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## **Promotion of Access to Information Act (PAIA) Manual**

Prepared in terms of Section 51 of the Promotion of  
Access to Information Act, No. 2 of 2000 (as amended)



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**Granate Asset Management (Pty) Ltd**

is an authorised Financial Services Provider (FSP 46189) Reg No. 2015/090537/07

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## List of acronyms

<b>DIO</b>	Deputy Information Officer
<b>IO</b>	Information Officer
<b>Minister</b>	Minister of Justice and Correctional Services
<b>PAIA</b>	Promotion of Access to Information Act, No. 2 of 2000 (as Amended)
<b>POPIA</b>	Protection of Personal Information Act, No.4 of 2013
<b>Regulator</b>	Information Regulator
<b>Republic</b>	Republic of South Africa
<b>Granate</b>	Granate Asset Management (Pty) Ltd

## Overview

### Purpose

The Promotion of Access to Information Act (PAIA) was enacted in 2000. Its purpose is to promote the constitutional right of access to information to foster a culture of transparency and accountability in South Africa.

PAIA aims to encourage an open democracy in which individuals from all walks of life are empowered to engage with government and participate in decisions that affect their lives. In the context of a financial service provider such as Granate, investors are entitled to reasonable information from the entity they have entrusted their investments to.

A PAIA Manual is useful for the public to:

- check the categories of records held by an entity that are available without having to submit a formal PAIA request;
- understand how to make a request for access to information held by an entity, by describing the subjects on which the entity holds records and the categories of records held on each subject;
- know which records held by an entity are available under any other legislation;
- access the contact details of the entity's Information Officer and Deputy Information Officer, who will assist the public with records they want to access;
- know how to access the guide on how to use PAIA, as updated by the Regulator;

- know if an entity will process personal information, its purpose for doing so and the description of the categories of data subjects and of the information or categories of information it processes;
- understand categories of data subjects and related information or categories of information;
- understand to which recipients or categories of recipients' personal information may be supplied;
- know if an entity has planned to transfer or process personal information outside the Republic, and to which recipients or categories of recipients the personal information may be supplied; and
- know whether an entity has appropriate security measures to ensure the confidentiality, integrity and availability of personal information being processed.

### Scope

PAIA applies to all people in South Africa, including non-nationals.

## Key contact details for access to information held by Granate

### Chief Information Officer (IO)

Name	Paul Johannes Bosman
Telephone Number	+27 (0)21 276 3450
Email	Paul.bosman@granate.co.za

### Deputy Information Officer (DIO)

Name	Simone Blanckenberg
Telephone Number	+27 (0)21b 276 3450
Email	Simone.blanckenberg@granate.co.za

### General contact details

Postal address	P.O. Box 51868, Waterfront 8002, South Africa
Physical address	2 <sup>nd</sup> Floor Josephine Mill, 13 Boundary Road, Newlands, Cape Town 7700, South Africa
Telephone number	+27 (0)21 276 3450
Email	info@granate.co.za
Website	www.granate.co.za

## How to use PAIA and obtain access to the Guide

The Regulator has, in terms of section 10(1) of PAIA (as amended), updated and made a user-friendly guide available on how to use PAIA ('the Guide'), containing the information that someone who wants to exercise a right under PAIA or POPIA may reasonably need.

The Guide is available in each of South Africa's official languages and in braille.

The Guide describes:

1. the objects of PAIA and POPIA;
2. the postal and street address, phone and fax number and, if available, email address of:
  - the Information Officer of every public body, and
  - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
3. the manner and form of a request for:
  - access to a record of a public body contemplated in section 11; and
  - access to a record of a private body contemplated in section 50<sup>1</sup>;
4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
5. the assistance available from the Regulator in terms of PAIA and POPIA;
6. all legal remedies available if an entity acts contrary to or fails to comply with the provisions of PAIA and POPIA, including how to lodge:
  - an internal appeal;
  - a complaint to the Regulator; and
  - an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Regulator, or a decision of the head of a private body;
7. the provisions of sections 14 and 51<sup>2</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
8. the provisions of sections 15 and 52<sup>3</sup>, which provide for the voluntary disclosure of categories of records by public bodies and private bodies respectively;
9. the notices issued in terms of sections 22 and 54<sup>4</sup>, which detail the fees to be paid when asking for access to information; and
10. the regulations made in terms of section 92<sup>5</sup>.

Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

The Guide can also be obtained:

- upon request from the Information Officer; and
- from the website of the Regulator: <https://www.justice.gov.za/inforeg/>

Finally, a copy of the Guide is available in English and isiZulu for public inspection at Granate's offices during normal office hours.

## Categories of records available without having to request access

The documents below are available without having to request access by completing the prescribed PAIA form (Form C):

Category of records	Type of records	Available on website	Available on request
Regulatory	FSCA license – Granate		Yes
Client-related	Quarterly investor letters	Yes	Yes
	Fee calculations		Yes
FAIS-related	Regulatory policies: 1. Conflicts of interest Policy 2. Complaints Resolution Policy	Yes	Yes
Protection of Personal Information Act related	Privacy Policy	Yes	Yes
Promotion of Access to Information Act related	PAIA Manual	Yes	Yes

## Description of records available under other legislation

Category of records	Applicable legislation
Memorandum of Incorporation Companies and Intellectual Property Commission-related documents	Companies Act, No. 71 of 2008
Employment-related documents Payroll-related reports Leave-related reports	Basic Conditions of Employment Act, No. 75 of 1997
Compensation for Occupational Injuries and Diseases Act submissions	Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
Employment Equity reports	Employment Equity Act, No. 55 of 1998
Policies required under the FAIS Act Competence register Form A- Liquidity Calculation	Financial Advisory and Intermediary Services (FAIS) Act, No. 37 of 2002

Category of records	Applicable legislation
ITA 34- Tax return PAYE, Skills Development Levy & UIF-related reports	Income Tax Act, No. 95 of 1967
VAT201 reports	Value Added Tax Act, No. 89 of 1991
FICA-related documents that include personal information as defined by the Protection of Personal Information Act.	Financial Intelligence Centre Act, No. 38 of 2001
PAIA manual	Promotion of Access to Information Act, No. 2 of 2000
Privacy Policy	Protection of Personal Information Act (2013)

While we have made every effort to identify all applicable legislation, we cannot guarantee that this list is complete. If you are aware of any legislation we have omitted, please contact the Deputy Information Officer.

## Description of subjects on categories of records held by Granate

Subjects on which Granate holds records	Categories of records
Strategic documents, plans, proposals	Business Plan Audit and Risk Committee minutes Board meeting minutes
Client	Client presentations Personal information: Contact details and mailing list Monthly client investment statements Invoices and fee calculations
Secretarial	Share-related documents Share registers Annual returns
Finance	Annual financial statements Monthly management accounts Budgets and projections
Compliance: FAIS-related documents	Business-related policies including: <ul style="list-style-type: none"> <li>- Governance Framework</li> <li>- Risk Management Policy (including risk register)</li> <li>- Internal Control Policy</li> </ul>

Subjects on which Granate holds records	Categories of records
Compliance: FICA-related documents	Personal information for all related parties' FICA verifications, including for: <ul style="list-style-type: none"> <li>- Ultimate beneficial owners</li> <li>- Directors of a legal entity</li> <li>- Authorised signatories and persons acting on behalf of the ultimate beneficial owner/client</li> </ul>
Operational	Daily trade-related information
Human resources	<ul style="list-style-type: none"> <li>• HR policies and procedures</li> <li>• Advertised posts</li> <li>• Employees records</li> </ul>

## Processing of personal information

### Purpose of processing personal information

Granate will use your personal information only for the purposes for which it was collected and agreed with you. Unless specifically stated otherwise, the information may be used for the following purposes:

- to administer a service to you;
- to gather contact information; and
- to respond to your requests.

We may use your personal information to inform you of products or services available from Granate. When collecting information that might be used to contact you about our products and services, we give you the opportunity to opt out from receiving such communication. In addition, each email communication we send includes an unsubscribe link, allowing you to stop delivery of that type of communication. If you choose to unsubscribe, we will remove you from the relevant mailing list within 14 business days.

Granate does not sell, re-sell or distribute your personal information for re-sale.

### Description of the categories of Data Subjects and of the information or categories of related information

Categories of Data Subjects	Personal Information that may be processed
Clients	Name, address, registration numbers or identity number, employment status and bank details
Service providers	Name, registration number, vat number, address and bank details
Employees	Address, qualifications, gender and race, bank details
Shareholders	Name, address, registration number or identity number, employment status



### Recipients or categories of recipients to whom personal information may be supplied

Category of personal information	Recipients or categories of recipients to whom personal information may be supplied
Name, address, registration number or identity number, contact information, gender, employment status and bank details	Interactive Brokers
Name, address, registration number or identity number, contact information, gender, employment status and bank details	External Compliance Officer (sometimes performs mock FAIS & FICA audits)
Name, address, registration number or identity number, contact information, gender, employment status and bank details	Co-named management company on funds
Name, registration number or identity number and bank details	Maitland
All creditor invoices with banking details, names and addresses	External auditors
Personal details of authorised signatory on investment mandates regarding fees	External auditors
Employee and shareholder personal details: name, address, registration number, identity number, contact information and employment title	External auditors

### Planned transborder flows of personal information

Granate does not plan a transborder flow of any personal information.

### General description of information security measures implemented by Granate to ensure the confidentiality, integrity and availability of the information

Please refer to our Privacy Policy published on our website: <https://www.granate.co.za/>

## Availability of the manual

A copy of this manual is available:

- on <https://www.granate.co.za/>;
- to any person on request and upon the payment of a reasonable prescribed fee (see links below) should they need a printout; and
- to the Information Regulator on request.

To ensure provision of reasonable access to the records requested, the following links for PAIA forms can be used:

**[InfoRegSA-PAIA-Form02-Reg7.pdf \(inforegulator.org.za\)](#)** – Request for information form to be submitted to Granate.

**[Form-3-PAIA.pdf \(inforegulator.org.za\)](#)** – This form reflects the fees payable by the requestor and outcome of the request.

## Updating this manual

The IO and Deputy IO will update this manual regularly.

Issued by



**Paul Johannes Bosman: Information Officer**  
Director