PAIA MANUAL: THE VICTUS GROUP OF COMPANIES

VICTUS GROUP (PTY) LTD (FSP 48687) (“VICTUS”)

Web version. Consolidated group manual based on Version 2 (4 September 2025); web edition last reviewed September 2026. Signed original on file. Approved for publication: Du Toit van den Bergh (Director). Compiled in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000, read with the Protection of Personal Information Act, 4 of 2013 and the PAIA Regulations, 2021.

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What This Policy Means, in Plain Terms

This manual explains how to request access to records held by the Victus group and how we process personal information. It tells you who to contact, what a request costs, how long a decision takes and what your remedies are if a request is refused. Requests go to our Information Officer using the form in Annexure E.

Scope: One Manual for the Group

This manual is compiled as a consolidated manual, as permitted by the PAIA Regulations, 2021, for the following private bodies within the Victus group:

Victus Group (Pty) Ltd, Reg 2012/211167/07, FSP 48687 (Category I)

Victus Tax & Accounting (Pty) Ltd, Reg 2014/209882/07

Victus Legal (Pty) Ltd, Reg 2016/037183/07

Olympus Invest (Pty) Ltd, Reg 2022/656388/07, FSP 53209 (Category II)

The Information Officer and Deputy Information Officer act for each of the bodies listed above. A reference to “the organisation” in this manual applies to each listed body.

This Manual has been prepared as a consolidated PAIA Manual for the entities identified above. Each entity constitutes a separate private body for purposes of the Promotion of Access to Information Act, 2 of 2000. The inclusion of the entities in a consolidated Manual does not alter their separate legal status or their respective obligations under PAIA and the Protection of Personal Information Act, 4 of 2013. Each entity remains individually responsible for compliance with PAIA, including the submission of its own annual report to the Information Regulator. The contact details, Information Officer and Deputy Information Officer set out in Annexure A apply to each of the listed entities.

Victus Risk (Pty) Ltd, Reg 2018/432444/07, FSP 49819, maintains its own PAIA Manual and is not covered by this Manual.

1. Definitions

1. Data Subject

The person to whom Personal Information relates.

2. Deputy Information Officer

The person to whom any power or duty conferred or imposed on an Information Officer by POPIA has been delegated.

3. Head

In relation to a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
  - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - the person who is acting as such or any person duly authorised by such acting person.

4. Information Officer

Johann Emmanuel Joubert has been designated as the Information Officer for each of the entities covered by this Manual, and Du Toit van den Bergh as the Deputy Information Officer, in terms of the authorisations referred to in Annexure I.

5. Information Regulator

The Regulator established in terms of Section 39 of POPIA.

6. PAIA

The Promotion of Access to Information Act 2 of 2000, as amended from time to time.

7. Person

A natural person or a juristic person.

8. Personal Information

- Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person;
- The personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

9. Personal Requester

A requester seeking access to a record containing personal information about the requester.

10. POPIA

The Protection of Personal Information Act 4 of 2013, as amended from time to time.

11. Private Body

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person but excludes a public body.

12. Processing

Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

13. Public Body

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- in any other functionary or institution when:
    - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
    - exercising a public power or performing a public function in terms of any legislation.

14. Requester

In relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person.

15. Request for Access

A request for access to a record of the organisation in terms of section 50 of PAIA.

16. Record

Any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation.

17. Third Party

In relation to a request for access to a record held by the organisation, means any person other than the requester.

2. Manual Purpose

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to; and
- actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPIA have been met.

The organisation's PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

Annexure A : Contact Details & Business Type

This section provides the organisation's postal and street address, phone and fax number, and, if available, the e-mail address of the head of the organisation.

Annexure B : Section 10 PAIA Guide

This section provides a description of the guide referred to in Section 10 of PAIA and how you may

Annexure C : Statutory Records

This section provides a description of the various statutes in terms of which the organisation is required to maintain records

Annexure D : Availability of Records

This section provides a list of records held by the organisation along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to who the respective records relates along with an indication of the purpose for which the record is being kept. Records that are indicated as "Freely Available" can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request as provided for in Annexure E.

Annexure E : Request Procedure

This section sets out the procedure required to be followed by a Requestor to obtain access to a record indicated as a "PAIA Request" in Annexure D.

Annexure F : Prescribed Fees

This section sets out the fees that are payable to the organisation by the Requestor prior to the organisation processing a request to obtain access to a record held by the organisation.

Annexure G : Processing of Personal Information

This section sets out the applicable aspects for the processing of personal information.

Annexure H : Outcome of Request and of Fees Payable

This section sets out the outcome of request to the Requestor and of the fees payable by the Requestor.

Annexure I : Information Officer Appointment

This section provides for the formal appointment of an Information Officer where so required.

Annexure J : Deputy Information Officer Appointment

This section provides for the formal appointment of a Deputy Information Officer where so required.

3. Duties of the Information Officer

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the manual for accuracy and communicating any amendments.

4. Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record;; and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

The Requestor must complete and submit Annexure E to the organisation.

5. Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted and the Information Officer and/or Deputy Information Officer must complete Annexure H and make the completed Annexure available to the Requestor.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk; and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question,

where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which

- does not contain; and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed,

the grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of Privacy of a Third Party who is a Natural Person

Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information that is already publicly available.
- The record consists of information that was given to the organisation by the individual to whom it relates and the individual was informed by or on behalf of the organisation, before it is given, that the information belongs to a class of information that would or might be made available to the public.
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest.
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin.
- The record consists of information about an individual who is or was an official of the organisation and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual and the name of the individual on a record prepared by the individual in the course of employment.

B: Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party.
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party.

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned.
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

C: Mandatory Protection of Certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D: Mandatory Protection of Safety of Individuals and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual.
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property.
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

E: Mandatory Protection of Records Privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

F: Commercial Information of the Organisation

Grounds for Refusal

- The record consists of information that contains trade secrets of the organisation.
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation.
- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition.

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by the organisation or the results of any such testing or investigation carried out by or on behalf of the organisation and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

G: Mandatory Protection of Research Information of a Third Party and the Organisation

Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage.
- The record consists of information that contains information about research being or to be carried out by or on behalf of the organisation, the disclosure of which would be likely to expose the organisation, a person that is or will be carrying out the research on behalf of the organisation, or the subject matter of the research to serious disadvantage.

6. Notice

1. Fee Payable

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Refer to Annexure F for a full breakdown of fees payable. Personal Requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);

- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be; and
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application,

except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request; and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

2. Granted Request for Access

If the request for access is **granted**, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given; and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

3. Refused Request for Access

If the request for access is **refused**, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on;
- Exclude, from any such reasons, any reference to the content of the records'; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

4. Undiscoverable Record

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in the organisation's possession, but cannot be found; or
- Simply does not exist,

the head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

7. Availability of the Manual

A copy of the Manual is available-

- on our website, www.victusgroup.co.za;
- the head office of the group for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

Annexure A: Contact Details & Business Type

A. Organisation Contact Details

Postal address:	PostNet Suite 44, Private Bag X22, Tyger Valley, 7536
Street address:	Suite 21 - 22, Section 14, Block C, Buena Vista Office Park, 1 Heuwelkruin Close, Eversdal, 7550
Phone number:	(021) 903-0916
Email address:	dutoit@vgrp.co.za

B. Head of Organisation

Full names & surname:	Du Toit van den Bergh
Email address:	dutoit@vgrp.co.za
Phone number:	(021) 903-0916
Full names & surname:	Du Toit van den Bergh

C. Information Officer

Full names & surname	Johann Joubert
Email address:	johann@vgrp.co.za
Phone number:	(021) 903-0916
Full names & surname	Johann Joubert

D. Deputy Information Officer

Full names & surname	Du Toit van den Bergh
Email address:	dutoit@vgrp.co.za
Phone number:	(021) 903-0916
Full names & surname	Du Toit van den Bergh

E. Business Type

The Organisation Conducts Its Main Type of Business in the Following Sector(s):	
Agriculture	☐
Mining and Quarrying	☐
Manufacturing	☐
Electricity, Gas & Water	☐
Construction	☐
Retail & Motor Trade and Repair Services	☐
Wholesale Trade, Commercial Agents & Allied Services	☐
Catering, Accommodation & Other Trade	☐
Finance & Business Services	☒
Community, Special & Personal Services	☐
If other, please specify:	☐

A fee for a copy of the Manual, as contemplated in Annexure F, shall be payable per each A4-size photocopy made.

Annexure B: Section 10 PAIA Guide

The 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.

The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
  - the Information Officer of every public body, and
  - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
- the manner and form of a request for-
  - access to a record of a public body contemplated in section 11; and
  - access to a record of a private body contemplated in section 50;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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-
  - an internal appeal;
  - a complaint to the Regulator; and
  - 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;
- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 .

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.

The Guide can also be obtained-

- upon request to the Information Officer;
- from the website of the Regulator (https://inforegulator.org.za/).

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Annexure C: Statutory Records

Each entity maintains statutory records and information in terms of the legislation applicable to it, as indicated below:

Legislation	Victus Group	Victus Tax & Accounting	Victus Legal	Olympus Invest
Companies Act, 71 of 2008	✓	✓	✓	✓
Income Tax Act, 58 of 1962	✓	✓	✓	✓
Value Added Tax Act, 89 of 1991	✓	✓		✓
Tax Administration Act, 28 of 2011	✓	✓	✓	✓
Trust Property Control Act, 57 of 1988	✓	✓	✓	
Administration of Estates Act, 66 of 1965	✓	✓	✓	
Financial Advisory and Intermediary Services Act, 37 of 2002	✓			✓
Financial Intelligence Centre Act, 38 of 2001	✓	✓		✓
Financial Institutions (Protection of Funds) Act, 28 of 2001	✓			✓
Long-term Insurance Act, 52 of 1998	✓			
Medical Schemes Act, 131 of 1998	✓			
Employment legislation (BCEA, LRA, EEA, UIA, COIDA, OHSA, SDA)	✓	✓		
Electronic Communications and Transactions Act, 25 of 2002	✓	✓	✓	✓
Promotion of Access to Information Act, 2 of 2000 / Protection of Personal Information Act, 4 of 2013	✓	✓	✓	✓

Employment-related records are held by the employing entity within the group. The table reflects the principal legislation under which each entity holds records and is reviewed as legislation or the group's activities change.

Annexure D: Availability of Records

The organisation maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Regulatory & Administrative	Permits, Licences or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-mails/	PAIA Request	Internal Communications	Employees
	Insurance Policies held by organisation	PAIA Request	Risk Management	Organisation
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
	Market Information	PAIA Request	Internal Referencing	Organisation

Marketing	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

Annexure E: Request for Access to Record

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

This request relates to the following entity (mark with an X):

- □ Victus Group (Pty) Ltd, Reg 2012/211167/07
- □ Victus Tax & Accounting (Pty) Ltd, Reg 2014/209882/07
- □ Victus Legal (Pty) Ltd, Reg 2016/037183/07
- □ Olympus Invest (Pty) Ltd, Reg 2022/656388/07

TO: The Information Officer
Suite 21-22, Section 14, Block C Buena Vista Office Park
1 Heuwelkruin Close
Eversdal
7550

E-mail address: johann@vgrp.co.za

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person

Personal Information				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	**Tel.:**		**Facsimile:**	
	Cellular:			
Full Names of Person on Whose Behalf Request is Made (If Applicable):				
Identity Number				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel.		Facsimile	
	Cellular			
Particulars of Record Requested *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 page and attach it to this form. All additional pages must be signed.)*				
Description of Record or Relevant Part of the Record:				
Reference number, if available				
Any further				

Any further particulars of record	

Type of Record *(Mark the applicable box with an "**X**")*	
Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

Form of Access *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

Manner of Access *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

Particulars of Right to Be Exercised or Protected *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	
Explain Why the Record Requested is Required for the Exercise or Protection of the Aforementioned Right:	

Fees	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *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	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal Address	**Facsimile**	**Electronic Communication** ***(Please Specify)***

Signed at_____this_____day of_____20 _____

_____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference Number:	
Request Received by: (Name and Surname of Information Officer)	
Date Received:	
Access Fees:	
Deposit (If Any):	

Annexure F: Prescribed Fees

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was 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.

No.	Description	Fee
1.	The request fee payable by every requester	R140,00
2.	Photocopy/printed black & white copy of A4-size page	R2,00
3.	Printed copy of an A4 size page	R2,00
4.	**For a Copy in a Computer-Readable Form on:**	
	i. Flash drive (to be provided by requester)	R40,00
	ii. **Compact Disc:**	
	• If provided by requestor	R40,00
	• If provided to the requestor	R60,00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24,00
8.	**Copy of an Audio Record on:**	
	i. Flash drive (to be provided by requester)	R40,00
	ii. **Compact Disc:**	
	• If provided by requestor	R40,00
	• If provided to the requestor	R60,00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145,00 R435,00
10.	**Deposit: If Search Exceeds 6 Hours**	One third of amount per request ito items 2-8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

Annexure G: Processing of Personal Information

1. Purpose of Processing Personal Information

The group processes personal information to render financial services, including advice and intermediary services, and related tax, accounting, fiduciary and insurance services; to improve its services and product offerings; to provide relevant information and resources to clients; to appoint suitable persons to provide financial services or products; and to comply with legislation that requires specific information to be collected, including the FAIS Act, the Financial Intelligence Centre Act and tax legislation.

These purposes apply to each entity within the scope of its own activities: Victus Group (Pty) Ltd and Olympus Invest (Pty) Ltd process personal information in rendering licensed financial services under their respective FSP licences; Victus Tax & Accounting (Pty) Ltd processes taxpayer and accounting information, including information submitted to SARS; and Victus Legal (Pty) Ltd processes personal information relating to estates, trusts, beneficiaries and related fiduciary services. Each entity processes personal information as a separate responsible party.

2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below is the table which 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 and prospective clients (natural persons)	Full names, identity or passport number, date of birth, contact details, residential and postal address, tax number and tax residency, marital status and dependents, employment details, income and financial position, banking details, source of funds and FICA verification documents, investment, policy and product details, risk profile and financial needs analysis, health information where required for risk or insurance products, records of advice and instructions, correspondence
Clients (juristic persons, trusts and estates)	Registration numbers, founding documents, details of directors, trustees, members, beneficiaries, executors and beneficial owners, tax numbers, banking details, financial statements and accounting records, SARS correspondence, Letters of Authority or Executorship, asset and liability schedules
Employees, directors and representatives	Full names, identity number, contact details, qualifications and regulatory fit and proper records, employment contract and remuneration, banking details for payroll, tax and UIF information, leave, performance and disciplinary records, employment equity information where required by law
Service providers, introducers and business partners	Names and registration numbers, VAT and tax numbers, contact persons and their details, banking details, agreements and correspondence
Website and social media users	Contact details submitted through forms, cookie and usage data as described in the Cookie Notice

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

Below is a table of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Client identity, financial and product information	Product providers, LISPs, insurers and administrators; portfolio managers and discretionary fund managers; banks and securities platforms
Client identity and FICA information	The Financial Intelligence Centre, the Financial Sector Conduct Authority and other regulators where disclosure is required by law
Client tax and accounting information	The South African Revenue Service, the Companies and Intellectual Property Commission
Client, employee and business records	External auditors, the external compliance officer, legal advisers and professional indemnity insurers
Estate, trust and beneficiary information	The Master of the High Court, the Deeds Office, conveyancers and other professionals involved in the administration of an estate or trust
Employee information	SARS, the Unemployment Insurance Fund, the Compensation Fund, medical schemes, retirement funds and payroll providers
All categories	Cloud, IT and software service providers acting as operators under written processing agreements; courts, regulators and law enforcement where disclosure is required by law

4. Planned transborder flows of personal information

Personal information may be stored or processed in cloud services hosted outside the Republic, including Microsoft 365 and the group's approved customer-relationship and productivity platforms. These providers are bound by data-processing agreements and provide a level of protection consistent with POPIA.

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

The group applies access control and password management, encryption in transit, endpoint protection, secure cloud storage with reputable providers under data-processing agreements, staff confidentiality and POPIA obligations, physical security at the office and an incident-response process that includes notification to the Information Regulator where required.

Annexure H: Outcome of Request and of Fees Payable

Note:

1. *If your request is granted the-*
   (a) *amount of the deposit, (if any), is payable before your request is processed; and*
   (b) *requested record/portion of the record will only be released once proof of full payment isreceived.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: The Requester

_____
_____
_____
_____

(Address)

E-mail address: _____

Your request dated_____ refers.

1. You requested:

Personal inspection of information at registered address of private body *(including listening to recorded words, information which can be reproduced in sound, or information heldon computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure F.	

OR

2. You requested:

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

3. **To be submitted:**

Postal Services to Postal Address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language: *(Note that if the record is not available in the language you prefer, access may be granted inthe language in which the record is available)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. **Fees payable with regards to your request:**

Item	Cost per A4-Size Page or Part Thereof/ Item	Number of Pages/ Items	Total
Photocopy	R2,00		
Printed copy	R2,00		
For a Copy in a Computer-Readable Form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40,00 R40,00 R60,00		
For a transcription of visual images per A4-sizepage	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24,00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40,00 R40,00 R60,00		
Postage, E-Mail or Any Other Electronic Transfer:	Actual costs		
Total:			

5. **Deposit payable (if search exceeds six hours):**

☐ Yes ☐ No

Hours of Search		**Amount of Deposit** ***(Calculated on One Third of Total Amount per Request)***	

The amount must be paid into the following Bank account: WEB VERSION AVAILABLE ON REQUEST

Name of Bank:	**XXXXXXXXXX**
Name of account holder:	**VICTUS GROUP (PTY) LTD**
Type of account:	**XXXXXXXXXX**
Account number:	**XXXXXXXXXX**
Branch Code:	**XXXXXXXXXX**
Reference Nr:	
Submit proof of payment to:	**XXXXXXXXXX**

Signed at_____this_____day of_____20 _____

_____
Signature of Information Officer

Annexure I: Information Officer Appointment

In terms of the Protection of Personal Information Act the head of a private body is the designated Information Officer for that private body. The Information Officer may delegate any power or duty conferred or imposed in terms of POPIA to the Deputy Information Officer.

The organisation has appointed a Deputy Information Officer to facilitate any requests to access records held by the organisation. This delegation does not prohibit the person who made the delegation from exercising power concerned or performing the duty concerned himself or herself. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.

The Deputy Information Officer need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments and business processes.

The Deputy Information Officer has the authority to approach all staff members of the organisation and to request all records held by the organisation. Where a manager is of the opinion that access to a record should not be granted to the Deputy Information Officer, reasons for this decision shall be given to the Information Officer who will make a final decision on the matter.

Together with the Information Officer, the Deputy Information Officer is responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

As the Head of the organisation, I Du Toit van den Bergh hereby appoint Johann Emmanuel Joubert as the Organisation's Information Officer

A corresponding authorisation has been signed by the head of each entity covered by this Manual, designating the same Information Officer and Deputy Information Officer for that entity. The signed authorisations are retained on file.

_____ _____

Head Signature Date

_____ _____

Information Officer Date

Annexure J: Deputy Information Officer Appointment

In terms of the Protection of Personal Information Act the head of a private body is the designated Information Officer for that private body. The Information Officer may delegate any power or duty conferred or imposed in terms of POPIA to the Deputy Information Officer.

The organisation has appointed a Deputy Information Officer to facilitate any requests to access records held by the organisation. This delegation does not prohibit the person who made the delegation from exercising power concerned or performing the duty concerned himself or herself. The delegation may at any time be withdrawn or amended in writing by the person who made the delegation.

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- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

The organisation has designated Du Toit van den Bergh as its Deputy Information Officer.

_____ _____

Head Signature Date

_____ _____

Deputy Information Officer Date