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SEED ANALYTICS (PROPRIETARY) LIMITED

MANUAL

in terms of

Section 51 of

The Promotion of Access to Information Act

2 of 2000

(the “ACT”)

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1. INTRODUCTION

This manual has been prepared in accordance with section 51 of the Act and aims to facilitate a request for access to a record held by a Seed Analytics and which is required for the exercise or protection of any right.

This manual may be amended from time to time and as soon as any amendments have been finalised, the latest version thereof will be made public.

Any requestor is advised to contact our Information Officer, Mr. Kevin Wilson, should you require any assistance in respect of using this manual or with requesting information from Seed Analytics. The contact details of our Information Officer can be found in paragraph 4, below.

2. DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them here under, namely –

- 2.1. “**the Act**” means the Promotion of Access to Information Act, Act 2 of 2000, as amended from time to time;
- 2.2. “**Data Subject**” means the person to whom Personal Information relates;
- 2.3. “**Information Officer**” means the person acting on behalf of Seed Analytics and discharging the duties and responsibilities assigned to the head of Seed Analytics by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the head of Seed Analytics in writing;
- 2.4. “**Manual**” means this manual published in compliance with Section 51 of the Act;
- 2.5. “**Personal Information**” means information as defined in the POPI Act;
- 2.6. “**POPI Act**” means the Protection of Personal Information Act 4 of 2013;
- 2.7. “**Record**” means any recorded information, regardless of form or medium, which is in the possession or under the control of Seed Analytics, irrespective of whether or not it was created by Seed Analytics, and which are kept as evidence of Seed Analytics’s functions, activities and transactions. There are different forms of records, for example correspondence files, maps, plans, registers, agendas and minutes, which could be available in different media, e.g paper, electronic, or on microfilm;
- 2.8. “**Request**” means a request for access to a Record of Seed Analytics;

- 2.9. “**Requestor**” means any person, including a public body or an official thereof, making a Request for access to a Record of Seed Analytics and includes any person acting on behalf of that person; and
- 2.10. “**SAHRC**” means the South African Human Rights Commission.
- 2.11. Unless a contrary intention clearly appears, words signifying:
 - 2.11.1. The singular includes the plural and vice versa;
 - 2.11.2. Any one gender includes the other genders and vice versa; and
 - 2.11.3. Natural persons include juristic persons.

Unless otherwise stated, terms defined in the Act shall have the same meaning in this Manual.

3. OVERVIEW OF SEED ANALYTICS

- 3.1. SEED ANALYTICS (PROPRIETARY) LIMITED is a private company incorporated in terms of the company laws of South Africa. Seed Analytics conducts business through assisting financial services businesses in finding solutions for key problems when it comes to consolidated data and business intelligence.
- 3.2. Our unique team of actuaries, investment specialists, system architects and developers put us in a unique position to solve these critical problems in the financial services industry.
- 3.3. Services available include:
 - 3.1.1. Consolidated Client Statements
 - 3.1.2. Business Intelligence
 - 3.1.3. Solving the Problem – identifying at risk portfolios and providing solutions
- 3.4. Depending on the package selected, the offerings provided include:
 - 3.4.1. **Consolidated Client Statements**
 - Advisors e-mailing the statements to clients from an online portal
 - Access to statements and data via an API
 - 3.4.2. **Business Intelligence Report**
 - CEO Book Report

Wealth Manager Book Report

Raw Data

3.4.3. Solving the Problem

Clients' Portfolio Risks

Rebalancing required

4. CONTACT DETAILS OF INFORMATION OFFICER (Section 51(1)(a))

Information Officer: Kevin Wilson

Designation: Head of Data and Operations

Telephone: 021 914 0658

E-mail: kevin@seedanalytics.info

Postal Address: P.O. BOX 3107
TYGERVALLEY
BELLVILLE
7441
SOUTH AFRICA

Street Address: SHOP 1/8a 6-8 HIGH STREET
ROSENPARK
BELLVILLE
7530

Telephone Number: +27 21 914 0658

Email: info@seedanalytics.info

Website: <http://www.seedanalytics.info/>

5. GUIDE TO THE ACT (Section 51(1)(b) READ WITH SECTION 10)

5.1. The Act (section 51(1)(b)) grants a Requestor access to the records of a private body, provided the record(s) is required for the exercise or protection of any rights. If a public body lodges a complaint, the public body must be acting in the public interest.

- 5.2. Requests must be made in terms of with the prescribed procedures and rates. The request forms and prescribed tariffs are dealt with in sections 53 and 54 of the Act.
- 5.3. In terms of section 10 the SAHRC must compile and publish a Guide which contains all information necessary for the exercise of Constitutional Rights. The Requestor is referred to the Guide which is available on the SAHRC website, at: <http://www.sahrc.org.za/>
- 5.4. The contact details of the Commission are:

Postal Address: PAIA Unit
The Research and Documentation Department
Private Bag 2700
Houghton
2041

Physical Address: PAIA Unit
The Research and Documentation Department
Forum 3
Braampark
33 Hoofd Street
Braamfontein

Telephone Number: +27 11 877 3600 (Switchboard)

Fax Number: +27 11 403 0625

Email: paia@sahrc.org.za

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

6. AUTOMATIC DISCLOSURE - CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS (Section 51(1)(c))

The following Records are automatically available without a person having to request access in terms of the Act:

- 6.1. The web page <http://www.seedanalytics.info/> is accessible to anyone who has access to the Internet. The Seed Analytics website hosts the following categories of information:
- Service:
 - Service Packages
 - Consolidated Client Statements
 - Business Intelligence
 - Problem Solving
 - Corporate Information:

- Contact Details
- Team Members
- Terms and Conditions
- Privacy Policy

7. PERSONAL INFORMATION PROCESSED (Section 110, amendment 12)

The POPI Act requires the following information to be provided:

| | |
|---|---|
| (i) Purpose of processing Personal Information | To deliver the services requested. Management of employees and independent contractors |
| (ii) Description of categories of Data Subjects and of information or categories of information relating thereto | Categories Data Subjects: <ul style="list-style-type: none"> • Clients, Brokers and Fund Managers • Employees • Independent Contractors Categories Information Basic Personal Information |
| (iii) Recipients or categories recipients to whom the Personal Information may be supplied | See Privacy Policy |
| (iv) Planned transborder flows of Personal Information | Personal Information transfer to European Union member state for data centre purposes and to ensure effective service delivery. |

For further information as to how we handle your Personal Information please see our [Privacy Policy](#)

8. RECORDS AVAILABLE IN TERMS OF LEGISLATION (Section 51(1)(d)). RECORDS HELD BY SEED ANALYTICS AVAILABLE ON REQUEST

8.1. Seed Analytics keeps, inter alia, records in terms of various regulatory requirements that have an impact on its operations. These records are not automatically available and any request for access to thereto will be assessed in accordance with applicable internal policies and legislative requirements.

| <u>No</u> | <u>Ref</u> | <u>Act</u> |
|-----------|---------------|-----------------------|
| 1 | No 71 of 2008 | Companies Act |
| 2 | No 98 of 1978 | Copyright Act |
| 3 | No 55 of 1998 | Employment Equity Act |
| 4 | No 95 of 1967 | Income Tax Act |

| | | |
|----|----------------|--|
| 5 | No 66 of 1995 | Labour Relations Act |
| 6 | No 89 of 1991 | Value Added Tax Act |
| 7 | No 37 of 2002 | Financial Advisory and Intermediary Services Act |
| 8 | No 75 of 1997 | Basic Conditions of Employment Act |
| 9 | No 68 of 2008 | Consumer Protection Act |
| 10 | No 25 of 2002 | Electronic Communications and Transactions Act |
| 11 | No 2 of 2000 | Promotion of Access to Information Act |
| 12 | No 30 of 1996 | Unemployment Insurance Act |
| 13 | No 194 of 1993 | Trademarks Act |
| 14 | No 97 of 1998 | Skills Development Act |
| 15 | No 85 of 1993 | Occupational Health and Safety Act |

8.2. Seed Analytics holds the following information and documentation as it pertains to our day-to-day management of our business:

| Department | Description of Categories of Records Held |
|--------------------------|--|
| Company Secretary | <ul style="list-style-type: none"> • Compliance with Corporate Governance • Memorandum and Articles of Association • Company Register • Shareholders Agreements • Share Certificates • Board Meetings <ul style="list-style-type: none"> ▪ Attendance Register ▪ Resolutions ▪ Minute books • Delegation of Authorities • General Correspondence |
| Finance | <ul style="list-style-type: none"> • Invoices • Credit/Debit Notes • Journals, Ledgers and Balance Statements • Income Statements • Trial Balance Statements • Cash Flow Statements • Salary Information • Auditors Reports |
| Administration | <ul style="list-style-type: none"> • General Correspondence • Suppliers • Debtors and Creditors • Insurance Policies • Lease Agreements • Employees Travel Records |
| Human Resources | <ul style="list-style-type: none"> • General Correspondence • Employee's Personal Details |

- Job Profiles
- Division and Cost Centres
- Remuneration
- Medical Aid
- Employee Benefits
- Disciplinary Records
- Job Competency Profile
- Employee Performance Contract
- Training Records
- Internal Policies and Procedures
- General Correspondence
- Contracts
- Litigation Records
- Administration Legislation
- General Correspondence
- Agreements
- Regulatory Submissions
- General Correspondence

Legal

Regulatory

- 8.3. Records held by Seed Analytics pertaining to third parties, including, but not limited to financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about any contractors and / or suppliers;
- 8.4. Records held by Seed Analytics pertaining to contractors, subsidiary companies, joint venture companies, special purpose vehicle companies and service providers. In cases where information requested by the requester may impact on a third party, the Information Officer is obliged to comply with the requirements as set out in terms of the Act (especially Sections 71 to 73 of the Act)
- 8.5. Please note that the above documents might be protected by privacy or on any of the grounds for refusal as set out in the Act. All Requests will be accessed on a case by case basis and in accordance with the Act and any other applicable legislation.

9. OTHER INFORMATION AS MAY BE PRESCRIBED (Section 51(1)(f))

Not available.

10. ACCESS: PROCEDURE, AVAILABILITY AND PRESCRIBED FEES (Section 51(1)(e))

10.1. How to request a Record (Section 53)

10.1.1. Requests for access to Records must be made to the Information Officer in the prescribed form (Annexure 1), at the address or electronic mail address referred to in paragraph 4 above. Failure to make use of the prescribed form could result in your Request being refused or delayed.

10.1.2. A Request for access to a Record must be accompanied by payment of an initial non-refundable Request fee of (R57.50 (inclusive of VAT)). This fee is not applicable to personal Requests, i.e. individual seeking access to Records pertaining to him/ herself.

10.1.3. The Requestor must provide sufficient detail on the Request form to enable the Information Officer to clearly identify the Record as well as the Requestor's identity, which is to be accompanied by positive proof of identification.

10.1.4. The Requestor must indicate which form of access is required and if he/ she wishes to be informed on the decision on the Request in any other manner and state the necessary particulars to be so informed.

10.1.5. Access is not automatic. The Requestor must therefore identify the right he/she is seeking to exercise or protect and provide an explanation as to why the requested Record is required for the exercise or protection of that right.

10.1.6. If a Request is made on behalf of a person, the Requestor must then submit proof, to the satisfaction of the Information Officer, of his/ her authority to make the Request. Failure to do so will result in the Request being rejected.

10.2. Decision on Request (Section 56)

10.2.1. The Requestor will be notified, within **30 days**, in the manner indicated by him/her of the outcome of his/her Request:

10.2.1.1. If the Request for access is granted. Upon grant a further access fee (as may be applicable under Annexure 2) must be paid for the reproduction, the research and preparation of the Records as well as for any time that has exceeded the prescribed hours to search and prepare the Record for disclosure. Access will be withheld until the Requestor has made payment of the applicable fee (s).

10.2.1.2. If the Request for access is refused and reasons for the refusal will be provided. The Requestor will be advised that he/she may lodge an application with a court against the refusal of the Request, as well as the procedure for lodging the application.

10.2.2. Alternatively, the Requestor will be notified whether an extension is required to deal with the Request. The extension may not exceed 30 days.

10.2.3. The Requestor may lodge an internal appeal or on application to court against the tender or payment of the Request fee.

10.3. Availability

This manual is available on the Seed Analytics website, <http://www.seedanalytics.info/>, alternatively, during office hours at:

SHOP 1/8a 6-8 HIGH STREET
ROSENPARK
BELLVILLE
7530
WESTERN CAPE
SOUTH AFRICA

10.4. **Fees:** The fees payable in respect of access to Records are attached as Annexure 2.

ANNEXURE 1

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
FORM C**

(Section 53(1) of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Information Officer: Seed Analytics in respect of _____
(specify company or operating division, if applicable)

If you are aware of the division within Seed Analytics that holds the Record/s you are Requesting, please indicate this fact clearly. Where you are unsure of the division name, please give as much detail to facilitate our search for the Record/s concerned. Please note that your failure to specify a division name will not invalidate your Request, but it may cause unavoidable delays.

B. Particulars of person Requesting access to the Record

- (a) The particulars of the person who requests access to the Record must be given below.
- (b) The address and/ or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the Request is made, if applicable, must be attached.

Full name and Surname:

Identity Number:

Postal Address:

Telephone Number: _____

Fax Number: _____

E-mail address: _____

Capacity in which Request is made, when made on behalf of another person:

C. Particulars of person on whose behalf Request is made

This section must be completed ONLY if a Request for information is made on behalf of another person.

Full names and Surname:

Identity Number:

D. Particulars of Record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The Requestor must sign all the additional folios.**

1. Description of the Record or relevant part of the Record:

2. Reference number, if available:

3. Any further particulars of the Record:

E. Fees

- (a) A Request for access to a Record, other than a Record containing personal information about you, will be processed only after a Request fee has been paid.
- (b) You will be notified of the amount payable as the Request fee.
- (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 for exemption of payment of the fee (if any):

F. Form of access to Record

If you are prevented by a disability to read, view or listen to the Record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the Record is required.

| | |
|---|---|
| <p>Disability:</p> <p>_____</p> <p>_____</p> <p>_____</p> | <p>Form in which Record is required:</p> <p>_____</p> <p>_____</p> <p>_____</p> |
|---|---|

Mark the appropriate box with an **X**.

NOTES:

- (a) Compliance with your Request in the specified form may depend on the form in which the Record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the Record, if any, will be determined partly by the form in which access is requested.

1. If the Record is in written or printed form:

| | | | |
|--|--|--|---|
| Copy of Record* | | Inspection of Record | |
| 2. If Record consists of visual images (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.): | | | |
| View the images | | Copy of the images* | Transcription of the images* |
| 3. If Records consists of Records, words or information which can be reproduced in sound: | | | |
| Listen to the soundtrack (Audio cassette) | | Transcription of soundtrack* (Written or printed) | |
| 4. If Record is held on computer or in an electronic or machine - readable form: | | | |
| Printed copy of Record* | | Printed copy of information derived from the Record* | Copy in computer readable form* (USB drive or compact disc) |
| * If you requested a copy or transcription of a Record (above), do you wish the copy or transcription to be posted to you? Postage is payable. | | | YES |
| | | | NO |

G. Particulars of right to be exercised or protected

If the space is inadequate, please continue on a separate folio and attach it to this form.
The Requestor must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. Explain why the requested Record is required for the exercising or protection of the aforementioned right:

H. Notice of decision regarding Request for access

You will be notified in writing whether your Request has been approved/ denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your Request.

How would you prefer to be informed of the decision regarding your Request for access to the Record?

Signed at _____ this _____ day of _____ 20 _____

SIGNATURE OF REQUESTOR / PERSON ON WHOSE BEHALF REQUEST IS MADE

FEES PAYABLE

(as prescribed)

1. Copy of manual.

The fee for a copy of the manual is R1,10 for every photocopy of an A4-size page or part thereof.

2. Reproduction fees

The fees for preparation of Records referred to in regulation 11(1) are as follows:

| | Rand |
|--|-------------|
| (a) For every photocopy of an A4-size page or part thereof | 1,10 |
| (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | 0,75 |
| (c) For a copy in a computer-readable form on: | |
| (i) Electronic media, i.e. diskette | 70,00 |
| (ii) Compact disc | 7,50 |
| (d) (i) For a transcription of visual images, for an A4-size page or part thereof | 40,00 |
| (ii) For a copy of visual images | 60,00 |
| (e) (i) For a transcription of an audio Record, for an A4-size page or part thereof | 20,00 |

3. Request fee

The Request fee payable by a Requestor, other than a personal Requestor, referred to in Regulation 11(2) is R50,00 (excl. VAT).

4. Access fees

The access fees payable by a Requestor referred to in regulation 11(3) are as follows:

| | Rand |
|--|-------------|
| (a) For every photocopy of an A4-size page or part thereof | 1,10 |
| (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | 0,75 |
| (c) For a copy in a computer-readable form on - | |
| (i) Electronic media, i.e. diskette | 7,50 |
| (ii) Compact disc | 70,00 |
| (d) (i) For a transcription of visual images, for an A4-size page or part thereof | 40,00 |
| (ii) For a copy of visual images | 60,00 |
| (e) (i) For a transcription of an audio Record, for an A4-size page or part thereof | 20,00 |
| (f) To search for and prepare the Record for disclosure for each hour or part of an hour reasonably required for such search and preparation | 30, 00 |

For purposes of section 22(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) One third of the access fee is payable as a deposit by the Requestor.

The actual postage is payable when a copy of a Record must be posted to a Requestor.

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