PROMOTION OF ACCESS TO INFORMATION MANUAL

A MANUAL PREPARED IN ACCORDANCE WITH
SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000 AS AMENDED

AND

PROTECTION OF PERSONAL INFORMATION ACT, NO 4 OF 2003 AS AMENDED

The Palamo Group

2026/2027

1. Introduction

1.1. The Palamo PAIA Manual, as defined below, has been prepared in accordance with section 51 of the Promotion of Access to Information Act No. 2 of 2000, as amended ("**PAIA**") and to address requirements of Protection of Personal Information Act, No 4 of 2013, as amended ("**POPIA**").

1.2. PAIA was promulgated during March 2001 and was primarily put into place to actively promote a society in which the people of South Africa have effective access to information, which enables them to more fully exercise and protect their rights.

1.3. The Information Regulator is responsible for compiling a guide that provides details on how to use PAIA.

1.4. The Information Regulator's guide can be downloaded from the following link: https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-

1.5. In terms of Section 51(1) of PAIA, private bodies are required to compile a manual that provides information regarding the subjects and categories of records held by such private bodies. This Manual, being the Palamo PAIA Manual, is intended to fulfil this requirement. Accordingly, this Manual provides a reference to the records Palamo holds and the process that needs to be adopted by persons and/or entities to access such records. All requests for access to information should be addressed to the contact person as identified in section 6.2 of this Manual, as he/she is Palamo's Information Officer.

1.6. The Palamo PAIA Manual may be amended from time to time and as soon as any amendments have been effected, the latest version of the Palamo PAIA Manual will be published and distributed in accordance with PAIA.

1.7. A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.

1.8. A copy of the Palamo PAIA Manual will be available for inspection at:

1.8.1. Palamo's registered head office (details of which are set out in 6.5 below); and

1.8.2. the offices of the Information Regulator.

1.9. Palamo adopted this Manual on 1 March 2022.

2. Scope

This Manual has been prepared in respect of Palamo. This Manual applies to all persons and entities who, by virtue of their relationship with Palamo, have access to Personal Information. This includes but is not limited to, employees, contractors, consultants, service providers, board

members, and other third parties acting on behalf of or in partnership with Palamo. Adherence to this Manual is compulsory and non-compliance may lead to disciplinary action, legal liability, or termination of the business relationship.

3. Purpose

3.1 The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within Palamo 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.

3.2 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.

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

3.3.1 limitation aimed at the reasonable protection of privacy;
3.3.2 commercial confidentiality;
3.3.3 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.

3.4 This Manual complies with the requirements of the guide contained in section 10 of the PAIA Act and recognizes that upon commencement of POPIA, that the appointed Information Regulator will be responsible to regulate compliance with the PAIA Act and its regulations by private and public bodies.

4. Definitions

4.1. The following words or expressions will bear the following meanings in this Manual –

4.1.1. "**Client**" means a natural or juristic person who or which receives professional services from Palamo;

4.1.2. "**Correspondence**" means any written and/or electronic communication exchanged between two or more parties;

4.1.3. "**Employee**" means any person who works for, or provides services to, or on behalf of Palamo, and receives or is entitled to receive remuneration;

4.1.4. "**Information Officer**" means the head of the body or any of the designated information officers described in this Manual;

4.1.5. "**Manual**" or "**Palamo PAIA Manual**" means this manual, together with all annexures thereto, as amended from time to time;

4.1.6. "**PAIA**" means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;

4.1.7. "**PAIA Guide**" means the guide issued by the Information Regulator providing detail to potential Requesters on how to use PAIA;

4.1.8. "**Palamo**" means Palamo Holdings Proprietary Limited (registration number 2021/351329/07), Palamo Fund Managers Proprietary Limited (registration number: 2021/373343), Palamo Investment Partners Proprietary Limited (registration number: 2021/357625) private companies duly incorporated in accordance with the laws of the Republic of South Africa, and its subsidiaries which renders corporate finance advisory and related services to Clients;

4.1.9. "**Private Bodies**" include a natural person or partnership that carries on trade, business or profession; and a former or existing juristic person;

4.1.10. "**POPIA**" means the Protection of Personal Information Act, No 4 of 2013;

4.1.11. "**Request**" means a request for access to information and/or records relating to Palamo, which Request complies with the requirements established pursuant to PAIA and this Manual;

4.1.12. "**Requester**" means any person or entity requesting access to a record that is under the control of Palamo;

4.1.13. "**SAHRC**" means the South African Human Rights Commission;

4.1.14. "**South Africa**" means the Republic of South Africa.

5. How to access information

5.1. PAIA grants a Requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request in terms of PAIA, the public body must be acting in the public interest.

5.2. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and against payment of the prescribed fees.

5.3. As set out in paragraph 1.4 above, the PAIA Guide must be used by a Requester to the extent that a Requester wishes to use PAIA to obtain information.

5.4. Sections 110 and 114(4) of POPIA states that the SAHRC will be replaced as the Regulator under PAIA and will be replaced with the Information Regulator. The Information Regulator will take over the PAIA functions from SAHRC on such date as agreed to between the parties. Until then requests to access records of a private body can be made to the SAHRC or to the Information Regulator:

THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION
PAIA Unit
Research and Documentation Department
Postal Address: Private Bag 2700 Houghton 2041 South Africa
Tel: +27 (0)11 877 3600
Fax: +27 (0)11 403 0625
Email: paia@sahrc.org.za
Website: www.sahrc.org.za

THE INFORMATION REGULATOR
Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
Tel: +27 (0)12 406 4818
Email: inforeg@justice.gov.za
Website: www.justice.gov.za/inforeg

6. Palamo

6.1. Palamo is a private equity fund.

6.2. Palamo operates primarily within South Africa.

6.3. The Information Officer appointed in terms of PAIA also refers to the Information Officer as referred to in POPIA. The Information Officer oversees the functions and responsibilities as required for in terms of both PAIA as well as the duties and responsibilities in terms of section 55 of POPIA after registering with the Information Regulator.

6.4. The Information Officer may appoint, where it deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of PAIA as well as section 56 of POPIA.

6.5. Palamo, Information Officer and Deputy Information Officer contact details:

NAME OF COMPANY:	**PALAMO HOLDINGS PROPRIETARY LIMITED**		
PHYSICAL ADDRESS:	**Pretoria Office:**	Die Groenhuis, 38 Garsfontein Road, Waterkloof, Pretoria, 0145	
POSTAL ADDRESS:		Suite 65, Private Bag X4, Menlo Park, 0102	
MANAGING DIRECTOR:	Lufuno Makhari	**Tel:** **Cell:** **Email:**	0128802490 0726203415 lufuno@palamopartners.com
INFORMATION OFFICER:	Lufuno Makhari	**Tel:** **Cell:** **Email:**	0128802490 0726203415 lufuno@palamopartners.com

DEPUTY INFORMATION OFFICER:	Robyn van Heerden	**Tel:** **Cell:** **Email**	0128802490 0825910714 robyn@pallidus.co.za
WEBSITE:	www.palamo.co.za		

7. Subjects and Corresponding Categories of Records

7.1. Pallidus' records can be found in various formats, including electronic and paper. In terms of PAIA, access must be granted irrespective of the form or medium.

7.2. To facilitate the easy identification of the records of Pallidus, the records have been categorised per subject area.

7.3. The tables below provide an indication of the subjects of information and the corresponding categories:

SUBJECT: FINANCE	ITEM DESCRIPTION
	• Audited financial statements
	• Tax records (relating to companies and individual employees)
	• Asset register
	• General correspondence
	• Management accounts and records
	• Budgets
	• Financial transactions
	• Banking records
	• Contracts
	• Financial policies and procedures
	• Risk management records
	• Statutory returns records
	• Cash flow forecasts
	• Shareholder registers
SUBJECT: HUMAN RESOURCES ("HR")	**ITEM DESCRIPTION**
	• Employee records
	• Employment contracts
	• Personnel guidelines, policies and procedures
	• General correspondence
	• Employment equity records
	• Provident fund records
	• Employee benefit records
	• Labour relations records
	• Statutory labour related records
	• Employee training records

SUBJECT: INVESTMENTS	ITEM DESCRIPTION
	• Basic introductory information on the respective investments made
	• Management accounts
	• Contact information
	• Non-disclosure agreements
	• Investment analysis
	• Shareholder information
SUBJECT: MOVABLE AND IMMOVABLE PROPERTY	**ITEM DESCRIPTION**
	• Agreements of lease of immovable property
	• Records regarding insurance in respect of movable property
	• Records regarding insurance in respect of immovable property
SUBJECT: COMPANIES' RECORDS	**ITEM DESCRIPTION**
	• Copies of all memoranda of incorporation
	• All relevant company secretarial information

7.4. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA Manual.

7.5. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before Pallidus will consider access.

8. Records that can be accessed without a formal request (i.e a formal request as defined in PAIA)

8.1. Palamo does not hold any information that is available for general public access.

8.2. Records of a public nature, typically those disclosed on the Palamo website may be accessed without the need to submit a formal application.

8.3. Other non-confidential records, such as statutory records maintained at Companies and Intellectual Property Commission, may also be accessed without the need to submit a formal application. However, please note that an appointment to view such records will still have to be made with the Information Officer.

8.4. Where applicable to its operations, Palamo retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA and POPIA or in terms of the below mentioned legislation and applicable internal policies, should such interested parties be entitled to such information.

8.5. In terms of the following Acts, we are required to ensure that certain categories of records are available for access as prescribed by each Act:

8.5.1. Basic Conditions of Employment Act, No. 75 of 1997;
8.5.2. Companies Act, No. 61 of 1973, as amended (repealed);
8.5.3. Companies Act, No. 71 of 2008, as amended;
8.5.4. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
8.5.5. Competition Act, No. 89 of 1998;
8.5.6. Consumer Protection Act, No. 68 of 2008;
8.5.7. Currency and Exchanges Act, No. 9 of 1933;
8.5.8. Electronic Communications and Transactions Act, No. 25 of 2002;
8.5.9. Employment Equity Act, No. 55 of 1998;
8.5.10. Financial Intelligence Centre Act, No. 38 of 2001;
8.5.11. Income Tax Act, No. 58 of 1962 (Section 75) (repealed);
8.5.12. Labour Relations Act, No. 66 of 1995;
8.5.13. Medical Schemes Act, No. 131 of 1998;
8.5.14. National Credit Act, No. 34 of 2005;
8.5.15. Occupational Health and Safety Act, No. 85 of 1993;
8.5.16. Regulation of Interception of Communications Act, No. 70 of 2002;
8.5.17. Skills Development Act, No. 97 of 1998;
8.5.18. Skills Development Levies Act, No. 9 of 1999;
8.5.19. Trade Marks Act, No. 194 of 1993;
8.5.20. Unemployment Insurance Act, No. 63 of 2001;
8.5.21. Unemployment Insurance Contributions Act, No. 4 of 2002; and

8.5.22. Value Added Tax Act, No. 89 of 1991.

8.6. Notification of the availability of these records in terms of these Acts has not yet been given to the Cabinet Minister of Justice.

8.7. Please note that while Palamo has made every effort to identify all pertinent legislation, we cannot guarantee that all legislation has been included. Should you be aware of any specific legislation that should be included, and which has been omitted, please contact our Information Officer. Your assistance in this regard will be most appreciated.

9. Procedure to be followed when submitting a formal request to access information

9.1. Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA. A request for access to a Record that does not fall within the categories identified in Section 8.4 of this manual must be done formally either via conventional mail, or e-mail**.**

9.2. The Requester must use the prescribed format (Government Notice Number 187, Regulation 6) to make the request for access to a Record. This must be made to the Information Officer at the address, or electronic mail address of the body concerned. The Request must be accompanied by the prescribed request fee (refer to Section 11 of the Manual in this regard).

9.3. The Information Officer will respond to a request within 30 days of receiving same, which response shall indicate whether the Request for access to information has been granted or not.

9.4. Please note that a Request for access to information can be refused in the event that the Request does not comply with the procedural requirements of PAIA. In addition, the successful completion and submission of an access Request form does not automatically allow the Requestor access to the requested record.

9.5. The Requester must provide sufficient detail on the Request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, or email address.

The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.

9.6. If a Request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the Information Officer.

9.7. If a Request for access to information has been granted, Palamo's response will include:

9.7.1. an indication of the access fee that should be paid upon gaining access (if any);
9.7.2. an indication of the form in which the access will be granted; and
9.7.3. a notice that you may lodge an application with the court against the access fee to be paid or the form of the access, including guidance on the procedure for lodging the application.

9.8. If a Request for access to information has not been granted, Palamo's response will include:

9.8.1. adequate reasons for the refusal; and

9.8.2. notice that you may lodge an application with the court against the extension and the procedure including the period, for lodging the application. For details on the procedure, please refer to Chapter 2 of Part 4 PAIA.

9.9. Assuming your Request of access is granted, you will be able to gain access to the requested Records as soon as is reasonably possible and once the access fee has been paid.

9.10. Access will be granted to a record if the following criteria are fulfilled:

9.10.1. the record is required for the exercise or protection of any right;
9.10.2. the Requestor complies with the procedural requirements in PAIA relating to a Request; and
9.10.3. access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of PAIA.

10. Denial for a request to access information

10.1. A Request for access to information may be refused and/denied under limited circumstances, including:

10.1.1. The main grounds for Palamo to refuse a request for information relate to the:

10.1.1.1. mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;

10.1.1.2. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, to comply with the provisions of POPIA;

10.1.1.3. mandatory protection of the commercial information of a third party (section 64 of PAIA) if the record contains:

10.1.1.3.1. trade secrets of the third party;

10.1.1.3.2. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; or

10.1.1.3.3. information disclosed in confidence by a third party to Palamo, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;

10.1.1.4. mandatory protection of confidential information of third parties (section 65 of PAIA) if it is protected in terms of any agreement;

10.1.1.5. mandatory protection of the safety of individuals and the protection of property (section 66 of PAIA);

10.1.1.6. mandatory protection of records which would be regarded as privileged in legal proceedings (section 67 of PAIA);

10.1.1.7. the commercial activities (section 68 of PAIA) of a private body, such as Palamo, which may include:

10.1.1.7.1. trade secrets of the Palamo;

10.1.1.7.2. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Palamo;

10.1.1.7.3. information which, if disclosed could put Palamo at a disadvantage in negotiations or commercial competition;

10.1.1.7.4. a computer program which is owned by Palamo, and which is protected by copyright; or

10.1.1.7.5. the research information (section 69 of PAIA) of Palamo or a third party, if its disclosure would disclose the identity of Palamo, the researcher or the subject matter of the research and would place the research at a serious disadvantage; or

10.1.1.7.6. requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

10.1.2. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

10.1.3. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the Requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the PAIA Act. If the record should later be found, the Requester shall be given access to the record in the manner stipulated by the Requester in the prescribed form, unless the Information Officer refuses access to such record.

11. Fees

11.1. PAIA provides for 2 (two) types of fees, namely:

11.1.1. a request fee, which is a form of administration fee to be paid by all Requesters except personal requesters, before the request is considered and is not refundable; and

11.1.2. an access fee, which is paid by all Requesters in the event that a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the Requester.

11.2. When the request is received by the Information Officer, such officer shall by notice require the Requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1) of the PAIA Act).

11.3. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer 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.

11.4. The Information Officer shall withhold a record until the Requester has paid the fees as indicated below.

11.5. A Requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process 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 record for disclosure including making arrangements to make it available in the request form.

11.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the Requester.

11.7. **Reproduction Fee**

11.7.1. Where Palamo has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question, which will be as follows:

Access Fees for Reproduction of Information (s52 Requests)	**Fees to be Charged**
Information in an A-4 size page photocopy or part thereof	R 2,00
A printed copy of an A4-size page or part thereof	R 2,00

A copy in computer-readable format, on: (i) flash drive (to be provided by requestor (ii) compact disc - If provided by requestor - If provided to be requestor	R40,00 R40,00 R60,00
A transcription of visual images, in an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
A copy of visual images	Service to be outsourced, will depend on quotation from service provider.
For a transcription of an audio record, for an A4-size page	R24,00
Copy of an audio record, per A4-size page (i) flash drive (to be provided by requestor (ii) compact disc - If provided by requestor - If provided to be requestor	R40,00 R40,00 R60,00
Request Fees & Fees (s53 Requests)	**Fees to be Charged**
For every photocopy/printed black and white copy of an A4- size page or part thereof	R2,00
For every printed copy of an A4-size page or part thereof	R2,00

For copy in a computer-readable form on: (iii) flash drive (to be provided by requestor) (iv) compact disc - If provided by requestor - If provided to be requestor	 R40,00 R40,00 R60,00
For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced, will depend on quotation from service provider.
For a copy of visual images	Service to be outsourced, will depend on quotation from service provider.
For a transcription of an audio record, for an A4-size page	R24,00
Copy of an audio record (i) flash drive (to be provided by requestor (ii) compact disc - If provided by requestor - If provided to be requestor	 R40,00 R40,00 R60,00

11.8. **Request Fees**

11.8.1. Where a Requester submits a request for access to information held by an institution on a person other than the Requester himself/herself, a request fee in the amount of R140,00 is payable up-front before the institution will further process the request received.

11.9. **Access Fees**

11.9.1. An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded

in terms of the PAIA Act or an exclusion is determined by the Minister in terms of section 54(8) of the PAIA Act. The applicable access fees which will be payable are:

11.10. **Deposits**

11.10.1. Where Palamo receives a request for access to information held on a person other than the Requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the Requester.

11.10.2. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.

11.11. **Collection Fees**

11.11.1. The initial "request fee" of R140,00 should be deposited into the bank account nominated by Palamo and a copy of the deposit slip, application form and other correspondence / documents, forwarded to the Information Officer via email.

11.11.2. All fees are subject to change as allowed for in PAIA and as a consequence such escalations may not always be immediately available at the time of the request being made.

11.11.3. Requesters shall be informed of any changes in the fees prior to making a payment.

12. Exemptions from paying fees

12.1. The following persons are exempted from paying access fees in terms of PAIA:

12.1.1. a single person whose annual income does not exceed **R14,712.00**; or

12.1.2. married persons or a person and his/her life partner whose annual income does not exceed **R27,192.00**.

12.2. Please take note of the following differences when making an application for access to information to a Public Body and a Private Body:

	PUBLIC BODY	**PRIVATE BODY**
Application form to use	“Form A”	“Form C”

Request fee payable	**R35.00**	**R50.00**
Remedy available (when not satisfied with the decision (including "deemed refusal") of the Information Officer or Deputy Information Officer	Internal appeal to the relevant authority (e.g. minister, MEC or Mayor) - use "Form B" - no fee payable	Application to Magistrates' Court (there is no internal appeal)
Remedy available (only when not satisfied with the outcome of the internal appeal)	Application to the Magistrates' Court	

13. Request for access to information about third parties

13.1. If you request access to a record that contains information about a third party, Palamo is obliged to attempt to contact this third party to inform them of the request and to give them an opportunity to respond by either consenting to the access or by providing reasons why the access should be denied.

13.2. In the event that the third party furnishes reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted.

13.3. You may appeal against a refusal of access by the Information Officer. Please refer to paragraph 12.2 above and Part 4 of PAIA for further details on the appeal process.

14. Remedies available when Palamo refuses a request

14.1. **Internal Remedies**

14.1.1. Palamo does not have internal appeal procedures. The decision made by the Information Officer is final.

14.1.2. Requesters will have to exercise such external remedies at their disposal if the request for information is refused and the Requestor is not satisfied with the answer supplied by the Information Officer.

14.2. **External Remedies**

14.2.1. A Requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, may apply to a Court for relief.

14.2.2. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

15. Access to records held by Palamo

15.1. **Prerequisites for Access by Personal/Other Requester**

15.1.1. Records held by Palamo may be accessed by requests only once the prerequisite requirements for access have been met.

15.1.2. A Requester is any person making a request for access to a record of Palamo.

15.1.3. There are 2 (two) types of requesters:

15.1.3.1. Personal Requester:

15.1.3.1.1. A personal requester is a requester who is seeking access to a record containing personal information about the Requester.

15.1.3.1.2. Palamo will voluntarily provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

15.1.3.2. Other Requester

15.1.3.2.1. This Requester (other than a personal requester) is entitled to request access to information on third parties.

15.1.3.2.2. In considering such a request, Palamo will adhere to the provisions of PAIA. Section 71 of PAIA requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the Information.

15.2. Palamo is not obliged to voluntarily grant access to such records. The Requester must fulfil the prerequisite requirements, in accordance with the requirements of the PAIA and as stipulated in Chapter 5: Part 3, including the payment of a request and access fee.

16. Protection of personal information that is processed by Palamo

16.1. POPIA requires Palamo to inform their clients as to the manner in which their Personal Information is used, disclosed and destroyed.

16.2. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

16.3. In this clause 16 words and phrases shall have the meanings assigned to them as in POPIA.

16.4. Palamo needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is processed and the purpose for which it is processed is determined by Palamo. Palamo is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

16.4.1. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Palamo, in the form of privacy or data collection notices. Palamo must also have a legal basis (for example, consent) to process Personal Information;

16.4.2. is processed only for the purposes for which it was collected;

16.4.3. will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

16.4.4. is adequate, relevant and not excessive for the purposes for which it was collected;

16.4.5. is accurate and kept up to date;

16.4.6. will not be kept for longer than necessary;

16.4.7. is processed in accordance with integrity and confidentiality principles. This includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by Palamo, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;

16.4.8. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:

16.4.8.1. be notified that their Personal Information is being collected by Palamo. The Data Subject also has the right to be notified in the event of a data breach;

16.4.8.2. know whether Palamo holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual;

16.4.8.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;

16.4.8.4. object to Palamo's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Palamo's

16.4.8.5. record keeping requirements);

16.4.8.6. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and

16.4.8.7. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

16.5. **Purpose of the Processing of Personal Information by Palamo**

16.5.1. As outlined above, Personal Information may only be processed for a specific purpose. The purposes for which Palamo processes or will process Personal Information is to:

16.5.1.1. comply with lawful obligations, including all applicable labour, tax and financial legislation (including compliance with any South African Reserve Bank and Johannesburg Stock Exchange requirements) such as the Financial Advisory and

Intermediary Services Act, 37 of 2002 (FAIS), the Financial Intelligence Centre Act 38 of 2001 (FICA), the National Credit Act, 34 of 2005 (NCA) and B-BBEE laws;

16.5.1.2. to give effect to a contractual relationship as between you and Palamo and in order to ensure the correct administration of the relationship;

16.5.1.3. for operational reasons; and

16.5.1.4. to protect the legitimate interests of Palamo, yourself or a third party.

16.6. **Categories of Data Subjects and Personal Information/Special Personal Information relating thereto**

16.6.1. As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person, which for purposes of this PAIA Manual are the individual, legal entity, public body or company, whose personal information is being processed.

16.7. **Recipients of Personal Information**

16.7.1. Palamo may provide a Data Subject's Personal Information to the following recipients:

16.7.1.1. any of Palamo's subsidiaries and or approved product supplier or third-party service providers whose services or products clients elect to use;

16.7.1.2. to a third party where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect the Organisation rights;

16.8. **Cross-border flows of Personal Information**

16.8.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

16.8.1.1. recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or

16.8.1.2. Data Subject consents to the transfer of their Personal Information; or

16.8.1.3. transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or

16.8.1.4. transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or

16.8.1.5. the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

16.9. **Description of information security measures to be implemented Palamo**

16.9.1. The types of security measures to be implemented by Palamo in order to ensure that Personal Information is respected and protected is **[as follows / listed below]:**

16.9.1.1. This PAIA Manual has been put in place throughout Palamo and training on this PAIA Manual will be implemented and will continue to be conducted by Palamo.

16.9.1.2. Each new employee will be required to sign an Employment Contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of PAIA and POPIA.

16.9.1.3. Every employee currently employed within Palamo will be required to sign an addendum to their Employment Contracts containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of PAIA and POPIA.

16.9.1.4. All Palamo's electronic files or data are backed up and stored in secure cloud-based systems.

16.9.1.5. Palamo's product suppliers, insurers and other third-party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.

16.9.2. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Palamo may be conducted in order to ensure that the Personal Information that is processed by Palamo is safeguarded and processed in accordance with the Conditions for Lawful Processing.

16.10. **Objection to the Processing of Personal Information by a Data Subject**

16.10.1. Section 11 (3) of the POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal

Information in the prescribed form (Form 1 to be obtained under the POPIA Regulations), subject to exceptions contained in POPIA.

16.11. **Request for correction or deletion of Personal Information**

16.11.1. Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may in the prescribed form (Form 2 to be obtained under the POPIA Regulations) request for their Personal Information to be corrected or deleted.

17. Availability of the Manual

17.1. This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Palamo. Copies of the Manual may be made, subject to the prescribed fees. Copies may also be requested from the Information Regulator.

17.2. The Manual is also posted on the Palamo website referred to above.

18. Signatures

Please refer to the attached resolution.