

PROTECTION OF PERSONAL INFORMATION MANUAL

Act 2 of 2000,

The Promotion of Access to Information

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000

Effective Date:

8 September 2020

1. **INTRODUCTION**

The Promotion to Access to Information Act, No 2 of 2000 ("the Act") gives effect to the constitutional right of access to any information in records held by public (government) or private (non-government) bodies that is required for the exercise of protection of any rights. Where a request is made in terms of the Act, Kasada Capital Management (Pty) Ltd is obliged to release the information, **except where the Act expressly provides that the information may or must not be released.**

This manual informs requesters of procedural and other requirements which a request must meet as prescribed by the Act. It is important to note that the Act recognises certain limitations to the right of access to information, including but not limited to, limitations aimed at reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

2. **PART I - PARTICULARS OF THE PRIVATE BODY**

(Information required under section 51(1)(a) of the Act):

- a. **Name of the Body**
Kasada Capital Management (Pty) Ltd
- b. **Information Officer**
Olivier Granet
- c. **Postal Address**
Rosebank Link, 6th Floor, 173 Oxford Road, Johannesburg
- d. **Street Address**
Rosebank Link, 6th Floor, 173 Oxford Road, Johannesburg
- e. **Telephone Number**
+27 10 541 0900
- f. **Fax Number**
NA
- g. **Web Address**
www.kasada.com
- h. **Contact Details of Information Officer**
Email: trad.cruickshank@kasada.com
Phone: +27 10 541 0900

3. **PART II - GUIDE OF SOUTH AFRICAN HUMAN RIGHTS COMMISSION**

The South African Human Rights Commission is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Postal Address: The South African Human Rights Commission
PAIA Unit
The Research and Documentation Department
Private Bag X2700
HOUGHTON
2041

Telephone Number: +27 (0) 11 484 8300

Fax Number: +27 (0) 11 484 0582

Email Address: paia@sahrc.org.za

Website: <http://www.sahrc.org.za>

4. **PART III - VOLUNTARY DISCLOSURE AND AUTOMATIC AVAILABILITY OF CERTAIN RECORDS**

The accessibility of the documents below may be subject to the grounds of refusal set out in this manual:

- Personnel Records.
- Client Related Records.
- Private Body Records (Financial and Company Secretarial).

5. **PART IV - RECORDS AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

A requester may also request information that is available in terms of other legislation.

<u>Legislation</u>	
1	Arbitration Act No. 42 of 1965
2	Basic Conditions of Employment No. 75 of 1997
3	Companies Act No. 61 of 1973
4	Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
5	Consumer Affairs (Unfair Business Practices) Act No. 71 of 1988
6	Credit Agreements Act No. 75 of 1980
7	Currency and Exchanges Act No. 9 of 1933
8	Debtor Collectors Act No. 114 of 1998
9	Employment Equity Act No. 55 of 1998
10	Finance Act No. 35 of 2000
11	Financial Sector Regulation Act No. 9 of 2017
12	Financial Services Board Act No. 97 of 1990
13	Financial Relations Act No. 65 of 1976
14	Harmful Business Practices Act No. 23 of 1999
15	Income Tax Act No. 95 of 1967
16	Insolvency Act No. 24 of 1936
17	Insurance Act No 27 of 1943
18	Intellectual Property Laws Amendments Act No. 38 of 1997
19	Labour Relations Act No. 66 of 1995
20	Long Term Insurance Act No. 52 of 1998
21	Medical Schemes Act No. 131 of 1998
22	Occupational Health & Safety Act No. 85 of 1993

23	Pension Funds Act No. 24 of 1956
24	Protection of Businesses Act No. 99 of 1978
25	Regional Services Councils Act No. 109 of 1985
26	SA Reserve Bank Act No. 90 of 1989
27	Short Term Insurance Act No. 53 of 1998
28	Skills Development Levies Act No. 9 of 1999
29	Skills Development Act No. 97 of 1998
30	Stamp Duties Act No. 77 of 1968
31	Stock Exchange Control Act No. 1 of 1985
32	Tax on Retirement Funds Act No. 38 of 1996
33	Unemployment Contributions Act No. 4 of 2002
34	Unemployment Insurance Act No. 63 of 2001
35	Usury Act No 73 of 1968
36	Value Added Tax Act No. 89 of 1991

6. PART V - ACCESS TO INFORMATION

Kasada Capital Management (Pty) Ltd may refuse a request for information in respect of information detailed below:

6.1 Commercial and Legal

- 6.1.1 Contracts and Agreements.
- 6.1.2 Company Confidential – Historical significance.
- 6.1.3 Meeting Minutes.
- 6.1.4 Shareholders.
- 6.1.5 Property Leases and Agreements.
- 6.1.6 Trademark.
- 6.1.7 Insurance.
- 6.1.8 Resolutions – Directors.
- 6.1.9 Correspondence.

6.2 Financial

- 6.2.1 Financial Yearend Results.
- 6.2.2 Financial Analysis and Reports.
- 6.2.3 Budgets.
- 6.2.4 Tax and Levies.

6.3 Human Resources

- 6.3.1 Employees Personal Information.
- 6.3.2 Employees History (skills and experience).
- 6.3.3 Educational Background.
- 6.3.4 Training and Development.
- 6.3.5 Health.
- 6.3.6 Salaries and Wages.
- 6.3.7 Contracts and Agreements.
- 6.3.8 Employment Equity.

6.4 Marketing

- 6.4.1 Advertising.
- 6.4.2 Contracts with Suppliers.
- 6.4.3 Product Ranges and Pricing.

6.5 Health and Safety

- 6.5.1 Policies.
- 6.5.2 Accidents and Incidents Reports.

7. REQUEST PROCEDURE

- 7.1 A requester requiring access to information from Kasada Capital Management (Pty) Ltd must complete the prescribed Form C.
- 7.2 Submit the completed form to the Information Officer at the postal or physical address, fax number or email address detailed above.
- 7.3 Kasada Capital Management (Pty) Ltd will process the request within 30 days.
- 7.4 The requester will be informed in writing whether or not access has been granted.
- 7.5 The requester must pay the prescribed fee, if applicable, before any further processing takes place.