

PAIA MANUAL

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

For the

ORIGIN GROUP

(the “Origin Group” consist of the holding company “Origin Financial Holdings (Pty) Ltd”, Registration number 2012/102789/07, and all the subsidiaries held with a direct/indirect controlling share of 25% +1)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer;
1.2	“COO/CIO”	Chief Operating Officer/Chief Information 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 ORIGIN GROUP

3.1. Chief Information Officer

Name:	Stefan Olivier (COO/CIO)
Tel:	+27 (0)86 118 7878
Email:	stefano@originfin.com
Fax number:	+27 (0)86 618 4606

3.2. Access to information general contacts

Email:	<u>info@originfin.com</u>
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3.3. National or Head Office

Postal Address:	PO Box 3813 Tyger Valley 7536
Physical Address:	17 Gants Plaza 28 Langenegger Street Strand 7140
Telephone:	+27 (0)86 118 7878
Email:	info@originfin.com
Website:	www.originfin.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/>).

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.”

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours -

4.6.1 English

4.6.2 Afrikaans

5. CATEGORIES OF RECORDS OF THE ORIGIN GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Website available info	Any info available on the Group's website for public knowledge	X	
External Privacy Notice	Notice as prescribed by the Protection of Personal Information Act	X	

6. DESCRIPTION OF THE RECORDS OF ORIGIN GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
External Privacy Notice (POPIA)	Protection of Personal Information Act 4 of 2013
Any legislative records as prescribed by the following legislation	Administration of Estates Act 66 of 1965 Basic Conditions of Employment Act No. 75 of 1997 Chartered Accountants Designation Act 67 of 1993 Collective Investments Schemes Control Act No. 45 of 2002 Companies Act No. 71 of 2008 Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993 Consumer Protection Act No. 68 of 2008 Employment Equity Act No.55 of 1998 Financial Advisory and Intermediary Services Act No. 37 of 2002 Financial Intelligence Centre Act No. 38 of 2001 Financial Institutions (Protection of Funds) Act No. 28 of 2001 Financial Services Board Act No. 97 of 1990 Financial Services Ombud Schemes Act No. 37 of 2004 Friendly Societies Act No. 25 of 1956

	Income Tax Act No. 58 of 1962 Insurance Laws Amendment Act No. 27 of 2008 Labour Relations Act No. 66 of 1995 Long-term Insurance Act No. 52 of 1998 Medical Schemes Act No. 131 of 1998 Occupational Health and Safety Act No. 85 of 1993 Pension Funds Act No. 24 of 1956 Prevention of Organised Crime Act No. 121 of 1998 Protection of Constitutional Democracy against Terrorist and Related Activities Act No. 33 of 2004 Public Accountants and Auditors Act 80 of 1991 Security Services Act No. 36 of 2004 Short Term Insurance Act No. 53 of 1998 Skills Development Act No.97 of 1998 Skills Development Levies Act No. 9 of 1999 Tax Administration Act 28 of 2011 Trust Property Control Act 57 of 1988 Unemployment Contributions Act No. 4 of 2002 Unemployment Insurance Act No. 63 of 2001 Value Added Tax Act No. 89 of 1991
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7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE ORIGIN GROUP

(NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used.)

Subjects of Records	Categories of records
Strategic Documents, Plans, Proposals & Meetings	Annual Reports Strategic Plan Minutes of management meetings Minutes of staff meetings General correspondence
Human Resources	HR policies and procedures Advertised positions Employee records Training records Health and Safety Records
Operations	Production records Compliance manual – FAIS Compliance reports Complaint procedures Contractual agreements with suppliers Procedure manual - FICA Records of advice

Subjects of Records	Categories of records
	Register of key individuals Register of representatives Register of non-compliance Record of continued compliance by representatives Register of premature cancellation of products Clients register
Information Technology	Change in Software and Software Application User Access Hardware Exchange
Finance	Accounting and audit records Financial statements Inventory of Assets

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 All personal information is processed

8.1.1.1 For the purpose of effectively providing a service;

8.1.1.2 To ensure compliance in accordance with any applicable legislation.

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

8.2.1 All Data Subjects and applicable information are processed and retained as specified per the following:

8.2.1.1 For any clients, external or third parties, as per our External Privacy Notice (Available and published on our website or obtainable by email to popia@originfin.com .)

8.2.1.2 For any employees or recruitment individuals, as per our Internal Privacy Notice (Available and published on our internal Files depository or obtainable by email to popia@originfin.com .)

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

8.3.1 All personal information is processed

8.3.1.1 For the purpose of effectively providing a service;

8.3.1.2 To ensure compliance in accordance with any applicable legislation.

8.3.2 An applicable summary is available:

8.3.2.1 For any clients, external or third parties, as per our External Privacy Notice (Available and published on our website or obtainable by email to popia@originfin.com .)

8.3.2.2 For any employees or recruitment individuals, as per our Internal Privacy Notice (Available and published on our internal Files depository or obtainable by email to popia@originfin.com .)

8.4 Planned transborder flows of personal information

8.4.1 Some Operators host their servers and back-up servers in Europe and therefore Personal Information is transferred across South African borders. These countries have similar protection laws under GDPR.

8.4.2 We use cloud services with servers outside of South Africa, in the USA. We apply the necessary safeguards to protect your personal information. Detail of these safeguards may be obtained by contacting us directly by sending an email to popia@originfin.com.

8.4.3 We will not share your personal information with third parties for secondary or unrelated purposes unless otherwise disclosed on collection.

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.

8.5.1 We have taken the best possible measure within our infrastructure to protect information on electronic medium. We have the CIS RAM v1a protocol inclusive of CIS Controls v8.

8.5.2 The security of your personal information is important to us, however no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

8.5.3 We have all reasonable commercial standards of technology and operational security in place to protect all information provided by data subjects from loss, misuse, alteration or destruction. Except for our Protocol Policy we have implemented industry standard accepted virus protection software, firewalls and spam filter software to limit exposure to the minimum. Furthermore, all email data are encrypted with TLS v3 protocol. We also constantly monitor all infrastructure through RMM implemented software.

8.5.4 All reasonable steps will be taken to secure our data subjects' data. Authorised employees or service providers who are responsible for the maintenance of any data submitted, are required to maintain the confidentiality of such data.

8.5.5 It is expressly prohibited for any person, business or entity to gain or attempt to gain unauthorised access to our platforms, or to deliver or attempt to deliver any unauthorised, damaging or malicious code to our platforms. If a person delivers or attempts to provide any unauthorised, harmful or malicious code to our platforms or attempts to gain unauthorised access to any platform, a criminal charge will be laid against

that person, and, if we or any public body should suffer any damage or loss, civil damages will be claimed.

9. AVAILABILITY OF THE MANUAL

8.6 A copy of the Manual is available-

8.6.1 at our Registered Office at 17 Gants Plaza, 28 Langenegger Street, Strand 7140 or an of our other offices for public inspection during normal business hours;

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

8.6.3 to the Information Regulator upon request.

8.7 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 Chief Operating Officer/Chief Information Officer will on a regular basis update this manual.

Issued by



Stefan Olivier

Chief Operating Officer/Chief Information Officer