

## PAIA MANUAL

Section 51 of the Promotion to Access of Information Act No 2 of 2000 (“PAIA”)

### **FSP NAME/S:**

**SENTINEL INTERNATIONAL ADVISORY SERVICES (PTY) LTD  
AND  
SENTINEL INTERNATIONAL TRUST COMPANY (PTY) LTD**



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# Access to Information Manual

## 1. Introduction

The object of PAIA is to give you access to the records of the company under certain circumstances. PAIA seeks to promote a society in which you have access to information to enable you to exercise and protect your rights, and to promote a culture of transparency and accountability.

Section 51 of PAIA requires all private bodies to compile a manual containing various information including the company's details, a description of the records of the company, as well as the means by which a record may be accessed.

The company is a private body and therefore this manual has been compiled in terms of and in order to comply with Section 51 of PAIA.

## 2. Company Registration Details

The company details are as follows:

|                                       |                                                                    |
|---------------------------------------|--------------------------------------------------------------------|
| <b>Registration Number</b>            | 1997/002524/07 and 1936/007597/07                                  |
| <b>Postal Address</b>                 | 6th floor, Mariendahl House, Newlands-On-Main, Main Road, Newlands |
| <b>Physical Address</b>               | 6th floor, Mariendahl House, Newlands-On-Main, Main Road, Newlands |
| <b>Telephone Number</b>               | 021 674-0390 / 011 656-2722                                        |
| <b>General contact e-mail address</b> | Rickyo@sentineltrust.co.za                                         |
|                                       |                                                                    |

## 3. Information Regulator's PAIA Guide

In Terms of Section 10 of PAIA, the Information Regulator is required to compile a guide, in each official language, containing information for any person who wishes to exercise any right contemplated in PAIA.

- The contact details of the Information Regulator (Department of Justice) are:

|                   |                                                                                                                 |
|-------------------|-----------------------------------------------------------------------------------------------------------------|
| Postal Address:   | P O Box 31533, Braamfontein, Johannesburg, 2017                                                                 |
| Telephone Number: | (010) 023 5200                                                                                                  |
| Email:            | infoereg@justice.gov.za                                                                                         |
| Website:          | <a href="https://www.justice.gov.za/infoereg/contact.html">https://www.justice.gov.za/infoereg/contact.html</a> |



4. Records of the company

The information collected and processed by the company may be shared with the following persons external to the company:

- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules
- Auditing and accounting bodies (internal and external).
- Anyone making a successful application for access in terms of PAIA.

5. Request for Access to a Record

The company has authorised and designated the Information Officer Coralea Zweig at coraleaz@sentineltrust.co.za to deal with all matters relating to PAIA.

In order to request access to a record please complete the **Request for Access Form** which is attached to this manual as Annexure B and submit it to the company at its email address life@canhaminsurance.co.za

6. Information available in terms of other legislation

The company holds information in accordance with the following legislation, but is not limited to:

- Basic Conditions of Employment No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Credit Agreements Act No. 75 of 1980
- Debtor Collectors Act No. 114 of 1998
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Firearms Control Act No. 60 of 2000
- Income Tax Act No. 95 of 1967
- Labour Relations Act No. 66 of 1995
- Occupational Health & Safety Act No. 85 of 1993
- Skills Development Levies Act No. 9 of 1999



- Skills Development Act No. 97 of 1998
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

## 7. Access to Records

If your request for access to records of the company is approved, access will be provided in the form as the company reasonably determines, unless you have requested access in a specific form.

## 8. Request procedure

The purpose of this section is to provide you with guidelines to follow to facilitate a request for access to records held. You must comply with all the procedural requirements contained in PAIA to request for access to a record.

It is important to note that an application for access to information can be refused if the application does not comply with the procedural requirements as stated above. In addition, the successful completion and submission of an Access Request Form does not automatically allow you access to the requested record.

You must complete the **Request for Access Form**, Annexure B, and submit same as well as payment of a request fee and a deposit, if applicable to the Information Officer at the postal or email address as stated above.

Completion of the Request for Access Form must follow the instructions listed below:

- The Request for Access Form must be completed in the English Language.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state “N/A” in response to that question.
- If there is nothing to disclose in reply to a particular question, state “nil” in response to that question.
- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.



- When the use of an additional folio is used, precede each answer thereon with the title applicable to that question.
- All additional folios used and attached to the Request for Access Form must be signed by the requestor.

Further to the completion of all fields in the Request for Access Form, please ensure that you provide us with the following information:

- A copy of your valid South African ID document or card.
- A copy of the power of attorney (if applicable).
- Details of how the information requested must be provided to you if the request is granted.
- Your contact details.

#### 9. Timelines for consideration of your request

The company will respond within 30 days of receipt of all the necessary information. the company may extend the period of 30 days once for a further period of not more than 30 days, if:

- The request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of the company.
- The request requires a search for records in, or collection thereof from, an office of the company not situated in the same town or city as the office of the head that cannot reasonably be completed within the original period.
- Consultation among divisions of the company or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period.

If the period is extended, the company must, as soon as reasonably possible, but in any event within 30 days, after the request is received, notify the requester of that extension, the period of the extension and the reasons for the extension. And notify the requester that they may lodge an application with a court against the extension, and the procedure (including the period) for lodging the application.



#### 10. Decision Regarding Request and Records Not Found

PAIA provides for numerous grounds upon which the company may refuse to grant you access to a record of the company. These grounds for refusal are to protect:

- The privacy of another person
- Commercial information of another company
- Confidential information of another person
- The safety of individuals and property
- Records privileged from operations in legal proceedings

You will be notified in writing whether your request has been approved or denied within 30 calendar days after receipt by the company of the completed **Request for Access Form**. Should any record of the company requested by you not be found or not exist, the company will, by way of affidavit, notify you that it is not possible to give access to that particular record.

#### 11. Remedies Available on Refusal of Access

The company does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and you will have to exercise external remedies at your disposal if the request for information is refused and are not satisfied with the answer supplied by the Information Officer.

Subject to the provisions of the PAIA, if you or a third party are dissatisfied with the Information Officer's refusal to disclose information, may within 180 days of notification of the decision, apply to a Court for relief.

#### 12. Fees

The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee.
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

When the request is received by the Information Officer, such officer shall by notice require the requester to pay the prescribed request fee (if any) before further processing of the request. Refer to Annexure A of this Manual.

If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion (being not more than one third) of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the requester has paid the fees as indicated in Annexure A. The requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the request fee or a deposit.

A requester whose request for access to a record has been granted must pay an access fee for reproduction and for search and preparation, and for any time reasonably required more than the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

