

Access to Information and Data  
Subject Participation Manual or  
PAIA (Section 51) manual



Full registered name of Fund (the Fund): DHL Provident Fund  
Registration number: 12/8/36179



Date of approval of Manual by the Board of the Fund: May 2025

Dates of review of Manual: May 2025

Version number: Two

## Index

Page	Heading
3	The aim of the Promotion of Access to Information Act (PAIA)
3	PAIA and this Manual
3	Other relevant documents
3	Introducing the Fund
4	Contact details of the Fund
4	A guide about PAIA
5	In terms of what legislation does the Fund hold records?
6	Information that is automatically available without a PAIA request
7	What records are held by the Fund which must be formally requested before the information is supplied to a member and/or a third party?
8	What procedure should you follow to obtain information or records from the Fund?
9	Fees
10	Protection of personal information
10	How do you request your personal information under POPIA?
10	You have the following rights under POPIA
10	The Fund processes personal information for the following purposes
10	Description of categories of data subjects and the personal information we hold for them
14	The recipients or categories of recipient to whom personal information may be supplied by the Fund
15	Planned flow of personal information out of South Africa
15	General description of security measures by the Fund
15	The Fund relies on the following authorisations, justifications or grounds to process personal information lawfully
17	Availability of this Manual
18	Signature
19	Form 2 – request for information from a private body

When we refer to “we” or “us” in this Manual that means the Fund and its Board. “You” or “your” means you the requestor of the information from the Fund.

## **The aim of the Promotion of Access to Information Act (PAIA)**

The purpose of PAIA is to give effect to the constitutional right of access to information held by any private or public body that is required for the exercise or protection of your rights.

PAIA provides you with the right of access to information held by public and private bodies when you request such information in accordance with the provisions of PAIA, for the exercise or protection of any of your or another person’s rights.

If you make such a request, a public or private body must release the information unless PAIA or any other relevant law states that the records containing such information may not be released.

## **PAIA and this Manual**

The Fund wants to ensure that persons, especially members and beneficiaries of the Fund, are aware of how they can make requests of the Fund, the purposes that the Fund processes information and what records the Fund possesses and processes.

Retirement funds are currently exempted from the requirement to have a section 51 PAIA manual in terms of a gazetted Notice. This exemption currently applies until 31 December 2020. If the Fund is required under PAIA to have a section 51 manual thereafter, then this Manual will be the Fund’s section 51 PAIA manual, and the Fund will make it available as prescribed. If the Fund continues to be exempted from having a section 51 PAIA manual, this Manual is not a section 51 Manual, but continues to be the Fund’s Manual describing, among other things, how people can approach the Fund for information, the purposes for processing information, what information the Fund processes and what records are available.

The Manual also includes information about the data subject rights derived from POPIA.

This Manual will be updated regularly as required.

## **Other relevant documents**

The Fund is in the process of finalising its data protection policy in accordance with the provisions of POPIA and this manual will be updated accordingly once this has been finalised. This will be available for free in electronic format from the Fund’s Information Officer, Board and Principal Officer

## **Introducing the Fund**

The Fund is a private body under PAIA. For many of its activities the Fund is a responsible party under the Protection of Personal Information Act (POPIA).

The Fund is a registered provident fund under the Pension Funds Act. It is also a Type B umbrella fund.

The Fund is governed by a Board and has a Principal Officer. The Board members and the Principal Officer change from time to time.

## Contact details of the Fund

You can contact the Fund and make your requests using these contact details:

The Fund's Principal Officer is: Michelle De Jager

The Fund's Information Officer is: Michelle De Jager

Street Address

**4<sup>th</sup> Floor, West Block, Sandown Mews, 88 Stella Street, Sandown, 2196**

Telephone number (during the day): +2771 480 9570

Facsimile number: n/a

Email address: [michelle@fccs.co.za](mailto:michelle@fccs.co.za)

## A guide about PAIA

Because the process of submitting a PAIA request can be quite daunting, the South African Human Rights Commission prepared a Guide to assist you to understand how to exercise your rights under PAIA.

This Guide is available in all the South African official languages. If you have any queries, or need a copy of the Guide, you can contact the Information Regulator directly at:

<p>The Information Regulator (South Africa)</p> <p>Website: <a href="https://inforegulator.org.za/">https://inforegulator.org.za/</a></p>	<p>27 Stiemens Street, Braamfontein, Johannesburg, 0001</p> <p>Tel: +27 11 023 5200 Email: <a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a></p>
---	---

## In terms of what legislation does the Fund hold records?

The Fund is subject to many different laws and we have set out some of the main ones below

- Constitution of the Republic of South Africa 108 of 1996
- The Financial Sector Regulation Act 9 of 2017
- Pension Funds Act 24 of 1956
- Divorce Act 70 of 1979
- Maintenance Act 99 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Income Tax Act 58 of 1962

- Broad-Based Black Economic Empowerment Act 53 of 2003
- Financial Institutions (Protection of Funds) Act 28 of 2001
- Financial Intelligence Centre Act 38 of 2001
- Prevention of Organised Crime Act 121 of 1998
- Insurance Act 18 of 2017
- Long-term Insurance Act 52 of 1988

The Fund is also subject to subordinate legislation, such as Conduct Standards issued by the Financial Sector Conduct Authority (as well as Joint Standards and Prudential Standards).

## Information that is automatically available without a PAIA request

We can provide you with the following information without you having to make a formal request that complies with PAIA:

Description of category of records automatically available in terms of section 52(1)(a) of PAIA	Manner of access to Records (section 52(1)(b))
<b>For inspection in terms of section 52(1)(a)(i):</b>	
<p>Available to all members, beneficiaries and participating employers for inspection:</p> <ol style="list-style-type: none"> <li>Rules of the Fund and amendments</li> <li>Fund's registration and approval documents</li> <li>Investment policy statement</li> <li>Fund Code of Conduct</li> <li>Fund Conflict of Interest Policy</li> <li>Communication policy</li> <li>Data Protection Policy (once finalised)</li> <li>Member booklet</li> <li>Fund general member communications</li> <li>Risk Management Policy</li> </ol>	<p>Please contact the Fund's administrator to arrange inspection:  <a href="mailto:home@robsav.com">home@robsav.com</a>  +2711 643 4520</p>
<b>For purchasing in terms of section 52(1)(a)(ii):</b> Not applicable	
<b>For copying in terms of section 52(1)(a)(ii):</b> Not applicable	
<b>Available free of charge in terms of section 52(1)(a)(iii):</b>	
<p><i>Available to each member of the Fund:</i></p> <ul style="list-style-type: none"> <li>• The last benefit statement issued by the Fund for the requestor</li> <li>• Benefit "quote"</li> <li>• The relevant requestor's own member records</li> <li>• Claim progress</li> <li>• Contribution history and fund return history related to yourself</li> </ul>	<p>Electronically by email.  Please request this from the Fund's administrator:  <a href="mailto:home@robsav.com">home@robsav.com</a>  +2711 643 4520</p>
<p><i>Available to all members, beneficiaries and participating employers of the Fund free of charge:</i></p> <ol style="list-style-type: none"> <li>Rules of the Fund and amendments</li> <li>Fund's registration and approval documents</li> <li>Investment policy statement</li> </ol>	<p>Electronically by email.</p> <p>*Items a, c, d, e, f, g, h, I and j are available to members in electronic format from the Fund's Information Officer, Board and Principal Officer</p>

<ul style="list-style-type: none"> <li>d. Fund Code of Conduct</li> <li>e. Fund Conflict of Interest Policy</li> <li>f. Communication policy</li> <li>g. Data Protection Policy (once finalised)</li> <li>h. Risk Management Policy</li> <li>i. Member booklet</li> <li>j. Fund general member communications</li> <li>k. Investment performance</li> <li>l. Fund financial statements</li> <li>m. Other policies of the fund from time-to-time</li> </ul>	<p>and for beneficiaries upon request from the Fund's administrator:  <a href="mailto:home@robsav.com">home@robsav.com</a>  +2711 643 4520</p> <p>**Item b and k are available upon request from the Fund's administrator:  <a href="mailto:home@robsav.com">home@robsav.com</a>  +2711 643 4520</p>
--	--

### What records are held by the Fund which must be formally requested before the information is supplied to a member and/or a third party?

<ul style="list-style-type: none"> <li>• Minutes of Board meetings</li> <li>• Board resolutions</li> <li>• Board agenda packs</li> <li>• Documentation of Board decisions</li> <li>• Tender documentation</li> <li>• Fund risk benefit insurance policies</li> <li>• Fund indemnity policies</li> <li>• Correspondence with insurers</li> <li>• Unclaimed benefits information</li> <li>• Records of the operations of the Fund</li> <li>• Members and beneficiaries personal information</li> <li>• Spouses, ex-spouses, partners and family members of members personal information</li> <li>• Children of members personal information</li> <li>• Health information about members and beneficiaries</li> <li>• Information about misconduct and alleged criminal behaviour of members</li> <li>• New entrant forms</li> <li>• Fund benefit statements</li> <li>• Fund investment mandates</li> <li>• Fund service provider agreements</li> <li>• Information about service providers</li> <li>• Agreements with participating employers</li> <li>• Correspondence with participating employers</li> <li>• Employer representative's personal information</li> </ul>	<ul style="list-style-type: none"> <li>• Correspondence with regulatory authorities, e.g. the FSCA</li> <li>• Correspondence with the South African Revenue Services</li> <li>• Reports to the South African Reserve Bank</li> <li>• Returns to regulatory authorities</li> <li>• Fund valuations or actuarial documents</li> <li>• Board and other fund official's personal information</li> <li>• Board Election forms and outcomes</li> <li>• Death benefit investigations</li> <li>• Deduction and withholding from benefits information</li> <li>• Nomination of beneficiary forms and beneficiary information</li> <li>• Section 14 transfer and recognition of transfer documentation</li> <li>• Claims forms and information including bank accounts and tax information</li> <li>• Personal information of members related to the Fund</li> <li>• Contributions and contribution schedules</li> <li>• Divorce and maintenance orders related to members</li> <li>• Complaints and complaints management</li> <li>• Housing loans and guarantees related to members</li> <li>• Communication to specific members</li> <li>• Legal opinions and litigation</li> </ul>
---	--

## What procedure should you follow to obtain information or records from the Fund?

### Form of the request

You *must* do both of the following:

Please use the prescribed form - Form 2. You can find Form 2 on this website: [www. https://inforegulator.org.za/](https://inforegulator.org.za/) and attached to the end of this Manual

The request must be made to the Information Officer using the contact details (address, fax or email address) once this person has been decided by the Fund

When you complete your PAIA form you *must*:

Provide sufficient detail on the request form to enable us to identify your record and the requestor (you, if you are the requestor)

Indicate which form of access is required e.g. electronic, paper

Indicate if there is a particular manner (way) to be used to inform the requestor (e.g. email or post) and state the particulars needed to be informed this way (e.g. email address)

Identify the right that the requestor is seeking to exercise or protect

Give an explanation of why the requested record is required for the exercise or protection of that right

If the request is being made on behalf of someone else - give proof of the capacity of the requestor (we will need to be satisfied of this)

**Note:** if you do not use the prescribed form or do not complete it properly, your request may be rejected, refused (if sufficient information is not provided or otherwise) or delayed.

All PAIA requests that we receive are evaluated and carefully considered in accordance with PAIA. Sometimes we may have to refuse your request and sometimes we are required to refuse your request. For example, the Fund must protect the personal information of third parties.

## Time to make the decision

We will, within 30 (thirty) days of receipt of the request, decide whether to grant or refuse the request and give notice with reasons (if required) to that effect.

The 30 (thirty) day period which we have to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large number of information, or the request requires a search for information held at another office of the Fund and the information cannot reasonably be obtained within the original 30 (thirty) day period. We will notify you in writing if we require an extension.

## Remedies available to you when the Fund refuses a request

### Internal Remedies

The Fund does not have internal appeal procedures. The decision made by the Information Officer once confirmed is final. You will have to exercise external remedies at your disposal if the request for information is refused, and you are not satisfied with the answer.

### External Remedies

If you are not satisfied by a decision made by the Fund, for example for refusing access, for imposing access fees, or for extending the time period in which the response is due, you may apply to court for relief within 180 days of receiving the decision. The decision of the private body will be reviewed by a court and a decision will be made by the courts as to whether or not to provide access to the requested records.

## Fees

- A requester who seeks access to a record containing personal information about that requester (him or herself) is not required to pay a request fee. If you ask for information about yourself you are called a personal requestor.
- Every other requester, who is not a personal requester, must pay the required request fee of R50.
- The Information Officer will notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before going any further with the request.
- The requester may lodge an application to court against the payment of the request fee.
- After the Information Officer has made a decision on the request, the requester will be notified (using the required form).
- If the request is granted then a further access fee must be paid for the search, reproduction and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure. Requesters who earn less than R14 712 per year (if single) and R27 192 per year (if married or in a life partnership), do not have to pay access fees. The fee structure and other information about access fees can be provided by the Fund on request.
- The Fund can decide not to charge fees.

## Protection of personal information

### How do you request your personal information under POPIA?

*Requests for personal information under POPIA must be made in accordance with the provisions of PAIA – as set out above in this Manual.*

### You have the following rights under POPIA

To request confirmation of whether we hold personal information about you and a description or record of it

To request information about which third parties have access to your personal information

To request us to correct or delete your personal information if it is inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained (Form 2, Regulations to POPIA)

To request us to delete or destroy your information if we are no longer authorised to keep it

To object to us processing your personal information (Form 1, Regulations to POPIA)

**Note:** please use the prescribed forms for these requests noted above, which you can get off the Information Regulator's website: <https://justice.gov.za/inforeg/>. If you do not use the prescribed form or do not complete it properly, your request may be rejected, refused (if sufficient information is not provided or otherwise) or delayed.

We will give you a written estimate of the fee for providing you with your personal information. We may also require you to provide us with a deposit for all or part of the fee prior to giving you the requested personal information. The Fund may decide not to charge a fee. Certain personal information is available to you at no cost – please see the schedule of this information in this Manual above.

### The Fund processes personal information for the following purposes

- (a) Mainly to provide benefits in terms of its rules for its members and former members as well as the dependants of such persons upon the death of a member. These benefits are provided on withdrawal or retirement from the Fund, upon the death of a member or in certain circumstances due to the ill-health of the member.

- (b) To receive contributions from the employer(s) who participate in the Fund and/or the members of the Fund and to process information about those contributions related to the members.
- (c) To allocate those contributions to investments or, if the rules permit, allow members to make certain choices as regards investment options.
- (d) To manage and oversee the insured benefits of the Fund and the attendant policies.
- (e) In order to investigate and then exercise its discretion concerning the allocation of lump sum death benefits or to provide pensions (depending on the rules).
- (f) To process divorce and maintenance orders.
- (g) To provide housing loans or guarantees for housing loans.
- (h) To exercise a discretion as regards withholding or deduction from benefits.
- (i) To comply with information requests by the Fund’s regulators and to provide information and reporting as required by law and regulators.
- (j) To manage or oversee transfers into and out of the Fund of members.
- (k) To manage registration, liquidation and rule amendments of or for the Fund.
- (l) To manage Fund officials, potential Fund officials, service providers, operators and the officials and employees of service providers and operators so as to facilitate or manage their appointment, removal, assessment, monitoring, fitness for office, service capability, delivery, performance and other relevant factors.
- (m) To direct, control and oversee the operations, administration and investments of the Fund and to comply with duties set out in the Pension funds Act (and its successors), including section 7D of this Act and other relevant law.
- (n) To ensure the Fund’s board and committees meet regularly, prepares agenda, minutes, resolutions and other Fund documentation and administration.
- (o) To provide relevant and appropriate communication to the members of the Fund and other stakeholders.
- (p) To manage requests for information and complaints related to the Fund.
- (q) To maintain, amend, consolidate or otherwise manage the Rules and other documentation of the Fund.

**Description of categories of data subjects and the personal information we hold for them**

We hold the following personal information for the following categories of data subject. Some of this personal information is special personal information and some of it is children’s personal information.

Category of data subject	Category or personal information we hold for them
Members of the Fund	Membership records with details and dates of joining and leaving the fund, identity or other numbers, dates of birth, age, nationality, retirement age, employment capacity, occupation or level at employer, employee numbers, employer details, any member information prescribed to be held by the Financial Sector Conduct Authority (FSCA), members’ contact details, including cell phone numbers and addresses, contributions received

	<p>with respect to them, contributions statements from employer including remuneration, pensionable salary, taxable salary, cost to company information, tax numbers, leave record, reason for leaving employment, fund investment choices, transfers received from other funds for the member, minimum individual reserves or accounts, employment status and reasons for leaving employment; health and disability information, reports and records related to a disability member, divorce and maintenance information and orders (including information contained therein about ex-spouses, partners, ex-partners, living arrangements, spouses, family and children), unclaimed benefits, housing loans and guarantees by fund and other financial service providers to members, housing purchases and building projects of members. Trade union, bargaining council or employer association information if relevant. Details of immovable property/residence of members or members' spouse, mortgage over property and/or pledge of members' benefits, terms of housing loan repayment and default. Elections regarding payment of benefits, investment of benefits when the member leaves the fund, Member's financial advisor details. Tax payable with respect to member, tax directives and applications, PAYE, knowledge of members' tax affair e.g. if they are not in order. Bank account details. Misconduct at employer, allegations and reports, including forensic reports from employer. Litigation, compensation and other legal claims (including CCMA) information related to their employer. Reporting of alleged criminal activity of member by employer to SAPS. Action by SAPS or NPA against member. Criminal activity, theft, fraud, misconduct, dishonest behaviour of member. Disciplinary proceedings against members. Information about financial prejudice to members, including family and details about other income sources and financial information.</p>
<p>Beneficiaries and potential beneficiaries of the Fund, children of member, ex-spouse, spouse of member, other family members and life partners of member (for example dependants as defined in the Pension funds or nominees as contemplated in section 37C of that Act and</p>	<p>Identity number, age, percentage nomination, relationship to member, sex-life information. Address and other contact information, banking records, employment status, occupation, financial (assets and income statements), children, family members, living arrangements,</p>

actually nominated by members. Including persons nominated on nomination of beneficiaries' forms.)	account numbers and details, criminal behaviour, divorce and maintenance information, partner, spouse and ex-partner and spouse information, caregiver, health, medical records, life expectancy information, education, training, paternity. Other information required to determine dependency.
Ex-spouses or spouses of members	Their representatives, contact details, identity or other numbers, age, marital status, membership of a fund, pension interest amount, bank account information, tax information and information disclosed in divorce and maintenance orders.
Former members of the Fund	Unclaimed benefit information Member records
Board members and other Fund officials	Full names, identity or other number, date of birth, nationality, occupation, contact details, and date of appointment, conflicts and declarations of interest, board memberships, in some cases other employment or provisions of services information and remuneration information, training, education, qualifications, experience, fit and proper requirements information, criminal record, professional body membership and disciplinary information, name of employer, directorships, prescribed person information, FICA information, reasons for removal from office.
Service provider companies and persons within those companies. Contractors and agents of the Fund as well as their directors and management	Company name, company registration number, FICA information, any due diligence or tender information, including previous criminal behaviour or other forms of misconduct, fit and proper information. Contractual arrangements, errors and omissions, information about claims or litigation, conflicts and declarations of interest, qualifications, licenses, professional body membership, prescribed information. Bank account details. Directors and management identity or other number, contact details, fit and proper requirements information, legal, compliance and regulatory information.
Participating employers of the Fund including their directors, management and consultants, directors and shareholders	Company name, company registration number, FICA information, pay-points. Litigation, compensation and other legal claims (including CCMA) information. Information about persons responsible for contributions. Bargaining council information if relevant.

## The recipients or categories of recipient to whom personal information may be supplied by the Fund

The Fund may provide certain of the personal information of data subjects to the following persons for purposes of the Fund, for example to the extent that they may provide services contracted to the Fund, to perform statutory duties, to comply with or facilitate court orders, to determine complaints and to regulate and supervise the Fund:

- the Fund's administrator;
- the Fund's Consultant;
- The Fund's investment consultant
- the Fund's auditors;
- the Fund's insurers;
- the Fund's legal providers;
- the Fund's tracing agents;
- the Fund's lump sum death benefit appointee
- the employers participating in the Fund
- the consultant of the employer
- the FSCA, Prudential Authority, South African Reserve Bank, the Information Regulator and relevant Authorities and Regulators;
- the South African Revenue Services, the Financial Intelligence Centre and other government entities;
- Ombud (for example the Pension Funds Adjudicator) as well as the Financial Services Tribunal;
- basic lump sum death benefit related personal information of beneficiaries to other beneficiaries;
- spouses, ex-spouses of members and their representatives;
- court appointees;
- the Board and other Fund officers;
- other persons lawfully entitled to receive Fund personal information.

## Planned flow of personal information out of South Africa

The Fund:

- Using electronic signature software, which is hosted outside of South Africa, however, the necessary data protection protocols are in place.
- Emails are saved on the cloud, which is hosted outside South Africa, however, the necessary data protection protocols are in place.

## General description of security measures of the Fund

The Fund and its operators employ appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information.

These measures include:

- Firewalls;
- Virus protection software and update protocols;

- Logical and physical access control;
- Secure setup of hardware and software making up the information technology infrastructure; and
- Passwords and encryption.

## The Fund relies on the following authorisations, justifications or grounds to process personal information lawfully

POPIA required the Fund to process personal information in compliance with the eight Conditions set out in that Act. The Fund wants to communicate where it relies on POPIA justifications to process personal information lawfully and, thus, has included this information in this Manual. More information on this can be obtained from the Fund's Data Protection Policy, which will be made available as set out above in this Manual. The legislation references under this heading refer to POPIA unless otherwise stated.

### Condition Two – justification for processing of personal information other than consent

1. The Fund relies on justifications other than consent to process personal information lawfully.
2. Under Condition Two, section 11 (10)(b) – processing the personal information is necessary for the performance of a contract to which the data subject is party- with respect to members generally the Fund does not contract with the member directly, however the member is subject to the Rules of the Fund. The Fund does not rely solely on this justification as the reference to “contract” may not be directly applicable to the Rules.
3. As regards service provider information - the Fund may rely on the contract performance justification (section 11 (1)(b)) in addition to the legitimate interests of the Fund justification (section 11(1)(f)) to process service provider information as there is a contract between the parties that allows for the Fund to process the personal information of operators and it is in the Fund's legitimate interests to do so.
4. Where the Fund has put a contract in place for the Board and other Fund officials or made them subject to a Code of Conduct, the Fund relies on the contract or Code wording where it specifies that the Board and other Fund officials permit the Fund to process their personal information. It is also in the Fund's legitimate interest to process their personal information. The Fund relies on the justification under section 11 (1)(b) and the justification under (section 11(1)(f) also applies.
5. The Fund relies on the justification in section 11(1)(c) to justify processing of personal information (an obligation in law imposed on the Fund). The Fund has a legal obligation to perform its activities as well as statutory duties in relation to financial statements, valuations, transfers, accounting, benefit payments, withholding and deductions, among other activities, in terms of the Pension Funds Act and other legislation such as the Financial Sector Regulation Act, anti-money laundering legislation, subordinate legislation such as Standards, the Rules of the fund as well as its common law duties.
6. In addition, it is often to protect the members' or other data subjects' interests that the Fund processes their personal information to fulfil its purposes – permitting the Fund to rely on section 11(1)(d). Failure to process data subject's personal information would lead to negative consequences for members and processing their personal information leads to positive outcomes for members, for example in relation to contributions to the Fund and benefit payments. The Fund processes personal information in line with its purposes and usual

activities. Its activities, in line with its stated purposes, are necessary in order to receive contributions, pay benefits and secure assets (among other purposes identified and documented by the Fund). These activities would be expected by members and other data subjects, would not come as a surprise and are necessary and in line with lawful purposes.

### **Condition Two – collecting personal information from persons other than the data subject themselves**

1. The Fund generally receives information either from employers (for example in relation to collection contributions or withholding requests), the member him or herself (for example a retirement or withdrawal claim form) or from the member's beneficiaries (for example a death claim). Thus, there are many instances where the Fund does not receive personal information about a data subject, for example the member or a beneficiary, from them personally.
2. Thus, the Fund has identified justifications where it may process this personal information even though it has not been received directly from the data subject themselves. These justifications relate to:
  - (a) collection from another source would not prejudice a legitimate interest of the data subject;
  - (b) collection is required to comply with an obligation imposed by law (for example sections 7A, 13A, 37C and 37D of the Pension Funds Act or Regulation 33 to the Pension Funds Act);
  - (c) to maintain the legitimate interest of the Fund (for example to allocate contributions or pay benefits) or the participating employer (third party) (for example to process a withholding or deduction request);
  - (d) compliance is not practicable (for example a potential beneficiary of a death benefit is not contactable);
  - (e) collecting tax related personal information from the member's employer is necessary to comply with tax legislation; and/or
  - f) occasionally the Fund may find itself in legal proceedings when it may be necessary to collect personal information from a source other than the data subject.

### **Bank account information**

1. We rely on certain justifications when processing bank account numbers.
2. For the processing of service provider bank account details, we have agreements with most of our operators that include payment of fees to their bank accounts, thus section 11(1)(b) of POPIA applies.
3. With respect to members' bank account numbers, beneficiaries' bank account numbers, maintenance order payees' bank accounts, divorce order non-member spouses' bank account numbers: the Fund relies on section 11(1)(b) of POPIA to process these bank accounts as it is in the data subject's legitimate interests that we pay them. The Fund may also rely on section 11(1)(f) to justify the processing of bank accounts in the Fund's legitimate interests. In addition section 37D of the Pension Funds Act requires under 37A(4)(a) that we pay to a member's or beneficiary's bank account, thus we also rely on section 11(1)(c) of POPIA.

### Children's personal information

The Fund has identified where it will rely on authorisations/grounds to process children's personal information.

Activity type	POPIA grounds to justify the processing of children's information	
Payment of benefits to a member (or other person) leaving the fund (other than on transfer) for example on withdrawal, death (pension) or retirement (including lump sum death benefits).	S35(1)(c)	Mainly S35(1)(a)
Nomination of beneficiaries by members i.e. members' dependants and nominees.	S35(1)(c)	Mainly S35(1)(a)

### Availability of this Manual

A copy of this Manual is available for inspection free of charge at the Fund's registered office (see address in this Manual above) within normal business hours.

If the Fund is, at any stage, required by law to have a section 51 PAIA manual, then this Manual will be available as prescribed and submitted to the SAHRC or as prescribed.

Signed on this 20th day of May 2025

  
\_\_\_\_\_

**Head of the Fund – Independent Principal Officer**

# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer


(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

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

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<b>PARTICULARS OF RECORD REQUESTED</b>			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

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

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

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

Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

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

Indicate which right is to be exercised or protected	

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

<b>FEEES</b>	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

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

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

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

\_\_\_\_\_  
**Signature of Information Officer**