

MANUAL ON ACCESS TO INFORMATION [PAIA MANUAL]

GrowthHouse (Pty) Ltd | Registration No: 2021/313421/07 | FSP No: 34792

Prepared in accordance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA" as amended) and in compliance with the Protection of Personal Information Act, No. 4 of 2013 ("POPIA").

1. INTRODUCTION

1.1. The Promotion of Access to Information Act (PAIA) gives effect to the constitutional right of access to information required for the exercise or protection of any rights. In terms of section 51 of PAIA, private institutions are obliged to compile a manual to give effect to this constitutional right.

1.2. This manual provides a guide to request information held by GrowthHouse and outlines the procedure for obtaining records.

1.3. This manual also aligns with the POPIA requirements, setting out GrowthHouse's commitment to handling personal information lawfully.

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual provides the public with:

- Information on categories of records available without a formal PAIA request;
- Guidance on requesting access to records, with descriptions of the records held by the Company;
- Contact information for the Information Officer and Deputy Information Officers to assist with requests;
- Information on accessing the guide for using PAIA from the Regulator;
- An overview of whether GrowthHouse processes personal information, the purposes for processing, and descriptions of relevant Data Subjects and categories of information.
- Information on categories of records available without a formal PAIA request;

3. CONTACT DETAILS

- **Name of FSP:** GrowthHouse (Pty) Ltd
- **Head of FSP:** Garikai Dhombo
- **Information Officer:** Garikai Dhombo
- **Physical Address:** The Ridge Building, 8th Floor, 1 Discovery Place, Sandton, 2196
- **Postal Address:** The Ridge Building, 8th Floor, 1 Discovery Place, Sandton, 2196
- **Telephone Number:** 010 142 5490
- **Email:** info@growthhouse.co.za
- **Website:** www.growthhouse.co.za

4. GUIDE OF THE SOUTH AFRICAN INFORMATION REGULATOR

- Requesters may consult the guide compiled by the South African Information Regulator, they have compiled a PAIA guide in each official language of South Africa on how to exercise your rights under PAIA.
- **Contact:**
 - **Postal Address:** PO Box 31533, Braamfontein, Johannesburg, 2017
 - **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - **Telephone:** +27 (0)10 023 5200
 - **Email:** inforeg@justice.gov.za enquiries@inforegulator.org.za

5. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

5.1 The Information Officer oversees PAIA and POPIA compliance.

5.2 Requests for information should be directed to the Information Officer.

6. ACCESS TO INFORMATION AND RECORDS HELD BY GROWTHHOUSE

6.1. Types of Records Automatically Available:

- Annual Financial Results / Statements
- Complaint Resolution Policy and Procedures
- Conflict of Interest Policy and Disclosure
- BBBEE Certificate
- FSP Licence
- Information pertaining to GrowthHouse's products and services published on the Company website
- Group Privacy Policy and Procedures
- Memorandum of Incorporation, shareholder information.
- Directors Names
- Documents of incorporation
- Marketing Information: Advertising and promotional materials.

6.2. Subjects and categories of records held by GrowthHouse:

The Categories of data subjects on which GrowthHouse holds records and the type of records held on each data subject by GrowthHouse may include, but is not limited to:

Categories of data subjects	Personal Information that may be processed
Customers	Name, address, registration numbers or identity numbers, employment status, information relating to the education and/or the medical, financial, criminal or employment history of the person.
Service Providers	Names, Email address, contact numbers
Employees / Prospective employees	Name, address, identity number, date of birth, employment status, tax reference number, residential address, email address, contact number.
Juristic Representatives	Name, address, identity number, tax reference number, business/ and residential address, email address, bank account details.
Financial Advisers	Name address, identity number, tax reference number, contact details, email address, bank account details.
Directors	Name, address, identity number, employment status, residential address, date of birth, gender, marital status, race.

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

GrowthHouse processes personal information to:

- to provide our products or services to our clients
- to execute transactions for and on behalf of our clients
- to maintain and nurture our client relationships
- Fulfil contractual obligations
- Provide financial products and services
- Comply with legal and regulatory requirements
- Notify clients of new offerings
- to liaise with third parties to offer services form part of the products our clients have with us
- in connection with legal proceedings

8. DATA SUBJECT CATEGORIES AND TYPES OF PERSONAL INFORMATION

GrowthHouse collects personal information from:

- **Clients:** Identifying and contact details, financial data.
- **Employees:** Employment and benefits information.
- **Suppliers:** Business and contact details for service providers.

9. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be shared with:

- Regulatory authorities such as the FSCA, SAPS, FICA, SAQA
- Auditors and compliance officers.
- Product providers and service suppliers under contractual arrangements.

10. CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

GrowthHouse does not currently engage in cross-border data transfers. Should this change, compliance with POPIA requirements for data protection will be ensured.

11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

GrowthHouse uses:

- Information security policies.
- Cybersecurity tools.
- Physical security measures for data storage.

12. REQUEST FOR ACCESS TO RECORDS

12.1. Under Chapter 1, Part 3, Section 50 of PAIA, any individual may request access to information from the Company, provided that:

- The record is needed for the exercise or protection of rights;
- The requester follows the procedural requirements for access requests as outlined in PAIA; and
- Access to the record is not denied based on any grounds listed under Chapter 4, Part 3 of PAIA.

12.2. According to Section 23 of POPIA, a data subject, upon providing sufficient proof of identity, has the right to:

- Confirm, free of charge, whether the Company holds personal information about them;
- Request the record or a description of the personal information held by the Company, along with details of any third parties, or categories of third parties, who have or had access to the information, under the following conditions:
 - within a reasonable time;
 - at any prescribed fee, if applicable;
 - in a reasonable manner and format; and
 - in a generally understandable form.

13. HOW TO REQUEST INFORMATION

13.1. Complete the appropriate form, available in the revised Guide referenced in paragraph 4 above.

13.2. If making a request on behalf of another person, provide proof of authority in a manner satisfactory to the Information Officer (IO).

13.3. Submit the completed form to the IO or Deputy Information Officer (DIO) at the physical or email address provided in paragraph 3 above.

13.4. Pay the required fee outlined in paragraph 13 below before processing can proceed.

13.5. The Company will process the request within 30 days, unless the requester specifies compelling reasons that justify an exception to this timeline.

13.6. Access to the Company's records is granted once all access requirements are met. Requesters fall into two categories:

- Personal Requester: A person requesting access to records containing personal information about themselves.
- Other Requester: A person requesting access to information about a third party, where the Company is not required to grant access voluntarily.

13. FEES

Please refer to Form 3 attached to this manual.

14. DECISION

GrowthHouse will notify the requester in writing within 30 days of receipt of the request, providing reasons if access is refused.

16. AVAILABILITY AND UPDATING OF THE MANUAL

This manual is available at GrowthHouse's premises and on its website. It will be updated as necessary.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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 <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

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)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

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 registered address of public/private body (<i>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</i>) 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.	
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OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
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 (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>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</i>)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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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	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	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	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	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: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer