

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000 (as amended)

1. INTRODUCTION

This manual applies to the following entities, who will hereafter be referred to as the “RPS Group”.

Retirement Planning Services (Pty) Ltd (“RPS”)- 1983/007582/07

Retirement Planning Services International (Pty) Ltd (“RPSI”) - 2001/06761/07

These public companies duly incorporated in the Republic of South Africa are financial service providers specialising in investment management and financial planning. The entities of the RPS Group are registered by the Financial Sector Conduct Authority (FSCA) as authorised Financial Services Provider with FSP Licence no 758 (RPS) & FSP Licence no 3355 (RPSI).

The RPS Group supports the constitutional right of access to information, and we are committed to provide you with access to our records in accordance with the provisions of the Act, the confidentiality we owe to third parties and the principles of South African law.

A copy of this manual is available on our website (www.rps.co.za) or by sending a request for a copy to the Information Officer by email. The Manual may also be obtained from our office or from the Information Regulator at the address set out below. This Manual will be updated from time to time, as and when required.

2. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

This manual has been compiled in accordance with the Promotion of Access to Information Act 2 of 2000 (the Act) and applies to both the identified entities.

2.1 CONTACT DETAILS

Name of Private Body	RPS International (Pty) Ltd
Designated Information Officer	Ms Ancia van der Mescht
Email address of Information Officer	ancia@rps.co.za
Postal Address	PO Box 257, Sanlamhof, 7532
Street Address	Cnr of Maree & Du Toit Street, Harry De Villiers, Bellville, 7530
Phone number	+27 21 946 3184
Website	www.rps.co.za

2.2 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator (“IR”) has, in terms of section 10 (1) of the Protection of Access to Personal Information Act (“PAIA”), updated and made available a revised guide on how to use PAIA (“Guide”). This guide has been drafted in an easily comprehensible form and manner, as may be reasonably required by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act 2 of 2013 (“POPIA”).

The Guide is available in each of the official languages and in braille.

The Guide contains the description of –

- What the objects of PAIA and POPIA are;
- The relevant contact details of each public and private body (where possible);
- The process that needs to be followed to request access to records;
- Assistance available from the IR and Information Officers in terms of both PAIA and POPIA;
- How to get access to the manual of a private body;
- All the remedies available in law to you; and
- Details on prescribed fees payable in respect of requests for information.

Members of the public can inspect or make copies of the Guide from the office of the IR, during normal working hours.

The guide can also be obtained –

- Upon request from the Information Officer
- From the website of the Information Regulator www.justice.gov.za/inforeg/

Contact details for the Information Regulator

Postal address: JD House
27 Stiemens Street
Braamfontein
JOHANNESBURG
2001

Website: www.inforegulator.org.za

E-mail: enquiries@inforegulator.org.za

2.2 PROCESSING OF PERSONAL INFORMATION

2.2.1 Purpose of processing personal information

The RPS Group processes the personal information of clients only for the purposes for which said information was collected and as agreed, for example –

- As part of onboarding or any subsequent instructions relating to the client’s financial services;
- We need to process personal information to comply with any binding obligations imposed by relevant governmental or regulatory authority;
- Verification for the purposes of preventing and mitigating financial crimes, fraud or money laundering; adhering to local and international best practice guidelines to safeguard our client’s investments;
- For us to provide investment management and other services as agreed between us and our clients maintain and nurture our client relationships;
- For audit and record keeping purposes;
- To liaise with third parties to offer services to our clients that form part of the products our clients have with us.

2.2.2 Categories of data subjects

Categories of Data Subjects	Personal Information that may be processed
Clients	Name, address, registration numbers or identity numbers, employment status, information relating to the education and/or the medical, financial, criminal or employment history of the person
Service Providers	Email address, name, contact number
Employees / Prospective employees	Name, address, identity number, date of birth, employment status, tax reference number, residential address, email address, contact number(s), remuneration, race, gender, medical aid applications, CVs, language, qualifications, work history, marital status, tax certificate, bank statement, medical aid membership number
Directors	Name, address, identity number, employment status, residential address, date of birth, gender, marital status, race

2.2.3 Recipients of personal information

The RPS Group may provide personal information to the following recipients:

- Product suppliers and their agents and representatives
- Employees of the RPS Group
- Third party verification agencies
- Employee benefit providers
- Relevant authorities, statutory bodies and regulatory bodies.
- Courts, administrative or judicial forums, arbitration or statutory commissions making requests in terms of the applicable laws or rules.

2.2.4 Planned transborder flows of personal information

Your personal information may be stored and processed in your region or another country where the RPS Group and their service providers maintain servers and facilities including the United States, Germany, Australia and Japan. We take steps, including through contracts, intended to ensure that the information continues to be protected wherever it is located in a manner that is consistent with the standards of protection required under applicable law.

2.2.5 Storage and destruction of personal information

We retain personal client information for the duration of the relationship between the RPS Group and the client. After a client ceases to be a client, we keep personal information for a maximum period of five years to comply with requirements imposed by law. Personal information may be retained for longer than five years, should it be the subject of any litigation or for other legal reasons.

2.2.6 General description of security measures implemented to ensure confidentiality, integrity and availability of information

We implement technical and organisational measures to seek to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information.

The Information Technology (IT) security measures implemented includes, but are not limited to:

- Firewall and network endpoint protection
- Antivirus and Multifactor Authentication
- Encryption of data at rest as well as in backups

The RPS Group has also implemented security measures in terms of paper records such as, but not limited to:

- Storing of files in a fireproof and secure filing room
- Restriction of transport of documents from the premises
- Destruction of documents when five year retention period has expired

2.4 TYPES OF RECORDS

2.4.1 Records available in terms of any other legislation

The organisation maintains **statutory records** and information in terms of the following legislation:

Auditing Professions Act	Labour Relations Act
Basic Conditions of Employment Act	Long-term Insurance Act
Companies Act	Medical Schemes Act
Compensation of Occupational Injuries & Diseases Act	Occupational Health and Safety Act
Consumer Protection Act	Prevention of Organised Crime Act
Copyright Act	Prevention and Combatting of Corrupt Activities Act
Electronic Communications and Transactions Act	Protection of Constitutional Democracy against Terrorist and related Activities Act
Employment Equity Act	Short-term Insurance Act
Financial Advisory & Intermediary Services Act	Skills Development Act
Financial Intelligence Centre Act	Unemployment Insurance Act
Income Tax Act	Value Added Tax Act

2.4.2 Records available without requesting access in terms of PAIA

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of PAIA. The Minister must publish any description so submitted by notice in the Gazette.

The identified entities in section 1 have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.rps.co.za.

2.4.3 Records available on request

The organisation maintains the following other 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
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management	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	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
	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 Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation

Financial	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	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
	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
	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

Records that are indicated as “Freely Available” can be accessed by contacting the Information Officer (see Section 2.1), 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 section 2.5 below.

2.5 REQUESTING PROCEDURES

A person who wants access to the records of RPS must complete the necessary request form (Form A). The request form can be accessed on www.rps.co.za or www.inforegulator.org.za.

The completed request form must be sent to the address or email address provided in section 2.1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. See fee structure (Form B).

The request form must be completed fully, failing which the process will be delayed while the outstanding information is obtained by the Information Officer.

NOTE: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- Information for the protection of the privacy of individuals
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information.