



REALFIN

# PAIA Manual

Effective date: 20 May 2021

Prepared in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (the "Act"), for the following entities:

1. RealFin Holdings Proprietary Limited (Registration no.: 2015/017244/07)
2. RealFin Collective Investment Schemes (RF) Proprietary Limited (Registration no.: 2013/170284/07)
3. RealFin Fund Services Proprietary Limited (Registration no.: 2015/017268/07)
4. RealFin Trustee Services Proprietary Limited (Registration no.: 2007/007405/07)

RealFin has been a trusted partner to some of SA's leading traditional and alternative investment fund managers for more than a decade, providing industry leading advisory and hosting services throughout the evolution of the domestic asset management landscape. RealFin offers Manco hosting services and independent administration services.

The purpose of this manual is to inform requesters of the procedural and other requirements which a request for information must meet as prescribed by the Act.

## Part I: Particulars of the Private Body

(Contact details required under section 51(1)(a) of the Act):

1. RealFin Holdings Proprietary Limited

<b>Name of the Body</b>	RealFin Holdings Proprietary Limited
<b>Registration Number</b>	2015/017244/07
<b>Primary Business</b>	Holding Company
<b>Head of the Body</b>	Cornelis Batten
<b>Information Officer</b>	Bianca Canary
<b>Directors</b>	Claire Carpenter Cornelis Batten
<b>Postal Address</b>	Suite 25 Private Bag X16 Constantia 7848
<b>Street Address</b>	1st Floor, 4 Silverwood Close Steenberg Office Park Tokai Cape Town
<b>Telephone number</b>	021 701 3777
<b>Web Address</b>	www.realfin.co.za
<b>Contact details</b>	bcanary@realfin.co.za

2. RealFin Collective Investment Schemes (RF) Proprietary Limited

<b>Name of the Body</b>	RealFin Collective Investment Schemes (RF) Proprietary Limited
<b>Registration Number</b>	2013/170284/07
<b>Primary Business</b>	Collective Investment Schemes Manager
<b>Head of the Body</b>	Cornelis Batten
<b>Information Officer</b>	Bianca Canary
<b>Directors</b>	Cornelis Batten Claire Carpenter John Doidge Michael Harber Ryan Kruger
<b>Postal Address</b>	Suite 25 Private Bag X16 Constantia 7848
<b>Street Address</b>	1st Floor, 4 Silverwood Close Steenberg Office Park Tokai Cape Town
<b>Telephone number</b>	021 701 3777
<b>Web Address</b>	www.realfin.co.za
<b>Contact details</b>	bcanary@realfin.co.za



3. RealFin Fund Services Proprietary Limited

<b>Name of the Body</b>	RealFin Fund Services Proprietary Limited
<b>Registration Number</b>	2015/017268/07
<b>Primary Business</b>	Administration services
<b>Head of the Body</b>	Claire Carpenter
<b>Information Officer</b>	Bianca Canary
<b>Directors</b>	Claire Carpenter Bianca Canary
<b>Postal Address</b>	Suite 25 Private Bag X16 Constantia 7848
<b>Street Address</b>	1st Floor, 4 Silverwood Close Steenberg Office Park Tokai Cape Town
<b>Telephone number</b>	021 701 3777
<b>Web Address</b>	www.realfin.co.za
<b>Contact details</b>	bcanary@realfin.co.za

4. RealFin Trustee Services Proprietary Limited

<b>Name of the Body</b>	RealFin Trustee Services Proprietary Limited
<b>Registration Number</b>	2007/007405/07
<b>Primary Business</b>	Trustee services
<b>Head of the Body</b>	Cornelis Batten
<b>Information Officer</b>	Bianca Canary
<b>Directors</b>	Claire Carpenter Cornelis Batten
<b>Postal Address</b>	Suite 25 Private Bag X16 Constantia 7848
<b>Street Address</b>	1st Floor, 4 Silverwood Close Steenberg Office Park Tokai Cape Town
<b>Telephone number</b>	021 701 3777
<b>Web Address</b>	www.realfin.co.za
<b>Contact details</b>	bcanary@realfin.co.za

## Part II - Description and Access to the Guide

(Information required under section 51(1)(b) of the Act):

A guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

The Guide is available for inspection, inter alia at the offices of the Human Rights Commission at Braampark Forum 3, 33 Hoofd Street, Braamfontein, Johannesburg and on its website at [www.sahrc.org.za](http://www.sahrc.org.za).

**The contact details of the Commission are:**

Postal address: Private Bag X2700, Houghton, 2041  
Telephone no.: +27 +11 877 3600  
Fax no.: +27 +11 403 0668  
Email: [info@sahrc.org.za](mailto:info@sahrc.org.za)



### Part III - Voluntary Disclosure and Automatic Availability of Certain Records

(Copy of notice, if any, required under section 51(1)(c) of the Act):

At this stage no notice(s) has/ have been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

### Part IV - Records available in accordance with any other legislation

(Information required under section 51(1)(d) of the Act):

1. Basic Conditions of Employment No. 75 of 1997
2. Companies Act No. 71 of 2008
3. Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
4. Employment Equity Act No. 55 of 1998
5. Financial Advisory and Intermediary Services Act No. 37 of 2002
6. Financial Intelligence Centre Act 38 of 2001
7. Financial Services Board Act No. 97 of 1990
8. Income Tax Act No. 58 of 1962
9. Labour Relations Act No. 66 of 1995
10. Occupational Health & Safety Act No. 85 of 1993
11. Skills Development Levies Act No. 9 of 1999
12. Skills Development Act No. 97 of 1998
13. Unemployment Contributions Act No. 4 of 2002
14. Unemployment Insurance Act No. 63 of 2001
15. Value Added Tax Act No. 89 of 1991

### Part V - Categories of Records held by the Company

The Company's web page which is accessible to anyone who has access to the Internet, contains information relating to the business operations of the Company.

Other records held by the Company include -

1. statutory company information;
2. financial records;
3. accounting records;
4. banking records;
5. tax returns;
6. employee records;
7. records required by law to verify identity of clients;
8. records relating to fixed and movable property;
9. commercial contracts;
10. insurance contracts;
11. debt collection records;
12. records relating to financial services;
13. records relating to prospective investments;
14. subjects and categories of records held;
15. Companies Act records;
16. documents of incorporation;
17. minutes of board meetings;
18. records relating to the appointment of directors/auditor/ secretary/ public officer and other officers;
19. share register and other statutory registers;
20. educational backgrounds;
21. training and developments;
22. employment equity;
23. health & safety;
24. policies;
25. accident and incident reports; and
26. records and information required for the exercise or protection of any rights will be made available subject to the provisions of the Act.

Access to records may be refused on grounds specified in the Act.



## Part VI - Processing of Personal Information

The Company is a responsible party in accordance with the Protection of Personal Information Act 4 of 2013 and accordingly processes the following personal information -

Data Subjects	Information Categories	Purpose of processing	Recipients of supply of personal information
<b>Employees</b>	Financial information Tax information Identity numbers Contact information Human resources information Employment history	Human resources	Accountants/Auditors Payroll Recruitment Attorneys
<b>Clients</b>	Financial information Tax information Identity numbers Contact information	Provision of services	Accountants/Auditors Attorneys Employees Directors Banks External service providers
<b>Service Providers</b>	Financial information Tax information Identity numbers Contact information	Provision of services	Accountants/Auditors Attorneys Directors Employees Banks
<b>Shareholders</b>	Financial information Tax information Identity numbers Contact information Company structures	Compliance	Accountants/Auditors Attorneys Directors Employees Banks
<b>Directors</b>	Financial information Tax information Identity numbers Contact information	Compliance	Accountants/Auditors Attorneys Employees Banks CIPC

There are no planned trans-border flows of information at this stage.

General information security measures relating to the personal information includes (but is not limited to) -

1. server is backed-up periodically;
2. information is stored on a secure access-controlled server;
3. email access requires 2-factor authentication;
4. external access to the server is locked down;
5. business continuity plans and disaster recovery testing plans are in place;
6. antivirus software is updated regularly;
7. remote monitoring of access activity; and
8. employees are under an obligation to keep information confidential.

### Details on how to make a request for access: Section 51(e)

1. The requester must complete Form C and submit this form together with a request fee, to the head of the private body.
2. The form must be submitted to the head of the private body at his/ her address, fax number or email address.
3. The form must -
  - a. provide sufficient particulars to enable the head of the private body to identify the record(s) requested and to identify the requester;
  - b. indicate which form of access is required;
  - c. specify a postal address or fax number of the requester in the Republic;
  - d. identify the right that the requester is seeking to exercise or protect, and provide an explanation of why the requested record is required for the exercise or protection of that right;
  - e. if in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, to state such manner and the necessary particulars to be informed in the other manner;
4. If the 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 reasonable satisfaction of the head of the private body.



# FORM C

## Request for Access to Record of Private Body

(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)

[Regulation 10]

### Particulars of private body

The Head: \_\_\_\_\_

### Particulars of person requesting access to the record

The particulars of the person who requests access to the record must be given below.  
The address and/or fax number in the Republic to which the information is to be sent must be given.  
Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: \_\_\_\_\_  
Identity number: \_\_\_\_\_  
Postal address: \_\_\_\_\_  
Fax number: \_\_\_\_\_  
Telephone number: \_\_\_\_\_  
E-mail address: \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person:  
\_\_\_\_\_

### Particulars of person on whose behalf request is made

This section must be completed *ONLY* if a request for information is made on behalf of another person.

Full names and surname: \_\_\_\_\_  
Identity number: \_\_\_\_\_

### Particulars of record

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 folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record: \_\_\_\_\_

Reference number, if available: \_\_\_\_\_  
Any further particulars of record: \_\_\_\_\_

### Fees

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. We attach the fees associated with PAIA requests as determined by the regulations.  
You will be *notified* of the amount required to be paid as the request fee.  
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.  
If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: \_\_\_\_\_



# REALFIN

## Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required
Form in which record is required:	
Mark the appropriate box with an X.	
NOTES:	
(a) Compliance with your request in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.	

<b>1. If the record is in written or printed form:</b>			
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
<b>2. If record consists of visual images</b> this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images"
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>			
<input type="checkbox"/>	listen to the soundtrack audio cassette	<input type="checkbox"/>	transcription of soundtrack* written or printed document
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>			
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record"
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)
'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES      NO

## 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 the additional folios.

1. Indicate which right is to be exercised or protected:  
\_\_\_\_\_
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:  
\_\_\_\_\_

## Notice of decision regarding request for access

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

Signed at..... This..... day of .....20

\_\_\_\_\_  
SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE