

--

F. Form of Access to record

If you are prevented by a disability from reading, viewing or listening to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:		Form in which record is required:	
Mark the appropriate box with an X.			
NOTES: (a) Your indication as to the required form of access depends on the form in which the record is available. (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.			

1. If the record is in written or printed form:					
	Copy of record*		Inspection of record		
2. If record consists of visual images: (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)					
	View the images		Copy of the images*		Transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	Listen to the soundtrack (audio cassette)		Transcription of soundtrack* (written or printed document)		

4. If record is held on computer or in an electronic or machine-readable form:					
	Printed copy of record		Printed copy of information derived from		Copy in computer readable form* (memory stick)
* If you requested a copy or transcription of a record (above), do you wish for a copy or transcription to be posted to you? A <i>postal fee is payable</i> .					Yes No

G. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED:

If the provided space is inadequate, please continue on a separate folio and attach it to this form. [***The requester must sign all the additional folios***]

1. Indicate which right is to be exercised or protected:

--

2. Explain why the requested record is required for the exercising or protection of the aforementioned right:

--

H. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS:

You will be notified in writing whether your request has been approved/denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

1. How would you prefer to be informed of the decision regarding your request for access to the record?

--

Signed at _____ this _____ day of _____ 20____.

Signature of Requester /

Person on whose behalf request is made

ANNEXURE B**Fees in respect of Private Bodies**

1. The fee for a copy of the manual as contemplated in regulation 9(2) (c) is R1.10 for every photocopy of an A4-size page or part thereof.
2. The request fee payable by a requester referred to in section 54(1) of the PAIA is R50.00. People who are requesting access to their Personal Information are exempt from paying a request fee – all other fees are the same.
3. The “fees for reproduction” referred to in section 52(3) and “access fees” payable by a requester referred to in section 54(7), unless exempted under section 54(8) of the PAIA, are as follows:

(a) For every photocopy of an A4-size page or part thereof	R1.10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
(c) For a copy in a computer-readable form on memory stick	R70.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40.00
(ii) For a copy of visual images	R60.00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R20.00
(ii) For a copy of an audio record	R30.00

- (2) For purposes of section 54(2) of the PAIA, the following applies:
 - (a) six hours as the hours to be exceeded before a deposit is payable; and
 - (b) one third of the access fee is payable as a deposit by the requester.
- (3) The actual postage is payable when a copy of a record must be posted to a requester.
- (4) The banking details to be used are as follows:

Pay: TreasuryONE (Pty) Ltd
 Bank: FNB
 Name: TreasuryONE (Pty) Ltd
 Current Account: Cheque
 Branch Code: 252-045
 Branch Name: Lynnwood
 Account Number: 62117037037
 Swift Code: FIRNZAJJ
 Reference: PAIA + surname

- (5) Person or persons exempted from paying access fees: -
 - (a) A single person whose annual income does not exceed R14,712.00; or
 - (b) Married persons or a person and his/her life partner whose annual income does not exceed R27,192.00

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