

SanlamGoTyme (Pty) Ltd

Registration number: 2024 / 590083 / 07

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Prepared in accordance with Section 51 of the Promotion of
Access to Information Act, 2 of 2000, as amended

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1. Introduction

The Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended was enacted on 3 February 2000, with the purpose of, amongst others, to give effect to the constitutional right of access to information held by public and private bodies for the exercise of or protection of rights and to establish the procedures to give effect to that right, as swiftly and inexpensively as reasonably possible.

It is important to note that PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy;
- Commercial confidentiality; and
- Effective, efficient and good governance.

This limitation must balance the right of access to information with any other rights including those entrenched in the Bill of Rights in Chapter 2 of the Constitution of the Republic of South Africa.

This PAIA Manual is prepared in compliance with PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA") and provides the following:

- the process by which a person can request information held by SanlamGoTyme,
- the categories of information/records held by SanlamGoTyme (Pty) Ltd ("SanlamGoTyme"),
- the fees charged if any, for providing the information, and
- the requirements that such a request must meet as prescribed by legislation.

This PAIA Manual must be read together with the SanlamGoTyme Privacy Notice which is available on the SanlamGoTyme website at www.sanlamgotyme.co.za

2. The Information Regulator

The Information Regulator is mandated under PAIA to promote the right of access to information, monitor the implementation of PAIA, make recommendations to strengthen PAIA and to report annually to Parliament.

A guide has been compiled and made available by the Information Regulator which contains information to assist a person wishing to exercise any rights as set out in PAIA ("PAIA Guide").

The PAIA Guide contains a description of:

- the objects of PAIA and POPIA;
- the manner and form of a request for access to a record of a private body;
- the assistance available from the Regulator in terms of PAIA and POPIA; and
- 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/or POPIA including:
 - an internal appeal;
 - a complaint to the Regulator; and
 - an application to court against a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.

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

The PAIA Guide can be inspected at the offices of the Information Regulator during normal office hours, or it can be **accessed on the website of the Information Regulator** <https://info regulator.org.za/paia/>

Information Regulator

Woodmead North Office Park, 54 Maxwell Dr,
Woodmead, Johannesburg 2191

Website:

<https://inforegulator.org.za>

Telephone:

010 023 5200

General enquiries:

enquiries@inforegulator.org.za

Complaints:

PAIAComplaints@inforegulator.org.za

POPIAComplaints@inforegulator.org.za

Copies of the PAIA Guide can also be obtained from SanlamGoTyme's head office, for public inspection during normal office hours or upon written request by completing Form 1 which is included in the Appendix to this PAIA Manual.

3. Structure and Functions of SanlamGoTyme

SanlamGoTyme (Pty) Ltd is a registered credit provider operating as a joint venture between Sanlam Personal Loans (Pty) Ltd ("SPL") and GoTyme Bank Limited ("GoTyme bank"), hereinafter referred to as the "Brands".

SanlamGoTyme acts as loan originator and administrator for both Brands. When a customer applies for a loan, SanlamGoTyme and the relevant Brand act jointly as responsible parties for processing personal information as outlined in the SanlamGoTyme Privacy Notice.

To access information held by Sanlam Group please refer to the [Sanlam PAIA manual](https://www.sanlam.com/promotion-of-access-to-information-act) accessible at: <https://www.sanlam.com/promotion-of-access-to-information-act> or to access information held by GoTyme Bank Limited please refer to the GoTyme Bank PAIA Manual: <https://gotyme.co.za/personal/paia-manual>

4. Contact Details for access to information of SanlamGoTyme

Information Officer

Chief Executive Officer: Alet Griesel

SanlamGoTyme (Pty) Ltd

2 Strand Road, Bellville, Cape Town, 7530

Phone number: 0860997771

Email: privacy.office@sanlamgotyme.co.za

Deputy Information Officer

All requests for access to records in terms of PAIA must be in writing and must be addressed to the Deputy Information Officer:

Craig Stones

GoTyme Bank Limited

30 Jellicoe Avenue, Rosebank, 7700

Phone number: 082 738 3716

Email: privacy.office@sanlamgotyme.co.za

5. Records Held by SanlamGoTyme

This section serves as a reference to the records that SanlamGoTyme holds, and it is recorded that the accessibility of the records listed below, may be subject to the grounds for refusal set out in item 8.1 below. The information is classified and grouped according to records relating to the subjects and categories outlined below.

5.1 Categories of records automatically available

PAIA requires institutions to list those records which are automatically available without the requester having to request access in terms of PAIA. Such automatically available records usually do not have information which can reasonably be said to be of a sensitive nature.

Most records which fall into this category of information are available from SanlamGoTyme at its **Head Office or on SanlamGoTyme's website** (www.sanlamgotyme.co.za) or can be requested by email, and do not require a formal process to access. A copy of the record will be made available upon request with payment of a fee for reproduction (if applicable) as indicated in item 7.4 below.

Records automatically available from SanlamGoTyme¹:

- Newsletters
- Booklets
- Pamphlets/brochures/posters
- Product information and promotional material intended for public viewing
- Campaigns
- Annual reports intended for public viewing
- Other literature intended for public viewing
- All SanlamGoTyme's customers are allowed to access their own information without lodging a formal access request. The information a customer automatically has access to includes, but is not limited to:
 - Loan documents
 - Credit policy documentation;
 - Product information;
 - Personal details; and
 - Loan statements
 - Loan account information.

5.2 Categories of Records

Records kept in accordance and made available in terms of other legislation as is applicable to SanlamGoTyme are listed in the Appendix.

The categories of records generated or held by SanlamGoTyme are classified and grouped as follows:

Subjects on which the body holds records	Categories of records
Company Administration	Financial Reports and Financial Records
	Memorandum of Incorporation
	Share Register
	Dividend Register
	Share Certificates
	Intellectual Property
	Supervisory body-related records
	Minutes of meetings and Resolutions

Human Resources and Employee Records	HR Policies and Procedures
	Salary records
	Personal records provided by employees
	Records provided by a third party relating to employees
	UIF and statutory levies
	Employment Equity Plan
	Pension Fund records
	Correspondence relating to employees
	Training attendance registers, training results, and other training related material
Finance	Conditions of employment, employment contracts, internal evaluation records and personnel records
	Bank statements of SanlamGoTyme and other banking records
	Treasury-related records
	Tax records
	Financial Statement and Reports
Corporate Governance	Auditors' reports
	Legal, Compliance and Audit Reports

¹ This is a list of records that are automatically available from SanlamGoTyme without a requester having to request access thereto, and is included in this PAIA Manual. In light of the fact that SanlamGoTyme is a Private Body and compliance with the provisions of Section 52(1)(a) read with Regulation 5, to compile and keep a description of categories of records voluntarily disclosed or automatically available, is on a voluntary basis, it has elected to include this information in its PAIA Manual and not to also publish this in a separate notice on the website of SanlamGoTyme. SanlamGoTyme's PAIA Manual is available on its website.

Operations	Loan application data and loan agreements
	Credit and affordability assessments
	Credit bureau information
	Credit insurance policy documents
	Debt collection and tracing information
	Customer Databases
	Records provided by a customer to SanlamGoTyme; records provided by a customer to a third party acting for or on behalf of SanlamGoTyme, records provided by a third party and records generated by or within SanlamGoTyme relating to its customers.
	Customer Correspondence
	Supplier Agreements and Records
	Information technology records
	Internal and external correspondence
	Internal policies and procedures
	Product and service records
	Other operational records

Marketing and Communication	Customer marketing preferences
	Direct marketing consent/opt-out records
	Social media interactions
	Other Marketing records

Other records	Employee, customer or private body records, which are held by another party, as opposed to the records held by SanlamGoTyme itself.
	Records held by SanlamGoTyme pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about contractors/suppliers.
	SanlamGoTyme may possess records pertaining to other parties, including without limitation the Brands, contractors, suppliers, partners, subsidiary/holding/sister companies, joint venture companies, job applicants, operators (suppliers and third parties) and service providers. Alternatively, such other parties may possess records that can be said to belong to SanlamGoTyme.

The records listed in the categories above may be formally requested as it is not automatically available. Access to parts of these records or the whole record may be refused on legal grounds set out in item 8 below.

Records held in terms of legislation are not automatically available without a request for information made in terms of the prescribed process set out in this PAIA Manual.

6. The Processing of Personal Information in terms of the Protection of Personal Information Act, 2013, as amended

6.1 Purpose for processing personal information

We understand that your privacy is important to you and we value your trust.

We protect your information and always aim to be clear and open about what we do with your personal information. We undertake to process your information lawfully and in a manner that does not infringe your privacy. We follow general principles in accordance with applicable privacy laws.

SanlamGoTyme collects and processes personal information (among others):

- To provide you with our products and services, and maintain our relationship with you;
- To design, manage and price our products;
- To conduct affordability assessments;
- To provide you with intermediary services related to credit insurance;
- To conclude and administer your application, which may include underwriting;
- To execute a transaction in accordance with your request;
- To enable us to provide you with relevant information to you, to communicate with you and carry out your requests and instructions or to respond to your enquiries or complaints.
- To assess, check, and process your application and any claims;
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators (including the National Credit Regulator, Financial Sector Conduct Authority, Information Regulator and Prudential Authority);
- To undertake credit reference searches and/or verification and ongoing credit reference searches;
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of applicable internal policies;
- For debt recovery or debt tracing;
- For purposes of online login and authorisation;
- To execute on the strategic initiatives of the shareholders of SanlamGoTyme ;
- To perform any risk analysis or for purposes of risk management to you;
- To record and/or monitor and have access to your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- To maintain the security of our digital channels and systems;
- For statistical analysis and research purposes;
- For audit and record-keeping purposes;
- For purposes of proof and legal proceedings;
- To enhance your experience when interacting with SanlamGoTyme and to help us improve our offerings to you;
- To share with other entities in the Sanlam Limited Insurance Group or Tyme Group, dependent on your loan Brand, so that we can market our financial products and services which we deem similar, with the aim of offering you the opportunity to take up some of the financial products to fulfil your needs, provided that you have not objected to receiving such marketing;
- To conduct market and behavioural research, including evaluation and analysis to determine if you qualify for our products or services as well as customer satisfaction surveys, and provide you with information about our products and services from time to time via email, telephone or other means (for example, invite you to events);
- To make you aware of any promotions or competitions that SanlamGoTyme or your loan Brand is running (unless you have unsubscribed from receiving our direct marketing communications).

- To process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- To protect or pursue your, our or the loan Brand's legitimate interests.
- You have consented to us processing your personal information for a reason other than as set out above.
- For any purpose related to and compatible with the above.

For more information, please visit our Privacy Notice at www.sanlamgotyme.co.za

6.2 Categories of personal information processed

SanlamGoTyme holds information on prospective employees, employees, employees of the Brands, prospective suppliers, suppliers, prospective customers, customers, visitors, and third-party service providers.

The following outlines the categories of data subjects and a non-exhaustive list of personal information processed by SanlamGoTyme:

Categories of Data Subjects	Personal Information that may be processed
Personnel /Employees	Personal information of employees (e.g. full name, ID number, contact information etc)
	Biometric information
	Conditions of employment and other personnel-related contractual and quasi-legal documents
	Information relating to education and employment history, including psychometrics records
	Banking details of employees, tax and financial information
	Payroll records

Personnel /Employees	Electronic access records and physical access records
	Training records
	Employment history
	Employee disciplinary and performance information
	Health and safety information
	Medical and Disability information
	Pension and provident fund information
	Internal evaluation records
	Criminal checks and other internal records
	Correspondence relating to personnel
Prospective Employees	Family members' records i.e. name, surname, ID, medical and disability information
	Surveillance records / Close circuit television (CCTV) footage
	Employee vehicle registration
	Personal information provided by prospective employee (e.g. full name, ID number, contact information etc)
	Curriculum vitae and application forms
	Criminal checks; background checks; academic records

Customer and Prospective Customer²	Details about your identity including, but not limited to, your name, surname, identity number, address, date of birth, gender, title and marital status.
	Race (for statistical purposes as required by law).
	Contact details, such as your email address, telephone number, physical/residential address, work address
	Cookies and information about the devices you use to interact with us.
	Biometric information, (e.g. fingerprints, signature, voice- and facial recognition) to establish and / or verify your identity.
	Your tax number and tax residency status.
	Financial and transactional information ³
	Location information (e.g. geolocation or GPS location) IP address and any third-party sites you access when visiting our website, kiosks or using our mobile apps
	Other personal information, such as details of your interactions with us
	Nationality, age, language, education
	Financial information (e.g. income, expenses, assets and liabilities, money management behaviour or goals and needs, based on amongst others, account transactions, including banking account information provided to us).

² A customer includes any natural person that is an existing SanlamGoTyme customer or a person that has provided their personal information to SanlamGoTyme or whose personal information SanlamGoTyme has lawfully processed, in the context of a sale of or acquiring of goods or services.

³ If you are a customer of GoTyme Bank, we may collect your transactional information from GoTyme Bank for purposes of conducting credit scoring on you. We can also use your GoTyme Bank transactional information to verify your income if your salary is received in your GoTyme Bank account.

Customer and Prospective Customer²	Criminal history
	Online and other unique identifiers ⁴
	Social media profiles
	Physical health, mental health, wellbeing, disability, religion, belief, conscience, and culture
	Medical history (e.g. HIV/AIDS status)
	Personal views, preferences and opinions
	Confidential correspondence
	Another's views or opinions about you

Suppliers; Brand Partners; third parties and prospective suppliers	Bank details and financial information
	Contracts and supplier/partner representative contact details
	Supplier/partner personal information
	Personal information of supplier/partner representatives
	Procurement information
Visitors	Correspondence with suppliers/partners
	Physical and electronic access records;
	Biometric information
	Surveillance records (e.g., CCTV footage)
Shareholders	Full name and contact information
	Shareholder personal information

⁴ These are numbers assigned to you that uniquely identify you in relation to SanlamGoTyme or in relation to any third party that processes personal information about you.

6.3 Sharing of personal information

We will only share your personal information with third parties if there is a legitimate and lawful reason to do so. We may disclose the personal information you provide to us to the following entities:

- Sanlam Limited Insurance Group or Tyme Group depending on the specific Brand of your loan.
- Other third parties in relation to the purposes set out under the item 6.1 above, such as credit bureaux, attorneys, tracing agents, debt collection agencies or service providers.
- Public bodies and law enforcement, courts of law, Regulators, Ombuds (either directly or through shared databases) for fraud detection and prevention or any other lawful reason as set out in this Privacy Notice.

We will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, Financial Sector Conduct Authority, National Credit Regulator, Information Regulator or Prudential Authority).

We will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.

6.4 Transborder flows of personal information

We may send your personal information to service providers outside of the Republic of South Africa ("RSA") for storage or processing on SanlamGoTyme's behalf.

We will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA.

6.5 Security and storage measures implemented to safeguard personal information

We intend to protect the integrity and

confidentiality of your personal information. We have implemented appropriate technical and organisational information security measures to keep your information secure, accurate, current, and complete.

This includes, but is not limited to:

- Secure handling and storage of information – we encrypt your data including when we need to transmit your information to third parties.
- Ensuring that our systems are secure by having firewalls, intrusion detection, password requirements, and virus scanning tools in place to stop viruses and unauthorised people from accessing our systems, among other controls.
- Building security to control access to our premises.
- Safely destroying, deleting or deidentifying records when we no longer require the information.

7. Procedure to Request Access to Records

Records held by SanlamGoTyme may be accessed only once the prerequisite requirements for access have been met.

7.1 Requester

A requester is any person making a request for access to a record of SanlamGoTyme.

There are two types of requesters:

A personal requester: A personal requester is a requester who is seeking access to a record that relates to their own personal information (as defined in PAIA and POPIA) and need not follow the PAIA request process to gain access to their personal information. Subject to the provisions of this PAIA Manual, POPIA and other applicable laws, SanlamGoTyme will provide the requested information or give access to any record regarding the requester's own personal information, unless any grounds for refusal to access these records exist, as set out in paragraph 8 below. No access fee will be charged but the prescribed fee for reproduction of the information requested may be charged. A requester that is acting on behalf of someone else must produce a letter of authority, to the reasonable satisfaction of the Information Officer or Deputy Information Officer.

Other requester: A requester (other than a personal requester) is entitled to request access to information held by SanlamGoTyme, including information about third parties. The requester must fulfil the prerequisite requirements for access in terms of PAIA, including the payment of a request and access fee. In terms of a request for information on third parties, or records of a third party, SanlamGoTyme will adhere to the provisions of section 71 to 73 of PAIA.

If a public body lodges a request, the public body must be acting in the public interest and provide details of the public interest that it is seeking to protect/rely on.

7.2 Voluntary access

Information that is automatically available can be obtained from SanlamGoTyme's website or requested via email. In certain instances, a reproduction fee may be charged as set out in the fee schedule. Transcription and copying of records in other media will also attract reproduction fees.

7.3 Request procedure

The requester must comply with all procedural requirements as set out in PAIA relating to the request for access to a record.

The requester must complete the prescribed Form 2 (see enclosed in the Appendix to this PAIA Manual) and submit same as well as the payment of the request fee and a deposit, if applicable, to the Information Officer or Deputy Information Officer (see contact details under item 4 above).

If a requester is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request verbally, which request must then be reduced into writing by the person assisting the requester.

If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer or Deputy Information Officer.

The prescribed form must be completed with enough detail to at least enable the Information Officer or Deputy Information Officer to identify:

- The record/s requested;
- The identity of the requester, in the form of a proof of identity of the requester and/or authority, where applicable a proper mandate or power of attorney or resolution;
- Which form or manner of access is required;
- The postal or e-mail address of the requester.

The requester must clearly state and explain the right they wish to exercise or protect. The requester cannot refer to the right of access to information in terms of PAIA, the requester must clearly identify another right it seeks to exercise or protect and explain how the record is reasonably required to protect, or exercise that right. The courts have indicated that access to the records must be "necessary" for the exercise or protection of the right so stated.

This right of access may not be used to access records that form part of criminal or civil proceedings, or where such proceedings have commenced. This right of access only applies to records in existence at the time of request.

If, in addition to a written reply and if the requester wishes to be informed of the decision on the request in any other manner, the requester must state that manner and the contact information to be used.

If there is missing information or if the requester has not adequately articulated the right sought to be exercised or protected or has not adequately satisfied the procedural requirements in terms of section 53 of PAIA, then the request will not be considered as a valid request until such time as the missing information is provided.

Subject to the provisions in PAIA and provided that the required information has been received, SanlamGoTyme will process the request within 30 (thirty) days from when the request is received, and the fee (if applicable) is paid, or within any extension timeline. The requester may submit special reasons to the Information Officer or Deputy Information Officer that dictate why the time periods as set out above should be shortened.

Where a requester (other than a personal requester) has requested access to information on a third party, PAIA provides that the third party whose information is requested must be given 21 (twenty-one) days in which to make representations to refuse access or give written consent for the disclosure of the record to the requester.

SanlamGoTyme will make a decision on whether to grant or refuse access after considering the representations made by the third party. It may not always be possible for SanlamGoTyme to comply with all refuse representations. For example, when a court order had been served for the access.

The 30 (thirty) day response period may further be extended for a further period of not more than 30 (thirty) working days if the request is for a large number of information, or the request requires a search for information held at another office of SanlamGoTyme and the information cannot reasonably be obtained within the initial 30-day period. SanlamGoTyme will notify the requester in writing should the extension be necessary.

The requester shall be informed in writing, in a manner substantially similar to Form 3 (see included in the Appendix to this PAIA Manual) whether access has been granted or denied. If the request is denied, the notice to the requester must state the reasons for refusal, which must be supported by the relevant provisions of PAIA. The notice must further state that the requester may lodge an application with a court against the refusal of the request and set out the procedure (including the period) for lodging the application.

7.4 Request fees and payment method

The fees (request and access fees) relating to a request are prescribed by the Regulations of the Act and must be paid by a requester when applying for access to information. The fee schedule as per the regulations to PAIA is listed below.

When the request is received by the Information Officer or Deputy Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing the request.

The Information Officer or Deputy Information Officer shall withhold a record until the requester has paid the prescribed fees.

Fees are paid at the inception of a request and thereafter, fees are incurred for search processes and reproduction costs. 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 of PAIA for this purpose, the Information Officer or Deputy Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

Persons who are requesting personal information about themselves do not have to pay a request fee. All other persons have to pay the request fee of R140.00 as provided for in PAIA.

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 planning to make it available in the request form.

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

Fees Schedule

Description	Fee
The request fee payable by every requestor	R140.00
Photocopy/printed black and white copy of A4-size page	R2.00 per page or part thereof
Printed copy of A4-size page	R2.00 per page or part thereof
For a copy in a computer-readable form on:	
Flash drive (to be provided by requestor)	R40.00
Compact disc (if provided by requestor)	R40.00
Compact disc (if provided to the requestor)	R60.00

For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation from Service provider
Copy of visual image	
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on: Flash drive (to be provided by the requestor) Compact disc (if provided by the requestor) Compact disc (if provided to the requestor)	R40.00 R40.00 R60.00
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. To not exceed a total cost of:	R145.00 R435.00
Deposit: If search exceeds 6 hours	One third of amount per request
Postage, email or any other electronic transfer	Actual expense, if any

8. Refusal of Access to Records

8.1 Grounds for Refusal of Access to Records

As set out in Part 3 of Chapter 4 of PAIA, SanlamGoTyme may refuse a request for access to information that relates to the mandatory protection:

8.1.1 of the privacy of a third party who is a natural person, which could involve the unreasonable disclosure of personal information of that natural person;

8.1.2 of the commercial information of a third party, if the record contains:

8.1.2.1 Trade secrets of that third party;

8.1.2.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party;

8.1.2.3 Information disclosed in confidence by a third party to SanlamGoTyme, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

8.1.3 of confidential information of third parties if disclosing such would or could constitute a breach of the duty of confidence owed to a third party in terms of any agreement.

8.1.4 of the safety of individuals and the protection of property;

8.1.5 of records that would be regarded as privileged in legal proceedings;

8.1.6 of the commercial activities of SanlamGoTyme, which may include:

8.1.6.1 Trade secrets of SanlamGoTyme;

8.1.6.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of SanlamGoTyme;

8.1.6.3 Information, which, if disclosed, could put SanlamGoTyme at a disadvantage in negotiations or commercial competition;

8.1.6.4 A computer programme/software which is owned by SanlamGoTyme, and which is protected by copyright;

8.1.7 of the research information of SanlamGoTyme or a third party, if its disclosure would disclose the identity of SanlamGoTyme, 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, and would place the research at a serious disadvantage.

Requests for information that are clearly frivolous or vexation or which involve an unreasonable diversion of resources shall be refused.

8.2 Remedies available if SanlamGoTyme refuses access

SanlamGoTyme does not have an internal appeal procedure and as such, the decision made by the Information Officer or Deputy Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused and the requester is not satisfied with the answer provided by the Information Officer or Deputy Information Officer.

Subject to the provisions of PAIA, a requester has the right to submit a complaint to the Information Regulator or to approach a court with appropriate jurisdiction, within 180 days of being informed of the decision, for relief where they are dissatisfied

with the imposition of fees, the time frames within which they received a response from SanlamGoTyme, or with a decision by the Information Officer or Deputy Information Officer to refuse access in part or fully.

9. Records that cannot be found or do not exist (Missing Records)

If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the Information Officer or Deputy Information Officer will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record. The affidavit will provide details of the steps taken to locate the record and will be regarded as a decision to refuse a request for access.

10. Disposal of Records

Requesters will be advised whether a particular requested record has been disposed of.

11. Availability of the PAIA Manual

This PAIA Manual, or any updated version thereof, is available in English and will be available at SanlamGoTyme's offices during office hours and on the website of SanlamGoTyme.

12. Updates to the PAIA Manual

This PAIA Manual will be reviewed and updated by SanlamGoTyme from time to time, as and when required.

Appendix

Records available in terms of legislation

Records are kept in accordance with such other legislation as is applicable to SanlamGoTyme, which includes but is not limited to the following legislation:

Applicable Legislation	Category of Records
Basic Conditions of Employment Act	Employee records
Companies Act No. 71 of 2008	- Pre-incorporation contract - Registration certificate - Rules of the company - Record of past and present directors - Copies of reports presented at the AGM - Minutes of all meetings and resolutions of directors / shareholders - Securities register - Accounting records - Registration of company secretary and auditor
Compensation for Occupational Injuries and Diseases Act No. 130 of 1993	Register of earnings
Consumer Protection Act No. 68 of 2008	- Disclosure by intermediaries - Catalogue Marketing - Written consumer agreements - Identification of supplier
Copyright Act No. 98 of 1978	IP assignment and confidentiality agreement
Design Act No. 195 of 1993	Patents
Employment Equity Act No. 55 of 1998	- Employment Equity Plan - Annual Report - Statement of income differentials - Relevant records

Financial Advisory and Intermediary Services Act No. 37 of 2002	• Known premature cancellations of transactions or financial products • FSP License • Complaints • Register of representative and related documents • Complaints received	Income Tax Act No. 58 of 1962	• Wage and salary details (including overtime details) • Insurance policies • Investment records • Transfer of marketable securities • Pensions – contribution records • Leases
Financial Intelligence Centre Act No. 38 of 2001	• Record of business relationships and transactions • Client information • FIC Reports	Insolvency Act No. 24 of 1936	• Taxation returns and assessments
Income Tax Act No. 58 of 1962	• Ancillary books of account and supporting schedules • Annual financial statements • Working papers • Bank instructions • Bank statements • Books of account • Cash books • Consolidation schedules • Creditors' ledger • Debtors' ledgers • Debtors' statements • Deposit slips • Fixed asset register • General ledgers • Goods received notes • Journal books • Journal vouchers • Payrolls • Petty cash books • Purchase invoices • Purchase orders • Receipts • Sales invoices (with supporting documentation) • Sales journals • Rail and shipping documents • Stock records • Stock sheets • Year-end working papers • Contracts and agreements for debts • Employee payrolls • Salary wage register	Labour Relations Act 66 of 1995	• Books of account • Supporting vouchers • Income and expenditure statements • Balance sheets • Auditor's report • Arbitration awards
		National Credit Act 34 of 2005	• Credit application records including quotes, disclosures, cost-of-credit documents • Correspondence with the consumer • Statements • Details, enquiries and results of disputes lodged by consumers • Credit agreements • Documents in connection with the credit agreement, including proof of credit insurance
		Occupational Health and Safety Act 85 of 1993	• Covid Registers and Plans • Records of incidents reported at work
		Patents Act 57 of 1978	• Patent and copyright information
		Tax Administration Act 28 of 2011	• Employee tax information records
		Unemployment Insurance Act 63 of 2002	• Employee records
		Value Added Tax Act 89 of 1991	• Tax invoices, debit and credit notes • Records of all goods and services supplied, received and imported and registered vendor's transactions
		National Payments System Act 78 of 1998	• Payment records

Prescribed form to request a copy of the PAIA Guide – Form 1

FORM 1: REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3]

The Information Officer
SanlamGoTyme (Pty) Ltd
2 Strand Road
Bellville
7530
Cape Town
Email address: privacy.office@sanlamgotyme.co.za

I,			
Full name and surname:			
In my capacity as (mark with “x”):	Information officer		Other
Name of *public/private body (<i>if applicable</i>)			
Postal Address:			
Street Address:			
E-mail Address:			
Facsimile:			
Contact numbers:	Tel.(B):	Cellular:	

hereby request the following copy(ies) of the guide:

Language (mark with "X")		No of copies	Language (mark with "X")	No of copies
	Sepedi		Sesotho	
	Setswana		siSwati	
	Tshivenda		Xitsonga	
	Afrikaans		English	
	isiNdebele		isiXhosa	
	isiZulu			

Manner of collection (mark with "x" :)			
Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

*Delete whichever is not applicable

**FORM 2:
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

[Regulation 7]

Note:

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

To: The Information Officer
SanlamGoTyme (Pty) Ltd
2 Strand Road
Bellville
7530
Cape Town

Email address:

privacy.office@sanlamgotyme.co.za

Fax Number: N/A

Mark with "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	
Email address	
Contact number	Telephone
	Cellular Facsimile
	Facsimile
Full Name of person on whose behalf request is made (if applicable)	
Identity number	
Postal address	
Street address	
Email address	
Contact number	Telephone
	Cellular Facsimile
	Facsimile
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 applicable	
Any further particulars of record	

TYPE OF RECORD (Mark 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 applicable box with an "X")	
Printed copy of record (including copies of virtual images, transactions 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 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 / public body (including listening to recorded words, information which can be reproduced in sound or information held on computer or in an electric or machine-readable form)	
Postal service to postal address	
Postal service 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 that 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

Indicate why the record is required for the exercise or the protection of 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 the record depends on the form in which access is required and the reasonable time required to search for and prepare the record
- d. If you qualify for an exemption of the payment for any fee, please state the reason for the 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 Communications
(please specify)

Signed at _____ this _____ day of _____ 20_____

Signature of requester (or person on whose behalf request is made)

FOR OFFICIAL USE

Reference number

Request received by

Date received

Access fee

Deposit (if any)

Signature of Information Officer

Outcome of the request and of fees payable – Form 3

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 (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) 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 (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	
Transcription of soundtrack (written or printed document)	
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)	

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 • To be provided by requestor	R40.00		
ii) Compact disc • 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: • To be provided by requestor	R40.00		
ii) Compact disc: • 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 (calculated on one third of total amount per request)	
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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 number: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information Officer