

**STS INVESTMENT HOLDINGS PROPRIETARY LIMITED**

**(Registration Number:2021/810371/07)**

**and the companies listed in the schedule annexed hereto as Appendix 1**

**(Hereinafter collectively referred to as “the Companies”)**

**PAIA MANUAL**


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Manual Owners	Fausto Di Palma, Maryna Wiesner and Melissa Ghannam
Responsible Business Unit	Information Officer Committee


## MANUAL STATEMENT


- This manual forms part of the Companies' internal business processes and procedures.
- Any reference to "The Companies" shall be interpreted to include the "manual owner".
- Any reference to "The Companies" shall be interpreted to include all companies listed in Appendix 1 annexed to this manual.
- The Companies' boards of directors, their employees, volunteers, contractors, suppliers and any other persons acting on behalf of the Companies is required to familiarise themselves with the manual's content, requirements and undertakes to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

## MANUAL ADOPTION

By signing this document, we, as Information Officers of the various entities within the STS Investment Holdings Group authorise the manual's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Fausto Di Palma
Capacity	Information Officer of Pyxis Property Investments (Pty) Ltd; and Information Officer of Professional Sectional Title Services (Pty) Ltd.
Signature	
Date	29/04/2024

Name & Surname	Maryna Wiesner
Capacity	Information Officer of STS Investment Holdings (Pty) Ltd; Information Officer of Sectional Title Solutions (Pty) Ltd; Information Officer of Sectional Title Solutions Outdoor (Pty) Ltd Information Officer of the Training Academy for Community Schemes NPC; and Information Officer of Faith Food's Distribution NPC.
Signature	
Date	29/04/2024

Name & Surname	Melissa Ghannam
Capacity	Information Officer of BC Funding Solutions (Pty) Ltd Information Officer of BCFS Funding SPV1 (RF) (Pty) Ltd Information Officer of BCFS Warehouse SPV1 (RF) (Pty) Ltd Information Officer of BCFS Security SPV1 (Pty) Ltd
Signature	
Date	29/04/2024

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## 1 DEFINITIONS

### 1.1 Data Subject

The person to whom personal information relates.

### 1.2 Deputy Information Officer

The person to whom any power or duty conferred or imposed on an Information Officer by POPIA has been delegated.

### 1.3 Head

In relation to a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
  - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - the person who is acting as such or any person duly authorised by such acting person

### 1.4 Information Officer

The head of a private body.

### 1.5 Information Regulator

The Regulator established in terms of Section 39 of POPIA.

### 1.6 PAIA

The Promotion of Access to Information Act 2 of 2000.

### 1.7 Person

A natural person or a juristic person

### 1.8 Personal Information

- Information (including special personal information) relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person;
- The personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

### 1.9 Personal Requester

A requester seeking access to a record containing personal information about the requester.

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## 1.10 POPIA

The Promotion of Personal Information Act 4 of 2013

### 1.11 Private body

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body

### 1.12 Processing

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

### 1.13 Public body

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- in any other functionary or institution when:
  - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
  - exercising a public power or performing a public function in terms of any legislation

### 1.14 Requester

In relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record held by the Companies or a person acting on behalf of such person.

### 1.15 Request for access

A request for access to a record of the Companies in terms of section 50 of PAIA.

### 1.16 Record

Any recorded information regardless of the form or medium, in the possession or under the control of the Companies irrespective of whether or not it was created by the Companies.

### 1.17 Third Party

In relation to a request for access to a record held by the Companies, means any person other than the requester.

## 2 MANUAL PURPOSE

The PAIA gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights

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The Companies recognises everyone's right to access to information and is committed to provide access to The Companies' records where the proper procedural requirements as set out by PAIA and POPIA have been met.

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The Companies's PAIA manual is compiled in accordance with section 51 of PAIA and contains the following provisions:

#### **Annexure A : Contact Details & Business Type**

This section provides The Companies' postal and street address, phone and fax number and, if available, the e-mail address of the head of The Companies.

#### **Annexure B : Section 10 PAIA Guide**

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.

#### **Annexure C : Statutory Records**

This section provides a description of the various statutes in terms of which the Companies is required to maintain records.

#### **Annexure D : Availability of Records**

This section provides a list of types of records held by the Companies along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to whom the respective records relate along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request as provided for in Annexure E.

#### **Annexure E : Request Procedure**

This section sets out the procedure required to obtain access to a record indicated as a "PAIA Request" in Annexure D.

#### **Annexure F : Prescribed Fees**

This section sets out the fees that are payable to the Companies prior to processing a request to obtain access to a record held by the Companies.

#### **Annexure G : Processing of Personal Information**

This section sets out the applicable aspects for the processing of personal information.

#### **Annexure H : Deputy Information Officer Appointment**

This section provides for the formal appointment of the Information Officer and Deputy Information Officer.

### **3 DUTIES OF THE INFORMATION OFFICER**

The Information Officer and/or the Deputy Information Officer of the Companies are responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the manual for accuracy and communicating any amendments.

#### **Right of Access**

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the Companies to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and

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- Access to that record is not unreasonably refused in terms of any of the grounds for refusal listed below or as applicable in any law of the Republic.

**Grounds for Refusal**

The Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with, the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question,.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regard to a record containing information that would justify a ground for refusal, every part of the record which:

- does not contain, and
- can reasonably be severed from any part that contains, any such information, must, despite any other provision of PAIA, also be disclosed.

Some applicable grounds for refusal, or absence thereof, are set out below. This is not a closed list.

**A: Mandatory Protection of privacy of a Third Party who is a Natural Person**

Examples of Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

Examples of No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information that is already publicly available.
- The record consists of information that was given to the Companies by the individual to whom it relates and the individual was informed by, or on behalf of, the Companies, before it is given, that the information belongs to a class of information that would or might be made available to the public.
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest.
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the request with the written consent of the individual's next of kin
- The record consists of information about an individual who is, or was, an official of the Companies and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration, and responsibilities of the position held, or services performed, by the individual and the name of the individual, which is provided on a record prepared by the individual in the course of their employment.

**B: Mandatory Protection of Commercial Information of a Third Party**

Examples of Grounds for Refusal

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- The record consists of information that contains trade secrets of a third party.
- The record consists of information that contains 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.
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.

#### Examples of No Grounds for Refusal

- The record consists of information about a third party who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

### **C: Mandatory Protection of certain Confidential Information of a Third Party**

#### Examples of Grounds for Refusal

- The record consists of information, the disclosure of which, would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

### **D: Mandatory Protection of Safety of Individuals and Protection of Property**

#### Examples of Grounds for Refusal

- The record consists of information that, if disclosed, could reasonably be expected to endanger the life or physical safety of an individual.
- The record consists of information that, if disclosed, would likely prejudice, or impair, the security of a building, a structure or system, a computer or communication system, a means of transport, or any other property.
- The record consists of information that, if disclosed, would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of any property.

### **E: Mandatory Protection of Records privileged from Production in Legal Proceedings**

#### Examples of Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege on affidavit submitted to The Companies.

### **F: Commercial Information of The Companies**

#### Examples of Grounds for Refusal

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- The record consists of information that contains trade secrets of The Companies.
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of The Companies, the disclosure of which, would likely cause harm to the commercial or financial interests of The Companies.
- The record consists of information, the disclosure of which, could reasonably be expected to put The Companies at a disadvantage in contractual, or other, negotiations or prejudice The Companies in commercial competition.
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by The Companies, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.

#### Examples of No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by The Companies or the results of any such testing or investigation carried out by or on behalf of The Companies and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

### **G: Mandatory Protection of Research Information of a Third Party and The Companies**

#### Examples of Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is, or will be, carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage.
- The record consists of information that contains information about research being, or to be, carried out by, or on behalf of, The Companies, the disclosure of which, would be likely to expose The Companies, a person that is, or will be, carrying out the research on behalf of The Companies, or the subject matter of the research to serious disadvantage.

## 4 NOTICE

Where a request for access has been received, the Information Officer and/or Deputy Information Officer and/or delegated authority, will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable by a requester. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or lodge an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be.
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 calendar days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access, and

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- The form and duration in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or lodge an application with a court against the access fee to be paid, or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude, from any such reasons, any reference to the content of the records; and
- State that the requester may lodge a complaint with the Information Regulator or lodge an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in The Companies' possession, but cannot be found, or
- Simply does not exist,

the head of The Companies must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

## **5 AVAILABILITY OF THE MANUAL**

A copy of the Manual is available -

- Freely on the Companies' Websites, if applicable, as listed in Appendix 1;
- head office of the Companies for public inspection during normal business hours;
- to any person in hard copy upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator, upon request.

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.

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**ANNEXURE A: CONTACT DETAILS & BUSINESS TYPE****A. Organisation Contact Details**

Postal address:	Block 1, Northdowns Office Park, 17 Georgian Crescent West, Bryanston
Street address:	Block 1, Northdowns Office Park, 17 Georgian Crescent West, Bryanston
Phone number:	010 020 8200
Email address:	<a href="mailto:info@stsolutions.co.za">info@stsolutions.co.za</a>
Fax number:	N/A

**B. Details of Information Officers****BC Funding Solutions (Pty) Limited**

Full names & surname:	Melissa Ghannam
Email address:	<a href="mailto:Melissa@stsolutions.co.za">Melissa@stsolutions.co.za</a> / <a href="mailto:melissa@bcfundingsolutions.co.za">melissa@bcfundingsolutions.co.za</a>
Phone number:	079 494 5155

**STS Investment Holdings (Pty) Limited / Sectional Title Solutions (Pty) Ltd / TRACS NPC / Faith Food's Distribution NPC / Sectional Title Solutions Outdoor (Pty) Ltd.**

Full names & surname:	Maryna Wiesner
Email address:	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>
Phone number:	072-844-3388

**Pyxis Property Investments (Pty) Ltd / Professional Sectional Title Services (Pty) Ltd**

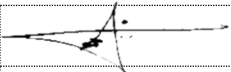


Full names & surname:	Fausto Di Palma
Email address:	<a href="mailto:Fausto@stsolutions.co.za">Fausto@stsolutions.co.za</a> / <a href="mailto:Fausto@pstservices.co.za">Fausto@pstservices.co.za</a>
Phone number:	076-430-9648

**C. Business Type**


The Companies conducts its main type of business in the following sector(s):

Agriculture	<input type="checkbox"/>
Mining and Quarrying	<input type="checkbox"/>
Manufacturing	<input type="checkbox"/>
Electricity, Gas & Water	<input type="checkbox"/>
Construction	<input type="checkbox"/>
Retail & Motor Trade and Repair Services	<input type="checkbox"/>
Wholesale Trade, Commercial Agents & Allied Services	<input type="checkbox"/>
Catering, Accommodation & Other Trade	<input type="checkbox"/>
Finance & Business Services	<input checked="" type="checkbox"/>
Community, Special & Personal Services	<input checked="" type="checkbox"/>
If other, please specify: Community Scheme Services	<input checked="" type="checkbox"/>

**The Companies offers innovative and value-add solutions for Community Schemes nationally.**

IO signatures:	  
Date:	29/04/2024

**ANNEXURE B: SECTION 10 PAIA GUIDE**

IO signatures:	
Date:	29/04/2024

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. The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-  
the Information Officer of every public body, and  
every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
- the manner and form of a request for-  
access to a record of a public body contemplated in section 11 ; and  
access to a record of a private body contemplated in section 50 ;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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-  
an internal appeal;  
a complaint to the Regulator; and  
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;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 .

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.

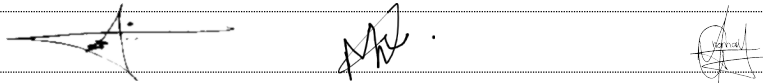
The Guide can also be obtained-

- upon request to the Information Officer;
- from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

**ANNEXURE C: STATUTORY RECORDS**

IO signatures:	
Date:	29/04/2024

The Companies maintains statutory records and information in terms of the following legislation:

Administration of Estates Act	<input checked="" type="checkbox"/>
Arbitration Act	<input checked="" type="checkbox"/>
Auditing Professions Act	<input type="checkbox"/>
Basic Conditions of Employment Act	<input checked="" type="checkbox"/>
Closed Corporations Act	<input type="checkbox"/>
Collective Investment Schemes Control Act	<input type="checkbox"/>
Companies Act	<input checked="" type="checkbox"/>
Compensation of Occupational Injuries & Diseases Act	<input checked="" type="checkbox"/>
Community Schemes Ombud Services Act	<input checked="" type="checkbox"/>
Consumer Protection Act	<input checked="" type="checkbox"/>
Copyright Act	<input checked="" type="checkbox"/>
Customs and Excise Act	<input type="checkbox"/>
Electronic Communications and Transactions Act	<input checked="" type="checkbox"/>
Employment Equity Act	<input checked="" type="checkbox"/>
Financial Advisory & Intermediary Services Act	<input type="checkbox"/>
Financial Institutions (Protection of Funds) Act	<input type="checkbox"/>
Financial Intelligence Centre Act	<input checked="" type="checkbox"/>
Friendly Societies Act	<input type="checkbox"/>
Income Tax Act	<input checked="" type="checkbox"/>
Insolvency Act	<input checked="" type="checkbox"/>
Labour Relations Act	<input checked="" type="checkbox"/>
Long-term Insurance Act	<input checked="" type="checkbox"/>
Medical Schemes Act	<input type="checkbox"/>
National Credit Act	<input checked="" type="checkbox"/>
Occupational Health and Safety Act	<input checked="" type="checkbox"/>
Patents Act	<input type="checkbox"/>
Pension Funds Act	<input type="checkbox"/>
Prevention of Organised Crime Act	<input type="checkbox"/>
Prevention and Combatting of Corrupt Activities Act	<input checked="" type="checkbox"/>
Promotion of Equality and Prevention of Unfair Discrimination Act	<input type="checkbox"/>
Protection of Constitutional Democracy against Terrorist and related Activities Act	<input type="checkbox"/>
Sectional Titles Act	<input checked="" type="checkbox"/>
Sectional Titles Schemes Management Act	<input checked="" type="checkbox"/>
Short-term Insurance Act	<input checked="" type="checkbox"/>
Skills Development Act	<input checked="" type="checkbox"/>
Trademarks Act	<input type="checkbox"/>

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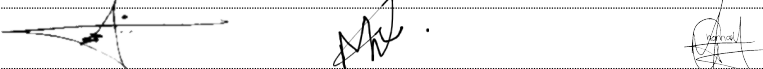
Unemployment Insurance Act	<input checked="" type="checkbox"/>
Value Added Tax Act	<input checked="" type="checkbox"/>

The above list may not be exhaustive and may be updated from time to time by the Companies in their sole and absolute discretion.

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## ANNEXURE D: AVAILABILITY OF RECORDS

IO signatures:	
Date:	29/04/2024

The Companies maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Employee Code of Conduct	Freely Available	Statutory Requirement	Organisation
	Client Documentation Protocol (FICA)	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan (incl. for covid-19)	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	Freely Available	Statutory Requirement	Organisation / Employees
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
Insurance Policies held by organisation	PAIA Request	Risk Management	Organisation	
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
Training Manual	PAIA Request	Internal Referencing	Organisation	

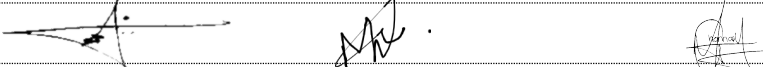
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

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**ANNEXURE E: REQUEST PROCEDURE**

IO signatures:	
Date:	29/04/2024

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Information Officer of the relevant company as indicated in Annexure A.

The Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected;
- where such records are already otherwise publicly available;
- instances where public interest is not served;
- the mandatory protection of commercial information of a third party; and / or
- the mandatory protection of certain confidential information of a third party.

When completing the form below please:

- indicate the identity of the person seeking access to the information;
- provide sufficient particulars to enable the Information Officer to identify the information requested;
- specify the format in which the information is required;
- indicate the contact details of the person requiring the information;
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right;
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed; and
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

<b>A. Particulars of Private Body</b>	
Information Officer	The correct Information Officer details with respect to the Company to which you are submitting your request will be listed here i.e. either Fausto Di Palma; Maryna Wiesner, or Jade Adair.
Company	The Company to which you are submitting your request will be listed here
Address	Block 1, Northdowns Office Park, 17 Georgian Crescent West, Bryanston
<b>B. Particulars of person requesting access to the record</b>	
(i) The particulars of the person who requests access to the record must be recorded below.	
(ii) Furnish an email address and/or fax number in the Republic to which information must be sent.	
(iii) Proof of the capacity in which the request is made, if applicable, must be attached	
Full names & surname:	

Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email address:	
Capacity:	
<b>C. Particulars of person on whose behalf request is made</b>	
This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person	
Full names & surname:	
Identity number:	
<b>D. Particulars of Record and Reason for Request</b>	
(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
(iii) Provide your reason for this request	
Description of record:	
Reference number:	
Reason(s) for request:	
Any further particulars:	
<b>E. Fees</b>	
(i) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.	
(ii) You will be notified of the amount required to be paid as the request fee.	
(iii) 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.	
(iv) If you qualify for exemption of the payment of any fee, please state the reason therefor	
Reason for exemption:	
<b>F. Form of access to record</b>	
If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability and indicate in which form the record is required.	
Disability:	
Form in which required:	
Mark the appropriate box with an "X"	
(i) Your indication as to the required form of access depends on the form in which the record is available.	<i>FDP</i>

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(ii) Access in the form requested may be refused in certain circumstances. In such a case you will be informed of access will be granted in another form.

(iii) 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
- view the images
- copy of the images
- transcription of the images
- listen to the soundtrack
- transcription of the soundtrack
- printed copy of record
- copy in computer readable form

Please indicate the preferred method of delivery

- By hand
- Email
- Post
- Fax

**G. Particulars of right to be exercised or protected**

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

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:

**H. Notice of decision regarding the request for access**

You will be notified in writing whether your request has been approved / denied. If you wish to be informed thereof 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?

**I. Signature page**

Signed at:

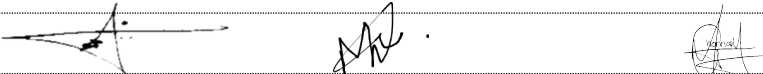
Date:

Signature of Requester / Person on whose behalf request is made:

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**ANNEXURE F: PRESCRIBED FEES**

IO signatures:	
Date:	29/04/2024

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted)
- A requestor may lodge an application with a court against the render / payment of the request fee and/or deposit
- Records may be withheld until the fees have been paid

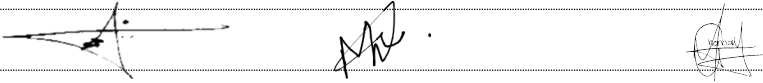
No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request ito items 2-8.

11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."
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## ANNEXURE G: PROCESSING OF PERSONAL INFORMATION

IO signatures:	
Date:	29/04/2024

### 1. Purpose of Processing Personal Information

1.1. The Companies require personal information relating to both individual and juristic persons to carry out their business functions.

1.2. The purposes for which the Companies process personal information is:

- to carry out actions for the performance of contracts to which it is a party;
- related to the pursuit of the legitimate interests of the Companies, their employees, clients, partners, and service providers;
- to comply with legislative requirements; and
- from time to time, to comply with any obligations imposed on it by law.

### 2. Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients (Juristic and Natural)	Names, Addresses, Scheme Numbers, Registration Numbers or Identity Numbers, Managing Agent Details; Portfolio Manager Details; Director Names and Identity Numbers; Trustees Names and Identity Numbers; Members; Employment Status; Bank Details; Phone Numbers; Financial Information; "know-your customer" data; photographs.
Service Providers / Partners / Consultants (Juristic and Natural)	Full Names, Registration Number, Vat numbers, Address, Trade Secrets and Bank Details; Financial Information; Phone Numbers.
Employees or Potential Employees (Natural)	Full Names, Physical and Electronic Addresses, Cellphone Numbers; Qualifications, Gender and Race; Health; Criminal Background; Education; Language; Age; Marital Status; Information relating to pregnancy and health; Previous Employment; The views or opinions of another individual about the person.

### 3. The recipients or categories of recipients to whom the personal information may be supplied:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Customer / Service Provider/ Partner / Consultant Details	Affiliates, Subsidiaries, Duly Authorised Operators and their respective representatives
Customer Details	The FIC, the NCR, the Gael Group (the Companies' cash custodian)
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

**4. Planned transborder flows of personal information**

The Companies do not currently actively process personal information outside of the Republic of South Africa, and in any event where the Company does, consent is obtained from the effected data subjects.

From time to time, the Companies make use of Microsoft products which may give rise to off-shore data processing in the event of load-balancing.

**5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

The Companies secure the integrity and confidentiality of all personal information in its possession by having regard and implementing generally accepted and industry related security practices and procedures.

The security safeguards that are implemented by the Companies or under implementation include *inter alia* Access Control to Data; Data Encryption; Anti-virus; Anti-malware Solutions; Password Protection; and Firewalls.

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## ANNEXURE H: INFORMATION OFFICER APPOINTMENT

The Boards of Directors of the Companies have duly resolved, appointed and authorised the persons listed under Appendix 1 as Information Officers.

The Companies have appointed these persons as Information Officers to facilitate any requests to access records held by the Companies. This delegation does not prohibit the persons who made the delegation from exercising power concerned or performing the duty concerned themselves. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.

The Information Officers have the authority to approach all staff members of the Companies and to request all records held by the Companies. Where a manager is of the opinion that access to a record should not be granted to the Information Officers, reasons for this decision shall be given to the Information Officers who will make the final decision on the matter.

The Information Officers are responsible for:

- Publishing and proper communication of the manual i.e., creating manual awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

The relevant signed resolutions appointing the Information Officers are freely available on request.

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## APPENDIX 1: COMPANIES AND INFORMATION OFFICER LIST

This manual is applicable to the following companies:

Company	Registration Number	Website	Information Officer	Email Address
BC Funding Solutions (Pty) Ltd	2007/020914/07	<a href="https://www.bcfundingsolutions.co.za/">https://www.bcfundingsolutions.co.za/</a>	Melissa Ghannam	<a href="mailto:Melissa@bcfundingsolutions.co.za">Melissa@bcfundingsolutions.co.za</a>
BCFS Funding SPV1 (RF) (Pty) Ltd	2023/657293/07	N/a	Melissa Ghannam	<a href="mailto:Melissa@bcfundingsolutions.co.za">Melissa@bcfundingsolutions.co.za</a>
BCFS Warehouse SPV (RF) (Pty) Ltd	2023/704257/07	N/a	Melissa Ghannam	<a href="mailto:Melissa@bcfundingsolutions.co.za">Melissa@bcfundingsolutions.co.za</a>
BCFS Security SPV (Pty) Ltd	2023/608197/07	N/a	Melissa Ghannam	<a href="mailto:Melissa@bcfundingsolutions.co.za">Melissa@bcfundingsolutions.co.za</a>
Faith Food Distribution NPC	2013/187532/08	N/a	Maryna Wiesner	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>
Professional Sectional Title Services (Pty) Ltd	2011/149092/07	<a href="https://www.pstservices.co.za">https://www.pstservices.co.za</a>	Fausto Di Palma	<a href="mailto:Fausto@pstservices.co.za">Fausto@pstservices.co.za</a>
Pyxis Property Management (Pty) Ltd	2015/192136/07	N/a	Fausto Di Palma	<a href="mailto:Fausto@stsolutions.co.za">Fausto@stsolutions.co.za</a>
Sectional Title Solutions (Pty) Ltd	2016/278017/07	<a href="http://www.stsolutions.co.za/">www.stsolutions.co.za/</a>	Maryna Wiesner	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>
STS Investment Holdings (Pty) Ltd	2021/810371/07	<a href="http://www.stsolutions.co.za/">www.stsolutions.co.za/</a>	Maryna Wiesner	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>
Sectional Title Solutions Outdoor (Pty) Ltd	2019/293368/07	<a href="http://www.stsolutions.co.za/">www.stsolutions.co.za/</a>	Maryna Wiesner	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>
Training Academy for Community Schemes (TRACS) NPC	2021/617395/08	<a href="http://www.tracslearning.co.za">www.tracslearning.co.za</a>	Maryna Wiesner	<a href="mailto:Maryna@stsolutions.co.za">Maryna@stsolutions.co.za</a>

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## Audit Trail

29/04/2024 12:55:54 SAST+0200: Status marked as complete.  
29/04/2024 12:55:49 SAST+0200: melissa@stsolutions.co.za (Melissa Ghannam) completed signing document 105.209.35.137  
29/04/2024 12:46:39 SAST+0200: melissa@stsolutions.co.za (Melissa Ghannam) accepted QuicklySign Terms and Conditions 105.209.35.137  
29/04/2024 12:46:31 SAST+0200: melissa@stsolutions.co.za (Melissa Ghannam) opened document 105.209.35.137  
29/04/2024 12:46:31 SAST+0200: melissa@stsolutions.co.za (Melissa Ghannam) clicked document link 105.209.35.137  
29/04/2024 12:12:22 SAST+0200: Email has been received by melissa@stsolutions.co.za mail server 167.89.84.21  
29/04/2024 12:12:12 SAST+0200: Signature request sent to: melissa@stsolutions.co.za (Melissa Ghannam)  
29/04/2024 12:12:01 SAST+0200: Maryna@stsolutions.co.za (Maryna Wiesner) completed signing document 41.216.201.83  
29/04/2024 12:10:08 SAST+0200: Maryna@stsolutions.co.za (Maryna Wiesner) accepted QuicklySign Terms and Conditions 41.216.201.83  
29/04/2024 12:09:57 SAST+0200: Maryna@stsolutions.co.za (Maryna Wiesner) opened document 41.216.201.83  
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29/04/2024 11:53:16 SAST+0200: Fausto@stsolutions.co.za (Fausto Di Palma) completed signing document 102.132.179.81  
29/04/2024 11:51:27 SAST+0200: Fausto@stsolutions.co.za (Fausto Di Palma) accepted QuicklySign Terms and Conditions 102.132.179.81  
29/04/2024 11:51:17 SAST+0200: Fausto@stsolutions.co.za (Fausto Di Palma) opened document 102.132.179.81  
29/04/2024 11:51:17 SAST+0200: Fausto@stsolutions.co.za (Fausto Di Palma) clicked document link 102.132.179.81  
29/04/2024 10:20:57 SAST+0200: Email has been received by fausto@stsolutions.co.za mail server 149.72.149.195  
29/04/2024 10:20:52 SAST+0200: Signature request sent to: Fausto@stsolutions.co.za (Fausto Di Palma)  
29/04/2024 10:20:42 SAST+0200: zareen@stsolutions.co.za (Zareen Magee ) changed the status to:awaiting\_signatures 41.198.144.109  
29/04/2024 10:07:53 SAST+0200: zareen@stsolutions.co.za (Zareen Magee ) uploaded document 41.198.144.109

## Supporting documentation

Supporting documents that were uploaded, as part of the signing process, can be found on document page online.

## Online verification

This document can be verified online here

[https://app.quicklysign.com/verify\\_document/bw2x2PquYch8BZ18f28e55743\\_F53nKJ9vhrbNpi](https://app.quicklysign.com/verify_document/bw2x2PquYch8BZ18f28e55743_F53nKJ9vhrbNpi)