

**HIGH STREET**  
ASSET MANAGEMENT

**PROMOTION OF ACCESS TO  
INFORMATION ACT MANUAL**

High Street Asset Management Pty Ltd  
FSP NO: 45210

November 2023

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## 1. DEFINITIONS

- 1.1. **Data Subject** means the person to whom the Personal Information relates
- 1.2. **FAIS Act** means the Financial Advisory and Intermediary Services Act, No. 37 of 2002;
- 1.3. **FSCA** means the Financial Sector Conduct Authority;
- 1.4. **FSP** means financial services provider;
- 1.5. **Information Regulator** means the Office of the Information Regulator as established in terms of section 39 of POPIA, to monitor and enforce compliance with both POPIA and PAIA;
- 1.6. **PAIA** means the Promotion of Access to Information Act No. 2 of 2000, as amended;
- 1.7. **Personal Information** means any information relating to an identifiable natural person, or to the extent applicable, a juristic person. This includes, but is not limited to information relating to race, gender, sex, pregnancy, marital status, ethnic and social origin, colour, sexual orientation, age, physical or mental health, religion, disability, language, information relating to educational, medical, financial, criminal or employment history, any identifying number, email address, physical address, telephone number, location information, online identifier or biometric Personal Information.
- 1.8. **PoPIA** means the Protection of Personal Information Act No.4 of 2013;
- 1.9. **Process or Processing** means any activity concerning Personal Information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 1.10. **Record/s** means any recorded information regardless of the form, including, for example, written documents, audio, digital and video materials. A Record requested from a public or private body refers to a Record that is in that body's possession regardless of whether that body created the Record;
- 1.11. **Responsible Party** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.

## 2. INTRODUCTION

High Street Asset Management (Pty) Ltd is an authorised FSP in terms of the FAIS Act and is regulated by the FSCA. The FSP number is 45210

HIGH STREET ASSET MANAGEMENT (PTY) LTD ("HSAM") is a private body as defined and is an authorised financial services provider that provides advisory, intermediary, and discretionary financial services to its clients, under license number 45210, issued in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002.

This document serves as the manual of HSAM as required in terms of PAIA and describes the categories of records held by the company and the procedures that need to be followed to request access to such records.

## 3. PURPOSE OF PAIA MANUAL

- 3.1. This PAIA Manual may be used by the public to:

- 3.1.1. check the categories of Records held by the FSP that are available without having to submit a formal PAIA request;
- 3.1.2. understand how to make a request for access to a Record of the FSP, by providing a description of the subjects on which the FSP holds Records and the categories of Records held on each subject;
- 3.1.3. know which Records of the FSP are available in accordance with other legislation;
- 3.1.4. access the relevant contact details of the persons who will assist the public with the Records they intend to access;
- 3.1.5. know where to access the Information Regulators guide on how to use PAIA;
- 3.1.6. know whether the FSP will process personal information, for what purpose personal information is processed and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.1.7. know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.1.8. know if the FSP has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.1.9. know whether the FSP has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### 4. COMPANY CONTACT DETAILS

Head Office Physical Address: The Offices of Hyde Park, Block B, 1 Strouthos Place, Hyde Park, 2196

Head Office Postal Address: The Offices of Hyde Park, Block B, 1 Strouthos Place, Hyde Park, 2196

Telephone No.: +27 11 325 4006  
 Contact Person: Jo-Ann van der Merwe  
 Contact E-mail: [Jo-Ann@hsam.co.za](mailto:Jo-Ann@hsam.co.za)  
 Website: [www.hsam.co.za](http://www.hsam.co.za)  
 Information Officer: Ross Mark Beckley  
 E-mail: [Ross@hasm.co.za](mailto:Ross@hasm.co.za)

#### 5. ACCESS TO RECORDS

- 5.1. PAIA grants a requester access to certain Records of a private body if the said Records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest.
- 5.2. Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner, at the rates provided. The prescribed form and manner and the tariff are dealt with in sections 6 and 7.
- 5.3. The contact details of the Information Regulator are as follows:
  - Postal Address: : PO Box 31533, Braamfontein, Johannesburg, 2017
  - E-mail address : [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)
  - Website : <https://justice.gov.za/infoereg/>

- 5.4 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, made available a Guide on how to use PAIA (the Guide), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille, and can be obtained from the Information Regulator's website at <https://infoeregulator.org.za/paia-guidelines/>
- 5.5 If your PAIA request is denied, or there is no response from a public or private body for access to Records, a complaint can be lodged with [PAIAComplaints@infoeregulator.org.za](mailto:PAIAComplaints@infoeregulator.org.za).

## 6. SCHEDULE OF RECORDS

CATEGORY OF RECORDS	TYPE OF RECORDS	AVAILABLE ON WEBSITE	REQUEST ACCESS
Client information	Presentations	Yes	Yes
	Fact Sheets		
	Newsletters		
Compliance Policies	PAIA Manual	Yes	Yes
	COI Policy		
	Privacy Policy		
	POPI Consent		
	Complaints Resolution Procedure	No	Yes
	RMCP		
	Debarment Policy		
	Financial Recovery and Resolution Plan		
	P.A Trading Policy		
	Responsible Investment Policy		
	Competence Register		
	Trading Policy		
	Disaster Recovery plan		
	Treating customers fairly policy		
	Business Continuity Policy		



CATEGORY OF RECORDS	TYPE OF RECORDS	AVAILABLE ON WEBSITE	REQUEST ACCESS
	FAIS Disclosure document		
<p>Personal Client information required to assist in the relationship between the Fund Administrators and the client</p> <p>* These documents are retained for 5 years as per the FAIS and FICA acts</p> <p>** these documents are available by request to the Data subject as set out in POPI and PAIA acts</p>	<p>Identification Documents</p> <p>Proof of Residence</p> <p>Banking Details</p> <p>Employment details</p> <p>Tax Details</p>	N / A	N / A

## 7. RECORDS AVAILABLE IN TERMS OF SOUTH AFRICAN LEGISLATION

CATEGORY OF RECORD	APPLICABLE LEGISLATION
<p>Company Documents:</p> <p>Company Registration documents</p> <p>Memorandum of Incorporation</p> <p>Minutes of Board meetings</p> <p>Records – Directors, Shareholders, auditors, and other officers (where applicable)</p> <p>Statutory registers</p> <p>PAYE Records</p> <p>Documents issued to employees for income tax purposes</p> <p>Salary and wages record</p> <p>Workmen's compensation</p> <p>VAT</p> <p>SDL – Levies</p> <p>UIF</p> <p>Income tax</p> <p>Provisional tax</p>	<p>Companies Act, 71 of 2008</p> <p>Income Tax Act No.58 of 1962</p> <p>Unemployment Act No 63 of 2001</p> <p>Unemployment Contributions Act No 4 2002</p> <p>Value Added Tax Act No.89 of 1991</p>
PAIA Manual	<p>Promotion of access to Information Act No2 of 2002</p> <p>Financial Advisory and Intermediary Services Act 37 of 2002</p>

CATEGORY OF RECORD	APPLICABLE LEGISLATION
	The Financial Intelligence Centre Act 38 of 2001 (as amended)  The Protection of Personal Information Act 4 of 2013  Promotion of Access to Information Act 2 of 2000.
Privacy Policy	Protection of Personal Information Act No. 4 of 2013

**8. DESCRIPTION OF THE SUBJECTS ON WHICH THE FSP HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY**

SUBJECT	CATEGORY OF RECORDS HELD
Strategic Documents	Strategic Planning
Human Resources	Remuneration Policy Employment contracts Salary Records Leave records Job Descriptions
Financial Records	Annual financial Statements Tax returns Accounting records (journals and ledgers) Banking Records Bank Statements Register of fixed assets Invoices
Information Technology	Agreements Accounting System Hardware register Software license agreements Internet Service Provider agreements

**9. FORM OF A REQUEST FOR INFORMATION**

- 9.1. A requester must use the prescribed Form 2 to request access to the information as per paragraph 6 above.
- 9.2. Form 2 can be accessed at the following URL: <https://inforegulator.org.za/paia-forms/>
- 9.3. The request must be addressed to the Information Officer as indicated in clause 4.
- 9.4. The requester must provide sufficient detail on Form 2 to enable the Information Officer of the company to establish who is requesting the said information as well as what information is being requested and in what format.
- 9.5. The requester must provide sufficient detail in respect of his/her contact details and if the requester wishes to be informed of the decision of the company in any manner (in addition to written) the manner and particulars thereof.

- 9.6. Lastly, the right which the requester is seeking to exercise or protect with an explanation of the reason the Record is required to exercise or protect the right.
- 9.7. After the company has decided on the request, the requester must be notified in the required form.
- 9.8. If the request is granted, then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hour to search and prepare the Record for disclosure. A Form 3 needs to be completed, which can be accessed at the following URL: <https://infoeregulator.org.za/paia-forms/>.
- 9.9. If the request is refused in terms of either the mandatory or discretionary grounds of refusal, the FSP must notify the requester thereof.

#### 10. PRESCRIBED FEES

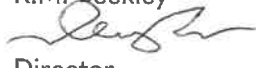
- 10.1. A requester who seeks access to a Record containing Personal Information about that requester is not required to pay a request fee.
- 10.2. Every other requester, who is not a personal requester, must pay the required request fee, as prescribed from time to time.
- 10.3. If the preparation of the Record requested requires more than the prescribed hours (six), 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.
- 10.4. Records may be withheld until the fees have been paid.
- 10.5. Fees applicable in respect of private bodies are as per Annexure B of the regulations to PAIA.

#### 11. PROCESSING OF PERSONAL INFORMATION IN TERMS OF PoPIA

- 11.1. The FSP may be required to Process Personal Information in terms of PoPIA. A Data Subject is entitled to access the Personal Information held by a Responsible Party, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the Personal Information.
- 11.2. To view the FSPs Privacy Policy, contact the Information Officer as per clause 4.

#### 12. AVAILABILITY OF THE MANUAL

- 12.1. This manual is available for inspection at the offices of the company during normal business hours free of charge upon prior arrangement with the Information Officer of the company as per clause 4.
- 12.2. A copy is also made available on the website of the company.

Name: R.M. Beckley  
 Signature:   
 Designation: Director  
 Date: 29/11/2023