

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

CITADEL HOLDINGS PROPRIETARY LIMITED AND THE CITADEL GROUP; AND THE PREFERRED RETIREMENT FUNDS

This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000.

Date of compilation: 9 November 2020
Date of revision: 27 September 2021
01 December 2024

CITADEL HOLDINGS PROPRIETARY LIMITED

REGISTRATION NUMBER: 2000/027580/07

1. PREAMBLE

- 1.1. This Manual applies to Citadel Holdings Proprietary Limited, its South African subsidiaries, certain companies in which such subsidiaries hold an interest, and retirement funds administered by a Citadel group company (“**Citadel Group**”). A list of the entities in the Citadel Group is attached hereto as Annexure A.
- 1.2. The *Promotion of Access to Information Act, 2000* (“**PAIA**”) came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 1.3. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 1.4. This Manual constitutes the Citadel Group’s PAIA manual (“**Manual**”). This Manual is compiled in accordance with section 51 of PAIA as amended by the *Protection of Personal Information Act, 2013* (“**POPIA**”), which gives effect to everyone’s Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies and includes certain conditions that establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.
- 1.5. This Manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
1.0.2020	Citadel Group Information Officer	09 November 2020
1.0.2022	Citadel Group Information Officer	06 December 2022
1.0.2024	Citadel Group Information Officer	01 December 2024

2. ABOUT THE CITADEL GROUP

Citadel Holdings Proprietary Limited is the holding company of the Citadel Group which operates in the financial services sector.

3. CONTACT DETAILS

Name of Private Body:	Citadel Holdings Proprietary Limited and the Citadel Group entities
Designated Information Officer:	Sajeel Maharaj
Email address of Information Officer:	IOfficerCitadelHoldings@citadel.co.za
Contact number:	+27 12 470 2500
Postal address:	Private Bag X9, Lynnwood Ridge, 0040
Street address:	Kaaimans Building, Lynnwood Bridge Office Park, 14 Hilden Road (off Daventry Road), Lynnwood Manor, Pretoria, 0081
Website:	www.citadel.co.za

Please refer to Annexure B for details relating to the Preferred retirement funds.

4. INFORMATION REGULATOR'S GUIDE

- 4.1. An official guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA ("**Guide**"). This Guide is made available by the Information Regulator. Copies of the Guide are available from Information Regulator and the Information Officer free of charge.
- 4.2. Any request for public inspection of the Guide at the office of the Citadel Group to the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with Form 1 of Annexure A of the PAIA Regulations, 2021. The form can be accessed via the following link: [**InfoRegSA-PAIA-Form01-Reg3.pdf \(info regulator.org.za\)**](#).
- 4.3. Any enquiries regarding the Guide should be directed to:

Postal address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Telephone number:	+27 (0) 10 023 5200
E-mail address:	<u>enquiries@info regulator.org.za</u> <u>mailto:enquiries@info regulator.org.za</u>
Website:	<u>https://info regulator.org.za/</u>

Link to access the form:

[InfoRegSA-PAIA-Form01-Reg2.pdf](#)
[\(info regulator.org.za\)](http://info regulator.org.za)

5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- 5.1. to provide a list of records held by the Citadel Group;
- 5.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- 5.3. to define the manner and form in which a request for information must be submitted; and
- 5.4. to comply with the additional requirements imposed by POPIA.

6. ENTRY POINT FOR REQUESTS

- 6.1. PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 6.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable the Citadel Group to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 6.3. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 6.4. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

7. AUTOMATICALLY AVAILABLE INFORMATION

- 7.1. Information that is obtainable via the Citadel Group website about the Citadel Group is automatically available and need not be formally requested in terms of this Manual.
- 7.2. The following categories of records are automatically available for inspection, purchase or photocopying:
 - 7.2.1. brochures;
 - 7.2.2. press releases;
 - 7.2.3. publications; and
 - 7.2.4. various other marketing and promotional material.

8. INFORMATION AVAILABLE IN TERMS OF POPIA

8.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by the Citadel Group will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

8.2. Categories of personal information collected by the Citadel Group

CATEGORIES OF DATA SUBJECTS	CATEGORIES OF PERSONAL INFORMATION COLLECTED
Shareholders	Shareholder personal information
Counterparty in contractual discussions with the Citadel Group, or an existing or former counterparty in a contractual relationship with the Citadel Group (including representatives and/or personnel)	Personal information and special or sensitive personal information as defined in applicable data protection legislation, including contact details, financial information and biometric information (CCTV footage)
Clients (including potential and previous clients)	Personal information and special or sensitive personal information as defined in applicable data protection legislation, including information about health, racial or ethnic origin, religious or philosophical beliefs, biometric information
	Address and contact information (including proof of address)
	Identification numbers issued by government bodies or agencies, such as identity numbers, passport numbers, tax identification numbers, driving licence numbers and company registration numbers
	Demographic information such as address, preferences and interests
	Information relevant to the provision of products and services

	Bank account or payment card details, income or other financial information
	Information provided as a consequence of the provision of products and services, which depends on The nature of instructions to any employee or member of the Citadel Group
	Relevant information as required by applicable laws, including anti-money laundering legislation and as part of client onboarding procedures, including evidence of source of funds
	Information provided to the Citadel Group for the purposes of attending meetings and events, including dietary requirements which may reveal information about a person's health or religious beliefs
	Still and video images captured by CCTV at offices. The Citadel Group uses CCTV to help provide a safe and secure environment and persons may be recorded when visiting the offices
	Identity data, contact data and special personal information from publicly available sources or third parties, service providers and the like who conduct screening on any member of the Citadel Group's clients or vendors for anti-money laundering purposes, or third parties with whom any member of the Citadel Group hosts events
	Location information
	Data collected through cookies and tracking technologies
	Data collected through surveys
	Gender, marital status, date and place of birth, nationality, employer, job title, financial records and employment history, and family details, including relationships
	Third-party information, such as from credit bureaux and the Companies and Intellectual Property Commission (CIPC).

Suppliers, service providers, or contractors	Supplier or supplier representative personal information
	Address and contact information (including proof of address)
	Supplier contracts
	Supplier bank details
	Biometric information of supplier representatives
	Surveillance information of supplier representatives (e.g. CCTV footage)
	third-party information, such as from credit bureaux and the Companies and Intellectual Property Commission (CIPC).
Employees (prospective, previous and existing employees)	Employee personal information and special or sensitive personal information as defined in applicable data protection legislation, including information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; genetic and biometric information
	Address and contact information (including proof of address)
	Identification numbers issued by government bodies or agencies, such as identity numbers, passport numbers, tax identification numbers, driving licence numbers and company registration numbers
	Rrelevant information as required by applicable laws, including employment equity information
	Employee education and psychometrics records
	Employee medical information, including disability information
	Employee pension and provident fund information
	Employee bank details
	Employee tax and financial information

	Employee contracts
	Employee beneficiary information
	Employee performance records
	Payroll records
	Electronic access records
	Physical access records
	Surveillance records
	Health and safety records
	Training records
	Background checks
	Criminal checks
	Employment history
Job applicants	Curriculum vitae and application forms
	Criminal and credit checks
	Background checks
Family members of Employees	Personal information and special or sensitive personal information as defined in applicable data protection legislation, including information about health, racial or ethnic origin, religious or philosophical beliefs; genetic and biometric information
	Identification numbers issued by government bodies or agencies, such as identity number, passport number, tax identification numbers, driving licence numbers and company registration numbers
	Address and contact information (including proof of address)
	Medical and disability information

	Bank details
Children of Employees	Child's personal information processed e.g. birth certificate, etc.
	Child's medical information and disability information
Visitors	Physical access records
	Electronic access records, scans and photographs
	Surveillance records (e.g. CCTV footage)
	Biometric information

8.3. The purpose of processing personal information

The Citadel Group processes personal information for the following purposes:

- 8.3.1. providing requested services, products or offerings, and notifying clients about important changes to these services, products or offerings;
- 8.3.2. managing accounts or relationships and complying with instructions or requests;
- 8.3.3. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- 8.3.4. assessing and dealing with complaints and requests;
- 8.3.5. operational, marketing, auditing, legal and record keeping requirements;
- 8.3.6. verifying the identity of third parties or the identity of their beneficial owners;
- 8.3.7. transferring or processing personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes for communication with other entities in the group who are based in other countries;
- 8.3.8. complying with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- 8.3.9. recording and/or monitoring telephone calls and electronic communications to/with the Citadel Group in order to accurately carry out instructions and requests, to use as evidence and in the interests of crime prevention;
- 8.3.10. conducting market research and providing information about our products or services from time to time via email, telephone or other means (for example, events);
- 8.3.11. where a person has unsubscribed from certain direct marketing communications, ensuring that such direct marketing is not sent to them again;

- 8.3.12. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from the Citadel Group or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications;
- 8.3.13. improving or evaluating the effectiveness of the Citadel Group's business or products, services or offerings;
- 8.3.14. as required for legal proceedings; and
- 8.3.15. for referral fee calculations (for example, investment dates and amounts).

8.4. The recipients or categories of recipients to whom the personal information may be supplied

The Citadel Group may share the personal information with the following:

- 8.4.1. persons and entities within the Citadel Group who may be located in any country in the world;
- 8.4.2. any person who conducts business with the Citadel Group in the ordinary course of business;
- 8.4.3. companies that provide services to the Citadel Group or act on its behalf (who in turn have a duty of confidentiality to Citadel) in any country in the world;
- 8.4.4. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- 8.4.5. any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- 8.4.6. South African Revenue Services, or another similar authority;
- 8.4.7. South African Police Services;
- 8.4.8. internal and external auditors;
- 8.4.9. persons who refer a prospective client's contact details to Citadel on the grounds that the prospective client may be interested in Citadel's financial service offerings. Citadel may share personal information with such persons to the extent required;
- 8.4.10. anyone making a successful application for access in terms of PAIA or POPIA;
- 8.4.11. persons involved in service delivery to Citadel clients which may be located in any country in the world;
- 8.4.12. a prospective buyer or seller of any of the Citadel Group's businesses, shares or assets (including data assets); and
- 8.4.13. a person's agent or any other person acting on their behalf;

8.5. Planned transborder flows of personal information

- 8.5.1. The Citadel Group is based in South Africa, and it may transfer personal information to another country where an entity within the group is located.

- 8.5.2. The Citadel Group may need to transfer personal information to an agent, sub-contractor or third party service provider in countries outside South Africa. These countries may not have data privacy laws similar to those of South Africa. If this happens, the Citadel Group will ensure that anyone who receives the personal information agrees to treat the information with the same level of protection as if the Citadel Group were dealing with it.

8.6. A general description of information security measures to be implemented by the Citadel Group

- 8.6.1. The Citadel Group takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in its possession. The Citadel Group takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8.6.2. The Citadel Group has implemented, as a minimum, the following data security measures:

- 8.6.2.1. defined and documented information security policies, procedures, and standards;
- 8.6.2.2. firewalls in place to control inbound and outbound traffic;
- 8.6.2.3. regular data backups to safeguard against data loss;
- 8.6.2.4. data loss prevention technologies and policies;
- 8.6.2.5. enforced careful access controls to limit who can access confidential data on devices and systems;
- 8.6.2.6. robust monitoring, auditing, and reporting capabilities to detect and respond to security incidents;
- 8.6.2.7. utilisation of anti-virus and anti-malware solutions to prevent malicious attacks;
- 8.6.2.8. periodic assessments (vulnerability, penetration test, cyber etc.);
- 8.6.2.9. physical safeguards to protect hardcopies of information;
- 8.6.2.10. security awareness programs to ensure that employees remain vigilant and informed about security risks and best practices.

9. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

The following information is available in terms of certain provisions of the following legislation, as amended from time to time, as applicable to the Citadel Group:

LEGISLATION	RECORDS
COMPANY SECRETARIAL	
Companies Act, 2008	<ul style="list-style-type: none"> • MOIs • Minutes of meetings • Other records and correspondence
Deed Registries Act, 1937	<ul style="list-style-type: none"> • Title deeds

COMPLIANCE	
Broad-based Black Economic Empowerment Act, 2003	<ul style="list-style-type: none"> • Skills development • BBEE status • BBEE status of suppliers • Supplier employee information • Contractor and supplier agreements • List of suppliers, products, services and distributors.
Copyright Act 98 of 1978	<ul style="list-style-type: none"> • Software licenses
Electronic Communications and Transactions Act 25 of 2002	<ul style="list-style-type: none"> • Digital signatures • Transactional records • Electronic terms and conditions
Occupational Health & Safety Act, 1993	<ul style="list-style-type: none"> • Occupational health and safety (OHS) reports including the following: <ul style="list-style-type: none"> ○ Learning history report ○ OHS agreement ○ OHS appointment letters ○ Data Centre procedure documents ○ Incident reports • Personal information for workmen's compensation • Personal information of visitors to our premises and branches • CCTV footage
Prevention and Combating of Corrupt Activities Act, 2004	<ul style="list-style-type: none"> • Anti-Bribery and Corruption Policy • Corrupt or fraudulent employee, customer or merchant activities • Reports on corrupt and fraudulent activities to law enforcement agencies • Code of Ethics
Protection of Personal Information Act, 2013	<ul style="list-style-type: none"> • Citadel Group Privacy Policy • Citadel Group Retention Policy • Citadel Group Privacy Notice • Citadel Group 3rd party management framework • Citadel Group Cookie Policy • Citadel Group POPIA Code of Conduct
Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002	<ul style="list-style-type: none"> • Citadel Group Information Security Policy • Citadel Group IT Usage Policy • Citadel Group Bring Your Own Device Policy • Citadel Group Crypto and Key Management Policy
HUMAN RESOURCES	
Basic Conditions of Employment Act, 1997	<ul style="list-style-type: none"> • Employee details • Employment contracts • Labour relations reports • Information regarding dismissals for dishonesty-related behaviour



	<ul style="list-style-type: none"> • Information on disability, trade union membership, race and religion • Employee next of kin or emergency contact details • Conflict-of-interest declarations • Education information • Health and safety records • Pension and provident fund records • Leave records • Internal evaluations and performance records • Disciplinary records • Training records • Background checks
Compensation for Occupational Injuries and Health Diseases Act, 1993	<ul style="list-style-type: none"> • Record of the earnings and other prescribed particulars of all employees
Employment Equity Act, 1998	<ul style="list-style-type: none"> • Employment equity plans and targets
Labour Relations Act, 1995	<ul style="list-style-type: none"> • Disciplinary records, including outcomes • Labour relations reports • Arbitration awards • Records of strike action and protests
Medical Schemes Act, 1998	<ul style="list-style-type: none"> • Medical aid details
Pension Funds Act, 1956	<ul style="list-style-type: none"> • Pension and Provident Fund details
Skills Development Act, 1998	<ul style="list-style-type: none"> • Training and Development reports
Skills Development Levies Act, 1999	<ul style="list-style-type: none"> • Skills levy reports
TAX	
Income Tax Act, 1962	<ul style="list-style-type: none"> • IT3 • IRP5 • T3a • Monthly IRP5 file • Unemployment Insurance Fund (UIF) files • PAYE information • SDL information • VAT record • Ledgers • Cash books • Journals • Bank statements • Deposit slips • Invoices • Other books of accounts • Electronic representations of information
Tax Administration Act, 2011	<ul style="list-style-type: none"> • Audited financial statements • Taxation records • Asset registers • Management accounts • Audit and Risk Committee reports • Operational

Value Added Tax Act, 1991	<ul style="list-style-type: none"> • Invoices • Tax invoices • Credit note • Debit notes • Bank statements • Deposit slips • Stock lists
Unemployment Insurance Act, 2001	<ul style="list-style-type: none"> • Unemployment Insurance Fund (UIF) files • PAYE information
Estate Duty Act 45 of 1995	Estate duty returns and supporting information
INVESTMENT MANAGEMENT, ADVICE AND ADMINISTRATION	
Administration of Estates Act 66 of 1965	<ul style="list-style-type: none"> • Wills • Death certificates • Identity documents
Collective Investment Schemes Control Act 45 of 2002	<ul style="list-style-type: none"> • Financial statements • Trust deeds • Bank statements • Policies • Regulatory approvals and licenses • Investor application forms
Financial Advisory and Intermediary Services Act 37 of 2002	<ul style="list-style-type: none"> • Registers of representatives, key individuals, qualifications completed by intermediaries and competencies • CPD programmes and activities • Records evidencing representatives' compliance with section 13 of FAIS • Records evidencing supervisory activities • Representative agreements • Supervisor/supervisee agreements • Complaints information: complaints register, complaints received, complaint information and resolution, complaints referred to Ombud • Compliance reports • Key individual authorisation letters • Records relating to competency requirements • Records evidencing deployment of adequate technological resources to maintain client records and data integrity • Records relating to business continuity plans • Records relating to capital adequacy requirements • Other records evidencing compliance with particular sections of FAIS • Regulatory licences and approvals
Financial Intelligence Centre Act 38 of 2001	<ul style="list-style-type: none"> • Identification and verification records • Client due-diligence and related records • Risk management and compliance programme

Insurance Act 18 of 2017 and Long-term Insurance Act 52 of 1998	<ul style="list-style-type: none"> • Founding documents and amendments • Documents evidencing capital reserves • Client policy documents • Accounting records and financial statements • Records of investments • Records of regulatory inspections • Policies required in terms of legislation • Records of board meetings and minutes • Agreements required by law • Insurance Act licence
Medical Schemes Act 131 of 1998	<ul style="list-style-type: none"> • Records of employee medical aid policies • Records of claims by clients and employees • Records of client medical aid policies
Pensions Funds Act 24 of 1956	<ul style="list-style-type: none"> • Fund rules • Member records • Regulator correspondence • Accounting records and financial statements • Records of investments • Records of regulatory inspections • Policies required in terms of the Act • Records of board meetings, including meeting packs and minutes • Resolutions • Death certificates • Death benefit related records • Records of payments and receipts • Register of trustees • Retirement benefits counselling document
Trust Property Control Act 57 of 1988	<ul style="list-style-type: none"> • Trust Deeds and amendments • Trustee information • Letters of authority • Trust bank account statements • Trust financial accounting records • Proof of registration of trust property
EXCHANGE CONTROL	
Currencies and Exchanges Act 9 of 1933	<ul style="list-style-type: none"> • Records of exchange control transactions entered into for clients

10. CATEGORIES OF RECORDS HELD

- 10.1. The Citadel Group maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.

- 10.2. Please note further that many of the records held by the Citadel Group are those of third parties, such as customers and employees, and the Citadel Group takes the protection of third party confidential information very seriously. For further information on the grounds of refusal of access to a record please see paragraph 11.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

CATEGORY OF RECORDS	RECORDS
<p>Internal records The records listed pertain to the Citadel Group's own affairs</p>	<ul style="list-style-type: none"> • Memoranda and articles of association • Financial records • Operational records • MOIs • Shareholder agreements • Strategic information • Intellectual property • Marketing records • Internal correspondence • Service records • Statutory records • Compliance and related records, registers, information and reports • Information technology information and reports • Internal policies and procedures; and • Minutes of meetings and meeting packs
<p>Personnel records For the purposes of this section, "personnel" means any person who works for or provides services to or on behalf of the Citadel Group and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the Citadel Group. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> • Any personal records provided to the Citadel Group by its personnel • Any records a third party has provided to the Citadel Group about any of their personnel • Conditions of employment and other personnel-related contractual and quasi legal records • Employment policies and procedures • Internal evaluation and disciplinary records • Other internal records and correspondence • Medical scheme reports • Pension scheme reports • SETA records • Salary records • Training records • Training manuals
<p>Customer-related records</p>	<ul style="list-style-type: none"> • Contracts with the customer and between the customer and other persons
<p>Investee/Portfolio company-related records</p>	<ul style="list-style-type: none"> • Documents processed during the assessment and review of prospective investment opportunities • Contracts related to investments

CATEGORY OF RECORDS	RECORDS
<p>Other third-party records Records are kept in respect of other parties, including without limitation joint ventures and consortia to which the Citadel Group is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to the Citadel Group.</p>	<ul style="list-style-type: none"> • Personnel, customers, or the Citadel Group records which are held by another party as opposed to being held by the Citadel Group • Records held by the Citadel Group pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.
<p>Other records</p>	<ul style="list-style-type: none"> • Information relating to the Citadel Group • Research information belonging to the Citadel Group or carried out on behalf of a third party
<p>Transformation and Stakeholder Development Records</p>	<ul style="list-style-type: none"> • Proposals for funding received • Records concerning organisations receiving support • Schedules of approved projects • Reports, books, publications and general information • Records and contracts of agreements
<p>Supply Chain Records</p>	<ul style="list-style-type: none"> • Policies and procedures manuals • Purchasing agreements • Material catalogue for stock items • Supply contract vendor list
<p>Corporate Affairs Records</p>	<ul style="list-style-type: none"> • Media database • General mailing lists • Promotional material • Company article and newspaper records • Presentations on the Citadel Group • Market research on the Citadel Group and peers • Company press releases • Media coverage on the Citadel Group and peers
<p>Treasury Records</p>	<ul style="list-style-type: none"> • Correspondence • Mandates and resolutions • Service contracts • Facility letters • Transitional records
<p>Finance Records</p>	<ul style="list-style-type: none"> • Vendor invoices • Remittance advices • Accounts receivable • Banking records

CATEGORY OF RECORDS	RECORDS
	<ul style="list-style-type: none"> • Management and monthly accounts, quarterly and annual financial statements • External audit reports and records • Annual budgets • Accounting policies and procedures • Guarantees, undertakings, subordinations, bonds and similar liabilities • Rental agreements • Loan agreements • Annual financial statements
Legal Records	<ul style="list-style-type: none"> • Details of external counsel used by the company (locally and abroad) • Offshore company data sheets • Copies of agreements to which Citadel Group companies are party to • List of current matters • Details of legal proceedings • General legal correspondence • Legal opinions and records of advice received or provided
Tax Records	<ul style="list-style-type: none"> • Tax returns as filed with the South African Revenue Services (SARS) • Correspondence with SARS on various issues – including objections to assessments, rulings obtained etc • Documentation on tax advice and opinions obtained from external counsel

11. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

11.1. Completion of the prescribed form

- 11.1.1. Any request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A of the PAIA Regulations, 2021 and should be specific in terms of the record requested. The form can be accessed via the following link: [InfoRegSA-PAIA-Form02-Reg7.pdf](https://info regulator.org.za/InfoRegSA-PAIA-Form02-Reg7.pdf) (info regulator.org.za) and is attached to this Manual.
- 11.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to the requester.
- 11.1.3. POPIA provides that a data subject may, upon proof of identity, request the Citadel Group to confirm, free of charge, all the personal information it holds about the data subject and may request access to such personal information, including information about the identity of third parties who have or have had access to such personal information.
- 11.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to them, the Citadel Group must provide the data subject

with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.

- 11.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 11.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by the Citadel Group, on reasonable grounds relating to their particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form and submit it to the Information Officer at the postal or physical address or electronic mail address set out above. The form can be accessed via the following link: [FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf](#) (info regulator.org.za) and is attached to this Manual.
- 11.1.7. A data subject may also request the Citadel Group to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that the Citadel Group is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 11.1.8. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address or electronic mail address set out above on the prescribed form. The form can be accessed via the following link: [FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf](#) (info regulator.org.za) and is attached to this Manual.

11.2. Proof of identity

Proof of identity is required to authenticate the requester's identity and the request. Requesters will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of their identity document or other legal forms of identity.

11.3. Payment of the prescribed fees

- 11.3.1. Section 54 of PAIA entitles the Citadel Group to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Annexure B of the PAIA Regulations, 2021.
- 11.3.2. Pursuant to section 54 of PAIA, there are two categories of fees which are payable:
 - 11.3.2.1. The request fee: R140.00.
 - 11.3.2.2. The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in an Annexure to this Manual.
- 11.3.3. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

11.4. Timelines for consideration of a request for access

- 11.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 11.4.2. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A of the PAIA Regulations, 2021. The form can be accessed via the following link: [Form-3-PAIA.pdf \(info regulator.org.za\)](#).
- 11.4.3. Should an extension be required, the requester will be notified, together with reasons explaining why the extension is necessary.

11.5. Grounds for refusal of access and protection of information

- 11.5.1. There are various grounds upon which a request for access to a record may be refused. These grounds include:
 - 11.5.1.1. the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
 - 11.5.1.2. the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
 - 11.5.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;
 - 11.5.1.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
 - 11.5.1.5. if the record was produced during legal proceedings, unless that legal privilege has been waived;
 - 11.5.1.6. if the record contains trade secrets, financial or sensitive information or any information that would put the Citadel Group at a disadvantage in negotiations or prejudice it in commercial competition; and/or
 - 11.5.1.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by the Citadel Group.
- 11.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.
- 11.5.3. If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

12. AVAILABILITY OF THIS MANUAL

Copies of this manual are available for inspection, free of charge, at the offices of the Citadel Group and on the Citadel Group's website: www.citadel.co.za.

ANNEXURE A

CITADEL GROUP ENTITIES:

- Citadel Holdings Proprietary Limited (company registration number 2000/027580/07)
- Citadel Solutions Holdings Proprietary Limited (company registration number 1998/011196/07)
- Citadel Investment Services Proprietary Limited (company registration number 1996/006847/07)
- Citadel Wealth Proprietary Limited (company registration number 1996/013143/07)
- Citadel Financial Protection Proprietary Limited (company registration number 1997/014428/07)
- Citadel Fiduciary Proprietary Limited (company registration number 1998/020731/07)
- Peregrine Administration Services Proprietary Limited (company registration number 1999/010434/07)
- Citadel Global Proprietary Limited (company registration number 2004/021931/07)
- Peregrine Life Limited (company registration number 2000/010635/06)
- Peregrine Solutions Nominees Proprietary Limited (company registration number 1999/010435/07)
- Purpose Wealth Proprietary Limited (company registration number 2014/256114/07)
- Citadel Impex Solutions Proprietary Limited (company registration number 2004/030477/07)
- Point 3 Financial Solutions Proprietary Limited (company registration number 2000/029722/07)
- Point 3 Investment Solutions Proprietary Limited (company registration number 2014/116798/07)
- The Preferred Retirement Annuity Fund (registration number 12/8/36052/1)
- The Preferred Pension Preservation Fund (registration number 12/8/36054/1)
- The Preferred Provident Preservation Fund (registration number 12/8/36053/1)
- Precept Wealth Solutions Proprietary Limited (company registration number 2002/005521/07)
- Precept Investments Proprietary Limited (company registration number 2015/422164/07)
- H4 Collective Investments (RF) Proprietary Limited (company registration number 2002/009140/07)
- Citadel Philanthropy Foundation Trust (company registration number 930/042/339)
- Electus Funds Managers Proprietary Limited (company registration number 2014/268056/07)

- Citadel LTIP4 (RF) Proprietary Limited (company registration number: 2020/799543/07)
- CIS Nominees Proprietary Limited (company registration number 1998/023373/07)
- Citadel Private Clients Proprietary Limited (company registration number: 1998/016676/07) – dormant

ANNEXURE B

THE PREFERRED RETIREMENT FUNDS

The Preferred Retirement Annuity Fund

Registration Number 12/8/36052/1

The Preferred Pension Preservation Fund

Registration Number 12/8/36054/1

The Preferred Provident Preservation Fund

Registration Number 12/8/36053/1

CONTACT DETAILS

Name of body	The Preferred Retirement Annuity Fund The Preferred Pension Preservation Fund The Preferred Provident Preservation Fund
Principal Officer	S Raswiswi
Information Officer	BM Griesel
Physical Address	The Citadel 15 Cavendish Street (corner of Cavendish and Warwick Streets) Claremont Cape Town 7700
Postal Address	PO Box 23388 Claremont 7735
Telephone Number	(021) 670 9000
Email Address	<u>IOfficerRetirementFunds@citadel.co.za</u>
Website	Not Applicable

FORM 2: REQUEST FOR ACCESS TO RECORD

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):	
Cellular:	
Facsimile	
Full names of person on whose behalf request is	

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

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
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 <i>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.</i>	
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) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record. d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.	
Reason:	

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 (Please specify)

Signed at _____ on this _____ day of _____
20____+_____

Signature of requester / person on whose behalf request is made

.....

FOR OFFICIAL USE

Reference number:	
Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of information officer

FEES IN RESPECT OF PRIVATE BODIES

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
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 requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 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. To not exceed a total cost of:	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

Form 1: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Registered name of responsible party:	

Form 2: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	

	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Registered name of responsible party:	
Postal address:	
Street address:	
Contact number(s):	
E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b)</p> <p>WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p>

	<i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

.....

Signature of data subject/ designated person