

KASADA CAPITAL MANAGEMENT (PTY) LTD “KASADA”

PAIA MANUAL

**Prepared in terms of section 51 of the Promotion
of Access to Information Act 2 of 2000
(as amended)**

**INFORMATION REGULATOR VERSION: 01/10/2021
KASADA UPDATED: 31/05/2024
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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“CFO”	Chief Financial Officer
1.3	“DIO”	Deputy Information Officer;
1.4	“IO”	Information Officer;
1.5	“Minister”	Minister of Justice and Correctional Services;
1.6	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.7	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.8	“Regulator”	Information Regulator; and
1.9	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE INFORMATION OFFICERS OF KASADA

3.1. Chief Information Officer

Name:	Grant Karolus
Tel:	+27 (10) 541-0900
Email:	info@kasada.com

3.2. Deputy Information Officer

Name:	Deon Steyn
Tel:	+27 (10) 541-0900
Email:	deon.steyn@kasada.com

3.3 Access to information general contacts

Email:	info@kasada.com
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3.4 **Office**

Postal Address: 12th Floor, Hyde Hotel
24 Cradock Avenue, Rosebank
Johannesburg 2196
South Africa

Physical Address: 12th Floor, Hyde Hotel
24 Cradock Avenue, Rosebank
Johannesburg 2196
South Africa

Telephone: +27 (10) 541-0900

Email: info@kasada.com

Website: www.kasada.com

4. **GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a public body contemplated in section 11³; and

4.3.3.2. access to a record of a private body contemplated in section 50⁴;

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

a) that record is required for the exercise or protection of any rights;
b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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

4.5. The Guide can also be obtained-

- 4.5.1. upon request to the Information Officer;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is available in English only.

⁵ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁶ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

⁷ Section 15(1) of PAIA- *The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

⁸ Section 52(1) of PAIA- *The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

⁹ Section 22(1) of PAIA- *The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

¹⁰ Section 54(1) of PAIA- *The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

¹¹ Section 92(1) of PAIA provides that –“*The Minister may, by notice in the Gazette, make regulations regarding-*

- (a) any matter which is required or permitted by this Act to be prescribed;*
- (b) any matter relating to the fees contemplated in sections 22 and 54;*
- (c) any notice required by this Act;*
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and*
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”*

5. CATEGORIES OF RECORDS OF KASADA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Marketing Records	Publications, media releases	X	X
Privacy Information	Access to information manual (PAIA Manual)	X	X

6. DESCRIPTION OF THE RECORDS OF KASADA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION (TO PERSONS AUTHORISED TO RECEIVE ACCESS TO SUCH INFORMATION BY THIS LEGISLATION)

Category of Records	Type of Record/s	Applicable Legislation*
Employment	Employment records	Employment Equity Act (Act 55 of 1998)
Workplace Health and Safety	Health and Safety files	Occupational Health and Safety Act (Act 85 of 1993)
Privacy/Information	Privacy statement	Protection of Personal Information Act (Act 4 of 2013)
Privacy/Information	PAIA Manual	Promotion of Access to Information Act 2 of 2000
Governance	Memorandum of incorporation and alterations or amendments, notice and minutes, annual financial statements, accounting records, securities register, etc.	Companies Act (Act 71 of 2008)

*The above is not an exhaustive list of legislation that may require Kasada to keep records.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY KASADA

Subjects on which the body holds records	Categories of records
Governance	Annual reports, meeting minutes
Employee records	Employment files, such as qualifications, certifications, CVs
Finance records	Finance, such as financial statements
Sustainability	Governance, such as environmental reports

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

We process/will process personal information and special personal information to for example

- communicate with our clients, members, partners, service providers, etc.
- fulfil legal or contractual obligations, including assisting with law enforcement, anti-money laundering and counterterrorist financing initiatives or complying with information requests by regulators and meeting our regulatory reporting obligations.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below is a list of data subjects and a non-exhaustive list of personal information that Kasada may process.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Legal entities: Name, personal contact information, registration number, email address, job title, country of registration, financial data, user account details and compliance investigatory data, such as sanction reports.

Categories of Data Subjects	Personal Information that may be processed
	Individuals / individuals representing legal entities: Name, personal contact information, date of birth, email address, job title, gender, nationality, professional contact information (email address, business phone number, job title, division), and compliance investigatory data such as sanction reports.
Juristic Entities, including service providers, vendors, suppliers	Name, Company/Entity registration number, income tax and VAT registration details, BEE certificates, address, bank details, agreements, any other related individual data
Employees	Name, personal contact information, date of birth, email address, user id, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, date of hire, manager, performance reviews, details of internal training undertaken, professional contact information (email address, business phone number, job title, division), travel and expenses data, grievances, record of app and website visits, IP address, cookie data, preferences, financial data, user account details, compliance investigatory data such as whistle-blower reports, editorial content, CCTV footage, biometric information and any other related personal information
Prospective employees	Name, personal contact information, date of birth, email address, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, professional contact information (email address, business phone number, job title, division), CCTV footage, any other related personal information

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services / similar foreign law enforcement entities.
Qualifications, for qualification verifications	South African Qualifications Authority / similar foreign bodies.
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Category of personal information	Recipients or categories of recipients to whom their personal information may be supplied
Commercial, financial, fraud or criminal records	Local and foreign regulatory bodies, statutory oversight bodies, regulators, data protection authorities, fraud prevention bodies, law enforcement, due diligence agencies, or judicial commissions of enquiry making a request for data
Commercial or financial	Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data
Commercial or financial or tax records	South African Revenue Service, or another similar authority authorised to have accessed to such information
Commercial or financial records	Auditing and accounting bodies (internal and external)
Personal information as requested, subject to the provisions of PAIA and POPIA	Anyone making a successful application for access in terms of PAIA and POPIA
Commercial or financial records	Credit providers, where Kasada applies for credit

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Kasada may transfer personal information outside South Africa to:

- Communicate using an email address provided to us which is hosted outside South Africa.
- Share information with related entities, when they process personal or special personal information as envisaged in the privacy statement.

We will ensure as far as reasonably possible that any authorised party that we pass personal information to for processing is subject to a binding agreement or is required by local data protection law or regulation to treat personal information with the same level of protection as we are obliged to.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.kasada.com;

9.1.2 office of Kasada for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

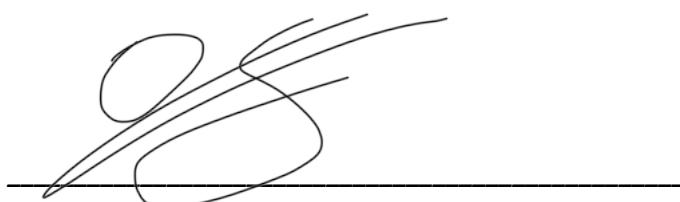
9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Head of Administration will on a regular basis update this manual.

Issued by



Olivier Granet

Co-Chief Executive Officer