ALEXANDER FORBES RETIREMENT FUND (PENSION SECTION): PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Effective date: 1 January 2022

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ALEXANDERFORBES
Securing your financial well-being

Table of Contents

1. Purpose of this PAIA manual

The main purpose of this manual is to:

1. Help you access records that the Alexander Forbes Retirement Fund (Pension Section) ("the fund") holds, as set out in the Promotion of Access to Information Act 2 of 2000 or "PAIA", and
2. Confirm how the fund uses and protects personal information to comply with the requirements of the Protection of Personal Information Act 4 of 2013 or "POPIA". To find out more about how the fund complies with POPIA please read the privacy statement that can be accessed here: https://www.alexanderforbes.co.za/umbrella-funds/comprehensive

Please note that publication of this manual does not give rise to any rights to access records except as provided for in terms of PAIA.

About the fund and applicable law:

The fund is registered in terms of the Pension Funds Act 24 of 1956 (as amended) or the "PFA" as a separate legal entity or "juristic person" and the Financial Sector Conduct Authority (FSCA) oversees compliance with this law. In terms of the PFA, the main purpose of the fund is to provide benefits to members on leaving the fund, or at retirement or to make payments to beneficiaries should a member pass away, as set out in the registered rules of the fund.

The personal information that is collected and processed for members of the fund is used mostly for this reason. The fund must also collect and process information to comply with the laws of South Africa.

The PFA confirms:

1. In section 13 – the registered rules of the fund are binding on the members, stakeholders and any person who claims under the rules, and
2. In section 35 – any member, subject to payment of a reasonable fee, may ask for a copy of the rules and the audited revenue account and balance sheet prepared as at the financial year end of the fund.

The fund is an existing juristic person and is therefore a "private body" as defined in POPIA and PAIA. The fund holds records for the purposes of POPIA and PAIA as required in terms of a number of laws relevant to the administration and management of retirement funds, among others:

- Constitution of the Republic of South Africa;
- Consumer Protection Act 68 of 2008;
- Divorce Act 70 of 1979;
- Financial Advisory and Intermediary Services Act 37 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Financial Sector Regulation Act 9 of 2017;
- Income Tax Act 58 of 1962;
- Insurance Act 18 of 2017;
- Maintenance Act 99 of 1998;
- National Credit Act 34 of 2005;
- Pension Funds Act 24 of 1956;
- Prevention of Organised Crime Act 121 of 1998;
- Prescription Act 68 of 1969;
- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2013;
- Value Added Tax Act 89 of 1991.

Any reference to any statute, constitution, regulation, directive, standard, order or any other enactment or legislative measure of government or a regulatory body which has the force of law means the relevant enactment or legislative measure as at the effective date of the agreement and as amended or re-enacted from time to time, as well as any amendments or other act or subordinate legislation in substitution thereof, from time to time.

<u>What is a private body?</u>

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

About this manual:

To help you access information, this manual sets out the types of records that the fund holds and the process to access these records. This manual is useful to:

1.1 check the types of records (documents and information) the fund holds which are available without having to complete the form as set out in PAIA;

1.2 check the types of records the fund holds where you must complete the form, as set out in PAIA, and how to submit your request to the fund for processing;

1.3 understand the records the fund holds that are available to you in terms of other laws;

1.4 access the contact details of the Information Officer (and Deputy Information Officer, if applicable) who will help you request the records you want to access;

1.5 know that the Regulator has issued a guide on how to use PAIA and where you can access a copy of this guide;

1.6 know if the fund will process personal information and the purpose of processing of personal information (this includes a description of any categories of fund members and the information or categories of information about them);

1.7 understand who the fund may share personal information with;

1.8 know if the fund has planned to transfer or process personal information outside of South Africa and the recipients or categories of recipients this personal information may be shared with; and

1.9 be aware that the fund has the proper security measures to protect the confidentiality, integrity and availability of the personal information which is being processed.

2. List of acronyms and abbreviations

2.1	**DIO**	Deputy Information Officer
2.2	**Form 2**	The form you need to fill in to request fund records
2.3	**Form 3**	The form the fund will complete when it responds to your request for records
2.4	**Guide**	A guide issued by the Information Regulator in terms of section 10(1) of PAIA to inform the public how to exercise their rights in terms of PAIA and POPIA.
2.5	**IO**	Information Officer
2.6	**PAIA**	Promotion of Access to Information Act No. 2 of 2000 (as amended)
2.7	**PFA**	Pension Funds Act No. 24 of 1956 (as amended)
2.8	**POPIA**	Protection of Personal Information Act No.4 of 2013
2.9	**Regulator**	Information Regulator (https://inforegulator.org.za/)

3. Important contact details to access the fund's information

3.1 Information Officer

Name: Chantell Watkins
Email: AFFundIO@aforbes.com

3.2 General contact

Email: contactus@aforbes.com
Website: www.alexanderforbes.com

3.3 Fund's registered address

Postal Address: PO Box 787240
Sandton
2146

Physical Address: 151 West Street
Sandown

Telephone: (011) 269 0000

Email: afrfqueries@aforbes.com
Website: https://www.alexanderforbes.co.za/umbrella-funds

3.4 Information Regulator

The Information Regulator of South Africa is based at:

Postal Address: P O Box 31533
Braamfontein
Johannesburg
2017

Physical Address: JD house
27 Stiemens Street
Braamfontein
Johannesburg
2001

General emails: enquiries@inforegulator.org.za
Complaints email: POPIAComplaints@inforegulator.org.za; and
PAIAComplaints@inforegulator.org.za

4. The Regulator's guide on how to use PAIA

4.1 The Regulator has issued a guide on how to use PAIA, in an easy-to-understand format, and in all eleven official languages and in braille.

4.2 The guide sets out:

4.2.1 the reason and purpose of PAIA and POPIA;
4.2.2 the process to follow to ask for a record of either a public body as set out in section 11 of PAIA, or a private body as set out in section 50 of PAIA
4.2.3 the help you can expect from the IO and DIO;
4.2.4 the help you can expect from the Regulator;

4.2.5 if you are not happy with the information you have been given or the reason why you haven't been given the information, you can lodge:
- 4.2.5.1 an internal appeal (*if applicable*);
- 4.2.5.2 a complaint to the Regulator; or
- 4.2.5.3 an application to a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator, or a decision of a private body;

4.2.6 what the fund must include in its PAIA manual and how members can get a copy of the manual;
4.2.7 the possible voluntary disclosure of categories of records by the fund, if applicable;
4.2.8 the fees to be paid when requesting records (if any); and
4.2.9 any other issues needed to meet the requirements of PAIA.

4.3 You can inspect or make copies of the guide at the fund's registered address or at the Regulator's office during normal working hours.

4.4 You can also get a copy of the guide from:
4.4.1 The fund's IO; or
4.4.2 The Regulator, go to: https://inforegulator.org.za/.

4.6 A copy of the guide will be available on the fund's website at https://www.alexanderforbes.co.za/umbrella-funds/comprehensive

4.7 The fund will make the guide will be available in two of the official languages, being English and isiZulu.

What is a public body?
(a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
(b) any other functionary or institution when-
(i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
(ii) exercising a public power or performing a public function in terms of any legislation;

5. Fund's records you can access without filling in a form 2

If you are a fund member, you can view the following records at the registered address of the fund or on the fund's website:

Description of record	Where to find it
Registered rules and amendments	Fund's website and registered address
Fund's latest annual financial statements	
The last report (if any) by a valuator prepared in terms of section 16 of the PFA	Fund's registered address
Any scheme which is being carried out by the fund in accordance with the provisions of section 18 of the PFA	

If you are not a fund member, then in terms of section 22 of the PFA, any person (subject to payment of prescribed fees) may view any record listed above at the offices of the FSCA or obtain a copy or extract from the FSCA at:

Contact Centre:	0800 20 37 22
Switchboard:	+27 12 428 8000
Facsimile:	+27 12 346 6941
Postal Address:	P.O. Box 35655 Menlo Park 0102
Enquiries:	enquiries@fsca.co.za
Website:	http://www.fsca.co.za

6. Fund's records that require you to complete a Form 2

Examples of other records the fund holds are set out in Annexure 1.

7. How to request a fund record

You can request access to records listed in Annexure 1 "by filling in Form 2 (attached as Annexure 2 of this manual) or for the most recent version at: https://inforegulator.org.za/.

Send your completed Form 2 to the fund's IO. If your form is completed correctly:

1. you will receive a completed Form 3, within 30 days of receiving your request, advising you of the outcome of your request. For information purposes, this form is attached as Annexure 3.
2. If your request for access is granted, you may need to pay a fee in order to arrange access.
3. There may be reasons why the IO is unable to approve your request. The reasons will be detailed in Form 3. Examples are given below.

If the form is not completed correctly, the IO will contact you to help you to complete the form correctly.

8. Reasons why the IO can refuse access to a record

1. There are legal reasons why the IO must refuse to give access to certain records, among others, to protect:

   - someone else's privacy including that of a deceased person;
   - someone else's confidential information;
   - the safety of individuals and property;
   - records that are privileged in legal proceedings;
   - research information.

2. If the fund cannot find a requested record or it does not exist, then the IO will notify you, in the form of an affidavit or affirmation, that it is not possible to give access to the record.

If you are not satisfied with the response provided by the IO, you may lodge a complaint with the Regulator by completing the form "lodging of complaint" that is available on the website: https://inforegulator.org.za/

9. Processing of personal information

9.1 Purpose of processing personal information

The fund processes members' personal information, as defined in POPIA, for example, to provide you with fund benefits, keep your records updated, make payments, contact you, and comply with the laws of South Africa.

9.2 Categories of data subjects

The fund processes personal information of the following categories of data subjects:

Categories of data subjects	Examples of personal information processed
Members, including • former members; • pensioners; • spouses and former spouses of members or former members; • children of members and former members; • beneficiaries, dependants, and nominees of deceased members	Could include name, surname, contact details, salary information, demographic information (e.g., age, race), financial information including bank account details, tax information, records of claims, and in some cases, health, or medical information, including disability status.
Service providers - for example the appointed administrator, appointed auditors, appointed consultants etc.	names, registration number, VAT numbers, address, and bank details.
Fund officers – the Board of Trustees, the Principal Officer and Deputy Principal Officer.	names, surnames, contact details, demographic information (e.g., age, race).
Participating employer/s – your employer and the employers of other fund members (as applicable).	names, registration number, VAT numbers, address, and bank details.

9.3 Other parties the fund may share your personal information with

To fulfil our responsibilities to members, the fund shares members' personal information that we process in the ordinary course of business, with other responsible parties, or co-responsible parties, or regulators or operators or other appointed service providers (and their agents) so that they can provide services in terms of law or agreed to in terms of formal signed agreements.

In terms of our formal signed agreements, we require all operators and service providers to handle your personal information appropriately and securely, and to comply with all relevant laws.

9.4 Cross-border transfers

The fund makes use of service providers who may store or process your information outside of South Africa. We try to ensure that our service providers only operate in countries with strong data protection laws (for example the United Kingdom or countries within the European Union), or who are contractually required to protect your information in terms of the principles set out in POPIA.

9.5 Information security

We take the security of your information very seriously and have implemented reasonable technical and operational measures to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction, and ensure that all our service providers do so too. We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

10. Where to find a copy of this manual

This manual is available in English:

10.1 on the fund's website;
10.2 at the registered address of the fund during normal business hours;
10.3 to any person who requests it and makes the prescribed payment (as applicable), and
10.4 to the Regulator upon request.

11. Keeping this manual up to date

The fund's IO will keep this manual regularly updated as needed.

Issued by

Chantell Watkins
Information Officer of the Alexander Forbes Retirement Fund (Pension Section)

12. Adopted by the fund

Adopted by the board on 26 June 2024.

Signed by:John Leon Liackman Signed at:2024-07-11 09:45:57 +02:00 Reason:Witnessing John Leon Liackman	Signed by:Nomonde Zwane Signed at:2024-07-08 18:53:25 +02:00 Reason:I approve this document	Signed by:Nazley Sallie Signed at:2024-07-10 15:10:12 +02:00 Reason:I approve this document
Chairperson/Trustee	**Principal Officer**	**Trustee**
11/07/24	08/07/24	10/07/24
Date	Date	Date

Annexure 1

Records the fund holds, that are not automatically available

The fund holds the following records that are not automatically available, this list of records is not exhaustive. To access these records, please complete the Form 2 (see Annexure 2) and send it to the Information Officer – the address details are provided under 3 above.

Claims records

Claim notification forms
Calculations (where available), or computerised statement of claim value
Tax directive application (where applicable)
Tax directive issued by SARs (where applicable)
IT 88 notifications
Tax certificate (duplicate - where applicable)
Client / broker payment instruction (where applicable)
Section 37D deduction instruction (where applicable)
Copy of any other court order against benefits (including divorce orders and maintenance orders)
Payment letter
Copy of cheque or EFT payment reference
Trustees' resolution - Disposal of benefit (deaths only)
Insurance received – statement by insurer (deaths only)
Copy of death certificate
Statement by employer (disability only)
Statement by employee (disability only)
Acceptance / declination letter (disability only)
General correspondence

Member information

New entrant data
Contribution records
Member investment choice investment option / switch forms (where applicable)
Installation, acquisition & transfer-in data
Statement of member fund value
Additional benefit / surplus / demutualisation / bulking calculations
Flexible benefit member option forms (where applicable)

Contributions

Monthly contribution schedules received from employer/s
Monthly contribution reports (section 13A reports) to fund
Interest calculations and letters

Section 14 transfers and liquidations

Calculations
Copy of S14(1)(e) certificate (transferee and transferor funds)
Option forms (where applicable)
Tax application forms (where applicable)
Tax directives (where applicable)
Tax certificates (duplicate - where applicable)
Payment letter (liquidations only)
Copy of S14 application lodged (transferor fund)

Housing loans

Application form
Partial settlement as a result of default - claim forms and approval for the payment
Monthly reconciliations/updates
Finalised / settled claims record / calculation
Refund requisitions

Funeral benefit claims

Claim form
Copy of death certificate
Payment letter

Pensioners

Special tax directives, including IT 88's, garnishees, etc.
Commutation of pensions - calculations
Pension increase notification
Certificates of existence (COE)
Confirmation of continued studies beyond age 18 years
Death certificates
Annuity option forms
Trustee resolution regarding payments

Disability

Medical Reviews - correspondence only (where applicable)
COCD (certificate of continued disability)
Escalator notification
Payment / benefit confirmation letter
EFT payment reference
Recovery documentation
Letter of suspension / reinstatement from underwriter

Accounting records

Deposit slips (where applicable)
EFT files (ACB whilst still applied)
Bank statements for fund bank accounts
Cash books/bank reconciliations
Audit files with working papers
Annual financial statements
General Ledgers
Journals
Trial balances
Levies payable
VAT documents
General correspondence

General records

Original signed rules and amendments
Registration certificates
Change of fund name certificates
Certain communication with SARS and FSCA
Copies of Pension Fund Adjudicator complaints lodged
Confirmation of the appointment of Principal Officer and Actuary of fund
Quarterly financial reviews (where the fund is valuation exempt)
Correspondence to members or former members or other categories of members
Correspondence to the trustees in respect of fund matters
Copy of service agreements between the fund and its service providers
Copies of communication sent to members of the fund in respect of specific events e.g., Trustees' reports, Member level Investment Choice, changes to death benefit structure, changes to fund structure, etc.
Minute books
Trustee ballots and elections
Trustee registers
Original or copies of policy documents relating to insurance, GLA, PHI, dread disease, stated benefits, travel, funeral, fidelity cover, etc. (as applicable to the fund membership)
Documentation relating to the review of insurances on an annual basis as well as the quotations obtained from insurers to a market test or “rebroke” exercise
Copies of statements detailing the asset values for a fund
Agendas prepared for meetings held
Investment manager mandates or policies of insurance, depending on the nature of the investment (if applicable where secretarial services are performed
Reports prepared, for example asset and liability matching, transfers in or out, benefit improvements, termination of fund, etc.
Liquidation documents, calculations, and records

Annexure 2

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 of the Alexander Forbes Retirement Fund (Pension Section)

E-mail address: AFFundIO@aforbes.com

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

☐ Request is made in my own name

☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (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 *(Mark the applicable box with an "**X**")*	
Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	
MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of 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)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
Reason	

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

Postal address	Facsimile	Electronic communication ***(Please specify)***

Signed at______________________this____________day of________________20 _________

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Signature of Requester / person on whose behalf request is made

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FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

____

Signature of Information Officer

Annexure 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 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	
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 (ii) Compact disc • If provided by requestor • If provider to the requestor	 R40.00 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		
For an audio record: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provider to the requestor	 R40.00 R40.00 R60.00		
Postage, e-mail, or any other electronic transfer	Actual costs		
TOTAL:			

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

☐ Yes ☐ No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

The amount must be paid into the following Bank account:

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