



CENTAUR
ASSET MANAGEMENT

ACCESS TO INFORMATION MANUAL

OF

CENTAUR ASSET MANAGEMENT (PTY) LTD

2000/000061/07

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

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1. INTRODUCTION

1.1. The provision of the Act

The Promotion of Access to Information Act no 2. of 2000 (the "Act") was enacted on 3 February 2000 and was put into effect in part on 9 March 2001, with Section 51 and other sections pertaining to the manuals to be prepared by public and private bodies coming into effect on 15 February 2002.

The object of the Act is to give effect to the constitutional right of access to information held by another and required for the exercise or protection of any right, privacy, commercial confidentiality, and professional privilege. When a request is made by a requester in accordance with the procedure provided for in the Act, for access to information held by a body (being either a public body or a private body), that body is obliged to deal with such a request in the manner prescribed in the Act. More specifically, that body is obliged to release the information except in those cases where the Act expressly provides that the information may not or must not be released.

1.2. Company Centaur Asset Management (Pty) Ltd

Centaur Asset Management (Pty) Ltd is a private company operating as asset managers and trade in the stock market.

In the case of private companies, the provision dealing with the form of the request, the fees payable, and the procedure to be followed in regard to a request, is contained in sections 53-60 of the Act. The grounds on which access to information may or must be refused are set out in sections 62-70 of the Act.

1.3. The purpose of the manual

The purpose of the manual is to make available to potential requesters information regarding the records held, to define the manner and form in which a request for information must be submitted and to set out the criteria and grounds, derived from the Act, to be applied with in granting or refusing a request.

The objective of the manual is therefore to inform and assist potential requesters in regard to the procedure to be followed and the criteria to be applied when a request is made for access to information held by Centaur Asset Management (Pty) Ltd in terms of the Act.

The manual may be amended from time to time as and when necessary. As and when amendments are effected, the latest version of the manual will be made public.

1.4. Definitions

The following words or expressions will bear the following meanings in this manual:

“the Act”	Shall mean the Promotion of Access to Information Act, no.2 of 2000, together with all relevant regulations published there under.
“the / this manual”	Shall mean this manual together with all annexures thereto as available at the offices of Centaur Asset Management (Pty) Ltd.
“POPIA”	The Protection of Personal Information Act 4 of 2013.
“SAHRC”	Shall mean the South African Human Rights Commission.
“Information Officer”	Shall mean the director of Centaur Asset Management (Pty) Ltd, who has been appointed as the Information Officer of Centaur Asset Management (Pty) Ltd and to whom requests for information in terms of the Act shall be addressed.
“Information Regulator”	The information Regulator is an Independent Body established in terms of Section 39 of the Protection of Personal Information Act 4 of 2013.

2. CONTACT DETAILS OF INFORMATION OFFICER(SECTION 51(1)(A) OF THE ACT)

Name of company	Centaur Asset Management (Pty) Ltd
Registration number	2000/000061/07
Contact Number	021 685 2408
Information Officer	Roger Williams
Deputy Information Officer	Kirsten Dale
Deputy Information Officer	Megan Morris
Physical Address	Great Westerford Building, 240 Main Road, Rondebosch, Cape Town, 7700.
Postal Address	P.O. Box 35, Newlands, 7725.
Registered Office	Unit A, 363 Surrey Avenue Ferndale, Randburg, 2194.

Company Secretary & Auditors Nolands
 Telephone 011 789 4966
 E-mail admin@centaur.co.za
 Website www.centaur.co.za

3. DETAILS OF SUBSIDIARIES AND DIVISIONS

None

4. CONTACT DETAILS OF SUBSIDIARIES AND DIVISIONS

None

5. GUIDE IN TERMS OF SECTION 10 OF THE ACT (SECTION 51(1)(B) OF THE ACT)

In terms of Section 10 of the Act, a guide has to be compiled by the South African Human Rights Commission (SAHRC) containing such information as may be required by a person who wishes to exercise any right contemplated in the Act. The guide will be made available in all official languages by the SAHRC and will be obtainable from the SAHRC.

Contact details of the SAHRC are as follows:

Postal address PAIA Unit, Private Bag 2700, Houghton, 2041.
 Physical address Offices of SAHRC, Forum 3, Braampark Office Park, Braamfontein.
 Telephone 011 877 3600
 E-mail PAIA@sahrc.org.za
 Website www.sahrc.org.za

6. NOTICE(S) IN TERMS OF SECTION 52(2) OF THE ACT (Section 51(1)(c))

In terms of section 52(1) of the Act, a private body may, on a voluntary basis, provide the Minister (of Justice) with information regarding categories of records that are automatically available without a person having to request access in terms of the Act. In terms of section 52(2), the Minister must, by notice in the Gazette, publish such information.

To date, no such notice has been published.

7. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(d) of the Act)

Centaur Asset Management (Pty) Ltd keeps information in accordance with the following legislation:

- Basic Conditions of Employment Act no. 75 of 1997
- Broad-based Black Economic Empowerment Act no. 53 of 2003
- Companies Act no. 71 of 2008
- Compensation for Occupational Injuries and Diseases Amendment Act no. 61 of 1997
- Copyright Amendment Act no. 9 of 2002
- Credit Agreements Act no. 75 of 1980
- Currency and Exchanges Act no. 9 of 1933
- Electronic Communications Amendment Act no. 37 of 2007
- Employment Equity Act no. 55 of 1998
- Finance Act, no. 42 of 2008
- Financial Services Board Amendment Act no. 12 of 2000
- Financial Relations Act no. 65 of 1976
- Income Tax Act no. 28 of 1997
- Insolvency Second Amendment Act no. 69 of 2002
- Intellectual Property Laws Amendment Act no. 38 of 1997
- Labour Relations Amendment Act no. 12 of 2002
- Occupational Health and Safety Act no. 85 of 1993
- Promotion of Access to Information Amendment Act no. 54 of 2002
- Promotion of Equality and Prevention of Unfair Discrimination Act no. 4 of 2000
- Protected Disclosures Act no. 26 of 2000
- Short Term Insurance Act no. 53 of 1998
- Skills Development Amendment Act no. 37 of 2008
- Stamp Duties Act no. 77 of 1968
- Stock Exchanges Control Amendment Act no. 40 of 2001
- Trade Marks Act no. 194 of 1993
- Unemployment Insurance Contributions Act no. 4 of 2002
- Usury Act no. 73 of 1968
- Value-Added Tax Act no. 89 of 1991

8. INFORMATION FORMING PART OF RECORDS IN TERMS OF THE ACT (Section 52(1)(e))

Centaur Asset Management (Pty) Ltd holds the following records:

8.1. Administration and management

- Administration and operational records
- Commercial contracts

- Correspondence
- Minutes of meetings
- Risk, security and insurance records
- Statutory records

8.2. Finance

- Accounting records
- Creditors and debtors' records
- Financial statements
- Operational expenditure records
- Salaries and wages records
- Taxes and levies records

8.3. Human resources

- Employment contracts
- Membership records
- Personnel records
- Staff policies and procedures
- Training and development records

8.4. Clients and correspondents

- Client and correspondents' database
- Client and correspondent professional services records
- Client and correspondent accounts
- Client files

8.5. Information technology

- Business intelligence
- Infrastructure and systems
- Service delivery systems

9. CRITERIA FOR GRANTING ACCESS TO INFORMATION

Any information, records, copies, documents or other data forming part of or pertaining to the records referred to in paragraphs 7 and 8 above will only be made available to a requester in response to a request prepared and lodged in the prescribed format and in accordance with the prescribed procedure

(see paragraph 10 below).

Information, records, copies, documents or other data forming part of or pertaining to the aforesaid records will be made available to a requester in accordance with the provisions of the Act, and subject to the rules and principles entrenched in the Act in regard to the protection of the commercial and confidential information of Centaur Asset Management (Pty) Ltd and third parties, and taking into account the other grounds for refusal of access as set out in the Act.

Centaur Asset Management (Pty) Ltd may, in terms of sections 62-70 of the Act, legitimately refuse to grant access to the aforesaid records in respect of information falling within certain categories as contemplated in the Act, inter alia in the following circumstances:

- To protect personal information that the firm holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- To protect commercial information that the firm holds about a third party or the firm itself (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organisation or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- If the record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- If disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the firm;
- If disclosure of the record would put the firm at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- If the record is a computer program; and
- If the record contains information about research being carried out or about to be carried out on behalf of a third party or the firm.

10. REQUEST PROCEDURE

- 10.1. The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.

- 10.2. The requester must complete the prescribed form enclosed here to as Appendix 1, and submit the form as well as payment of the request fee and a deposit, if applicable, to the Information Officer at the postal or physical address, fax number or electronic mail address as stated in paragraph 2 above.
- 10.3. The prescribed form must be filled in with enough particularity to enable the Information Officer to identify -
- The information and/or record or records requested;
 - The identity of the requester;
 - Which form of access is required, if the request is granted;
 - The postal address or fax number of the requester.
- 10.4. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.
- 10.5. The firm will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information officer that circumstances dictate that the above time periods not be complied with.
- 10.6. The requester will be informed whether access is granted or denied. If, in addition, the requester requires the reasons for the decision he/she must state the particulars so required.
- 10.7. If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.
- 10.8. In an individual is unable to complete the prescribed form because of illiteracy or disability, such as person may make the request orally.
- 10.9. The requester must pay the prescribed fee, before any further processing can take place.

11. REQUEST FEES

Section 54 of the Act provides for a private body to require a request fee to be paid by a requester before processing a request. The Minister of Justice has determined, by way of notice in the Gazette in terms of section 54(8) of the Act, the fee that may be charged.

Information in regard to the fees payable is set out in Appendix 2.

12. OTHER INFORMATION (Section 51(1)(g) of the Act)

The Minister of Justice and Constitutional Development has to date not published any regulations in terms of this section.

13. AVAILABILITY OF THIS MANUAL (Section 51(3) of the Act)

- 13.1. This manual is available for inspection at the offices of Centaur Asset Management (PQ) Ltd, free of charge.
- 13.2. Copies of the manual may be obtained, subject to the prescribed fees, at the offices of Centaur Asset Management (Pty) Ltd.
- 13.3. The manual can also be accessed on the website of Centaur Asset Management (Pty) Ltd (www.centaur.co.za).
- 13.4. It should be noted that the manual accessible from the SAHRC may not include the request form (Appendix 1) or fee structure (Appendix 2). The request forms and fee structure can be obtained on the SAHRC website (www.sahrc.org.za) or the website of the Department of Justice and Constitutional Development (www.doj.gov.za) (under "regulations").

14. PROTECTION OF PERSONAL INFORMATION

- 14.1. A copy of Centaur Asset Management (Pty) Ltd POPI Policy is available free of charge upon request from admin@centaur.co.za.
- 14.2. Centaur Asset Management (Pty) Ltd privacy statement is attached as Appendix 3.

This policy is owned by Centaur Asset Management (Pty) Ltd.

The processes contained herein forms part of the organisation's internal control structures and procedures.

As the Head of the aforementioned organisation, I ,Roqer Williams, hereby confirm the adoption of the processes set out in this document.

Appointed Information Officer - RC Williams

Date

APPENDIX 1

Form C

Request For access to record of private body

(Section 53 (1) of the Promotion of Access to Information Act, 2000 (Act 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- a. The particulars of the person who requests access to the record must be given below.
- b. The address and/or fax number in the Republic to which the information is to be sent must be given.
- c. 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: _____

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

C. 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: _____

D. Particulars of record

- a. 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.
- b. 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. Description of record or relevant part of the record: _____

2. Reference number, if available: _____

3. Any further particulars of record: _____

E. Fees

- a. 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.
- b. You will be notified of the amount required to be paid as the request fee.
- 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 for exemption from payment of fees: _____

F. Form of access to record

Disability: _____

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 to the record, if any, will be determined partly by the form in which access is requested.

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G. Particulars of right to be exercised or protected

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

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.

H. Notice of decision regarding request for access

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

APPENDIX 2

Charge Sheet For Access To Information Act 2/2000 Requests

REQUESTER'S DETAILS

Name: _____

Address: _____

Ref No: _____

PREPARED BY

Name: _____

Date: _____

Signature: _____

Approved (Manager): _____

1. ACCESS FEES FOR REPRODUCTION

1.1. For every photocopy of an A4-size page or part thereof	R1.10
1.2. For every photocopy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
1.3. For a copy in a computer-readable form on memory stick	R70.00
1.4. For a copy in a computer-readable form on compact disc	R70.00
1.5. For a transcription of visual images for an A4-size page or part thereof	R40.00
1.6. For a copy of visual images	R60.00
1.7. For a transcription of an audio record for an A4-size page or part thereof	R20.00
1.8. For a copy of an audio record	R30.00

2. ACCESS FEE FOR TIME SPENT

2.1. The time reasonably required to search for the record for disclosure and Preparation	R30.00/hr or part thereof
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3. REQUEST FEE

3.1. For a request for access to a record by a person other than a personal Requestor	R50.00
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4. DEPOSIT

- 4.1. One third of the access fee is payable as a deposit by the requester
- 4.2. Six hours as the hours to be exceeded before a deposit is payable

5. POSTAL FEE

- 5.1. When a copy of a record must be posted to the requestor R9.75

6. APPEAL FEES

- 6.1. For lodging an internal appeal by a requester against the refusal of his/her request for access to a record R50.00

7. VAT

- 7.1. Private bodies registered under the Value Added Tax Act, 1991 (Act No. 89 of 1991) as vendors may add VAT to all the prescribed fees in.

APPENDIX 3

Protection of Personal Information (POPI) - Privacy Policy

Centaur Asset Management is an Authorised Financial Services Provider (FSP No: 647)

Preamble:

The Protection of Personal Information Act No 4 of 2013 ("POPIA") aims to give effect to the constitutional right to privacy by safeguarding personal information and regulates the manner in which personal information must be processed. Centaur Asset Management (Pty) Ltd regards the lawful and correct treatment of personal information as important to the achievement of our objectives and the success of our business. Centaur is committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Policy sets out:

- Who we are
- What information we collect
- Our aim to provide ongoing financial services
- How we use your information
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Changes to this Policy

Who We Are

In this Policy, Centaur Asset Management (Pty) Ltd, "Centaur" or "we" refers to our company which operates as an authorized Financial Services Provider with license number: FSP No: 647.

The Information We Collect

We collect and process your personal information mainly to provide you with access to our services and products and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that specific purpose. We collect information directly from you where you provide us with your personal details, for example when you invest into a product, enquire about a service from us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional. Examples of the Personal Information we collect includes but is not limited to:

- Clients' identity number, name, surname, address, tax number, marital status and how many dependents they have;
- Source of income and wealth, occupation and employment status
- description of clients' residence, business, assets and liabilities; and
- any other information required by us, and suppliers in order to provide clients with an accurate analysis of their financial planning needs.

We also collect information about you from other sources. With your consent, we may also supplement the information that you provide to us with information we receive from other companies such as administrators, product suppliers or other Financial Services Providers. This is most commonly used for enhanced identity verification purposes as required by the Financial Intelligence Centre Act 38 of 2001.

How We Use Your Information

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship; to effectively process your transactions;
- To confirm and verify your identity;
- to communicate to you in respect of the product purchase or service applied for
- to detect and prevent fraud;
- to comply with auditing and record-keeping requirements;
- to comply with legal and regulatory requirements;
- to share information with our administrators and/or service providers with whom Centaur has a business agreement to process such information on Centaur 's behalf or to those who render services to Centaur.

Ongoing Financial Services

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

You may also give and withdraw consent and tell us what your communication preferences are.

Disclosure of Information

We may disclose your personal information to our administrators, service or product suppliers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may also disclose your information where we have a duty or a right to disclose in terms of law or industry codes or where we believe it is necessary to protect your and our own rights.

Safeguarding Your Information

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an ongoing basis, continue to review our security and risk management controls and related processes to ensure that your personal information is secure.

Our risk management (security) policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;

- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

Your Rights: Access to Information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us on 021 685 2408 or admin@centaur.co.za and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

The details of our Information Officer are as follows:

Information Officer:	Roger Williams
Deputy Information Officer:	Megan Morris

Correction of Your Information

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us on 021 685 2408 or admin@centaur.co.za and submit a request in this regard. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate.

Changes to This Policy

Please note that we may amend this Policy from time to time.