

**PSG GROUP LIMITED AND ITS SUBSIDIARIES LISTED IN ANNEXURE A
(collectively “PSG Group”)**

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO. 2 OF 2000**

1. INTRODUCTION

- 1.1 This Manual has been prepared in accordance with section 51 of the Act and is aimed at assisting potential Requesters in requesting access to information (documents or records) from PSG Group as contemplated under the Act.
- 1.2 The Manual may be amended from time to time and as soon as any amendments have been effected, the latest version of the Manual will be made available on PSG Group’s website (www.psggroup.co.za) and at its office.
- 1.3 A Requester is invited to contact the Information Officer for assistance in respect of the use or content of this Manual.
- 1.4 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to the Act.

2. DEFINITIONS

- 2.1 The following words or expressions will bear the following meanings in this Manual –
- 2.1.1 "**Act**" means the Promotion of Access to Information Act, No. 2 of 2000, together with any regulations published thereunder;
- 2.1.2 "**Client**" means a natural or juristic person who or which receives services from PSG Group;
- 2.1.3 "**Correspondence**" means written and electronic communication exchanged between two or more parties;
- 2.1.4 "**Employee**" means any person who works for, or provides services to, on behalf of PSG Group, and receives or is entitled to receive remuneration;
- 2.1.5 "**Information Officer**" means the designated information officer(s) or the head of the body, as described in this Manual;
- 2.1.6 "**Manual**" means this manual, together with all annexures thereto, as amended and made available at the office of PSG Group from time to time;
- 2.1.7 "**POPIA**" means the Protection of Personal Information Act, No. 4 of 2013, together with any regulations published thereunder;
- 2.1.8 "**PSG Group**" means PSG Group Limited (registration number: 1970/008484/06), a JSE-listed investment holding company, and its subsidiaries listed in Annexure A;

2.1.9 "Requester" means any person or entity requesting access to a record that is under the control of PSG Group; and

2.1.10 "SAHRC" means the South African Human Rights Commission.

3. HOW TO USE THE ACT TO ACCESS INFORMATION

3.1 The Act grants a Requester access to records of a private body if such records are required for the exercise or protection of any rights. If a public body lodges a request in terms of the Act, the public body must be acting in the public interest.

3.2 Requests in terms of the Act shall be made in accordance with the prescribed procedures, and at the prescribed fees.

3.3 A guide on how to use the Act has been compiled by the SAHRC in terms of section 10 of the Act and is available on the SAHRC website (www.sahrc.org.za). Any queries should be directed to –

The South African Human Rights Commission
PAIA Unit, Research and Documentation Department
Postal Address: Private Bag 2700, Houghton, 2041, South Africa
T +27 (0)11 877 3600
F +27 (0)11 403 0625
E paia@sahrc.org.za
W www.sahrc.org.za

4. OVERVIEW OF PSG GROUP

4.1 PSG Group is a JSE-listed investment holding company consisting of underlying investments that operate across a diverse range of industries, which include financial services, education and food and related business, as well as early-stage investments in select growth sectors.

4.2 PSG Group's contact details

Name of body	PSG Group
Physical & postal addresses	Physical: 1 st Floor, Ou Kollege Building, 35 Kerk Street, Stellenbosch, 7600, South Africa Postal: PO Box 7403, Stellenbosch, 7599, South Africa
Designated Information Officer	Name Wynand Greeff (CFO) T +27 (0)21 887 9602 F +27 (0)21 887 9624 E cosec@psggroup.co.za

4.3 Disclosure in terms of section 52 of the Act

No records are available in terms of section 52 of the Act.

4.4 Information kept by PSG Group in accordance with other legislation

Records are kept in accordance with relevant legislation applicable to PSG Group, which includes, but is not limited to, the following –

- Basic Conditions of Employment Act, No. 75 of 1997;
- Companies Act, No. 71 of 2008;

- Financial Intelligence Centre Act, No. 38 of 2001;
- Income Tax Act, No. 58 of 1962;
- Labour Relations Act, No. 66 of 1995;
- Protection of Personal Information Act, No. 4 of 2013; and
- Value Added Tax Act, No. 89 of 1991.

4.5 Information held by PSG Group in terms of the Act

NOTE: This section of the Manual sets out the categories and descriptions of records held by PSG Group. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under the Act. In particular, certain grounds of refusal as set out in the Act may be applicable to a request for such records.

CATEGORIES OF RECORDS	DESCRIPTION OF RECORDS
Financial Records	<ul style="list-style-type: none"> • Financial statements • Financial and tax records (company and Employees) • Asset register and insurance information • Banking details
Company Records	<ul style="list-style-type: none"> • Documents of incorporation • Statutory information • Share register
Human Resources	<ul style="list-style-type: none"> • Employee records • Employment contracts • Personnel guidelines, policies and procedures
Operational Information	<ul style="list-style-type: none"> • Client documentation in terms of Financial Intelligence Centre Act, No. 38 of 2001 • Correspondence with Clients and third parties • Mandates and agreements with Clients • Files relating to Client matters and other Client information • General contract documentation • General operational information
Intellectual Property	<ul style="list-style-type: none"> • Trademarks and other intellectual property • Software and other licences
Information Technology	<ul style="list-style-type: none"> • Domain names • Records regarding computer systems and programmes
Website	<ul style="list-style-type: none"> • PSG Group's website address is www.psggroup.co.za and contains information regarding the company, investees, annual reports, annual financial statements, circulars, sum-of-the-parts calculation, news and contact details
Miscellaneous	<ul style="list-style-type: none"> • Security agreements, guarantees and indemnities • Internal Correspondence • Correspondence with the JSE, the Takeover Regulation Panel, the Competition Commission, the South African Revenue Service and other regulatory authorities

4.6 Request Procedures

Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of the Act.

4.6.1 Form of request

The Requester must use the prescribed form to make the request for access to a record. This must be made to the Information Officer at the address, fax number or electronic mail address of the body concerned.

The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic of South Africa or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.

The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the Information Officer of the private body.

4.6.2 Fees

A Requester who seeks access to a record containing personal information about that Requester is not required to pay the request fee. Every other Requester, who is not requesting access to a record containing personal information about him/her or itself, must pay the required request fee.

The Information Officer must by notice require the Requester (other than a personal Requester) to pay the prescribed request fee (if any) before further processing the request. The forms and fee structure prescribed under the Act are available from the Government Gazette, or at the website of the Department of Justice and Constitutional Development (www.doj.gov.za), under the 'regulations' section, as well as at the SAHRC website (www.sahrc.org.za).

The fee that the Requester must pay to a private body is R50. The Requester may lodge an application to the court against the tender or payment of the request fee.

If access to a record(s) is granted by PSG Group, the Requester may be required to pay an access fee for the search for and preparation of the records and for re-production of the record(s).

The access fees which apply are set out below (Part III of Annexure A of the Regulations to the Act). PSG Group can withhold a record(s) until such access fees have been paid.

Reproduction Fee	Rand
Photocopy of an A4-size page or part thereof	R1.10 per page
Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75 per page
A copy of, in a computer readable form on – <ul style="list-style-type: none">• Stiffy disc	R7.50

• Compact disc	R70.00
Transcription of visual images on an A4-size page or part thereof	R40.00 per page
Copy of visual images	R60.00
Transcription of an audio record on an A4-size page or part thereof	R20.00 per page
Copy of an audio record	R30.00
Search and preparation of the record for disclosure	R30 for each hour or part thereof reasonably required for such search and preparation

4.6.3 **Decision on request**

After the Information Officer has made a decision on the request, the Requester will be notified using the required form. If the request is granted then a further access fee must be paid for reproduction, for search and preparation, and for any time that has exceeded the prescribed hours to search for and prepare the record(s) for disclosure.

4.6.4 **Grounds of refusal of access**

In terms of Part 3, Chapter 4 of the Act, PSG Group may and in certain instances must refuse access to records on the grounds set out in the Act. The grounds include:

- that the record constitutes privileged information for the purposes of legal proceedings;
- that it is necessary to protect the commercial information or the confidential information of a third party;
- that it is necessary to protect the commercial information of PSG Group;
- that it is necessary to protect the safety of individuals or property;
- that it is necessary to protect the research information of a third party or of PSG Group; and
- that granting access would result in the unreasonable disclosure of personal information about a third party.

5. **RECORDS OR INFORMATION NOT FOUND**

5.1 If, after all reasonable steps to locate a record have been taken, and no record is found, then the Information Officer will notify the Requester, by way of an affirmation or affidavit that access to the requested and titled document cannot be provided. The affirmation or affidavit will include detailed account of the steps taken to try locating the record.

5.2 Should a record be found at a later stage, the Information Officer shall provide the Requester access to such record, unless access to the record is refused on the grounds permitted by the Act (Part 3, Chapter 4).

6. **AVAILABILITY OF THE MANUAL**

This Manual is available on PSG Group's website (www.psggroup.co.za) and may be inspected, during business hours and free of charge, at the office of PSG Group. Copies of the Manual may be made, subject to the prescribed fees. Copies may also be requested from the SAHRC.

7. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

NOTE: This section of the Manual will apply from 1 July 2021, when the applicable provisions of POPIA take effect.

7.1 **PSG Group processes personal information of data subjects for the purposes of:**

(section 51(1)(c)(i) of the Act, as amended by POPIA)

- Fulfilling its obligations in terms of applicable legislation, as well as obligations imposed by the JSE Limited and other regulatory authorities;
- Verifying information provided to PSG Group;
- Obtaining information necessary to provide contractually agreed services to Clients;
- Monitoring, maintaining and managing PSG Group's contractual obligations to Clients, suppliers, service providers, Employees, directors and other third parties;
- Marketing and advertising;
- Historical record keeping, research and recording statistics necessary for fulfilling PSG Group's business objectives.

7.2 **PSG Group may process the personal information of the following categories of data subjects, which includes current, past and prospective data subjects:**

(section 51(1)(c)(ii) of the Act, as amended by POPIA)

- Clients, investees and Employees, representatives, agents, contractors and service providers of such Clients and investees;
- Regulatory, commercial, financial and other institutions and organisations with which PSG Group engages in connection with its Clients and investees, as well as their employees, representatives, agents, contractors and service providers;
- Suppliers, service providers to and vendors of PSG Group and employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- Directors and officers of PSG Group;
- Shareholders;
- Job applicants;
- Existing and former Employees (including contractors, agents, temporary and casual Employees);
- Visitors to any premises of PSG Group; and
- Correspondents.

7.3 **The nature of personal information processed in respect of the above data subjects may include, as may be applicable:**

(section 51(1)(c)(ii) of the Act, as amended by POPIA)

- Name, identifying number, symbol, email address, physical address, telephone number, fax number, location, online identifier or other particular assignment to the data subject;
- Biometric information of the data subject;
- Education, medical, financial, criminal or employment history of the data subject;
- Information relating to the race, gender, marital status, national origin, age, disability, language and birth of the data subject;
- The personal opinions, views or preferences of the data subject;
- Confidential Correspondence sent by the data subject; and
- The views or opinions of another individual about the data subject.

7.4 **PSG Group may supply personal information to the following recipients:**

(section 51(1)(c)(iii) of the Act, as amended by POPIA)

- Regulatory, statutory and government bodies;
- Suppliers, service providers, vendors, agents and representatives of PSG Group;
- Employees of PSG Group;
- Shareholders and other stakeholders;
- Clients and investees of PSG Group;
- Third party verification agencies and credit bureau;
- Collection agencies; and
- Banks and other financial institutions.

7.5 **Planned or prospective transborder flow of personal information processed by PSG Group in respect of the above categories of data subjects:**

(section 51(1)(c)(iv) of the Act, as amended by POPIA)

Personal information of data subjects may be transferred across borders, should any of PSG Group's information technology infrastructure be hosted in foreign jurisdictions, or should this be required in the course of performing Client and investee mandates or other contractual obligations.

7.6 **Security measures implemented by PSG Group to ensure the confidentiality, integrity and availability of the personal information which may be or is being processed by PSG Group:**

(section 51(1)(c)(v) of the Act, as amended by POPIA)

PSG Group has established and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the personal information in its possession or under its control is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access, having regard to applicable legal requirements, industry practice and generally accepted information security practices and procedures relevant to PSG Group.

Entity	Registration number
PSG Group Limited	1970/008484/06
PSG Financial Services Limited	1919/000478/06
PSG Alpha Investments (Pty) Limited	2009/022552/07
PSG Corporate Services (Pty) Limited (<i>excluding PSG Capital division as detailed at www.psqcapital.com</i>)	1996/004840/07
PSG Fundco (Pty) Limited	2013/222942/07
Ou Kollege Beleggings Limited	2002/017362/06
Sideling Hill Properties (Pty) Limited	2011/135087/07
PSG Group Ltd Supplementary Share Incentive Trust	IT2321/2009
The PSG Group BEE Education Trust	IT1403/2006
The PSG BEE Trust	IT3338/2004