



PAIA MANUAL

Strategic Transfer Solutions (Pty) Ltd

FSP Licence No: 36382

Registration Number: 2008/012031/07

Address: 2nd Floor, The Place, 1 Sandton Drive, Sandton, 2196, South Africa

PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NUMBER 2 OF 2000 (AS AMENDED)

Contents

1. INTRODUCTION	2
2. PURPOSE OF THIS MANUAL	2
3. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION	3
4. THE INFORMATION OFFICER (SECTION 51(1) (8)).....	4
5. PROCESSING OF PERSONAL INFORMATION.....	4
6. PROCEDURE FOR REQUESTS	4
7. PAYMENT OF FEES.....	5
8. TYPES OF RECORDS HELD BY STS	5
9. RECORDS AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION	6
10. GROUNDS FOR REFUSAL	7
11. DECISION.....	7
12. AVAILABILITY OF THE MANUAL.....	8
13. UPDATING OF THE MANUAL.....	8
ANNEXURE A PRESCRIBED FEES	9
ANNEXURE B REQUEST FOR ACCESS TO RECORD.....	10



1. INTRODUCTION

The Promotion of Access to Information Act (PAIA), No. 2 of 2000 ("the Act") gives effect to the constitutional rights of access to information held by another person and that is required for the exercise or protection of any rights.

Requests in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

STS is an authorised Financial Services Provider (FSP), registered with the Financial Sector Conduct Authority (FSCA).

2. PURPOSE OF THIS MANUAL

1. In this PAIA manual, any reference to "STS" refers to Strategic Transfer Solutions (Pty) Ltd, Registration Number: 2008/012031/07
2. This PAIA Manual is intended to ensure that STS complies with the Act and to foster a culture of transparency and accountability within STS by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
3. To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act for them to exercise their rights in relation to public and private bodies.
4. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
 - a. Limitations aimed at the reasonable protection of privacy;
 - b. Commercial confidentiality; and
 - c. Effective, efficient, and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

In addition, this PAIA Manual complies with the requirements of Section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its Regulations by Public and Private Bodies.

Please note that publication of this manual does not give rise to any rights to access records except as provided for in terms of PAIA.

About this manual:

To help you access information, this manual sets out the types of records that STS holds and the process to access these records. This manual is useful to:

- check the types of records STS holds where you must complete the form, as set out in PAIA, and how to submit your request to STS for processing;
- understand the records that STS holds that are available to you in terms of other laws;

access the contact details of the Information Officer and Deputy Information Officer, who will help you request the records you want to access;



3. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

Contact details

Any person who wishes to request any information from STS to protect or exercise a right may contact the Information Officer at the following contact details:

Registered Company Name:	Strategic Transfer Solutions (Pty) Ltd
Registration Number:	2008/012031/07
Date of Incorporation:	14/05/2008
FSP Number:	36382
Business Address:	2nd Floor, The Place, 1 Sandton Drive, Sandton, 2196, South Africa
Postal Address:	2nd Floor, The Place, 1 Sandton Drive, Sandton, 2196, South Africa
Telephone:	011 783 4997
Website:	https://www.stsbrokers.com/

We have appointed one Information Officer and one Deputy Information Officer:

Information Officer:	Gareth Pinker	garethp@stsbrokers.com
Deputy Information Officer:	Karen Jones	karenj@stsbrokers.com

The Information Regulator of South Africa can be reached at:

Physical Address:	JD House 27 Stiemens Street Braamfontein Johannesburg 2001
Postal Address:	P O Box 31533 Braamfontein Johannesburg 2017
Telephone:	010 – 023 5200
Website:	www.inforegulator.org.za
General Enquiries:	enquiries@inforegulator.org.za
Complaints:	POPIAComplaints@inforegulator.org.za ; and PAIAComplaints@inforegulator.org.za



4. THE INFORMATION OFFICER (SECTION 51(1) (8))

- 4.1. The Act prescribes the appointment of an Information Officer for Private Bodies where such Information Officer is responsible to, inter alia, assess requests for access to information. The Head of a Private Body fulfils such a function in terms of section 51. STS has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act. You can access our Privacy Policy on our website <https://www.stsbrokers.com/>
- 4.2. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.
- 4.3. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is to render STS as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All requests for information in terms of the Act must be addressed to the Information Officer and the appointed Deputy Information Officers, as per details in point number 3 above.

5. PROCESSING OF PERSONAL INFORMATION

Our [privacy policy](#) highlights why we process your personal information and how we protect it.

6. PROCEDURE FOR REQUESTS

- 6.1. In terms of PAIA, the following persons may request access to records held by STS:
 - o 6.2. A person requesting information about him/herself;
 - o 6.3. An agent requesting information on behalf of someone else;
 - o 6.4. A third-party requesting information of someone else; or
 - o 6.5. A public or private body requesting information for the exercise or protection of its rights or in the interest of the public.

A request for access to a record of STS must be made in the prescribed form to STS at the address, fax, or e-mail address provided in point number 3 above. The form must be addressed to the Information Officer using contact details described in point number 3 above.

Use the prescribed form, available on the website of the Information Regulator at <https://www.inforegulator.org.za>

Requesters must:

- provide sufficient particulars to enable the Information Officer to identify the record/s requested and must contain the name and contact details of the requester;
- indicate which form of access is required;
- specify a postal address or email address of the requester in South Africa;
- indicate the right exercised or to be protected and why the record is required to protect or exercise the right;



- where they need to be informed of the decision on the request in any other manner, state that manner and particulars to be so informed; and
- if the request is made on behalf of a person, submit proof in the form of an affidavit or signed letter of consent, of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

7. PAYMENT OF FEES

- The Information Officer will notify the requester of the prescribed fee (if any) payable before further processing the request. Should a fee be required, proof of payment must be sent to the Information Officer together with the request.
- A requester seeking access to a record containing their own personal information will not be charged a request fee.
- The schedule of all fees payable for PAIA requests and related access to requested information is attached to this manual as **Annexure A**.
- If the request is granted the requester will be accordingly notified and a further fee must be paid. This would be for the search, reproduction, preparation, and time that exceed the prescribed hours to search and prepare the disclosure.

8. TYPES OF RECORDS HELD BY STS

Requests for access to documents held by STS will be in accordance with the Act. The following records are available to the requester from the STS office:

Human Resources records

These include but are not limited to the following:

- Any personal records provided to STS by their personnel;
- any records a third party has provided to STS about any of their personnel;
- conditions of employment and other personnel-related contractual and quasi-legal records;
- internal evaluation records; and other internal records and correspondence.

Client-related records

A client in this instance refers to any natural or juristic entity (including brokers) who receives services from STS client-related information includes but is not limited to the following:

Any records a client has provided to a third party acting for or on behalf of STS; any records a third party has provided to STS; and records generated by or within STS pertaining to the client, including transactional records.

Financial, IT and Operational records

This includes but is not limited to the following:

Financial records; operational records; databases; information technology; marketing records; internal correspondence; product records; statutory records; internal policies and procedures; and records held by officials of STS.

Other Parties

STS may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, service providers.



Alternatively, such other parties may possess records which can be said to belong to STS. The following records fall under this category: Personnel, customer or STS records which are held by another party as opposed to being held by STS; and records held by STS pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

9. RECORDS AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

Records are available in accordance with the following legislation:

1. Basic Conditions of Employment Act,
2. Companies Act,
3. Compensation for Occupational Injuries & Diseases Act,
4. Electronic Communications and Transactions Act,
5. Employment Equity Act,
6. Financial Advisory and Intermediary Services Act,
7. Financial Intelligence Centre Act,
8. Financial Services Board Act,
9. Income Tax Act,
10. Labour Relations Act,
11. Occupational Health and Safety Act,
12. Protection of Personal Information Act,
13. Short Term Insurance Act,
14. Unemployment Insurance Act,
15. Value Added Tax Act.



10. GROUNDS FOR REFUSAL

1. As prescribed in Section 25 of PAIA, justifiable grounds exist for STS to refuse or limit access to information and will inform the requester accordingly. Grounds for refusal include, but are not limited to;
 - 1.1 mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
 - 1.2 mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013;
 - 1.3 mandatory protection of the commercial information of a third party (section 64), if the record contains:
 - 1.4 trade secrets of the third party;
 - financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - information disclosed in confidence by a third party to STS, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition; mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - mandatory protection of the safety of individuals and the protection of property (section 66);
 - mandatory protection of records privileged from production in legal proceedings;
 - protection of the commercial information of STS; or
 - mandatory protection of the research information of a third party and of STS.
- 1.5 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 1.6 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 1.7 If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

11. DECISION

Time Allowed to Institution

- STS will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- The 30 (thirty) day period within which STS must decide whether to grant or refuse the request, may be extended for a further period of not more than 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 STS and the information cannot reasonably be obtained within the original 30 (thirty) day period.



- STS will notify the requester in writing should an extension be sought.

12. AVAILABILITY OF THE MANUAL

The manual is also available for inspection at STS's office, free of charge, and on the STS website <https://www.stsbrokers.com/>

13. UPDATING OF THE MANUAL

The Information Officer will on a regular update this manual as required according to regulatory amendments.



Gareth Pinker

Registered Information Officer

ANNEXURE A PRESCRIBED FEES

1. PAIA sets out two (2) types of fees, namely, a request fee and an access fee, that are required to be paid prior to STS processing the request for access to a record.
2. A personal requestor, that is a requestor who requests access to a record containing personal information about him/herself, is not required to pay the request fee. Any other requestor will be required to pay the request fee.
3. The access fee in respect of the search, preparation and disclosure of records does not apply to the personal record of a requestor.
4. A request fee of R50.00 is payable up front where a requestor submits a request for access to information other than for personal information relating to the requestor himself/ herself.
5. Where a copy of the record needs to be posted the actual postal fee is payable.
6. Where STS receives a request for access to information regarding a person other than the requestor him/herself and the Information Officer is of the opinion that the preparation of the required record will take more than six (6) hours, a deposit of one third (1/3) of the amount of the applicable access fee will be payable.
7. The applicable fees which will be payable upfront are:

ITEM	RAND
Photocopy of A4-size page or part thereof	R 1.10
Printed copy of A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
Copy in computer-readable form on flash drive	R 70.00
Transcription of visual images, for an A4-size page or part thereof	R 40.00
Copy of visual images	R 60.00
Search for and preparation of the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation	R 30.00



**ANNEXURE B
REQUEST FOR ACCESS TO RECORD
[Regulation 7]**

TO:
The Information Officer
The Place
1 Sandton Drive
Sandhurst, Sandton, 2196 Johannesburg

Telephone: 011 783 4997

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.*

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:
	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			
PARTICULARS OF RECORD REQUESTED <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				
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>				
Record is in written or printed form				
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)				
Record is held on a computer or in an electronic, or machine-readable form				

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
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>	
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 <i>(Mark the applicable box with an "X")</i>	
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	
<i>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.</i>	
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:	

FEES	
<p>a) <i>A request fee must be paid before the request will be considered.</i></p> <p>b) <i>You will be notified of the amount of the access fee to be paid.</i></p> <p>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></p> <p>d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i></p>	
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