



PAIA MANUAL OF PEREGRINE CAPITAL PROPRIETARY LIMITED

THIS MANUAL HAS BEEN PREPARED IN ACCORDANCE WITH
SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000 (“PAIA”) AND THE
PROTECTION OF PERSONAL INFORMATION ACT, NO 4 OF 2013 (“POPIA”)

DATE OF COMPILATION: 1 APRIL 2021



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PEREGRINE CAPITAL PROPRIETARY LIMITED

Registration number: 1998/04238/07

This manual applies to Peregrine Capital Proprietary Limited, and its South African subsidiaries and their divisions hereinafter referred to as (“Peregrine Capital” or the “Company”).

1. INTRODUCTION

The Company is an asset management company and is a registered as a financial services provider in terms of the Financial Advisory and Intermediary Service Act.

2. CONTACT DETAILS

The responsibility for administration of and compliance with PAIA and POPIA, has been delegated by the Chief Executive Officer (Jacques Conradie) of the Company to the Information Officer of the Company.

Requests to be directed as follows:

Name of body	Peregrine Capital Proprietary Limited
Information Officer	Henry Huysamen
Physical Address	10 th Floor, 1 Park Lane 39 Wierda Road West Wierda Valley Sandown, 2196 Sandton
Postal Address	PO Box 650361 Benmore 2010
Telephone Number	+27 11 722 7492
Email address	mailto:dataprotection@peregrine.co.za
Website	www.peregrinecapital.co.za



3. THE ACT

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability in South Africa.

PAIA and POPIA give effect to the constitutional right of access to information which is held by private sector or public bodies, that is required for the exercise and or protection of the requester's right.

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

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

Requesters are referred to the Guide in terms of Section 10, which has been compiled by the South African Human Rights Commission ("SAHRC"), which contains information for the purposes of exercising Constitutional Rights and details on prescribed fees payable in respect of requests for information. The Guide is available from the SAHRC. The contact details of the SAHRC are set out below.

Postal Address	Private Bag 2700 Houghton 2041
Telephone Number	+27 11 877 3600
Facsimile Number	+27 11 403 0625
Website	www.sahrc.org.za
Email	section51.paia@sahrc.org.za

4. APPLICABLE LEGISLATION

1. Consumer Protection Act, 68 of 2008
2. Companies Act, 71 of 2008
3. Income Tax Act, 58 of 1962
4. Protection of Personal Information Act, 4 of 2013
5. Basic Conditions of Employment Act, 75 of 1997



6. Occupational Health and Safety Act, 85 of 1993
7. Employment Equity Act, 55 of 1998
8. Compensation for Occupational Injuries and Diseases Act, 130 of 1993
9. Unemployment Insurance Act, 30 of 1966
10. Value Added Tax Act, 89 of 1991
11. Copyright Act, 98 of 1978
12. Electronic Communications and Transactions Act, 25 of 2002
13. Trade Marks Act, 194 of 1993
14. Financial Intelligence Centre Act
15. Financial Advisory and Intermediaries Services Act
16. Collective Investment Schemes Control Act
17. Foreign Account Tax Compliance Act
18. The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (European Union)

5. REQUEST PROCEDURE/FORM OF REQUEST

Records held by the Company may be accessed on request only once the requirements for access have been met.

A requester is any person making a request for access to a record of the Company.

A requester must comply with all the procedural requirements contained in PAIA relating to a request for access to a record.

A requester must complete the prescribed form, available on the website of the SAHRC at www.sahrc.org.za, and submit same as well as payment of a request fee and a deposit, if applicable to the Information Officer at the postal or physical address or electronic mail address set out in clause 3 above. All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.



The Company will process a request within 30 days (of receipt of a completed form with sufficient information as set out above), unless the requestor has stated special reasons which satisfy the Information Officer that circumstances dictate that this time period not be complied with and that a shorter time period is appropriate.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required.

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.

The Company will, within 30 days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect.

The 30-day period within which the Company has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company (other than the head office) and/or the information cannot reasonably be obtained within the original 30 day period. The information officer will notify the requester in writing should an extension be necessary.

6. PRESCRIBED FEES

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

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

The fee structure is available on the website of the SAHRC at www.sahrc.org.za.



7. TYPES OF RECORDS

7.1 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 the Act. The Minister must publish any description so submitted by notice in the Gazette.

The Company has not submitted any such description for publication in the Gazette, however certain records are freely available on the internet at www.peregrinecapital.co.za.

7.2 Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in PAIA. Records are held on the following subjects:

- Personnel records;
- Client-related records;
- Private body records; and
- Records in the possession of or pertaining to other parties.

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body 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.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:



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

(iii) Private body records

A private body's records relate to the body's own affairs and are considered to include, but not limit to:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body 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.



8. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

The Company takes privacy and the protection of personal information seriously and will only process personal information in accordance with POPIA.

8.1 Purpose of Processing

The Company processes Personal Information, which includes but is not limited to, rendering of services to our customers, employee administration; providing or managing any information on products, transacting with our suppliers; maintaining customer records, recruitment purposes, apprenticeship and bursary purposes, travel purposes, general administration, financial and tax purposes, legal purposes, health and safety purposes, visitor access monitoring purposes, managing the premises and facilities, investigating of and preventing fraud, debt recovery and responding to website enquiries.

8.2 Types of personal information held by the Company

Categories of individual and juristic entities	Categories of Personal Information held	Availability
Employees	ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/provident fund information), details related to employee performance, disciplinary procedures, employee disability information, employee pension and provident fund information, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history, time and attendance records	Not automatically
Suppliers/Service Providers	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation,	Not automatically



	BBB-EE certificates, invoices, contractual documentation	
Directors and Shareholders	Name, surname, ID numbers, financial information as required for statutory reporting	Not automatically
New Job Applicants	Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, information about your current level of remuneration, including benefit entitlements, whether or not you have a disability for which Peregrine Capital needs to make reasonable adjustments during the recruitment process, and information about your entitlement to work in South Africa	Not automatically
Website Visitors	Name, emails address, company name, job title and telephone number	Not automatically
Visitors	Physical access records, electronic access records scans and CCTV records	Not automatically available

8.3 Transborder Flows of Personal Information

The Company may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. The Company will take the necessary steps to ensure that services providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

8.4 Sharing of Personal Information

The Company may share personal information with:

- other companies forming part of the Company's group of companies located outside of South Africa;
- services providers who perform services on behalf of the Company; and
- third party suppliers.



8.5 The Company's security measures to protect personal information

The Company takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. The Company has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. The Company will take steps to ensure that third party providers who process personal information on behalf of the Company apply adequate safeguards as required in terms POPIA.

9. AVAILABILITY OF THE MANUAL

The manual is available for inspection, on reasonable prior notice, at the office of the Company free of charge. Copies of the manual of the Company are also available from the SAHRC and on the Company's website.

SIGNED

1 April 2021

JACQUES CONRADIE

Date: