



**BROKER SOLUTIONS GROUP (PTY) LTD**

**Referred to in this document as BRS**

**PAIA MANUAL**

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## 1 DEFINITIONS

### 1.1 Data Subject

The person to whom personal information relates.

### 1.2 Deputy Information Officer

The person to whom any power or duty conferred or imposed on an Information Officer by POPI has been delegated.

### 1.3 Head

In relation to a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
  - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - the person who is acting as such or any person duly authorised by such acting person

### 1.4 Information Officer

The head of a private body.

### 1.5 Information Regulator

The Regulator established in terms of Section 39 of POPI.

### 1.6 PAIA

The Promotion of Access to Information Act 2 of 2000

### 1.7 Person

A natural person or a juristic person

### 1.8 Personal Information

- Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: 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;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person;
- The personal opinions, views or preferences of the person; 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;
- The views or opinions of another individual about the person; and 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.

### 1.9 Personal Requester

A requester seeking access to a record containing personal information about the requester

### 1.10 POPI

The Promotion of Personal Information Act 4 of 2013

### 1.11 Private body

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body

### 1.12 Processing

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

### 1.13 Public body

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- in any other functionary or institution when:
  - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
  - exercising a public power or performing a public function in terms of any legislation

### 1.14 Requester

In relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of BRS or a person acting on behalf of such person

### 1.15 Request for access

A request for access to a record of BRS in terms of section 50 of PAIA.

### 1.16 Record

Any recorded information regardless of the form or medium, in the possession or under the control of BRS irrespective of whether or not it was created by BRS

### 1.17 Third Party

In relation to a request for access to a record held by BRS, means any person other than the requester

## 2 MANUAL PURPOSE

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights

BRS recognises everyone's right to access to information and is committed to provide access to BRS' records where the proper procedural requirements as set out by PAIA and POPI have been met.

BRS's PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

**Annexure A : Contact Details & Business Type**

This section provides BRS' postal and street address, phone and fax number and, if available, the e-mail address of the head of BRS

**Annexure B : Section 10 PAIA Guide**

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it

**Annexure C : Statutory Records**

This section provides a description of the various statutes in terms of which BRS is required to maintain records

**Annexure D : Availability of Records**

This section provides a list of records held by BRS along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to who the respective records relates along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request as provided for in Annexure E

**Annexure E : Request Procedure**

This section sets out the procedure required to obtain access to a record indicated as a "PAIA Request" in Annexure D

**Annexure F : Prescribed Fees**

This section sets out the fees that are payable to BRS prior to processing a request to obtain access to a record held by BRS

**Annexure G : Processing of Personal Information**

This section sets out the applicable aspects for the processing of personal information

**3 DUTIES OF THE INFORMATION OFFICER**

The Information Officer and/or the Deputy Information Officer of BRS are responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

**Right of Access**

The Information Officer and/or Deputy Information Officer may only provide access to any record held by BRS to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below

**Grounds for Refusal**

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question,.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed

The grounds for refusal, or absence thereof, are set out below:

**A: Mandatory Protection of privacy of a Third Party who is a Natural Person**

Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual)

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned
- The record consists of information that is already publicly available
- The record consists of information that was given to BRS by the individual to whom it relates and the individual was informed by or on behalf of BRS, before it is given, that the information belongs to a class of information that would or might be made available to the public
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin
- The record consists of information about an individual who is or was an official of BRS and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position heled or services performed by the individual and the name of the individual on a record prepare by the individual in the course of employment

**B: Mandatory Protection of Commercial Information of a Third Party**

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition

#### No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

#### **C: Mandatory Protection of certain Confidential Information of a Third Party**

##### Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement

#### **D: Mandatory Protection of Safety of Individuals and Protection of Property**

##### Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property

#### **E: Mandatory Protection of Records privileged from Production in Legal Proceedings**

##### Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege

#### **F: Commercial Information of BRS**

##### Grounds for Refusal

- The record consists of information that contains trade secrets of BRS
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of BRS, the disclosure of which would likely cause harm to the commercial or financial interests of BRS
- The record consists of information, the disclosure of which, could reasonably be expected to put BRS at a disadvantage in contractual or other negotiations or prejudice BRS in commercial competition
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by BRS, except insofar as it is required to give access to a record to which access is granted in terms of PAIA

#### No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by BRS or the results of any such testing or investigation carried out by or on behalf of BRS and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

### **G: Mandatory Protection of Research Information of a Third Party and BRS**

#### Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage
- The record consists of information that contains information about research being or to be carried out by or on behalf of BRS, the disclosure of which would be likely to expose BRS, a person that is or will be carrying out the research on behalf of BRS, or the subject matter of the research to serious disadvantage

## 4 NOTICE

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any)
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access



- The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on
- Exclude, from any such reasons, any reference to the content of the records' and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in BRS' possession, but cannot be found, or
- Simply does not exist,

the head of BRS must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

## **5 AVAILABILITY OF THE MANUAL**

A copy of the Manual is available-

- On our website;
- At our offices for inspection during our normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

**ANNEXURE A : CONTACT DETAILS & BUSINESS TYPE****A. Organisation Contact Details**

Postal address:	19 Kroton Street South, Weltevredenpark, 1709
Street address:	19 Kroton Street South, Weltevredenpark, Roodepoort, Gauteng
Phone number:	0861 274 365
Email address:	chris@brokersolutionsgroup.co.za

**B. Head of Organisation for purposes of POPIA and PAIA**

Full names & surname:	Chris Thessner
Email address:	chris@brokersolutionsgroup.co.za
Phone number:	0861 274 365

**C. Deputy Information Officer**


Full names & surname	Steven Rogers
Email address:	steven@brokersolutionsgroup.co.za
Phone number:	0861 274 365

**D. Business Type**


BRS conducts its main type of business in the following sector(s):

Finance &amp; Business Services



Head signature:	
Date:	2 November 2023

## ANNEXURE B : STATUTORY RECORDS

Head signature:	
Date:	2 November 2023


BRS maintains statutory records and information in terms of the following legislation:

Administration of Estates Act
Arbitration Act
Auditing Professions Act
Basic Conditions of Employment Act
Closed Corporations Act
Collective Investment Schemes Control Act
Companies Act
Compensation of Occupational Injuries & Diseases Act
Consumer Protection Act
Copyright Act
Customs and Excise Act
Electronic Communications and Transactions Act
Employment Equity Act
Financial Advisory & Intermediary Services Act
Financial Institutions (Protection of Funds) Act
Financial Intelligence Centre Act
Friendly Societies Act
Income Tax Act
Insolvency Act
Labour Relations Act
Long-term Insurance Act
Medical Schemes Act
National Credit Act
Occupational Health and Safety Act
Patents Act
Pension Funds Act
Prevention of Organised Crime Act
Prevention and Combatting of Corrupt Activities Act
Promotion of Equality and Prevention of Unfair Discrimination Act
Protection of Constitutional Democracy against Terrorist and related Activities Act
Short-term Insurance Act
Skills Development Act
Trademarks Act

Unemployment Insurance Act

Value Added Tax Act

**ANNEXURE C : AVAILABILITY OF RECORDS**


Head signature:	
Date:	2 November 2023

BRS maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
Insurance Policies held by organisation	PAIA Request	Risk Management	Organisation	
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees

	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

**ANNEXURE D : REQUEST PROCEDURE**

Head signature:	
Date:	2 November 2023

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Deputy Information Officer indicated in Annexure A.

The Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Deputy Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

**ANNEXURE E : PRESCRIBED FEES**

Head signature:	
Date:	2 November 2023


The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted)
- A requestor may lodge an application with a court against the render / payment of the request fee and/or deposit
- Records may be withheld until the fees have been paid

Please ensure that should you wish to make a request and it is accepted, please click on the below link to provide you with the relevant fees.

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

## ANNEXURE F : PROCESSING OF PERSONAL INFORMATION

Head signature:	
Date:	2 November 2023

### 1. Purpose of Processing Personal Information

Describe the purpose or reasons for processing personal information in your organisation.

### 2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

### 3. The recipients or categories of recipients to whom the personal information may be supplied

Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority



Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Credit and payment history, for credit information	Credit Bureaus

#### 4. Planned transborder flows of personal information

Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

#### 5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.

