

PAIA Manual

April 2024

Contents

1. List of acronyms and abbreviations	3
2. Purpose of the PAIA manual	3
3. Key contact details for access to information	4
4. Guidance on how to use and obtain the PAIA guide	4
5. Categories of records	6
6. Description of the records	7
7. Description of the subjects	8
8. Processing of personal information	8
9. Availability of the manual	10
10. Updating of the manual	10

1. List of acronyms and abbreviations

1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer
1.3	"IO"	Information Officer
1.4	"Minister"	Minister of Justice and Correctional Services
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as amended)
1.6	"POPIA"	Protection of Personal Information Act No.4 of 2013
1.7	"Regulator"	Information Regulator
1.8	"Republic"	Republic of South Africa

2. Purpose of the PAIA Manual

This PAIA Manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) for Camissa Asset Management (Pty) Ltd.

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Key contact details for access to information

3.1 Chief Information Officer

Name: Roland Greaver, CEO
Tel: +27 21 673 6300
Email: rgreaver@camissa-am.com
Fax number: +27 86 675 8501

3.2 Deputy Information Officer

Name: Wajdah Fataar, Head of Compliance & Risk
Tel: +27 21 673 6300
Email: wfataar@camissa-am.com
Fax Number: +27 86 675 8501

3.3 Access to information general contacts

Email: compliance@camissa-am.com

3.4 National or Head Office

Postal Address: PO Box 1016, Cape Town, 8000
Physical Address: Fifth Floor, MontClare Place, Cnr Campground and Main Roads, Claremont, Cape Town, 7708
Telephone: +27 21 673 6300
Email: info@camissa-am.com
Website: www.camissa-am.com

4. Guidance on how to use and obtain the PAIA guide

- 4.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of:
 - 4.3.1 the objects of PAIA and POPIA
 - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of:

- 4.3.2.1 the Information Officer of every public body; and
- 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3 the manner and form of a request for:
 - 4.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
- 4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*
a) that record is required for the exercise or protection of any rights;
b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁶ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

⁷ Section 15(1) of PAIA- *The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.*

⁸ Section 52(1) of PAIA- *The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.*

- 4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92¹¹.
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5 The Guide can also be obtained:
 - 4.5.1 upon request to the Information Officer;
 - 4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
 - 4.6.1 English and Afrikaans

5. Categories of records

The categories of records held by Camissa Asset Management which are available without a person having to request access by completing the relevant regulatory forms, types of the records and how the records can be accessed. These are mostly records that are available on the website and a person may download or request telephonically or by sending an email or a letter.

Category of records	Types of the record	Available on website	Available upon request
Our Funds	Monthly Fund Fact sheets and quarterly commentary in relation to our fund range.	X	X
Legal	Applicable legal information and policies.	X	X
Contact	Details to contact Camissa Asset Management	X	

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

6. Description of the records

The records which are created and available in accordance with any of the South African legislation is listed below.

Category of records	Applicable legislation
Company	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Financial products by a client	Financial Advisory and Intermediary Services Act, 2002, and relevant subordinate legislation.
Collective Investment Schemes	Collective Investment Schemes Control Act, 2002, and relevant subordinate legislation.
Client records relating to: <ul style="list-style-type: none"> ○ identification and verification of client; ○ understanding the nature of the client and intended business; ○ obtaining source of funds; ○ risk rating; ○ DPIIP/FPPO status; ○ transactions during the course of business relationship; and ○ updated CDD obtained/evidence of ongoing due diligence. 	Financial Intelligence Centre Act, 2002 (as amended in 2017), and relevant subordinate legislation.
US indicia	Foreign Account Tax Compliance Act (USA) in terms of Intergovernmental agreement between USA and SA (FATCA)
Employee	Labour Relations Act, 1995, and relevant subordinate legislation.

7. Description of the subjects

The description of the subjects on which Camissa Asset Management holds records and categories of records held on each subject is as documented below.

Subjects on which the body holds records	Categories of records
Camissa Asset Management	<ul style="list-style-type: none">○ Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none">○ HR policies and procedures○ Advertised posts○ Employees records
Clients	<ul style="list-style-type: none">○ Identification and verification

8. Processing of personal information

8.1 Purpose of processing personal information

Personal Information is used for the purposes for which it was collected from the client by agreement or required for regulatory requirements.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Camissa Asset Management's data subjects are clients who contract with Camissa Asset Management for investment purposes. Related parties or contacts of clients are also regarded as data subjects. The personal data processed in respect of data subjects relates to documentation collected for purposes of identifying and verifying the identity of the client and related parties.

There may also be data subjects who are third party contract suppliers, employees, media personnel and the public in relation to queries received from the website.

The below table sets out the categories of data subjects and the description of the nature or categories of the personal information to be processed.

Categories of Data Subjects	Personal Information that may be processed
Clients	name, address, registration numbers or identity numbers, employment status and bank details

Categories of Data Subjects	Personal Information that may be processed
Service providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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

Camissa may also disclose Personal Information on request from recipients:

- Where we have a duty or a right to disclose in terms of law or industry codes; and
- Where we believe it is necessary to protect our rights.

The table below is an example of the person or category of persons to whom the body may disseminate personal information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Identity number and names	Financial Sector Conduct Authority
Identity number, names, address and contact details	Financial Intelligence Centre
Company information	Companies and Intellectual Property Commission
Identity number, names, address and contact details	South African Reserve Bank

8.4 Planned transborder flows of personal information

Camissa mostly processes, collects and retains data in South Africa - unless data is processed for Camissa Global Asset Management ICAV specifically, where the data is processed in Ireland.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of Personal Information. We review our security controls and related processes on an on-going basis to ensure that your Personal Information is secure.

Our 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; and
- 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.

9. Availability of the Manual

9.1 A copy of the Manual is available:

9.1.1 on www.camissa-am.com;

9.1.2 head office of Camissa Asset Management for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. Updating of the manual

The Deputy Information Officer will update this Manual on a regular basis.

Issued by

Roland Greaver
Chief Executive Officer