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GEDDES

GEDDES CAPITAL (PTY) LTD

PAIA MANUAL

Version	3.0
Publishing Date	December 2023
Last Review Date	January 2026
Frequency of Review	Annual
Next Review Date	January 2027
Manual Owner	Nikki Germishuys
Responsible Business Unit	Risk and Compliance

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MANUAL STATEMENT

- This document forms part of the Geddes Capital (Pty) Ltd ("GC") internal business processes and procedures.
- Any reference to GC shall be interpreted to include the "manual owner".
- GC's governing body, its employees, volunteers, contractors, suppliers, and any other persons acting on behalf of GC are required to familiarise themselves with the manual's requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

MANUAL ADOPTION

By signing this document, I authorise the manual owner's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Brent Geddes
Capacity	Chief Executive Officer
Signature	Brent Geddes
Date	Jan 29 2026 17:11 SAST

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1 DEFINITIONS

1.1 Data Subject

The person to whom Personal Information relates.

1.2 Information Officer

The person to whom any power or duty conferred or imposed on an Information Officer by POPIA has been delegated.

1.3 Head

In relation to a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
  - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - the person who is acting as such or any person duly authorised by such acting person.

1.4 Information Officer

The head of a private body.

1.5 Information Regulator

The Regulator established in terms of Section 39 of POPIA.

1.6 PAIA

The Promotion of Access to Information Act 2 of 2000, as amended from time to time.

1.7 Person

A natural person or a juristic person.

1.8 Personal Information

- Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person;
- The personal opinions, views, or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

1.9 Personal Requester

A requester seeking access to a record containing personal information about the requester.

1.10 POPIA

The Promotion of Personal Information Act 4 of 2013, as amended from time to time.

1.11 Private body

- a natural person who carries or has carried on any trade, business, or profession, but only in such capacity.
- a partnership which carries or has carried on any trade, business, or profession; or
- any former or existing juristic person but **excludes** a public body.

1.12 Processing

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure, or destruction of information.

1.13 Public body

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- in any other functionary or institution when:
  - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
  - exercising a public power or performing a public function in terms of any legislation.

1.14 Requester

In relation to a private body**,** means any person, including, but not limited to public body or an official thereof, making a request for access to a record of GC or a person acting on behalf of such person.

1.15 Request for access

A request for access to a record of GC in terms of section 50 of PAIA.

1.16 Record

Any recorded information regardless of the form or medium, in the possession or under the control of GC irrespective of whether or not it was created by GC.

1.17 Third Party

In relation to a request for access to a record held by GC, means any person other than the requester.

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2 MANUAL PURPOSE

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to; and
- actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

GC recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPIA have been met.

GC's PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

Annexure A: Contact Details & Business Type
This section provides GC's postal and street address, phone, and fax number, and, if available, the e-mail address of the head of GC.
Annexure B: Section 10 PAIA Guide
This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.
Annexure C: Statutory Records
This section provides a description of the various statutes in terms of which GC is required to maintain records.
Annexure D: Availability of Records
This section provides a list of records held by GC along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to whom the respective records relate along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Information Officer (see Annexure A), 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 Annexure E.
Annexure E: Request Procedure
This section sets out the procedure required to be followed by a Requestor to obtain access to a record indicated as a "PAIA Request" in Annexure D.
Annexure F: Prescribed Fees
This section sets out the fees that are payable to GC by the Requestor prior to GC processing a request to obtain access to a record held by the organisation.
Annexure G: Processing of Personal Information
This section sets out the applicable aspects for the processing of personal information.
Annexure H: Outcome of Request and Of Fees Payable
This section sets out the outcome of request to the Requestor and of the fees payable by the Requestor.
Annexure I: Information Officer Appointment
This section provides for the formal appointment of an Information Officer where so required.

3 DUTIES OF THE INFORMATION OFFICER

The Information Officer of GC is responsible for:

- Publishing and proper communication of the manual i.e., creating manual awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the manual for accuracy and communicating any amendments.

3.1 Right of Access

The Information Officer may only provide access to any record held by GC to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record; and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

The Requestor must complete and submit Annexure E to GC.

3.2 Grounds for Refusal

The Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted and the Information Officer must complete Annexure H and make the completed Annexure available to the Requestor.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk; and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question,

where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which

- does not contain; and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed,

the grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person

Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information that is already publicly available.
- The record consists of information that was given to GC by the individual to whom it relates, and the individual was informed by or on behalf of GC, before it is given, that the information belongs to a class of information that would or might be made available to the public.
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest.
- The record consists of information about an individual who is deceased, and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin.
- The record consists of information about an individual who is or was an official of GC and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position heled or services performed by the individual and the name of the individual on a record prepare by the individual in the course of employment.

B: Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party.
- The record consists of information that contains financial, commercial, scientific, or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party.
  The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of duty of confidence owed to a third party in terms of an agreement.

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D: Mandatory Protection of Safety of Individuals and Protection of Property
Grounds for Refusal
▪ The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual. ▪ The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property. ▪ The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.
E: Mandatory Protection of Records privileged from Production in Legal Proceedings
Grounds for Refusal
▪ The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.
F: Commercial Information of GC
Grounds for Refusal
▪ The record consists of information that contains trade secrets of GC. ▪ The record consists of information that contains financial, commercial, scientific, or technical information, other than trade secrets, of GC, the disclosure of which would likely cause harm to the commercial or financial interests of GC. ▪ The record consists of information, the disclosure of which could reasonably be expected to put GC at a disadvantage in contractual or other negotiations or prejudice GC in commercial competition. The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by GC, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.
No Grounds for Refusal
▪ The record consists of information about the results of any product or environmental testing or other investigation supplied by GC or the results of any such testing or investigation carried out by or on behalf of GC and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).
G: Mandatory Protection of Research Information of a Third Party and GC
Grounds for Refusal
▪ The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage. ▪ The record consists of information that contains information about research being or to be carried out by or on behalf of GC, the disclosure of which would be likely to expose GC, a person that is or will be carrying out the research on behalf of GC, or the subject matter of the research to serious disadvantage.

4 NOTICE

4.1 Fee payable

Where a request for access has been received the Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Refer to Annexure F for a full breakdown of fees payable. Personal Requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be; and
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application,

except to the extent that the provisions regarding third party notification may apply, the Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request; and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

4.2 Granted request for access

If the request for access is **granted**, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given; and

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- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

4.3 Refused request for access

If the request for access is **refused**, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude, from any such reasons, any reference to the content of the records'; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

4.4 Undiscoverable record

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in GC's possession, but cannot be found; or
- Simply does not exist,

the head of GC must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

5 AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- on (specify the website), if any;
- head office of the (name of the body) for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in Annexure F, shall be payable per each A4-size photocopy made.

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ANNEXURE A: CONTACT DETAILS & BUSINESS TYPE

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

A. Organisation Contact Details

Postal address:	**Unit 603 Grove Exchange, 9 Grove Avenue, Claremont, Western Cape, 7708**
Street address:	**Unit 603 Grove Exchange, 9 Grove Avenue, Claremont, Western Cape, 7708**
Phone number:	**021 300 0211**
Email address:	**nikki@geddescapital.co.za**
Fax number:	**Not applicable**

B. Head of Organisation

Full names & surname:	**Mr. Brent Geddes**
Email address:	brent@geddescapital.co.za
Phone number:	**021 300 0211**
Fax number:	**Not applicable**

C. Information Officer

Full names & surname	**Mr. Warren Edmund Deats**
Email address:	warren@geddescapital.co.za
Phone number:	**021 300 0211**
Fax number:	**Not applicable**

D. Business Type

The organisation conducts its main type of business in the following sector(s):	
Agriculture	
Mining and Quarrying	☐
Manufacturing	☐
Electricity, Gas & Water	☐
Construction	☐
Retail & Motor Trade and Repair Services	☐
Wholesale Trade, Commercial Agents & Allied Services	☐
Catering, Accommodation & Other Trade	☐
Finance & Business Services	☒
Community, Special & Personal Services	☐
If other, please specify:	☐

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ANNEXURE B: SECTION 10 PAIA GUIDE

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

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.

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

The aforesaid Guide contains the description of-
- the objects of PAIA and POPIA;
- the postal and street address, phone, and fax number and, if available, electronic mail address of-
  the Information Officer of every public body, and
- 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 ;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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-
  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 or a decision by the Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 .

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.

The Guide can also be obtained-
- upon request to the Information Officer;
- from the website of the Regulator (https://www.justice.gov.za/inforeg/).

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where 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.

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ANNEXURE C: STATUTORY RECORDS

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

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

Administration of Estates Act	☐
Arbitration Act	☐
Auditing Professions Act	☐
Basic Conditions of Employment Act	☐
Closed Corporations Act	☐
Collective Investment Schemes Control Act	☐
Companies Act	☐
Compensation of Occupational Injuries & Diseases Act	☐
Consumer Protection Act	☐
Copyright Act	☐
Customs and Excise Act	☐
Electronic Communications and Transactions Act	☐
Employment Equity Act	☐
Financial Advisory & Intermediary Services Act	☐
Financial Institutions (Protection of Funds) Act	☐
Financial Intelligence Centre Act	☒
Friendly Societies Act	☐
Income Tax Act	☐
Insolvency Act	☐
Labour Relations Act	☐
Long-term Insurance Act	☐
Medical Schemes Act	☐
National Credit Act	☐
Occupational Health and Safety Act	☐
Patents Act	☐
Pension Funds Act	☐
Prevention of Organised Crime Act	☐
Prevention and Combatting of Corrupt Activities Act	☐
Promotion of Equality and Prevention of Unfair Discrimination Act	☐
Protection of Constitutional Democracy against Terrorist and related Activities Act	☐
Short-term Insurance Act	☐
Skills Development Act	☐
Trademarks Act	☐
Unemployment Insurance Act	☐
Value Added Tax Act	☐

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ANNEXURE D: AVAILABILTY OF RECORDS

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

GC maintains the following 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
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	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 Meetings	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
	Pension Fund 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	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, 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

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Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	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
	Franchise 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

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ANNEXURE E: REQUEST FOR ACCESS TO RECORD

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

_____
_____
_____
_____
(Address)

E-mail address: _____

Fax number: _____

Mark with an **"X"**

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel.:		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel.		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (Mark the applicable box with an "**X**")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS (Mark the applicable box with an "**X**")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

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MANNER OF ACCESS (Mark the applicable box with an "**X**")	
Personal inspection of record at registered address of private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b)* You will be notified of the amount of the access fee to be paid. *c)* The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. *d)* If you qualify for exemption of the payment of any fee, please state the reason for exemption	
Reason	

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You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at_____this_____day of_____20 _____

_____

Signature of Requester / person on whose behalf request is made.

FOR OFFICIAL USE

Reference number:	
Request received by: (Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer

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ANNEXURE F: PRESCRIBED FEES

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

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

No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request ito items 2-8.
11.	Postage, e-mail, or any other electronic transfer	Actual expense, if any.".

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ANNEXURE G: PROCESSING OF PERSONAL INFORMATION

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

1. **Purpose of Processing Personal Information**
   Describe the purpose or reasons for processing personal information in your organisation.

2. **Description of the categories of Data Subjects and of the information or categories of information relating thereto**
   Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.
   Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

3. **The recipients or categories of recipients to whom the personal information may be supplied.**
   Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

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
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

4. **Planned transborder flows of personal information.**
   Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.

5. **General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.**
   Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.

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ANNEXURE H: OUTCOME OF REQUEST AND OF FEES PAYABLE

Note:

1. If your request is granted the—
   (a) amount of the deposit, (if any), is payable before your request is processed; and
   (b) requested record/portion of the record will only be released once proof of full payment is received.

2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO:

_____
_____
_____

Your request dated_____, refers.

1. You requested:

Personal inspection of information at the registered address of private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
Postage, e-mail, or any other electronictransfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes ☐ No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	

The amount must be paid into the following Bank account:
Name of Bank: RMB
Name of account holder: Geddes Capital (Pty) Ltd
Type of account: Cheque Account
Account number: 62722389104
Branch Code: 250655
Reference Nr:
Submit proof of payment to: warren@geddescapital.co.za

Signed at_____this_____day of_____20 _____

_____
Information Officer

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ANNEXURE I: INFORMATION OFFICER APPOINTMENT

Head signature:	Brent Geddes
Date:	Jan 29 2026 17:11 SAST

In terms of the Protection of Personal Information Act the head of a private body is the designated Information Officer for that private body. The Information Officer may delegate any power or duty conferred or imposed in terms of POPIA to the Information Officer.
GC has appointed an Information Officer to facilitate any requests to access records held by GC. This delegation does not prohibit the person who made the delegation from exercising power concerned or performing the duty concerned himself or herself. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.
The Information Officer need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments and business processes.
The Information Officer has the authority to approach all staff members of GC and to request all records held by GC. Where a manager is of the opinion that access to a record should not be granted to the Information Officer, reasons for this decision shall be given to the Information Officer who will make a final decision on the matter.
The Information Officer is responsible for:

- Publishing and proper communication of the manual i.e., creating manual awareness.
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record.
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format.
- Reviewing the manual for accuracy and communicating any amendments

As the Head of the organisation, I, Brent Geddes, hereby appoint Warren Edmund Deats as GC's Information Officer

Brent Geddes
Head Signature

Jan 29 2026 17:11 SAST
Date

Warren Deats
Information Officer Signature

Jan 29 2026 17:26 SAST
Date