



MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

(15 May 2026 approved by Board of PPA)

Effective 15 May 2026

1. INTRODUCTION

- 1.1 Pension Path Administrator (Pty) Ltd ("**PPA**"), is a fund benefit administrator duly registered with the Financial Sector Conduct Authority ("**FSCA**") in terms of section 13B of the Pension Funds Act 24 of 1956 ("**PFA**") and is a private body in terms of the Promotion of Access to Information Act 2 of 2000 ("**the Act**").
- 1.2 The purpose of this manual is to give effect to the right of access to information as enshrined in the Constitution of the Republic of South Africa in respect of information held by PPA.
- 1.3 This manual contains the information of the records that PPA holds and sets out the process to be followed in accessing information from PPA. For purposes of interpretation and application, this Manual shall be read together with PPA's Privacy Policy.

2. CONTACT DETAILS FOR ACCESS TO INFORMATION OF PPA

Information Officer (Chief Executive Officer)	Mr Raymond Wentworth
Deputy Information Officer (Chief Financial Officer)	Mr Grant Biggs
Registered address (Head Office)	CRF Building, 3rd Floor, 4 Bridal Close, Tyger Falls, Bellville, 7530
Postal address	PO Box 4739, Tygervally, 7530
FSCA registration number	24/818
Tel	021-915 3540
WhatsApp	-
Email	PAIA@pensionpath.co.za
Website	www.pensionpath.co.za

3. THE INFORMATION REGULATOR'S GUIDE ON HOW TO EXERCISE ANY RIGHT CONTEMPLATED IN THE ACT

3.1 The Information Regulator has, in terms of section 10(1) of the Act updated and published a guide on its website that is user-friendly and available to any person who wishes to exercise any right in terms of the Act and the Protection of Personal Information Act 4 of 2013 ("the POPIA").

3.2 The guide is available in all official languages and in braille.

3.3 The guide can be obtained upon written request to PPA's Information Officer and the website of the Information Regulator: https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf. PPA shall charge a fee for the printing of hard copies.

3.4 The guide contains, *inter alia*, a description of the -

3.4.1 objects and purpose of the Act and POPIA;

3.4.2 manner and the form of a request for access to a record of both public and private bodies;

3.4.3 assistance available from the Information Regulator in terms of the Act and POPIA; and

3.4.4 remedies available in law to a requester regarding an act or failure to act in respect of a right or a duty conferred or imposed by the Act or POPIA.

3.5 The Information Regulator's details:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
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Postal address	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone number	010 023 5200
Email	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za/

3.6 Complaints to the Information Regulator in respect of the Act or POPIA, must be submitted in the prescribed manner as set out on the website of the Information Regulator.

4. INFORMATION HELD BY PPA THAT IS AVAILABLE WITHOUT A REQUEST IN TERMS OF THE ACT

4.1 The following information may be available without the need to submit a formal PAIA request and can be obtained through PPA's website or through a written request to the Information Officer:

Corporate and Public Information	Information, documents and policies published on PPA's official website
	Contact details of PPA
	Marketing and promotional material
	Publicly available corporate publications
Governance and Regulatory Information	Corporate governance statements, where publicly disclosed
	Public regulatory disclosures
	Industry-related disclosures required by regulatory bodies
Operational and Administrative Information	General service description
	Information brochures and general explanatory material in relation to services offered by PPA

5. INFORMATION HELD BY PPA TO BE REQUESTED IN TERMS OF THE ACT

5.1 The categories of records listed below are available upon request for the purposes of the Act, subject to any grounds for refusal of access as provided for in the Act and POPIA, including where disclosure would constitute an unreasonable invasion of privacy,

reveal commercially sensitive or confidential information, involve legally privileged communications; or undermine the effective functioning of PPA or its services.

Category	Description of records
Strategic Documents, Plans, Proposals	Annual reports
	Strategic plans and proposals
	Annual performance plans
Corporate Governance Records	Company incorporation documents
	Memorandum of Incorporation
	Registration documents as a section 13B administrator with the FSCA
	Share certificates and share register
	Board resolutions and related documents
	Board meeting agenda items, minutes and audio recordings
	Board committee agenda items, minutes and audio recordings
	Records relating to the appointment of directors, auditors, and other officers
	Policies and procedures not published on the Company's website
	Legal correspondence and compliance
	Risk management reports and assessments
Financial and Tax records	Statutory returns to relevant authorities
	Pay-as-you-earn (PAYE) returns and records
	Documents issued to employees for income tax purposes
	Records of payments made to SARS (South African Revenue Services) on behalf of employees
	Statutory compliance documents such as Skills Development Levies; UIF (Unemployment Insurance Fund) and Worksmens Compensation
	Value Added Tax records and returns
	Skill development levies
	UIF
	Annual financial statements
	Accounting records
	Audit reports

	Asset register
	Banking records
	Receipts and payments
	Management accounts
	Invoices
	Rental agreement
Human Resources Records	Employment and consultancy contracts
	BEE Statistics
	Personnel documents and records
	Details of next of kin for contact purposes
	Employee and independent contractor records and correspondence
	Curriculum vitae of employees and independent contractors as well as skills development records and SETA (Sector Education and Training Authority) records
	Employee education and training records
	Employee benefit records
	Payroll records
	Leave and medical records
	Disciplinary code and records
	Performance management records
	Financial records of employees and independent contractors including salary and payments including tax records such as IRP5
	Workmen's compensation claims and records.
Clients	Fund administration agreements and correspondence
	Contact details and names and addresses of relevant employees/trustees/Principal Executive Officer of the Client
	Client registration and/or identity number details
	Client addresses - physical and postal
	Financial Intelligence Centre Act 38 of 2001 (FICA) documents of clients
	Legal records such as summons
	Payment history and records

Supplier records	Service level agreements, correspondence and other related documents such as contact details and names of relevant contact persons of suppliers and service providers as well as address (both physical and postal)
	Supplier registration and/or identity number including bank account details and invoices/statements of suppliers and service providers
	Operational records and manuals
	Procurement policy
Operational and technical	Administration agreements with clients
	Incident reports and investigations
	Licenses and approvals
	Policy documents
	Marketing strategies
	Survey reports
	Technical records
	Insurance policies and claim records
	Details of insurance coverage, limits and insurers
Information Technology Records	Electronic databases
	System access logs
	Data protection procedures
	Disaster recovery plans
Marketing	Market information relating to products and services
	Performance records
	Product sales records
	Customer records including customer satisfaction surveys
Other	Secretarial records
	Complaints register
	Media releases and public relation events records

6. APPLICABLE LEGISLATION (AS AMENDED FROM TIME TO TIME) IN RESPECT OF WHICH PPA HOLDS RECORDS THAT MAY BE ACCESSED BY CERTAIN PERSONS

PPA is required in accordance with legislation to retain certain records. We hold records for purposes of the Act in accordance with *inter alia* the following legislation:

Basic Conditions of Employment Act 75 of 1997
Broad Based Black Economic Empowerment Act 53 of 2003
Companies Act 71 of 2008
Compensation for Occupational Injuries and Diseases Act 130 of 1993
Competition Act 89 of 1998
Consumer Protection Act 68 of 2008
Copyright Act 98 of 1978
Constitution of the Republic of South Africa 1996
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Financial Advisory and Intermediary Services Act 37 of 2002
Financial Institutions (Protection of Funds) Act 28 of 2001
Financial intelligence Centre Act 38 of 2001
Financial Sector Regulation Act 9 of 2017
Income Tax Act 58 of 1962
Insolvency Act 24 of 1936
Insurance Act 18 of 2017
Intellectual Property Laws Amendment Act 38 of 1997
Labour Relations Act 66 of 1995
Long-term Insurance Act 52 of 1998
National Credit Act 34 of 2005
Occupational Health and Safety Act 85 of 1993
Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
Pension Funds Act 24 of 1956
Prevention of Organised Crime Act 121 of 1998
Promotion of Access to Information Act 2 of 2000
Promotion of Administrative Justice Act 3 of 2000
Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Protected Disclosures Act 57 of 1987
Protection of Personal Information Act 4 of 2013
Short Term Insurance Act 53 of 1998
Skills Development Act 97 of 1997
Skills Development Levies Act No 97 of 1999
Tax Administration Act No 28 of 2011
Trade Marks Act 194 of 1993
Unemployment Insurance Act 63 of 2001
Unemployment Insurance Contributions Act 4 of 2002
Value-Added Tax Act 89 of 1991

7. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND OF THE INFORMATION RELATING THERETO

Categories of Data Subjects	Personal Information that may be processed
Clients and Client Representatives	Name, address, registration number, banking details, VAT number, contact details, financial information, FSCA registration documents and other applicable personal information. Names and surname, South African identity number or passport number, date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, income tax number and FICA documentation.
Service Providers (including outsourced services)	Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses and contact details.
Directors, Executive officials, and Employees (including prospective employees)	Name, surname, South African identity number or other identifying number, contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, CVs, education history, banking details, income tax reference number, remuneration and benefit information, health information, details related to employee performance, disciplinary procedure information and biometric data.

8. PROCEDURE TO BE FOLLOWED TO REQUEST INFORMATION OR RECORDS LISTED IN ITEM 5 HEREOF

- 8.1 The requester must complete the prescribed form available on the Information Regulator's website (link to the website is set out in this manual above). If the requester does not make use of the prescribed form or does not complete the form properly, the request may be rejected or refused or delayed (if insufficient information is provided).

- 8.2 The requestor must provide sufficient detail to enable the Information Officer to identify the record(s) requested and the requestor.
- 8.3 The completed form must be submitted to PPA's Information Officer via email (the email address set out in this manual above).
- 8.4 A person may also request PPA to correct or delete personal information about a data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 8.5 In the event that the requester is unable to read or write, the requester is advised to contact PPA's Information Officer for assistance (the telephone number is set out in this manual above).
- 8.6 Access to certain records may be or must be refused on the grounds set out in the applicable sections of Chapter 4 of Part 2 and Chapter 4 of Part 3 of the Act. The Information Officer, on this basis, will decide whether or not to grant a request for access to information.

9. PERIOD TO DECIDE ON REQUEST FOR INFORMATION OR RECORDS

- 9.1 Once PPA has received the completed prescribed form, it will be reviewed and considered by PPA's Information Officer in accordance with the Act, and PPA will revert to the requester within a period of 30 days of receipt of the request as to whether the request will be granted or refused. Where a requester is a third party requesting information of a Data Subjectⁱ, the Information Officer shall within the 30 day period enquire from the Data Subject whether he/she consents to the disclosure/access to the information requested by a third party.
- 9.2 The abovementioned period may be extended for a further period of not more than 30 days if the request relates to a large amount of information or records, or requires a search for information or records or if the Data Subject in respect of a request by a third party, has not responded with regards to his/her consent.

9.3 The decision of PPA's Information Officer is final and if the requester is not satisfied with the decision, he/she may exercise the below mentioned remedies.

9.4 Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of the Act relied upon.

10. REMEDIES AVAILABLE TO THE REQUESTER IF NOT SATISFIED WITH DECISION

10.1 If the requester is not satisfied with PPA's decision (including refusal of access or access fee charged), the requester may lodge a complaint with the Information Regulator. The complaint must be lodged within 180 days of receipt of PPA's decision.

10.2 The complaint must be made in writing using the prescribed form. Please see the guide issued by the Information Regulator regarding complaints for more information.

10.3 A requester may only apply to a court for appropriate relief in circumstances where he/she has exhausted the internal complaints procedure before the Information Regulator.

11. INFORMATION OR RECORDS NOT FOUND

If PPA is unable to find the records that the requester has requested despite reasonable and diligent search and it believes either that the records are lost or that the records are in its possession but unattainable, the requester will receive a notice in this regard from the Information Officer in the form of an affidavit setting out the measures taken to locate the document and accordingly the inability to locate the document.

12. FEES

12.1 If the requester is granted access to the records that he/she requested and he/she is not exempted from paying any fees, PPA may charge fees as set out in item 12.2, relating to the categories listed in item 5 hereof.

12.2 Fees charged by PPA to access information or records:

Item	Description	Fee
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1.	Request fee, payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part of the page
3.	Printed copy of A4-size page	R2.00 per page or part of the page
4.	For a copy in a computer-readable form on: - a flash drive (provided by the requester) - a compact disc (CD) if the requester provides the CD to us - a compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6.	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	For a copy of an audio record on a flash drive (provided by the requester) For a copy of an audio record on compact disc (CD) if the requester provides the CD to us For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9.	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure The search and preparation fee cannot exceed	R145.00 R435.00
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request calculated in terms of item 2 to 8.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

13. AVAILABILITY OF THE MANUAL

13.1 A copy of the Manual is available:

13.1.1 on www.pensionpath.co.za;

13.1.2 PPA's head office for public inspection during normal business hours;

13.1.3 to any person upon request and upon the payment of a reasonable prescribed fee (if applicable); and

13.1.4 to the Information Regulator upon request.

13.2 A fee for a copy of the Manual, as contemplated above, shall be payable per each A4-size photocopy made.

14. REVIEW OF THE POLICY

14.1 This policy shall be reviewed when circumstances require it.

15. EFFECTIVE DATE

15.1 This Policy is effective from 15 May 2026.

ⁱ As defined in the POPIA.