



**HIGH STREET**  
ASSET MANAGEMENT

"HSAM"

Promotion of Access to Information Act

FSP:45210

Registration number: 2013/124971/07

August 2025

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This manual is created in accordance with Section 51 of the Promotion of Access to Information Act (No. 2 of 2000) and the Protection of Personal Information Act (No. 4 of 2013), as mandated by South African law.

## 1. DEFINITIONS

<i>Client</i>	<i>any natural or juristic person that received or receives services from HSAM.</i>
<i>Conditions for Lawful Processing</i>	<i>the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of The Protection of Personal Information Act 4 of 2013 of the Republic of South Africa (POPI) and in paragraph 14 of this Manual.</i>
<i>Data Subject</i>	<i>the person to whom personal information relates.</i>
<i>FAIS Act</i>	<i>means the Financial Advisory and Intermediary Services Act 37 of 2002</i>
<i>FSCA</i>	<i>means the Financial Sector Conduct Authority</i>
<i>FSP</i>	<i>Means the financial services provider</i>
<i>Information Officer</i>	<i>the individual who is identified in paragraph 4 of this Manual.</i>
<i>Information Regulator</i>	<i>means the Office of the Information Regulator as established in terms of section 39 of POPIA, to monitor and enforce the compliance with both POPIA and PAIA.</i>
<i>Manual</i>	<i>this Manual.</i>
<i>PAIA</i>	<i>the Promotion of Access to Information Act 2 of 2000 of the Republic of South Africa.</i>
<i>Personal Information</i>	<p><i>means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—</i></p> <ul style="list-style-type: none"> <li><i>a. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;</i></li> <li><i>b. information relating to the education or the medical, financial, criminal or employment history of the person;</i></li> </ul>

	<p><i>c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;</i></p> <p><i>d. the biometric information of the person;</i></p> <p><i>e. the personal opinions, views, or preferences of the person;</i></p> <p><i>f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</i></p> <p><i>g. the views or opinions of another individual about the person; and</i></p> <p><i>h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.</i></p>
<b>Personnel</b>	<i>any person who works for, or provides services to or on behalf of HSAM, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of HSAM, which includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff as well as contract workers.</i>
<b>POPI</b>	<i>the Protection of Personal Information Act 4 of 2013.</i>
<b>POPI Regulations</b>	<i>the regulations promulgated in terms of section 112(2) of The Protection of Personal Information Act 4 of 2013.</i>
<b>Private Body</b>	<p><i>means—</i></p> <p><i>a. a natural person who carries or has carried on any trade, business or profession, but only in such capacity;</i></p> <p><i>b. a partnership which carries or has carried on any trade, business, or profession; or</i></p> <p><i>c. any former or existing juristic person but excluding a public body.</i></p>
<b>Processing</b>	<i>means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—</i>

	<p><i>a. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;</i></p> <p><i>b. dissemination by means of transmission, distribution or making available in any other form; or</i></p> <p><i>c. merging, linking, as well as restriction, degradation, erasure, or destruction of information.</i></p>
<b>Record</b>	<i>has the meaning ascribed thereto in section 1 of the Promotion of Access to Information Act 2 of 2000 and includes Personal Information.</i>
<b>Requester</b>	<i>has the meaning ascribed thereto in section 1 of the Promotion of Access to Information Act 2 of 2000.</i>
<b>Request for access</b>	<i>has the meaning ascribed thereto in section 1 of the Promotion of Access to Information Act 2 of 2000.</i>
<b>SAHRC</b>	<i>the South African Human Rights Commission.</i>

*Any other terms not described herein will have the meaning as ascribed to it in terms of the Promotion of Access to Information Act 2 of 2000.*

## **2. INTRODUCTION**

- 2.1. 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.
- 2.2. High Street Asset Management ( Pty) Ltd ('HSAM') is a private body as defined and is an authorised financial services provider that provides advisory, intermerdiary and discretionary financial services to its clients under license number 45210, issued in terms of the Financial Advisory and intermediary services.
- 2.3. This Manual is articulated in conformity with the laws and statutory provisions of the Republic of South Africa, and in consideration of pertinent international privacy laws and standards. This Manual is applicable to ***"HSAM"*** and which ***for the purpose of the Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2000, is defined as a private body.***
- 2.4. Due to the positioning of our head office within the Republic of South Africa, all 'PAIA Requests' for information related to the company, as delineated under Schedule of Records in paragraph 6 of this Manual, must be submitted utilizing the prescribed forms and in strict compliance with the PAIA Act.

This manual is created in accordance with Section 51 of the Promotion of Access to Information Act (No. 2 of 2000) and the Protection of Personal Information Act (No. 4 of 2013), as mandated by South African law.

- 2.5. The Promotion of Access to Information Act, 2000 was implemented on 9 March 2001. It grants individuals and legal entities the right to access records held by public or private bodies, with certain limitations, to facilitate the exercise or protection of their rights.
- 2.6. The Promotion of Access to Information Act 2 of 2000 establishes the procedural aspects related to information requests, which include the requirement to create a Promotion of Access to Information Act 2 of 2000 Manual (also referred to as a “PAIA Manual”). Private bodies are mandated by Section 51 of the Promotion of Access to Information Act 2 of 2000 to compile a Manual that allows individuals to access information held. The Manual specifies the minimum criteria that must be met.
- 2.7. If you wish to obtain information from a private body under the Promotion of Access to Information Act 2 of 2000, a request must be made in the prescribed format outlined in the private body's Promotion of Access to Information Act 2 of 2000 Manual, just like ours. Once the request is received, the private body must disclose the information if the requester can demonstrate that the record is necessary for exercising or protecting their rights, provided that no grounds for refusal stated in the Promotion of Access to Information Act 2 of 2000 are applicable.

### **3. THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 MANUAL**

- 3.1. This Manual serves as HSAM’s Promotion of Access to Information Act 2 of 2000 Manual, complying with section 51 of the Promotion of Access to Information Act 2 of 2000 as amended by the Protection of Personal Information Act 4 of 2013.
- 3.2. The Protection of Personal Information Act 4 of 2013, which primarily came into effect on 1 July 2020, upholds individuals' Constitutional right to privacy and emphasizes the protection of personal information handled by public and private entities within the Republic of South Africa. It establishes specific conditions to establish minimum requirements for the handling of personal information.
- 3.3. The Protection of Personal Information Act 4 of 2013, amends certain provisions of the Promotion of Access to Information Act 2 of 2000, striking a balance between the need for information access and the necessity to safeguard personal information. It establishes an Information Regulator with certain powers, duties, and functions under both The Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2000. Additionally, it introduces codes of conduct and safeguards individuals' rights concerning unsolicited

electronic communications and automated decision-making processes. The aim is to regulate the flow of personal information and address related matters.

- 3.4. We have compiled this Manual to provide you with guidance and ensure that you understand the procedural and other requirements that must be fulfilled when making a Promotion of Access to Information Act 2 of 2000 request (also known as a “PAIA Request”) to HSAM.

#### 4. OUR HEAD OFFICE CONTACT DETAILS

<i>Business Name</i>	<i>High Street Asset Management ( Pty ) Ltd</i>
<i>Registration Number</i>	<i>2013/124971/07</i>
<i>Registered Office</i>	<i>The offices of Hyde Park, 1 Strouthos Place, Hyde Park</i>
<i>Postal Address</i>	<i>The offices of Hyde Park, 1 Strouthos Place, Hyde Park</i>
<i>Contact Number</i>	<i>011 325 4006</i>
<i>Information Officer</i>	<i>Ross Mark Beckley</i>
<i>Email address</i>	<i>Ross@hsam.co.za</i>
<i>Deputy Information Officer</i>	<i>Jo-Ann Felicity van der Merwe</i>
<i>Email Address</i>	<i>Jo-Ann@hsam.co.za</i>

*Background information of HSAM can be found at <https://hsam.co.za/>.*

## 5. GUIDE OF SAHRC

- 5.1. The South African Human Rights Commission has compiled an official guide designed to aid individuals who wish to exercise their right to access information under the Promotion of Access to Information Act (PAIA). This same guide is applicable when seeking information under the Protection of Personal Information Act. You can access the "Guide on How to Navigate the Promotion of Access to Information Act 2 of 2000" at [www.sahrc.org.za](http://www.sahrc.org.za).
- 5.2. Effective June 30, 2021, the Information Regulator has assumed responsibility for overseeing the regulatory functions related to the Promotion of Access to Information Act (PAIA) of 2000:

**Postal address** : ***The Information Regulator (South Africa) PO Box 31533  
Braamfontein 2017***

**Telephone number** : ***+27 10 023 5207***

**PAIA Complaints email** : ***PAIAComplaints.IR@justice.gov.za***

**POPI Complaints email** : ***POPIAComplaints.IR@justice.gov.za***

**General enquiries email** : ***infoereg@justice.gov.za***

## 6. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

- 6.1. HSAM holds and/or process the records referred to under Schedule of Records below for the purposes of the Promotion of Access to Information Act 2 of 2000 and The Protection of Personal Information Act 4 of 2013.
- 6.2. The following records below may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of the Promotion of Access to Information Act 2 of 2000 and any other applicable legislation.
- 6.3. All services are listed on HSAM's website as set out above.

### SCHEDULE OF RECORDS

Administrative	<ul style="list-style-type: none"><li>▪ Governance structures</li><li>▪ Internal rules, regulations, and policies</li><li>▪ General correspondence (emails)</li><li>▪ Presentations</li><li>▪ Fact Sheets</li></ul>
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	<ul style="list-style-type: none"> <li>▪ Newsletters</li> </ul>
Corporate Affairs	<ul style="list-style-type: none"> <li>▪ Corporate Policies and Procedures</li> <li>▪ Compliance Reports</li> <li>▪ COI Policy</li> <li>▪ Financial Recovery and Resolution Plan</li> <li>▪ P.A. Trading Policy</li> <li>▪ Responsible Investment Policy</li> <li>▪ Competence Register</li> <li>▪ Trading Policy</li> <li>▪ TCF Policy</li> <li>▪ BCP &amp; DRP</li> <li>▪ FAIS Disclosure document</li> </ul>
Client	<ul style="list-style-type: none"> <li>▪ Identification Documents</li> <li>▪ Proof of Residence</li> <li>▪ Banking and Financial details</li> <li>▪ Employment details</li> <li>▪ Tax details</li> </ul>
Financial Records	<ul style="list-style-type: none"> <li>▪ Accounting records</li> <li>▪ Annual financial statements</li> <li>▪ Banking records and statements</li> <li>▪ Tax records</li> <li>▪ Transactional records</li> <li>▪ Register of fixed assets</li> <li>▪ Invoices</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>▪ Personnel Files</li> <li>▪ Training records</li> <li>▪ Employment Policies and Contracts</li> <li>▪ Employee Tax and Remuneration Records</li> </ul>
IT Operations	<ul style="list-style-type: none"> <li>▪ Website information</li> <li>▪ Policies and procedures</li> <li>▪ SLA</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Accounting system</li> <li>▪ Hardware register</li> <li>▪ Software license agreements</li> <li>▪ Internet Service Provider Agreements</li> </ul>
Legal	<ul style="list-style-type: none"> <li>▪ Complaint Resolution Procedure</li> <li>▪ RMCP</li> <li>▪ Debarment Policy</li> <li>▪ Material licenses, permits and authorisations</li> </ul>
Secretarial	<ul style="list-style-type: none"> <li>▪ Statutory Records</li> <li>▪ Company guidelines</li> </ul>
Website	<ul style="list-style-type: none"> <li>▪ Company Profile</li> <li>▪ Areas of Service and Expertise</li> <li>▪ Contact Portal</li> </ul>

## 7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

7.1. HSAM may be in possession of records in terms of the following legislation as and when applicable in terms of South African Laws:

- 7.1.1. Basic Conditions of Employment Act 75 of 1997
- 7.1.2. Broad-Based Black Economic Empowerment Act 53 of 2003
- 7.1.3. Companies Act 71 of 2008
- 7.1.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993
- 7.1.5. Competition Act, No. 89 of 1998
- 7.1.6. Constitution of the Republic of South Africa Act, No. 108 of 1996
- 7.1.7. Consumer Protection Act, 2008
- 7.1.8. Customs and Excise Act 91 of 1964
- 7.1.9. Electronic Communications Act No. 36 of 2005
- 7.1.10. Electronic Communications and Transactions Act 25 of 2002.
- 7.1.11. Employment Equity Act 55 of 1998
- 7.1.12. Financial Intelligence Centre Act 38 of 2001
- 7.1.13. Financial Advisory and Intermediary Services Act 37 of 2002
- 7.1.14. Identification Act, No. 68 of 1997

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- 7.1.15. Insolvency Act No. 24 of 1936
- 7.1.16. Income Tax Act 58 of 1962
- 7.1.17. Intellectual Property Laws Amendment Act No.38 of 1997
- 7.1.18. Labour Relations Act 66 of 1995
- 7.1.19. National Payment Systems Act No. 78 of 1998
- 7.1.20. Occupational Health and Safety Act 85 of 1993
- 7.1.21. Pension Funds Act 24 of 1956
- 7.1.22. Promotion of Access to Information Act 2 of 2000
- 7.1.23. Protection of Personal Information Act 4 of 2013
- 7.1.24. Prescription Act No. 68 of 1969
- 7.1.25. Prevention of Organised Crime Act No. 121 of 1998
- 7.1.26. Skills Development Act no. 97 of 1998
- 7.1.27. Skills Development Levies Act 9 of 1999
- 7.1.28. Trademark Act No. 194 of 1993
- 7.1.29. Unemployment Insurance Contributions Act 4 of 2002
- 7.1.30. Unemployment Insurance Act 30 of 1996
- 7.1.31. Value Added Tax Act 89 of 1991

***\*Note: Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in 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.***

## **8. REQUEST PROCESS**

- 8.1. An individual who wishes to place a request must comply with all the procedures laid down in the Promotion of Access to Information Act 2 of 2000.
- 8.2. The requester must complete ANNEXURE A, which is attached to this Manual and submit it to the Information Officer at the details specified in Part A.

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- 8.3. The prescribed form must be submitted as well as payment of a request fee and a deposit, if applicable to the Information Officer at the postal or physical address, or electronic mail as is stated herein.
- 8.4. The prescribed form must be completed with enough particularity to enable the Information Officer to determine:
- 8.4.1. The record(s) requested;
  - 8.4.2. The identity of the requester;
  - 8.4.3. What form of access is required; and
  - 8.4.4. The electronic or if applicable postal address of the requester.
- 8.5. The requester is required to explicitly declare that the requested records are necessary for the purpose of asserting or safeguarding a particular right. Furthermore, it is imperative that the requester explicitly outlines the nature of the right in question that is to be asserted or safeguarded. Additionally, a comprehensive rationale for why the requested records is essential for the exercise or protection of said right must be provided by the requester.
- 8.6. The request for access will be dealt with within 30 days from date of receipt, unless the requester has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.
- 8.7. The period of 30 days may be extended by not more than 30 additional days, if the request is for a large quantity of information, or the request requires a search for information held at the head office of HSAM and the information cannot be reasonably obtained within 30 days. The Information Officer will notify the requester in writing should an extension be necessary.
- 8.8. The requester will be informed in writing whether access to the records have been granted or denied. If the requester requires a reason for the decision the request must be expressed in the prescribed form, the requester must further state the particulars of the reasoning the requester requires.
- 8.9. If a requester has requested the records on another individual's behalf, the requester must submit proof of the capacity the requester submits the request in, to the satisfaction of the Information Officer.
- 8.10. Should the requester have any difficulty with the form, or the process laid out herein, the requester should contact the Information Officer for assistance.

- 8.11. An oral request can be made to the Information Officer should the requester be unable to complete the form due to illiteracy or a disability. The Information Officer will complete the form on behalf of the requester and provide a copy of the form to the requester. HSAM is here to guide you through the process and offer all the help you may require.

## **9. GROUNDS FOR REFUSAL**

- 9.1. The following are grounds upon which HSAM may, subject to the exceptions in Chapter 4 of the Promotion of Access to Information Act 2 of 2000, refuse a request for access in accordance with Chapter 4 of the Promotion of Access to Information Act 2 of 2000:

- 9.1.1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable.
- 9.1.2. Mandatory protection of the commercial information of a third party, if the Records contain:
  - 9.1.2.1. Trade secrets of that third party;
  - 9.1.2.2. Financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
  - 9.1.2.3. Information disclosed in confidence by a third party to HSAM, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 9.1.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 9.1.4. Mandatory protection of the safety of individuals and the protection of property;
- 9.1.5. Mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 9.1.6. Protection of the commercial information of HSAM, which may include:
  - 9.1.6.1. Trade secrets;
  - 9.1.6.2. Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of HSAM;

- 9.1.6.3. Information which, if disclosed, could put HSAM at a disadvantage in contractual or other negotiations or prejudice HSAM in commercial competition; and/or
- 9.1.6.4. Computer programs which are owned by HSAM, and which are protected by copyright and intellectual property laws;
- 9.1.7. Research information of HSAM or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- 9.1.8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

## **10. REMEDIES SHOULD A REQUEST BE REFUSED**

- 10.1. HSAM does not have an internal appeal procedure in light of a denial of a request, decisions made by the Information Officer is final.
- 10.2. The requester may in accordance with sections 56(3) (c) and 78 of the Promotion of Access to Information Act 2 of 2000, apply to a court for relief within 180 days of notification of the decision for appropriate relief.

## **11. FEES**

- 11.1. Upon receiving an information access request PAIA Request, HSAM may require the requester to pay a prescribed fee. Cost management for record access or production will be at HSAM discretion, and in accordance with the fees gazetted by the South African Government under Section 22 and 92 of the Promotion of Access to Information Act 2 of 2000 from time to time. You may further request the payment details from the Information Officer where a prescribed fee has been determined by HSAM.

### ***FEE SCHEDULE APPLICABLE***

Fee Description	Cost
Request fee (Payable on every request)	R140.00
Photocopy of an A4 page or part thereof	R2.00

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Printed copy of an A4 page or part thereof	R2.00
Hard copy on flash drive (Flash drive to be provided by requestor)	R40.00
Hard copy on a compact disc (Compact disc to be provided by requestor)	R40.00
Hard copy on a compact disc (Compact disc to be provided by HSAM)	R60.00
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record per A4 page	R24.00
Copy of an audio record on flash drive (Flash drive to be provided by requestor)	R40.00
Copy of an audio on a compact disc (Compact disc to be provided by requestor)	R40.00
Copy of an audio on a compact disc (Compact disc to be provided by HSAM)	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R145.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R435.00

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(Cannot exceed total cost)	
Postage, email or any other electronic transfer	Actual expense, if any

## **12. THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

### **12.1. Conditions for lawful processing:**

12.1.1. The Protection of Personal Information Act 4 of 2013 has eight conditions for lawful processing and includes:

- 12.1.1.1. Accountability
- 12.1.1.2. Processing limitation
- 12.1.1.3. Purpose specification
- 12.1.1.4. Further processing limitation
- 12.1.1.5. Information quality
- 12.1.1.6. Openness
- 12.1.1.7. Security safeguards
- 12.1.1.8. Data subject participation

### **12.1.2. HSAM is involved in the following types of processing:**

- 12.1.2.1. Collection
- 12.1.2.2. Recording
- 12.1.2.3. Organization
- 12.1.2.4. Structuring
- 12.1.2.5. Storage
- 12.1.2.6. Adaptation or alteration
- 12.1.2.7. Retrieval
- 12.1.2.8. Consultation
- 12.1.2.9. Use
- 12.1.2.10. Disclosure by transamination
- 12.1.2.11. Dissemination or otherwise making available
- 12.1.2.12. Alignment or combination
- 12.1.2.13. Restriction
- 12.1.2.14. Erasure



12.1.2.15. Destruction

**12.1.3. *HSAM processes information for the following purposes:***

- 12.1.3.1. to fulfil agreements in relation to its employees;
- 12.1.3.2. to provide services to its Clients in accordance with terms agreed to by the Clients;
- 12.1.3.3. to undertake activities related to the provision of services, such as:
  - 12.1.3.3.1. to fulfil domestic legal, regulatory and compliance requirements
  - 12.1.3.3.2. to verify the identity of client representatives who contact HSAM or may be contacted by HSAM;
  - 12.1.3.3.3. for risk assessment, information security management, statistical, trend analysis and planning purposes;
  - 12.1.3.3.4. to monitor and record calls and electronic communications with the Client for quality, training, investigation, and fraud prevention purposes;
  - 12.1.3.3.5. to enforce or defend HSAM;
  - 12.1.3.3.6. to manage HSAM's relationship with its Clients, which may include providing information to its Clients and its Clients affiliates about HSAM products and services;
- 12.1.3.4. the purposes related to any authorised disclosure made in terms of agreement, law, or regulation;
- 12.1.3.5. any additional purposes expressly authorised by HSAM client;
- 12.1.3.6. any additional purposes as may be notified to the Client or Data Subjects in any notice provided by HSAM.

**12.2. *HSAM processes personal information from the following groups of Data Subjects:***

- 12.2.1. Juristic persons –
  - 12.2.1.1. Corporate Clients or Distributors
  - 12.2.1.2. Suppliers
  - 12.2.1.3. Corporate Partners
  - 12.2.1.4. Subsidiaries
- 12.2.2. Natural persons –
  - 12.2.2.1. Individuals
  - 12.2.2.2. Staff
  - 12.2.2.3. Clients

#### 12.2.2.4. Suppliers

#### **12.3. HSAM process the following categories personal information:**

- 12.3.1. Client profile information;
- 12.3.2. Bank account details;
- 12.3.3. Payment information;
- 12.3.4. Client representatives;
- 12.3.5. Names;
- 12.3.6. Email Addresses;
- 12.3.7. Telephone numbers;
- 12.3.8. Physical addresses;
- 12.3.9. Tax numbers;
- 12.3.10. Identity Numbers;
- 12.3.11. Passport Numbers;

#### **12.4. Recipients of Personal Information:**

- 12.4.1. HSAM; and
- 12.4.2. HSAM subsidiaries.

12.5. When making authorised disclosures or transfers of personal information in terms of Section 72 of the Protection of Personal Information Act 4 of 2013, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as the Republic of South Africa does.

#### **12.6. The following Security measures are implemented by HSAM:**

- 12.6.1. HSAM implements numerous security measures to protect personal information that is stored electronically and physically.
- 12.6.2. HSAM ensures that appropriate security measures are taken and updates these measures on a regular basis.
- 12.6.3. HSAM have also implemented various policies for additional security for personal information stored both physically and electronically.

#### **12.7. The personal information that is stored physically is protected as follows:**

This manual is created in accordance with Section 51 of the Promotion of Access to Information Act (No. 2 of 2000) and the Protection of Personal Information Act (No. 4 of 2013), as mandated by South African law.

12.7.1. Where physical records of the data exist, such records will be stored in a secure area that can be 'locked-away' as to avoid a breach of the personal information.

12.7.2. Such physical data records will be 'locked-away' and secured when not in use.

12.8. HSAM may share personal information with third parties and in certain instances this may result in cross border flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013.

**12.9. *Objection to the processing of personal information by a data subject:***

12.9.1. Section 11(3) of the Protection of Personal Information Act 4 of 2013 and regulation 2 of the Protection of Personal Information Act 4 of 2013 regulations provides that a data subject may, at any time object to the processing of their personal information in the prescribed form attached to this Manual as ANNEXURE "B".

**12.10. *Request for correction or deletion of personal information:***

12.10.1. Section 24 of the Protection of Personal Information Act 4 of 2013 and regulation 3 of the Protection of Personal Information Act 4 of 2013 regulations provides that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as ANNEXURE "C".

  
\_\_\_\_\_  
**INFORMATION OFFICER**

**DATE:** 01/09/2025

**ANNEXURE A**

**REQUEST FOR ACCESS TO RECORD OF A PRIVATE BODY  
REGULATIONS RELATING TO THE PROMOTION OF ACCESS INFORMATION ACT NO.2 2000**

**Section 53 (1)  
[Regulation 10]**

**A. PARTICULARS OF PRIVATE BODY**

**HSAM Information Officer:** \_\_\_\_\_

**B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD**

- (a) The particulars of the person who requests access to the record must be given below.*
- (b) The address and/or email address in the Republic to which the information is to be sent must be given.*
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.*

<b>Full name(s) and surname</b>													
<b>Identity Number</b>													
<b>Residential or postal address</b>													
												<b>Code</b>	
<b>Contact number(s)</b>													
<b>E-mail address</b>													

**C. PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE**

*This section must ONLY be completed if a request for information is made on behalf of another person.  
HSAM may require proof of consent from the person whose information is being requested.*

<b>Full name(s) and surname</b>													
<b>Identity Number</b>													

**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 additional folios.*

**Description of record or relevant part of the record:**

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Reference number, if available:	
Any further particulars of the record:	

#### E. FEES

- (a) A request for access to a record, other than a 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 as the request fee.
- (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.

Reason for exemption from payment of fees:

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#### F. FORM OF ACCESS TO RECORD

If you are prevented by a disability to read, view, or listen 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	
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Mark the appropriate box with an X

#### NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such 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.

<b>1. If the record is in written or printed form</b>					
Copy of record*		Inspection of record			
<b>2. If the record consists of visual images (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</b>					
View the images		Copy of the images*	Transcription of images*		
<b>3. If the record consists of recorded words or information which can be reproduced in sound</b>					
Listen to soundtrack (audio cassette)		Transcription of soundtrack* (written or print)			
<b>4. If the record is held on a computer or in an electronic or machine-readable form</b>					
Printed copy of record*		Printed copy of information derived from the record*	Copy in computer-readable form*		
*If you requested a copy or transcription of a record, do you wish the copy or transcription to be collected from the Head Office in Gauteng?			<table border="1"> <tr> <td>Yes</td> <td>No</td> </tr> </table>	Yes	No
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.

Indicate which right is to be exercised or protected:

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Explain why the record requested is required for the exercise or protection of the aforementioned right:

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#### 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 in another manner, please specify the manner, and provide the necessary particulars to enable compliance with your request.

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

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*Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.*

\_\_\_\_\_  
*Signature*

*Requester/Person on whose behalf request is made.*

**ANNEXURE B**

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018  
[Regulation 2]**

**Note:**

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

**I. DETAILS OF DATA SUBJECT**

Name(s) and surname/registered name of data subject													
Unique Identifier / Identity Number													
Residential, postal, or business address													
												Code	
Contact number(s)													
E-mail address													

**J. REASONS FOR OBJECTION IN TERMS OF SECTION 11 (1) (d) to (f)**

*(Please provide detailed reasons for the objection)*

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Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

Signature of data subject/designated person \_\_\_\_\_



## ANNEXURE C

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 3]

- ☐ *Correction or deletion of the personal information about the data subject which is in possession or under the control of the HSAM.*
- ☐ *Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of HSAM, and which HSAM is no longer authorized to retain the record of information about the data subject.*

### K. DETAILS OF DATA SUBJECT

Name(s) and surname of data subject											
Unique Identifier / Identity Number											
Residential, postal, or business address											
										Code	
Contact number(s)											
E-mail address											

**L. INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED**

[illegible]

**M. REASONS FOR \*CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24 (1) (a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR THE \*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24 (1) (b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.**

*(Please provide detailed reasons for the request)*

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Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

Signature of data subject/designated person \_\_\_\_\_

**ANNEXURE D**

**FORM 3**

**OUTCOME OF REQUEST AND OF FEES PAYABLE**

*[Regulation 8]*

1. *If your request is granted –*
  - (a) *Amount of the deposit, if any, is payable before your request is processed; and*  
*Requested record/ portion of the record will only be released once proof of full*  
*payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

**Reference number:** \_\_\_\_\_

**TO:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Your request dated \_\_\_\_\_ refers

- You requested:

<i>Personal inspection of information at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.</i>	
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OR

- You requested:

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

1. To be submitted:

<i>Postal services to postal address</i>	
<i>Postal services to street address</i>	
<i>Courier service to street address</i>	
<i>Facsimile of information in written or printed format (including transcriptions)</i>	
<i>E-mail of information (including soundtracks if possible)</i>	
<i>Cloud share/file transfer</i>	
<i>Preferred language:</i> <i>(Note that if the record is not available in the language you prefer, access may be granted in the</i>	

<i>language in which the record is available)</i>	
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*Kindly note that your request has been:*

☐

*Approved*

☐

*Denied, for the following reasons:*

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**2. Fees payable with regards to your request:**

<i>Item</i>	<i>Cost per A4-size page or part thereof/item</i>	<i>Number of pages/items</i>	<i>Total</i>
<i>Photocopy</i>			
<i>Printed copy</i>			
<i>For a copy in a computer-readable form on:</i>			
(i) <i>Flash drive</i> • <i>To be provided by requestor</i>	<i>R40.00</i>		
(ii) <i>Compact disc</i> • <i>If provided by requestor</i> • <i>If provided to the requestor</i>	<i>R40.00</i> <i>R60.00</i>		
<i>For a transcription of visual images per A4-size page</i>	<i>Service to be outsourced. Will depend on the quotation of the</i>		
<i>Copy of visual images</i>	<i>service provider</i>		

<i>Transcription of an audio record, per A4-size</i>	<i>R24.00</i>		
<i>Copy of an audio record</i>			
<i>(i) Flash drive</i> • <i>To be provided by requestor</i> <i>(ii) Compact disc</i> • <i>If provided by requestor</i> • <i>If provided to the requestor</i>	<i>R40.00</i>   <i>R40.00</i> <i>R60. 00</i>		
<i>Postage, e-mail or any other electronic transfer:</i>	<i>Actual costs</i>		
<b>TOTAL:</b>			

3. *Deposit payable (if search exceeds six hours):*

☐

*Yes*

☐

*No*

<i>Hours of search</i>		<i>Amount of deposit</i> <i>(calculated on one third of total amount per request)</i>	
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*The amount must be paid into the following Bank account:*

*Name of Bank:*

*Name of account holder:*

*Type of account:*

*Account number:*

*Branch Code:*

*Reference Nr:*

*Submit proof of payment to:*

*Signed at*

*this*

*day of*

*20*

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*Information officer*