



PAIA Manual



STANLIB
MULTI-MANAGER

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STANLIB Limited PAIA Manual

The Manual is prepared in line with Section 51 of the Promotion of Access to Information Act, No 2 of 2000 (“PAIA”).

The STANLIB Limited group entities (the entities are listed below) use personal information for purposes of investing, managing and administering investments for, as well as concluding agreements with, clients.

Personal information, as defined in the Protection of Personal Information Act, No. 4 of 2013 (“POPI”) is used in the day to day operational processes, employment processes including recruitment, employment contracts, employment equity, medical aid, pension/provident fund, disciplinary actions, performance management, benefits and remuneration, training, SETA records or other employment-related requirements.

From time to time, STANLIB Limited group entities (sometimes referred to as “STANLIB” in this manual) may process personal information as part of standard business operations, including audits, reviews, market research, product development, and other legitimate business purposes.

STANLIB Limited group entities also process personal information when required to under any other laws or regulations, including for the purposes of market conduct oversight by an authorised body, law enforcement, investigations, prevention of terrorist activities, anti-money laundering, or other events which may be in the public interest.

The STANLIB Limited group entities’ Legal Department will attend to all matters pertaining to PAIA.

The Manual prepared under section 51 of PAIA for the following South African STANLIB Limited group entities: S STANLIB Asset

Management Limited

* STANLIB Collective Investments (RF) Limited S STANLIB

Wealth Management Limited

* STANLIB Wealth Management Nominees (Pty) Ltd S STANLIB

Credit Partners (Pty) Ltd

* STANLIB Multi-Manager Limited

* Classic Preservation Provident Plan S

Classic Preservation Pension Plan S Classic

Retirement Annuity Fund

Introduction to entities

- * STANLIB Limited is the holding company of the various STANLIB Limited group entities listed below:
- * The group entities are financial services companies providing a diverse range of services and financial products including investment, management, custody services and administration of investments to clients. The entities include three sponsored retirement funds (preservation pension, preservation provident and retirement annuity fund).
- * STANLIB Asset Management Limited, STANLIB Wealth Management Limited, STANLIB Multi-Manager Limited and STANLIB Credit Partners (Pty) Ltd (a wholly owned subsidiary of STANLIB Asset Management Limited) are financial service providers under the Financial Advisory and Intermediary Services Act, 2002 (“the FAIS Act”).
- * STANLIB Wealth Management Nominees (Pty) Ltd is a nominee company (providing custodial services) and a subsidiary of STANLIB Wealth Management Limited approved and regulated under the FAIS Act.
- * STANLIB Collective Investments (RF) Limited is an approved collective investments schemes management company under the Collective Investment Schemes Control Act.

Particulars in terms of section 51

This manual has been compiled in line with PAIA and applies to all the identified entities.

PAIA is a national legislation giving the requesters of information, requesting information from public, private (e.g. the STANLIB Limited group of entities) and government institutions the procedure to follow to get access, subject to a number of conditions, to records held by such bodies. In the case of STANLIB Limited, requests by third parties (including our clients) for information held by any of the STANLIB Limited group entities will be dealt with according to the manual and any other handbook or policies and procedures documentation developed for PAIA purposes.

The manual is applicable to all STANLIB Limited group entities and contains the details of the types of records kept by the STANLIB Limited group entities. The manual is available for inspection at the offices of STANLIB Wealth Management Limited at 17 Melrose Boulevard, Melrose Arch, Johannesburg, 2076 as well as on the STANLIB website – www.stanlib.com.

1. Contact details

The STANLIB Wealth Management Limited legal department will deal with all requests relating to any of the STANLIB Limited group entities. All requests for information in terms of the manual should be directed to:

Head of Legal

STANLIB Wealth Management Limited	17 Melrose Boulevard
PO Box 202	Melrose Boulevard
Melrose Arch	Melrose Arch
2076	2196
Telephone	+27(0)114486000
Fax	0865295087

2. The section 10 Guide on how to use the Act

Should you require greater clarity on or assistance with PAIA, we refer you to the guide that has been published by the South African Human Rights Commission ('SAHRC') under section 10 of PAIA. The guide includes:

- a. what the objects of PAIA are;
- b. the relevant contact details of each public and private body (where possible);
- c. the process that needs to be followed to request access to records;
- d. assistance available from the SAHRC and information officers of public bodies;
- e. how to get access to the manual of a private body;
- f. all the remedies available in law to you; and
- g. details on prescribed fees payable for requests for information. Any information

or queries related to the above should be directed to: The South African Human Rights

Commission

PAIA Unit

The Research and Documentation Department

Postal address	Private Bag 2700 HOUGHTON 2041
Telephone	+27(0)114848300
Fax	+27(0)114840582/1360
Website	www.sahrc.org.za
E-mail	PAIA@sahrc.org.za

In future, such queries must be directed to the Information Regulator as they will have oversight of PAIA in addition to POPI. This manual will be updated accordingly as soon as such information is made available.

3. Types of Records

a. Records available in terms of any other legislation

All records kept and made available according to legislation applicable to any of the entities listed above and the financial services industry in general, as it applies to the specific environment in which it operates, are available in line with the said legislation.

b. Records available without requesting access in terms of the Act

STANLIB Limited as a private body together with its subsidiaries may, on a voluntary basis, submit to the Minister of Justice and Correctional Services ("Minister") a description of records, which are automatically available without a person having to request access as set out in PAIA. The Minister may publish any descriptions so submitted by notice in the Government Gazette. No submissions have been made at this stage by the STANLIB Limited group entities for publication in the Government Gazette. Certain records are however freely available on the internet at www.stanlib.com

c. Company records

The following are records pertaining to STANLIB Limited group entities' own affairs: S Finance and

accounting records

* Human resources S

Strategy

* Shareholders S

Intermediaries

* Operational records S

Technology

* Compliance and risk S

Subsidiary

* Contractors S

Directors

d. Personal Information kept by the STANLIB Limited group entities

Categories of data subjects	Categories of information held
Clients/policyholders/investors / beneficiaries	Includes name, South African identity number or other identifying number (e.g. passport), date of birth, citizenship, telephone number(s), email address(es), income tax numbers, physical and postal addresses, financial information (e.g. fund or portfolio details), banking information (including account numbers). For juristic persons: entity name, registration number, income tax number, tax information, contact details for representative persons. FICA documentation used to verify identity and details of customer.
Advisers / brokers	Includes licencen numbers, physical addresses, contact details, compliance officer details.
Directors	ID numbers, name.
Employees	Includes ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/provident fund information), details related to employee performance, disciplinary procedures.
Consultants / contractors	Dependent on the nature of the consultant or contractor, but may include any details under "Employees" or "Service Providers" categories.
Service Providers, including outsourced / hosted services, auditors	Includes company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details.

e. Recipients of personal information Customer

information is / may be provided to:

* Brokers / advisers / intermediaries

* Group companies, including Liberty Holdings Limited and/or Standard Bank Group S Third party service provider to uphold contractual obligations or service clients

Employee information is/may be received from or provided to: S Pension/

provident funds and/or their trustees

* Medical aid funds

* Recruitment companies S

Credit bureaux

f. Planned trans-border information flows:

STANLIB has operations in the following countries:

Republic of South Africa	Tanzania
Lesotho	Kenya
Swaziland	Uganda
Namibia	South Sudan
Botswana	Ghana

As a result, personal information of clients in these operating countries is transferred into the Republic of South Africa for processing, following which it is transferred back to the operations. All operations are required to abide by STANLIB's policies, procedures and guidelines, regardless of legislative requirements for data protection in these countries.

g. Information security

STANLIB strives to uphold good information security practices and has policies, procedures and technological controls to ensure that the following areas of information security are addressed:

* Physical and environmental security controls S

Network security controls

* Logical access controls to systems and data including password controls S Protection from viruses and other malware

* Patch management and security updates

* Acceptable usage of information assets, including mobile devices

* Business continuity management and IT disaster recovery procedures S Induction training to all new staff members

In addition to the implementation of these measures, STANLIB regularly employs the expertise of independent third parties to review and identify gaps within our environment, so that we can strengthen internal controls.

4. Requesting procedures

a. A person who wants access to the records of any of the identified identities must complete the necessary request form. The request form can be accessed on www.stanlib.com or www.sahrc.org.za. If a person needs assistance with obtaining the form or on any other matter, they should contact the Information Officer (i.e. Head of Legal) at the telephone number provided in paragraph 1.

b. The completed request form must be sent to the address or fax number provided in paragraph 1 and marked for the attention of the Information Officer (Head of Legal) which requests shall include the following:

The records requested;

The identity of the requester;

Which form of access to the records is required, should the request be granted; The postal address or facsimile number of the requester.

c. The requester of the information must explain what other rights is being protected or exercised.

d. The requester must indicate if the requester, in addition to being informed in writing whether access to the record has been granted, wishes to be informed of the decision of the request in any other manner.

- e. If the request is made for another person, then the requester must submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer.
- f. Should an individual be unable to complete the prescribed form because of illiteracy, disability or any other reason, such individual may submit such request orally to the Information Officer.
- g. The requester must pay the prescribed fee (if applicable) before any further processing can take place.

The Information Officer (Head of Legal) will process the request and inform the requester of the fees (if any and if so, will be available on the SAHRC website/access to information/PAIA) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.stanlib.com.

All the pertinent sections must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

5. The outcome of a request (Granting or Refusal)

Should the request be granted, the notice will state the access fee (if any) to be paid upon access, the form in which access will be given and further that the requester may lodge an application with a court of law against the access fee to be paid or the form of access granted, and the procedure for lodging such application.

Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of PAIA relied upon; and that the requester may lodge an application with a court of law against the refusal of the request, and the procedure (including the time period) for lodging the application.

6. Grounds for refusal of access to records

All sections referred to in this clause 6 are those of PAIA. Some of the grounds on which STANLIB Limited and/or its subsidiaries may rely in refusing a request for information as contemplated by PAIA include:

- a. Protection of the privacy of a third party, if that third party is a natural person, which would involve the unreasonable disclosure of personal information of that natural person (Section 63(1));
- b. Protection of commercial information of a third party as defined in PAIA, if the record contains:
 - S trade secrets of that third party;
 - * 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;
 - * information disclosed in confidence to STANLIB Limited and/or subsidiary entity by a third party, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or would prejudice that third party in commercial competition (Section 64).
- c. Protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of an agreement (Section 65);
- d. Protection of safety of individuals and protection of property (Section 66);
- e. Protection of records which would be regarded as privileged in any legal proceedings, unless the person so entitled to privilege waives the privilege (Section 67);
- f. Protection of commercial activities of STANLIB Limited and/or subsidiary entities, which includes:
 - S trade secrets of STANLIB Limited and/or subsidiary entities;
 - * financial, commercial, scientific or technical information, disclosure of which could cause harm to the financial or commercial interests of STANLIB Limited and/or subsidiary entities;
 - * information which, if disclosed, could put STANLIB Limited and/or subsidiary entities at a disadvantage in negotiations or commercial competition;
 - * a computer programme owned by STANLIB Limited and/or subsidiary entities, and which is protected by copyright (Section 68);
 - * information which, if disclosed, could put STANLIB Limited and/or subsidiary entities at a disadvantage in negotiations or commercial competition;
 - * a computer programme owned by STANLIB Limited and/or subsidiary entity, and which is protected by copyright (Section 68).
- g. The research information of STANLIB Limited and/or subsidiary entities or a third party for STANLIB Limited and/or subsidiary entities if the disclosure would expose the third party, STANLIB Limited and/or subsidiary entities, the researcher or the subject matter of the research to serious disadvantage (Section 69).

7. Remedies available in refusal of a request for information (Part 4 of the Act):

- a. STANLIB Limited does not have internal appeal procedures and as such, the decision made by the Information Officer is final.
- b. Should the requester be dissatisfied with the Information Officer's decision to refuse access, that person may within 30 days after notification of the refusal apply to a court of law for the appropriate relief.
- c. Should a third party be dissatisfied with the Information Officer's decision to grant a request for information relating to that third party, the third party may within 30 days of notification of such decision, apply to a court of law for the appropriate relief.

8. Availability of the manual

The manual is available for inspection free of charge at the STANLIB offices and on the STANLIB website (www.stanlib.com).

Legal Notices

Information and Content

The information and content (collectively 'information') provided hereinafter are provided by STANLIB Asset Management ("STANLIBAM") as general information for information purposes only. STANLIB does not guarantee the suitability or potential value of any information or particular investment source. Any information herein is not intended nor does it constitute financial, tax, legal, investment, or other advice. Before making any decision or taking any action regarding your finances, you should consult a qualified Financial Adviser. Nothing contained herein constitutes solicitation, recommendation, endorsement or offer by STANLIBAM.

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STANLIB Asset Management Limited

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Compliance number: