



**LAURIUM
CAPITAL**

Promotion of Access to Information Act ("PAIA") Manual

List of Acronyms and Abbreviations

Acronym	Description
IO	Information Officer
PAIA	Promotion of Access to Information Act No. 2 of 2000
POPIA	Protection of Personal Information Act No.4 of 2013
PFMA	Public Finance Management Act No.1 of 1999
FICA	Financial Intelligence Centre Act No. 38 of 2001
Laurium	Laurium Capital (Pty) Ltd, including its subsidiaries
Personal Information	Any information relating to an identifiable natural person, or to the extent applicable, a juristic person. This includes, but is not limited to information relating to race, gender, sex, pregnancy, marital status, ethnic and social origin, colour, sexual orientation, age, physical or mental health, religion, disability, language, information relating to educational, medical, financial, criminal or employment history, any identifying number, email address, physical address, telephone number, location information, online identifier or biometric Personal Information.
Regulator	Information Regulator
Republic	Republic of South Africa
Requester	Any person making a request for access to a record

Introduction

1. This Manual is prepared in terms of section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA") and the Protection of Personal Information Act, 2013 ("POPIA").
2. This Manual enables the public to:
 - a) Access contact details for assistance
 - b) Know remedies available before approaching the Information Regulator or Court
 - c) Access the PAIA Guide as updated by the Regulator
 - d) Identify records available at Laurium without a formal PAIA request
 - e) Understand how to make a request for access to a record of Laurium, by providing a description of the subjects on which Laurium holds records and the categories of records held on each subject
 - f) Understand the purpose of processing Personal Information, the type of Personal Information processed and how Personal Information is protected at Laurium.

Company Details

1. Laurium is established under the Companies Act No. 71 of 2008 as a private company, registered in South Africa. Laurium is mandated to provide asset management and investment advisory services, as regulated by the Financial Sector Conduct Authority (FSCA) in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002. FSP number is 34142.

Information Officer

Name: Zayaan Saban

Tel: +27 11 263 7700

Email: Zayaan.saban@lauriamcapital.com

General Access to Information Contact

Email: ir@lauriamcapital.com

Physical Address: Ninth Floor, 90 Grayston Dr, Sandown, Sandton, 2031; or 4th floor, The Osborne, 1 Osborne Rd, Claremont, Cape Town, 7708

Postal Address: PO Box 653421, Benmore, 2010 South Africa

Website: www.lauriamcapital.com

Guide for how to use PAIA

1. Remedies available to the requester include:
 - a) Internal appeal process
 - b) Complaints to the Information Regulator
 - c) Application to the Court for relief
2. PAIA grants a requester access to certain records of a private body if the said records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest. Any request for information in terms of PAIA must be made in accordance with the prescribed form and manner, at the rates provided. The internal appeal process is outlined in

the “Request Procedure” section below.

3. The Information Regulator has, in terms of section 10(1) of PAIA, as amended, made available a Guide on how to use PAIA (the 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. The Guide is available in each of the official languages and can be obtained from the Information Regulator’s website.
4. If a PAIA request is denied, or there is no response from a public or private body for access to records, a complaint can be lodged with PAIAComplaints@infoeregulator.org.za

5. Contact details for the Information Regulator:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Tel: 010 023 5200

Email: enquiries@infoeregulator.org.za

Website: www.infoeregulator.org.za

Categories of Records without having to request access

Types of Records	Available of website	Available on request
PAIA Manual	X	X
Privacy Policy	X	X
FAIS Disclosure Document		X

Applicable Legislation

1. This Manual has been prepared in accordance with the requirements of PAIA and POPIA. All records maintained and made available under these Acts, and any other legislation applicable to Laurium, are accessible in compliance with the relevant legal provisions. Requesters may also seek information available under other applicable legislation:
 - a) Basic Conditions of Employment No. 75 of 1997
 - b) Broad Based Black Economic Empowerment Act No. 53 of 2003
 - c) Companies Act No. 71 of 2008
 - d) Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
 - e) Consumer Protection Act No. 68 of 2005
 - f) Electronic Communications and Transactions Act No. 25 of 2002
 - g) Electronic Communications Act No. 36 of 2005
 - h) Employment Equity Act No. 55 of 1998
 - i) Financial Intelligence Centre Amendment Act No.11 of 2008
 - j) Financial Markets Act No. 19 of 2012
 - k) Financial Sector Regulation Act No. 9 of 2017
 - l) Financial Services Board Act No. 97 of 1990
 - m) Income Tax Act No. 58 of 1962

- n) Insurance Act No 27 of 1943
- o) Labour Relations Act No. 66 of 1995
- p) Occupational Health & Safety Act No. 85 of 1993
- q) Pension Funds Act No. 24 of 1956
- r) SA Reserve Bank Act No. 90 of 1989
- s) Skills Development Levies Act No. 9 of 1999
- t) Skills Development Act No. 97 of 1998
- u) Telecommunications Act No. 103 of 1996
- v) Unemployment Insurance Act No. 63 of 2001
- w) Value Added Tax Act No. 89 of 1991

Categories of Records held

1. The following categories of records are available for the purposes of PAIA, subject to grounds for refusal to the access thereof. Records are maintained on the following subjects:

Subjects on which the body holds records	Categories of records held
Personnel records	• Personnel files • Personal records provided by personnel • Records provided by a third party relating to personnel • Conditions of employment and other personnel-related contractual and quasi-legal records • Correspondence relating to personnel • Internal evaluation records and other internal records • Training schedules and material • Forms and applications • Standard letters and notices
Client-related records	• Any records a client has provided to a third party acting for or on behalf of Laurium • Any records a third party has provided to Laurium • Records generated by or within Laurium pertaining to the client, including transactional records
Other Party Records	• Personnel, customer or private body records which are held by another party, as opposed to the records held by Laurium itself • Records held by Laurium pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers • Laurium may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to Laurium
Company Records	• Statutory records • Financial records • Operational records • Compliance and Regulatory records; including Communication with the relevant industry bodies • Legal Agreements- e.g. Investment Management Agreement; Service Level Agreements • Internal Policies and Procedures

Processing of Personal Information

1. Purpose of Processing Personal Information

Personal information is processed for:

- a) Employment and HR management
- b) Client onboarding and verification (FICA compliance)
- c) Service delivery and communication
- d) Regulatory reporting

2. Personal Information Processed by Laurium

Depending on the type of business conducted, or the relationship you have with Laurium the following types of personal information may be processed:

- a) Names of individuals and entities
- b) Identification numbers and registration numbers
- c) Nationality and place of residence
- d) Contact details – residential, business and email addresses and telephone numbers
- e) Gender
- f) Age
- g) Marital status
- h) Tax identification numbers
- i) Bank account details
- j) Company information (such a group structure and shareholder information) and financial information

In addition to the above, the following personal information may be processed with regards to employees, prospective employees and shareholders:

- k) Race (for employment or regulatory purposes only)
- l) Qualifications
- m) Medical information
- n) Criminal checks
- o) Employment history

3. Planned Transborder Flows of Personal Information

Laurium may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. The Company will take the necessary steps to ensure that services providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

The Company may share personal information with:

- a) Affiliate companies of Laurium located outside of South Africa
- b) Services providers who perform services on behalf of Laurium

- c) Third party suppliers

4. Laurium's Information Security Measures

Laurium takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. The Company has internal policies and controls in place to ensure that data is protected.

Laurium implements:

- a) Data encryption (at rest and in transit)
- b) Access controls and authentication
- c) Anti-virus and anti-malware solutions
- d) Regular security testing and audits
- e) Secure cloud infrastructure

Request Procedure

1. This section aims to highlight the process in which the requestor may go about requesting information from Laurium.
2. A **requester** must use the prescribed Form 2 to request access to the relevant information, which can be accessed at the following URL: **<https://inforegulator.org.za/paia-forms/>**
3. The request must be addressed to the Information Officer.
4. 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 or fax number in the Republic. 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.
5. 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.
6. 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 head of the private body.
7. Access to certain records may be denied on the grounds set out in the PAIA. Laurium will consider the request and respond with a decision in writing not more than 30 days after receiving the request.
8. Mandatory grounds for refusal include but are not limited to:
 - a) Mandatory protection of the privacy of a third party who is a natural person or deceased person (Section 63) or a juristic, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
 - b) Mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of POPIA;
 - c) Mandatory protection of the commercial information of a third party (Section 64), if the records contain trade secrets of the third party; financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and information disclosed in confidence;
 - d) Information for the protection of the privacy of individuals;

- e) Information privileged from production in legal proceedings;
 - f) Commercial information of the company;
 - g) Research information.
9. 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 a personal requester, must pay the required request fee. If the preparation of the Record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted). A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit. Records may be withheld until the fees have been paid. Fees applicable per Annexure B of the Information Regulator's PAIA Manual.

Availability of the Manual

This manual is available for inspection at Laurium's offices during normal business hours free of charge upon prior arrangement with the Information Officer of the company. A copy is also made available on Laurium's website.

Review History			
Responsible Person	Date	Reviewed	Approved
Zayaan Saban	November 2025	Veld & Cooper	Head Governance