

MANUAL in terms of THE PROMOTION OF ACCESS TO INFORMATION ACT (No.2 of 2000) (the “Act”)

Applies only to Navigare

Copies of this manual are available for inspection, free of charge, at the offices of Navigare. Alternatively, the manual can be downloaded from Navigare’s website: www.navigare.co.za

For a description of how Navigare processes personal information, refer to the Navigare Privacy Statement located under <http://www.navigare.co.za/disclaimer-and-confidentiality-notice/>

Policy owner	Jennifer Titus
Applicable	Executive and Non-Executive Directors, all employees
Version	V3
Review	September 2024
Review group	Compliance
Approved by	Board of Directors



Contents

Version control	3
Key Definitions	3
Objective	5
Policy Statement and Contact details	5
Key Principles	6
Inherent Risks	6
The Role of the Information Regulator	6
The PAIA Guide	7
Legislation applicable to Navigare (the Company)	7
Who is Navigare	7
Records available in terms of any legislation	7
Records available without requesting access in terms of the act	8
Records available on request	9
Company confidential information	9
Grounds for Refusal	12
Request Procedure and Links to Forms	12
Prescribed Fees	13
Navigare’s Decision Process	14
Remedies available to the requester	14
Internal Remedies:	14
External Remedies:	14
ANNEXURE 1	15
ANNEXURE 2	20
ANNEXURE 3: Guidance on Procedures for making information electronic information available	23



Version control

Descriptions of Changes made	Date Amended	Person Responsible
V1 – Creation of Policy	June 2021	Jennifer Titus / Kashnie Naidoo / Krishna Govender
V2 – General update Functions & Powers of the IR (Information Regulator) PAIA guidance	June 2022	Jennifer Titus / Krishna Govender
V2 – General (Reviewed)	2023	Jennifer Titus / Krishna Govender
V3 – Update of regulator required (website) forms	2024	Jennifer Titus / Krishna Govender

Key Definitions

Commission: South African Human Rights Commission.
Consent: means any voluntary, specific, and informed expression agreeing to the processing of PI
Constitution: The Constitution of the Republic of South Africa Act, No. 108 of 1996.
Data Subject: A person to whom personal information relates. The person can be a natural or juristic person.
De-identify: means the deletion or manipulation of information to such a degree that it cannot be linked to the identity of a data subject, even if reconstructed.
Deputy Information Officer: The person to whom any power or duty imposed on an Information Officer by POPIA has been delegated.
Direct marketing: Sending a data subject an electronic communication about goods and services that you are promoting or offering to supply in the ordinary course of business or requesting a donation of any kind for any reason.
Electronic Communication: Any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient.
Head: A “Head” encompasses the following: In the case of a natural person, that person or their duly authorised representative. In the case of a partnership, any of the partners or their duly authorised representatives. In the case of a juristic person, the CEO, a person acting in a capacity equivalent to the CEO or their authorised representatives.



Information Officer (IO): The Head of a Private Body or to whom the head of the private body has delegated such role to.
Minister: The Cabinet member responsible for the administration of justice.
Operator: means a third party that processes information for or on behalf of Navigare in terms of a contractual agreement.
PAIA: The Promotion of Access to Information Act of 2000.
Person: A natural person or a juristic person
Personal Information (PI): Information relating to a natural person or juristic person which can include, but is not limited to: Race; Gender; Sexual affiliation and activity; Pregnancy; Marital status; National, ethnic, or social groups; Age; Physical and mental Health; Disability status; Personal/Private correspondence; Religious and personal beliefs (including matters of conscience); Language; Birth dates; ID numbers; Physical and email addresses; Contact numbers; Personal/Private correspondence; and Biometric information.
POPIA: The Protection of Personal Information Act of 2013 or the Act.
Private Body: A “Private Body” encompasses the following: A person who carries on a business, trade, or profession in his/her personal capacity. A partnership which carries on a business, trade, or profession. Any former or existing juristic person, specifically excluding Public Bodies.
Processing: Any activity or set of operations (whether automatic or manual) concerning a person’s personal information. This will include the collection, receipt, recording, organising, 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.
Record: A record of information in the possession of a Public or Private Body.
Regulator: The Information Regulator (IR) established in terms of POPIA.
Requester: Any person acting in their own capacity or as a representative of a Public Body making a Request for Access.
Request for Access: A request for access to a record of an organization in terms of section 50 of PAIA.
Responsible Party: means we or us at Navigare who determine the purpose of and means for processing personal information.
Third Party: In relation to a request for information, a “third party” is any person other than the requester.



Preamble

The Promotion of Access to Information Act, No.2 of 2000 ("the Act or PAIA") is an Act that was passed to give effect to the constitutional right held by South African citizens, of access to any information held by the State or by another person, which is required for the exercise or protection of any right.

Where a request is made in terms of the Act, the body to which the request is made is obliged to give access to the requested information, except where the Act expressly provides that the information may or must not be released.

Therefore, the right of access to information and this Manual is only applicable to South African citizens, as defined in the Constitution of the Republic of South Africa Act 108 of 1996. It is important to note that the Act recognises certain limitations to the right of access to information, including, but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. All requests shall be considered in accordance with the prescribed procedures and fees as outlined in PAIA.

Objective

This manual is compiled in accordance with Section 51 of the Act. It is intended to:

- give a description of the records held by and on behalf of the Company;
- to stipulate grounds for refusal of access to any such records;
- to outline the procedure to be followed and the fees payable when requesting access to any of these records in the exercise of the right of access to information with a view of enabling requesters to obtain records which they are entitled to in a quick, easy and accessible manner.

Policy Statement and Contact details

Navigare must develop a PAIA manual in order for a requester to exercise their rights in terms of PAIA and the Constitution. As such this document serves that purpose. The Information Officer has the responsibility to enable this process.

Information Officer:	Jennifer Titus
Physical Address:	51 West Street, Houghton, JHB, 2041
Telephone Number:	011 853 8702
Email:	compliance@navigare.co.za



Deputy Information Officer:	Christopher Beilings
Physical Address:	51 West Street, Houghton, JHB, 2041
Telephone Number:	011 853 8712
Email:	compliance@navigare.co.za

Key Principles

- Access to information is a fundamental human right, it is open to everyone.
- The process to obtain information should be simple and fast.
- Private bodies shall be obliged to proactively release information relating to their activities that is of public interest.
- Information should be available in an accessible location and format.
- The right to access to information should only be limited where there would be a significant harm if the information was released.

Inherent Risks

Navigare has identified the following potential key risks, which this policy aims to address/prevent:

- Unnecessarily preventing requesters from accessing information which could result in long drawn-out arbitration or legal battles over right to access of information.
- Failure to comply with the requirements of PAIA and POPIA could have serious consequences for Navigare.

The Role of the Information Regulator

POPIA establishes an Information Regulator (IR). In terms of POPIA, the Information Regulator is an independent body that is accountable to the National Assembly of Parliament.

The Information Regulator, established under the Protection of Personal Information Act (POPIA), has been empowered with significant authority to investigate and impose fines on responsible parties. Data subjects will be able to complain to the IR and it will be able to take action on behalf of data subjects. The IR now regulates both POPIA and PAIA.

Duties and functions:

- protect data subjects from harm and ensure that their PI is protected by responsible parties;
- provide education;
- monitor and enforce compliance;
- consult with interested parties;
- handle complaints;
- conduct research and to report to Parliament;
- facilitate cross-border cooperation in the enforcement of privacy laws by participating in any initiative that is aimed at such cooperation; and
- other duties specified in section 40(1) of POPIA.



Powers:

- hold responsible parties accountable for non-compliance;
- may issue an enforcement notice for a breach;
- may issue an enforcement notice related to codes of conduct (if applicable in sector);
- may call witnesses;
- can interview any person;
- has search and seizure powers;
- can enter premises and seize documents under a warrant;
- data subject or IR or both may sue the responsible party for damages. *Note that the data subject does not have to prove “intent” or negligence. The enforcement will be based on the fact that there was a breach.*

For further information on the IR, please consult the IR website at the following link - [Home - Information Regulator \(infoeregulator.org.za\)](https://infoeregulator.org.za)

The PAIA Guide

The Information Regulator is required in terms of the Act to compile a guide in every official language, containing information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act, for the purposes of exercising Constitutional Rights, in a manner that is easily comprehensible to any such person.

Such a guide can be accessed at this link - [PAIA Guidelines - Information Regulator \(infoeregulator.org.za\)](https://infoeregulator.org.za) .

Legislation applicable to Navigare (the Company)

Who is Navigare

The scope of this manual applies to Navigare (or NVG), a black owned and managed boutique firm that is based on a strong entrepreneurial and partnership culture with the skills and belief that we can compete with the dominant market players.

Navigare is an authorised user of the Johannesburg Stock Exchange. As such, Navigare is authorised to provide trading services to controlled and non-controlled clients who may also be accountable institutions.

Records available in terms of any legislation

All records kept and made available in terms of legislation applicable to the entity listed in this Manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

Note that this is not an exhaustive list and that some of the legislation may not be applicable to Navigare at this point, as well as with other legislation that may apply to Navigare from time to time:



No.	Applicable Act/Legislation
1.	Basic Conditions of Employment Act 57 of 1997
2.	Broad-based Black Economic Empowerment Act 53 of 2003
3.	Companies Act 71 of 2008
4.	Compensation for Occupational Injuries and Diseases Act 130 of 1993
5.	Employment Equity Act 55 of 1998
6.	Financial Intelligence Centre Act 38 of 2001
7.	Financial Advisory and Intermediary Services Act 7 No 37 of 2002
8.	Financial Institutions (Protection of Funds) Act 28 of 2001
9.	Financial Markets Act, 19 of 2012
10.	Financial Services Board Act 97 of 1990
11.	Financial Sector Regulation Act No. 9 of 2017
12.	Income Tax Act 58 of 1962
13.	Labour Relations Act 66 of 1995
14.	Occupational Health and Safety Act 85 of 1993
15.	Prevention of Organised Crime Act 121 of 1998
16.	Prevention and Combating of Corrupt Activities Act 12 of 2004
17.	Promotion of Access to Information Act 2 of 2000
18.	Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
19.	Skills Development Act 97 of 1998
20.	Skills Development Levy Act 9 of 1999
21.	Securities Transfer Tax Act 25 of 2007
22.	Unemployment Insurance Act and Contributions Act 4 of 2002
23.	Value Added Tax Act 89 of 1991

Records available without requesting access in terms of the act

Navigare may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description submitted in the Gazette.

For the moment any information Navigare wants to make publicly available, it will do so by publishing such information via its website – [www.navigare.co.za]

CATEGORIES OF RECORDS FOR EACH SUBJECT FORM HELD	FORM HELD	AVAILABILITY
COMPANY RECORDS		
Company incorporation	Electronic and physical	Available from CIPC website
Names of directors	Electronic and physical	Available from CIPC website
Records relating to the appointment of directors / auditor / secretary / public officer and other officers	Electronic and physical	Available from CIPC website
RECORDS AVAILABLE ON COMPANY WEBSITE		
Public Product Information	Electronic	Freely available from NVG website
Public Corporate Records	Electronic	Freely available from NVG website
Media Releases	Electronic	Freely available from NVG website
Published Newsletters	Electronic	Freely available from NVG website
Any other information made available on the NVG website	Electronic	Freely available from NVG website



Records available on request

Below is a list of subjects and categories of records that are subject to access restrictions, in accordance with the provisions of the Act, for purposes outlined therein.

Please note the following:

- The recording of a category or subject matter in this Manual does not imply that a request for access to such records would be granted.
- All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.
- Records pertaining to Navigare’s own affairs and operational in nature: Operational information is defined as information needed for the day to day running of the organisation, and which is of little or no use to persons outside of Navigare. Operational information is limited to the staff of Navigare directly involved with the management of such records, unless otherwise published on the Navigare website.

Company confidential information

“Confidential Information” includes but is not limited to any of the Company's trade secrets, confidential information in general which relates to the Business and/or the Company; including (but not limited to): Clients, the Business, contractual arrangements between the Company and the Company’s associates as well as the agreement between the Company and the Employee, financial information of the Company as well as the Clients, financial methods, policies and philosophies, marketing methods, research methods, incentive schemes, formulae, processes, systems, business methods, inventions, specialised knowledge of training material and training programmes, personnel, knowledge and details of Clients, knowledge and details of suppliers of financial products and insurance policies, internal control systems, policies and strategies, salary and wage policies, security methods, contractual arrangements and financing techniques, strategic plans, any software and/or database information or other electronically stored information and other matters which relate to the business of the Company in respect of which information is not readily available in the ordinary course of business to a member of the general public or any other entity.

Access to records relating to Navigare’s Confidential information will not be provided.

COMPANY’S OWN/INTERNAL AFFAIRS

CATEGORIES OF RECORDS HELD	PURPOSE	FORM HELD	AVAILABILITY
1. COMPANY SECRETARIAL RECORDS			
Salaries of directors	Internal Business Requirement	Electronic and physical	Not automatically available
Minutes of Board and Director meetings	Internal Business Requirement	Electronic and physical	Not automatically available
Board agendas and attendance registers	Internal Business Requirement	Electronic and physical	Not automatically available
Share Register and other statutory registers	Internal Business Requirement	Electronic and physical	Not automatically available



2. FINANCIAL RECORDS			
Financial statements, Accounting records, Audit records	Statutory Requirement	Electronic and physical	Not automatically available
Documents relating to taxation of the company	Statutory Requirement	Electronic and physical	Not automatically available
Management accounts	Statutory Requirement	Electronic and physical	Not automatically available
Financial Agreements and Leases	Internal Business Requirement	Physical	Not automatically available
Banking Details and banking records	Internal Business Requirement	Electronic and physical	Not automatically available
3. INSURANCE POLICES/RECORDS			
Insurance Policies held by the Company	Risk Management	Electronic and physical	Not automatically available
Insurance claims and arrangements	Internal Business Requirement	Electronic and physical	Not automatically available
Register of all fixed assets owned/rented by NVG	Internal Business Requirement	Electronic and physical	Not automatically available
MARKETING RECORDS			
Marketing Information	Internal Business Requirement	Electronic and physical	Not automatically available
Product Brochures	Internal Business Requirement	Electronic and physical	Not automatically available
Advertisements	Internal Business Requirement	Electronic and physical	Not automatically available
Product/Service Sales Records	Internal Business Requirement	Electronic and physical	Not automatically available
Marketing Strategies	Internal Business Requirement	Electronic and physical	Not automatically available
SYSTEMS, SOLUTIONS, INFORMATION TECHNOLOGY RECORDS			
Intellectual property pertaining to solutions and products developed.	Internal Business Requirement	Electronic	Not available
Usage of solutions and products	Internal Business Requirement	Electronic and physical	Not automatically available
COMPANY ADMINISTRATION RECORDS			
Policies and procedures - Internal relating to employees and the company	Internal Business Requirement	Electronic and physical	Not automatically available
Policies and Procedures - External relating to clients and other third parties	Statutory Requirement	Electronic and physical	Not automatically available
Licenses or Authorities	Statutory Requirement	Physical	Not automatically available
AGREEMENTS OR CONTRACTS			
NVG may possess records pertaining to other parties, including without limitation: Contractors, suppliers, subsidiary/holding company, joint venture companies, service providers.			
Standard Agreements	Internal Business Requirement	Electronic and physical	Not automatically available
Contracts concluded with customers	Internal Business Requirement	Electronic and physical	Not automatically available



Third party and Supplier contracts (such as Service Level Agreements, CSA etc.)	Internal Business Requirement	Electronic and physical	Not automatically available
Rental Agreements	Internal Business Requirement	Electronic and physical	Not automatically available
Non-Disclosure Agreements	Internal Business Requirement	Electronic and physical	Not automatically available
Financial records of 3 rd parties	Internal Business Requirement	Electronic and physical	Not automatically available
Correspondence with 3 rd parties	Communications	Electronic and physical	Not automatically available

HUMAN RESOURCES / EMPLOYEE RECORDS

CATEGORIES OF RECORDS HELD	PURPOSE	FORM HELD	AVAILABILITY
Personnel refers to any person who works for or provides services to or on behalf of NVG and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of NVG. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers. Personnel information/records related to employment shall remain strictly confidential to protect the constitutional rights of individuals. Personnel records include the following:			
Employment applications	Internal Business Requirement	Electronic and physical	Not automatically available
List of Employees and organisational structure	Internal Business Requirement	Electronic and physical	Not automatically available
Personal information of employees and internal evaluation	Internal Business Requirement	Electronic and physical	Not automatically available
Employee contracts of employment and other personnel-related contractual and quasi-legal records	Employment contract	Electronic and physical	Not automatically available
Employee salaries and benefits payable, travel claims, PAYE records, SETA records	Statutory requirement	Electronic and physical	Not automatically available
Leave records and Training records	Statutory requirement	Physical	Not automatically available
Disciplinary code and records	Statutory requirement	Electronic and physical	Not automatically available
Other internal records and correspondence	Internal Business Requirement	Electronic and physical	Not automatically available
Any records a third party has provided to NVG about any of their personnel	Internal Business Requirement	Physical	Not automatically available

CUSTOMER INFORMATION/RECORDS

CATEGORIES OF RECORDS HELD	PURPOSE	FORM HELD	AVAILABILITY
A client includes any natural or juristic entity who receives services from NVG. Client related information, includes but is not limited to the following:			
Customer Details/Database	Internal Business Requirement	Electronic and physical	Not automatically available
Contact details of individuals within customers	Internal Business Requirement	Electronic and physical	Not automatically available
Client instructions	Internal Communications	Electronic and physical	Not automatically available
Account opening documents	Internal Business Requirement	Electronic and physical	Not automatically available
FICA documents	Statutory requirement	Electronic and physical	Not automatically available
Investment and transactional details/records	Internal Business Requirement	Electronic and physical	Not automatically available
Communications with customers	External Communications	Electronic and physical	Not automatically available
Any records a client has provided to a third party acting for or behalf of NVG	Internal Business Requirement	Electronic and physical	Not automatically available
Any records a third party has provided to NVG	Internal Business Requirement	Electronic and physical	Not automatically available



Grounds for Refusal

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that 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 by a third party to Navigare, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- Mandatory protection of the safety of individuals and the protection of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;
- The commercial activities of Navigare, which may include:
 - Trade secrets of Navigare; or
 - Information which, if disclosed, could put Navigare at a disadvantage in negotiations or commercial competition.
- The research information of Navigare or a third party, if its disclosed, would reveal the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious advantage; or
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

Request Procedure and Links to Forms

The link to the Information Regulators website to access the forms can be found by clicking [here](#). By clicking on the provided link, a requester can download the forms directly from the Information Regulators website, which would look as follows:

The following link to the Information regulators' website is available on our website:

<https://info regulator.org.za/paia-forms/>

Promotion of Access to Information (PAIA) Forms

- Form 01: [Request for a Guide from the Regulator](#) [Regulation 2]
- Form 01: [Request for a Copy of the Guide from an Information Officer](#) [Regulations 3]
- Form 02: [Request for Access to Record](#) [Regulation 7]
- Form 03: [Outcome of request and of fees payable](#) [Regulation 8]
- Form 04: [Internal Appeal Form](#) [Regulation 9]
- Form 05: [Complaint Form](#) [Regulation 10]
- Form 13: [PAIA Request for Compliance Assessment Form](#) [Regulation 14(1)]



The following forms can also be printed from the Annexures at the end as follows:

- **Annexure 1 – Form 02: Request for Access to Record (Regulation 7)**

Please note that where the person requesting access to information held by Navigare must compile the prescribed form ([Form 02](#)) and submit it to the Information Officer at the physical address, or electronic mail address as provided and pay a requested fee and a deposit, if applicable. The requester must take care to complete the prescribed form with enough care to at least enable the Information Officer to identify the following:

- The records requested;
- The identity number of the person requesting the records;
- The contact details of the person requesting the records;
- The form of access required, if the request is granted;
- The right to exercise and/or to protect, and specify the reasons why the records required will enable the person to protect and/or exercise the right;

Where a request for information is being made on behalf of another person, the requester must submit sufficient and adequate proof that the person has obtained the necessary authorisation to do so.

- **Annexure 2 – Form 03: Outcome of request and of fees payable (Regulation 8)**

The Information Officer must, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons to the requester.

For requests, other than (personal requests), the requester **must take note** of the fees that may be applicable and that these are to be paid prior to the requested information. These fees are set out in Form 3 ([Form-3-PAIA.pdf \(info regulator.org.za\)](#)). If there is any waiver of fees, this will be at the sole discretion of the Information Officer & the Board of the Company.

Prescribed Fees

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

- A requester may be required to pay prescribed fee before a request will be processed. (Amount to be advised by Navigare and will depend on the required administration involved related to the request);
- If the preparation of the record requested requires more than the prescribed six (6) hours, 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 requester 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.
- The fee structure is available on the website of the Information Regulator at [Form-3-PAIA.pdf \(infoeregulator.org.za\)](#)

Navigare's Decision Process

The Information Officer will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods could not be complied with.

The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

The requester must pay the prescribed fee (should any apply) before any further processing can take place.

Note that the 30-day period which Navigare must decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request is for a large number of information, or the request requires a search for information held at another office or 3rd party service provider of Navigare and the information cannot reasonable be obtained within the original 30-day period. The Information Officer will notify the requester in writing should an extension be sought.

Remedies available to the requester

Internal Remedies:

Navigare does not have internal appeal procedures. Therefore, the decision made by the Information Officer / deputy officer (with input from the Board) is final. Requesters who are dissatisfied with the decision of the Information Officer will have to exercise external remedies at their disposal, as detailed below.

External Remedies:

A requester or a third party who is dissatisfied with an Information Officer's refusal to disclose information, or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of similar status for relief.

The requester may make use of the following form which can be accessed from the Information Regulators website at [InfoRegSA-PAIA-Form05-Reg10-1.pdf \(infoeregulator.org.za\)](#).



FORM 2
REQUEST FOR ACCESS TO RECORD
 [Regulation 7]

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.*

TO: The Information Officer

 _____ (Address)

E-mail address: _____

Fax number: _____

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 <i>(when made on behalf of another person)</i>		
Postal Address		
Street Address		
E-mail Address		
Contact Numbers	Tel. (B):	
	Cellular:	
Facsimile:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :		



Identity Number	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		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 particulars of record	



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

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(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)</i>	
Postal services to postal address	
Postal service to street address	



Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer



ANNEXURE 2

**FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE**

[Regulation 8] 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 is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body <i>(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)</i> 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 B.	
---	--

OR

2. You requested:

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

3. To be submitted:

Postal service to postal address	
Postal service to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	



E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(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)</i>	

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			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
(ii) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R60.00		
For a transcription of visual images per A4-size page	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 <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
(ii) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	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 <i>(calculated on one third of total amount per request)</i>	
-----------------	--	---	--

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer



ANNEXURE 3: Guidance on Procedures for making information electronic information available

Since PAIA sets specific time limits for providing information, the ability to locate information quickly and accurately is essential for complying with access legislation.

In March 2022, the Information Regulator issued guidance on procedures for making information available electronically.

For information to be accessible, it must first be properly located, which often means accessing records. Without proper documentation, public and private bodies cannot effectively respond to requests or provide necessary information to the public.

The guidelines provide a framework for public and private bodies to make information available electronically in a way that allows individuals to access records quickly, easily, and at minimal cost. The recommendations include:

- Efficient and systematic control over the creation, receipt, maintenance, management, use, and disposal of records in an electronic environment, following international standards.
- Effective management of electronic records to ensure information is readily available to users and that authentic and reliable records are preserved for the long term.
- Maintaining the reliability, usability, authenticity, and integrity of records.
- Ensuring that reliable records of business activities are generated, maintained, and available to those who need them for as long as necessary to enable the following:
 - improved transparency and accountability;
 - effective policy formation;
 - informed decision-making;
 - management of business risks;
 - continuity in the event of disaster;
 - the protection of rights and obligations of organisations and individuals;
 - protection and support in litigation;
 - compliance with legislation and regulations;
 - improved ability to demonstrate corporate responsibility, including meeting sustainability goals;
 - reduction of costs through greater business efficiency;
 - protection of intellectual property;
 - evidence-based research and development activities;
 - the formation of business, personal and cultural identity;

The same as physical records are managed, electronic records need to be managed continuously. Effective management includes the following:

- Defining retention and disposal guidelines to determine how long records should be kept and the appropriate methods for their disposal
- Identifying who is authorised to access and use records;
- Determining whether a record is official and should be removed if it is no longer required



This procedure aims to support creators and users of electronic records, IT staff, records management staff, and managers in managing electronic records effectively and cost-efficiently while ensuring compliance with PAIA and other relevant legislation

Electronic Records Management

PAIA mandates the proper management of all types of records, including electronic ones, to ensure they are accessible, securely protected, retained for the necessary duration, and disposed of in compliance with legal requirements. While the Act does not specifically use the term 'Electronic Records Management,' it requires organizations to establish effective practices for handling electronic records to uphold the right of access to information

Best Practices for Electronic Records Housekeeping

- Consistent and ongoing management of shared and personal drives, as well as paper filing systems, is crucial for maintaining the long-term integrity and accessibility of records.
- Staff members who handle or store client personal information should review their records to remove non-official materials and eliminate unnecessary duplicates.
- Staff should be cognisant of the need to review and declutter their filing systems, local drives, personal workspaces, and other paper or electronic areas. They should also avoid using local or personal drives for the long-term storage of client personal information

Retention and Disposal of records

In accordance with Section 14(1) of the Protection of Personal Information Act (POPIA), records containing personal information must not be retained longer than necessary to fulfill the purpose for which they were collected or processed, unless:

- Retention is required or authorized by law.
- The record is needed for lawful purposes related to our functions or activities.
- Retention is required by a contract between the parties.
- The data subject, or a competent person in the case of a child, has consented to retention.

Navigare is committed to managing records responsibly, ensuring transparency, accessibility, and the protection of personal and sensitive information. Records are retained only for as long as necessary to meet their intended purpose, comply with legal requirements, or respond to information requests. When records are no longer needed, we dispose of them securely to prevent unauthorized access and maintain confidentiality.

