



PAIA INFORMATION MANUAL

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Creation Date	2018
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Amendments/Updates	Addition of new companies; replace Form C with Form 2
Responsible Business Unit	Compliance
Approving Body	Board

1. INTRODUCTION AND PURPOSE

This manual is prepared for Novare Holdings and the Novare Group in accordance with the Promotion of Access to Information Act 2 of 2000, as amended ("PAIA"). It is intended to assist members of the public to understand what records may be held by the private body, how to request access to those records, the applicable fees, and the contact details of the person responsible for access to information requests.

This manual also provides a high-level description of the categories of personal information processed by the private body and related information relevant to PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA").

Novare is a financial services group. This manual applies to the following companies in the Novare Group of Companies:

- Novare Holdings (Pty) Ltd
- Novare Equity Partners (Pty) Ltd
- Novare Impact Investment Partners (Pty) Ltd
- Novare Actuaries and Consultants (Pty) Ltd
- Novare Investment Services (Pty) Ltd
- Novare Investments (Pty) Ltd
- Novare Capital (Pty) Ltd
- Novare CIS (RF) (Pty) Ltd
- Novare Wealth and Invest (Pty) Ltd
- Nexus Investment Partners (Pty) Ltd

2. COMPANY CONTACT DETAILS

Persons designated/duly authorised persons:

Information Officer:	L Keuler
Postal Address:	PO Box 4742, Tyger Valley, Bellville, Western Cape, 7536
Street Address:	5 th Floor, The Cliffs, Office Block 1, Niagara Way, Tyger Falls, Carl Cronje Drive, Western Cape, 7530
Telephone Number:	+27(0)21 914 7730
E-mail address:	liesl@novare.com

3. GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of section 10 of PAIA, made available a guide on how to use PAIA. The guide explains how to make a request for access to records, the assistance available to requesters, and the remedies available where access is refused or where a requester has a complaint. A copy of the guide may be obtained from the Information Regulator. The guide is available in multiple official languages.

Postal Address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Telephone: 010 023 5200
Toll Free: 0800 017 160
E-mail: enquiries@inforegulator.org.za

4. APPLICABLE LEGISLATION

No	Ref	Act
1	No. 71 of 2008	Companies Act
2	No. 98 of 1978	Copyright Act
3	No. 55 of 1998	Employment Equity Act
4	No. 95 of 1967	Income Tax Act
5	No. 66 of 1995	Labour Relations Act
6	No. 89 of 1991	Value-Added Tax Act
7	No. 37 of 2002	Financial Advisory and Intermediary Services Act
8	No. 75 of 1997	Basic Conditions of Employment Act
9	No. 2 of 2000	Promotion of Access to Information Act
10	No. 4 of 2013	Protection of Personal Information Act
11	No. 30 of 1996	Unemployment Insurance Act

5. ACCESS TO RECORDS AND AVAILABILITY

This manual is available for inspection at the offices of Novare during normal business hours. A requester may inspect the manual without charge, and copies may be made available in accordance with any prescribed fee and the manner of access requested.

6. RECORD CATEGORIES

PUBLIC AFFAIRS

1. Public product information
2. Public corporate records
3. Media releases

COMPANIES ACT RECORDS

1. Documents of incorporation
2. Memorandum of Incorporation and related founding documents
3. Minutes of board meetings
4. Records relating to the appointment of directors, auditors, company secretary, public officer and other officers
5. Share register and other statutory registers

FINANCIAL RECORDS

1. Annual financial statements

2. Tax returns
3. Accounting records
4. Banking records, including bank statements, paid cheques and electronic banking records
5. Asset register
6. Rental agreements
7. Invoices

INCOME TAX RECORDS

1. PAYE records
2. Documents issued to employees for income tax purposes
3. Records of payments made to SARS on behalf of employees
4. Other statutory compliance records, including VAT, skills development levies, UIF and compensation-related records

PERSONNEL DOCUMENTS AND RECORDS

1. Employment contracts
2. Employment equity plan, where applicable
3. Medical aid records
4. Pension fund records
5. Disciplinary records and disciplinary code
6. Salary, leave, training and SETA records
7. Training manuals

7. MARKETING

1. Marketing information, where applicable
2. Public customer information, where applicable
3. Field records, performance records, product sales records and marketing strategies, where applicable
4. Customer database, where applicable

SUBJECTS ON WHICH RECORDS ARE KEPT

Investors, service providers, product suppliers and staff of Novare.

PRODUCTS AND SERVICES

Long-term insurance products, retirement annuities, pension funds, savings products, trust services, and investment and risk products for groups and schemes. These records are kept in terms of legislation applicable to the above products and services and the financial services industry generally.

8. PROCEDURE FOR REQUESTING ACCESS

A requester who wishes to obtain access to a record of the private body must complete Form 2 (Request for Access to Record), as prescribed under PAIA from time to time, and submit it to the Information Officer at the postal, physical or electronic address set out in this manual.

The request must provide sufficient detail to enable the private body to identify the record requested and the requester.

- Specify the record or records requested with enough detail to locate them.
- State the form of access required, subject to the manner in which the record is held and applicable law.
- Provide the requester's contact details within the Republic, including an e-mail address where available.
- In the case of a request to a private body, identify the right sought to be exercised or protected and explain why the requested record is required for the exercise or protection of that right, unless the request relates to the requester's own personal information and the law provides otherwise.
- If the request is made on behalf of another person, provide proof of the capacity in which the request is made.

The Information Officer will consider the request in accordance with PAIA and will notify the requester of the outcome, any applicable fees, and any further steps required.

9. PRESCRIBED FEES

1. The fees applicable to requests for access to records are those prescribed under PAIA and its regulations from time to time.
2. The request fee payable by a requester, other than a personal requester, is currently R140.00.
3. If the search for and preparation of the record for disclosure would require more than six hours, a deposit may be required. The deposit is one-third of the amount of the estimated access fee.
4. Access fees for reproduction, copies, transcriptions, computer-readable copies, and search and preparation time are charged in accordance with the prescribed PAIA tariffs in force at the time of the request.
5. A personal requester is not required to pay a request fee. Access fees may still be payable where applicable under PAIA.
6. Records may be withheld until the prescribed fees, where applicable, have been paid.

10. PROCESSING OF PERSONAL INFORMATION

The private body processes personal information in the ordinary course of business, including information relating to employees, directors, clients, investors, beneficiaries, intermediaries, suppliers, service providers and other stakeholders. Such information may include identification and contact details, financial information, employment information,

contractual information, correspondence, compliance records and any other information reasonably necessary to provide products and services, manage relationships, comply with legal obligations, and conduct business operations.

Personal information may be disclosed, where lawful and necessary, to regulators, auditors, professional advisers, administrators, counterparties, insurers, service providers and other recipients for legitimate business, legal and compliance purposes. Appropriate, reasonable technical and organisational safeguards are implemented to protect personal information.

11. REMEDIES AND COMPLAINTS

If a requester is dissatisfied with the outcome of a PAIA request, the requester may lodge a complaint with the Information Regulator using the prescribed complaint procedure, where applicable, and/or apply to a court of competent jurisdiction for appropriate relief as provided for in PAIA.

12. AVAILABILITY AND UPDATING OF THIS MANUAL

This manual is available for inspection at the offices of the private body during normal business hours and should also be made available on the private body's website, where applicable. The private body will review and update this manual from time to time to reflect changes in applicable law, regulatory guidance and operational requirements. The manual should be made available in the languages and manner required by applicable law and regulatory guidance.

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:

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Fax number:

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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 (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
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 (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
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 <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>	
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 <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	
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 (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer