



INFORMATION MANUAL

IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT

FOR

**RISK BENEFIT INVESTMENT
HOLDINGS (PTY) LTD**

AND ALL OF ITS SUBSIDIARIES

(hereinafter referred to as "the Business")

INDEX

1. Procedure for obtaining access to information
2. The section 10 guide on how to use the Act
3. Types of records held by RBS
4. The request procedure
5. Availability of the manual

1. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

1.1. Contact details

1.1.1. Any person who wishes to request any information from RBS to protect or exercise a right may contact the Information Officer at the following contact details:

1.1.2. The Information Officer

Postal address	Physical address	Electronic
1st Floor RBS Soho on Strand 128 Strand Street Cape Town 8000	PO Box 449 Cape Town 8001	Tel: (021) 443-4400 E-mail: complaints@rbs.co.za Website: www.rbs.co.za

1.1.3. If you have submitted your request to the Information Officer, and your request has not been resolved within 6 weeks of you submitting your request, you may complain to the Information Regulator at:

- 1.1.3.1. <https://www.justice.gov.za/infoereg/>
- 1.1.3.2. Complaints.IR.justice.gov.za

1.2. Prescribed Access Form

1.2.1. A request for access to a record of RBS must be made in the prescribed contents to RBS at the address or e-mail address provided above.

1.2.2. Requesters must:

- 1.2.2.1. provide sufficient particulars to enable the Information Officer to identify the record/s requested and must indicate who the requester is;
- 1.2.2.2. indicate which form of access is required;
- 1.2.2.3. specify a postal address in the RSA or email address of the requester;
- 1.2.2.4. identify the right exercised or to be protected and why the record is required to protect or exercise the right;
- 1.2.2.5. where they need to be informed of the decision on the request in any other manner, state that manner and particulars to be so informed; and
- 1.2.2.6. if the request is made on behalf of a person, submit proof of their capacity to do so to the Information Officer's satisfaction.

2. THE SECTION 10 GUIDE ON HOW TO USE THE ACT

2.1. The Guide was compiled in accordance with the South African Human Rights Commission specifically to assist people to access records and exercise their right to information. The Guide is available in all South African official languages free of charge and any person may request a copy of the guide.

2.2. Please direct queries to:

The South African Human Rights Commission PAIA Unit
2nd Floor Braampark Forum 3
33 Hoofd Street,
Braampark Office Park
Braamfontein
Telephone: +27 11 877 3627
Fax: +27 11 403 0668
Website: www.sahrc.org.za
Contact: Chantelle Kisoon
E-mail: ckisoon@sahrc.org.za

3. TYPES OF RECORDS HELD BY RBS

3.1. Requests for access to documents held by RBS will be in accordance with the Act. The following records are available to the requester from the RBS office:

3.2. Human Resources Records

3.2.1. These include but are not limited to the following:

- 3.2.1.1. Any personal records provided to RBS by their personnel;
- 3.2.1.2. any records a third party has provided to RBS about any of their personnel;
- 3.2.1.3. conditions of employment and other personnel-related contractual and quasi-legal records;
- 3.2.1.4. internal evaluation records; and
- 3.2.1.5. other internal records and correspondence.

3.3. Customer-related records

3.3.1. A customer includes any natural or juristic entity who receives services from RBS.

Customer-related information includes but is not limited to the following:

- 3.3.1.1. Any records a customer has provided to a third party acting for or on behalf of RBS;
- 3.3.1.2. any records a third party has provided to RBS; and
- 3.3.1.3. records generated by or within RBS pertaining to the customer, including transactional records.

3.4. Financial, IT and Operational records

3.4.1. This includes but is not limited to the following:

- 3.4.1.1. Financial records;
- 3.4.1.2. operational records;
- 3.4.1.3. databases;
- 3.4.1.4. information technology;
- 3.4.1.5. marketing records;
- 3.4.1.6. internal correspondence;
- 3.4.1.7. product records;
- 3.4.1.8. statutory records;
- 3.4.1.9. Internal policies and procedures;
- 3.4.1.10. treasury-related records;
- 3.4.1.11. securities and equities; and
- 3.4.1.12. records held by officials of RBS.

3.5. Other Parties

3.5.1. RBS may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies, service providers.

3.5.2. Alternatively, such other parties may possess records which can be said to belong to RBS. The following records fall under this category: Personnel, customer or RBS records which are held by another party as opposed to being held by RBS; and records held by RBS pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

3.6. Records available in terms of other legislation

3.6.1. The requester may also request information which is available in terms of legislation, such as the following:

3.6.2. Basic Conditions of Employment Act, Companies Act, Compensation for Occupational Injuries & Diseases Act, Employment Equity Act, National Credit Act, Pension Funds Act, Financial Services Board Act, Income Tax Act, Labour Relations Act, Unemployment Insurance Act, Long Term Insurance Act, Occupational Health and Safety Act, Promotion of Equality and Prevention of Unfair Discrimination Act, Electronic Communications and Transactions Act, Short Term Insurance Act, Skills Development Act, Skills Development Levies Act, South African Qualifications Authority Act, VAT Act, Financial Intelligence Centre Act, Financial Advisory and Intermediary Services Act, Protection of Constitutional Democracy Against Terrorist and related Activities Act.

4. THE REQUEST PROCEDURE

- 4.1. The requester must make the request for access to a record to the above RBS address or email address for the attention of the Information officer.
- 4.2. The Information officer will notify the requester of the prescribed fee (if any) payable before further processing the request.
- 4.3. A requester reasonably seeking access to a relevant record containing their own relevant personal information will not be charged a request fee.
- 4.4. The fees (excluding VAT) that the requester must pay to RBS is as follows:
 - 4.4.1. For every photocopy of an A4-sized page or part thereof - R1,00
 - 4.4.2. For every printed copy of an A4 sized page or part thereof held on a computer or in electronic form - R1,00
 - 4.4.3. For a copy in a computer-readable form on a compact disk - R50,00
 - 4.4.4. For a copy of an audio report - R20,00
 - 4.4.5. Any other request - R50,00
 - 4.4.6. An additional fee may be charged should documentation / information have to be searched for and prepared for disclosure - R40,00 per hour
- 4.5. The requester may lodge an application to court against the tender or payment of the fee.
- 4.6. If the request is granted the requester will be accordingly notified and a further fee must be paid.
- 4.7. This would be for the search, reproduction, preparation and time that exceed the prescribed hours to search and prepare the disclosure.

5. AVAILABILITY OF THE MANUAL

- 5.1. The manual is also available for inspection at RBS's office, free of charge, as well as on the RBS's website, and copies are available at the South African Human Rights Commission.