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Internet site: <http://www.coronation.com>

**MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 FOR THE FOLLOWING ENTITIES:**

Coronation Fund Managers Limited  
Coronation Investment Management SA (Proprietary) Limited  
Coronation Asset Management (Proprietary) Limited  
Coronation Management Company (RF) (Proprietary) Limited  
Coronation Life Assurance Limited CFM (Isle of Man) Limited  
Coronation Preservation Pension Fund  
Coronation Preservation Provident Fund  
Coronation Retirement Annuity Fund  
Namibia Asset Management (Proprietary Limited  
Coronation Fund Managers (Botswana) Limited  
Professional Provident Society Investments (Pty) Limited  
Coronation Global Fund Managers (Ireland) Limited  
Coronation International Limited  
Coronation Investment Services (Proprietary) Limited  
Coronation Investment Management International (Proprietary) Limited

**CONTENTS**

- A. INTRODUCTION TO ENTITIES**
- B. PARTICULARS IN TERMS OF SECTION 51 MANUAL**
  - 1. Contact Detail
  - 2. The section 10 Guide on how to use the Act
  - 3. Types of Records
    - (a) Records available in terms of any other legislation
    - (b) Records available without requesting access in terms of Act
    - (c) Records available on request
  - 4. Processing of Personal Information
  - 5. Procedure to Request Access to Information
  - 6. Availability of the Manual
  - 7. Your Right of Access to Information
  - 8. Our Right to Refuse Access to Information

## A. INTRODUCTION OF ENTITIES

Coronation Fund Managers Limited is the holding company and listed on the Johannesburg Stock Exchange.

Coronation Asset Management (Proprietary) Limited and Coronation Investment Management International (Pty) Ltd are approved as authorised services providers by the Financial Services Board ("FSB"). Coronation Management Company (RF) (Pty) Limited is a collective investment management company approved by the Financial Services Board.

Coronation Life Assurance Company Limited is registered in terms of section 9(2)(b) of the Long-Term Insurance Act, 52 of 1998 to carry on the business of long term insurance.

The Legal and Global Risk and Compliance Department will attend to all matters relating to this Act.

## B. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

This Manual has been compiled in accordance with the Promotion of Access to Information Act 2 of 2000 ("the Act") and applies to all the identified Entities.

### 1. CONTACT DETAILS

Coronation Fund Managers Limited will deal with all deal requests relating to any of the Entities. All requests of this Manual should be directed to:

The Compliance Officer  
PO Box 44684  
Claremont  
7735

7<sup>th</sup> Floor, MontClare Place  
Cnr of Campground and Main Roads  
Claremont  
7708

Telephone: +27 21 680-2000  
Fax: +27 21 680-2100  
Email address: Mbarratt@coronation.co.za

### 2. THE GUIDE AS DESCRIBED IN SECTION 10

The Guide will be available from the South African Human Rights Commission ("SAHRC"), and provides greater clarity on or assistance with the Act. It will, *inter alia*, include the following:

- What the objects of this Act are;
- The relevant contact details of each public and private body (if available);
- The process that needs to be followed in order to request access to records;
- The assistance available from the information officer of a public body and the SAHRC;
- How to obtain access to a manual of a public and private body;
- All the remedies available in law to you;
- Details on prescribed fees payable in respect of requests for information.

The guide has been compiled in each official language and contains such information, in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.

Please direct any queries to:

**The South African Human Rights Commission:**

PAIA Unit

The Research and Documentation Department

Physical address: Forum 3, Braampark Office Park, 33 Hoofd Street, Braamfontein

Postal address: Private Bag 2700

Houghton

2041

Telephone: +27 11 877 3803

Fax: +27 11 403 0625

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

### **3. TYPES OF RECORDS AVAILABLE**

#### **1) Records Available in Terms of any Other Legislation**

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

Legislation includes the following:

1. Consumer Protection Act, 68 of 2008
2. Companies Act, 71 of 2008
3. Income Tax Act, 58 of 1962
4. Protection of Personal Information Act, 4 of 2013
5. Basic Conditions of Employment Act, 75 of 1997
6. Occupational Health and Safety Act, 85 of 1993
7. Employment Equity Act, 55 of 1998
8. Compensation for Occupational Injuries and Diseases Act, 130 of 1993
9. Unemployment Insurance Act, 30 of 1966
10. Customs and Excise Act, 91 of 1964
11. Value Added Tax Act, 89 of 1991
12. Copyright Act, 98 of 1978
13. Electronic Communications and Transactions Act, 25 of 2002
14. Trade Marks Act, 194 of 1993
15. Financial Intelligence Centre Act
16. Financial Advisory and Intermediaries Services Act
17. Collective Investment Schemes Control Act
18. Foreign Account Tax Compliance Act

#### **2) Records Available without Requesting Access in Terms of the Act**

A private body 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 so submitted by way of a notice in the Gazette.

The Entities listed in this manual have not submitted any such description to the Minister for publication in the Gazette, however certain records are however freely available on the internet at [www.coronation.co.za](http://www.coronation.co.za)

#### **3) Records Available on Request**

Set out below are the subjects and categories of records that are available for the purposes of the Act, subject to grounds for refusal to the access thereof.

Records are maintained on the following subjects:

- Personnel records
- Client related records
- Private body records
- Records in the possession of or pertaining to other parties

**a) Personnel records**

“*Personnel*” refers to any person who works for, or provides services to or on behalf of the Entities, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.

Personal records include the following:

- Personal records provided to the private body by their personnel;
- Records provided by a third party to the private body relating to their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records and other internal records;
- Correspondence relating to personnel;

**b) Client related records**

A “*client*” refers to any natural or juristic entity that receives services from the private body.

Client records include the following:

- Records provided by the client to a third party acting for or on behalf of the private body;
- Records provided by a third party to the private body;
- Records generated by or within the private body pertaining to the client including transactional records.

**c) Records of Coronation Fund Managers Limited and other listed Entities**

These records include, but are not limited to, the records which pertain to the various Entities’ own affairs:

- Financial records;
- Operational records;
- Databases;
- Information Technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal Policies and Procedures;
- Treasury related records;
- Securities and Equities; and
- Records held by officials of the private body.

Other Party records include the following:

- Personnel, client or private body records which are held by another party, as opposed to the records held by the private body; and

- Records held by the private body 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 the contractors and suppliers.

#### 4. PROCESSING OF PERSONAL INFORMATION

##### a) Purpose of Processing

The Entities use the Personal Information under their care in the following ways:  
 Rendering service according to instructions given by clients  
 Staff administration  
 Keeping of accounts and records  
 Complying with tax laws  
 Administration of pension and other investment funds

##### b) Description of Categories of Data Subjects and of the Personal Information relating thereto

Coronation Fund Managers Limited (and/or the other listed Entities) may possess records pertaining to contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers, staff and clients.

Data Subjects	Type of Personal Information Processed
Clients - Legal Entities	Full names of contact persons; Name of Legal Entity; Physical and Postal address and contact details of the client; Financial information; Registration Number; Founding documents; Tax related information; VAT number;
Clients: Natural Persons	Full names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; correspondence of a private/confidential nature;
Clients: Foreign Passports	Full names; contact details; physical and postal addresses; date of birth; Passport number Tax related information; nationality; gender; correspondence of a private/confidential nature;
Clients: Pension Funds	Full name of the fund; Certificate of Registration; Identity documents of Trustees; Registration number of the Pension Fund; Tax related information; Physical and Postal addresses;
Client: Trusts	Full legal name; Registration Number; Physical and Postal Addresses; Contact details; List of authorised signatories; Financial information; Tax related information; documentation required i.t.o. FICA
Executors	Letters of Executorship; Physical and Postal Addresses, Contact details, Identity number
Intermediary	Registered name of business; Registration number; Income Tax number; VAT number; FSP License number; Physical and Postal addresses; Contact details; Website address; Business references;

	List of Representatives of the Intermediary and their full names; ID numbers, FSP License numbers; Marital status;
Service Providers	Full name and Registration number of the entity; Physical and Postal addresses; Contact Details; Financial Information; VAT number;
Employee	Gender, Pregnancy; Marital Status; Colour, Age, Language, Education information; Financial Information; Employment History; ID number; Physical and Postal address; Contact details; Opinions, Criminal behaviour; Well-being;

**c) The Recipients or Categories of Recipients to Whom the Personal Information may be Supplied**

The Entities may supply the Personal Information under their care to service providers who render the following services to the Entities:

- Capturing and organising of data;
- Storing of data;
- Conducting surveys on behalf of the Entities;
- Conduction quality assessments;
- Sending of emails and sms's to clients on behalf of the Entities;
- Conducting World Checks;
- Administrating funds on behalf of the Entities;

**d) Actual or Planned Transborder Flows of Personal Information**

The Entities supply the Personal Information of clients who invest in International Funds, to Administrators in Britain and Ireland. This Personal Information is transferred among the Entities who are in South Africa, Ireland and Britain.

**e) General Description of Information Security Measures**

The Entities employ the latest technology to ensure the confidentiality, integrity and availability of its information assets which include the Personal Information under its care. These measures include:

- Boundary firewalls and Internet gateways;
- Secure configuration of all devices and software which make up the IT infrastructure;
- Both logical and physical Access controls;
- Malware protection;
- Patch management to keep software up to date.

Service Providers who process Personal Information on behalf of the Entities are bound by agreement to implement similar and/or better information security controls than those employed by the Entities.

## **5. PROCEDURE TO REQUEST ACCESS TO INFORMATION**

If you want to obtain access to any of the records listed in this manual, you should follow the procedure as set out below.

1. Fill in the application form contained in this manual and send it to us via hand delivery, postal service, email or via fax.
2. Hand in your completed application form, and a non-refundable request fee of R50.00 + VAT at our office. If you are an employee or ex-employee requesting access to your personnel record, then you do not have to pay the request fee.
3. If you cannot visit our office in person, you can post the form and fee to us, or you can contact us to make alternative payment arrangements.

## **OUR RESPONSE**

We will consider your request and let you know our decision, in writing, not more than 30 days after we receive your request.

Our response will probably be one of the following:

1. Your application does not contain enough information to enable us to search for the record you want. Please provide additional details.
2. It is going to take us more than six hours to search through our records, and before we do so you must pay us a deposit of R60.00 (plus VAT).
3. We have found the record you're looking for, and you may have access to it, on payment of:

- an access fee of R30.00 (+ VAT) per hour for the time that it took us to find the record (less any deposit which you have already paid), and
- a reproduction fee for making photocopies or printouts or copying the record onto a stiffer disc or CD - the prescribed fees are set out in this manual

Note: we will not charge fees to an employee or ex-employee requesting access to his/her personnel record.

4. If your request is for access to your Personal Information in terms of Section 23 of the Protection of Personal Information Act, we will give you a written estimate of the fee before providing the access. We may require you to pay a deposit for all or part of the fee.
5. You may not have access to the record you want, for reasons which we will state in our reply. If you have paid a deposit, we will refund it (but not the request fee).
6. We have searched for the record and cannot find it. We will give you an affidavit explaining what steps we took to try and find the record. Should the missing record later come to light, we will notify you.
7. If we may or must refuse to give you access to part of the requested personal information, we will give you access to every other part.

## **6. AVAILABILITY OF THE MANUAL**

The manual is available for inspection at the offices of Coronation Fund Managers Limited free of charge; and copies are available with the SAHRC, in the Gazette and on the Coronation website [www.coronation.com](http://www.coronation.com).

## **YOUR RIGHT OF ACCESS TO INFORMATION**

Both the Promotion of Access to Information Act and the Protection of Personal Information Act entitle you to have access to our records, if:

- you need access to exercise or protect any of your rights, and
- you apply for access according to the procedure set out in this manual, and
- the Entities do not have grounds for refusing you access.

## **OUR RIGHT TO REFUSE ACCESS TO INFORMATION**

We have the right to refuse to give you access to our records if any of the following grounds apply:

- the record would unreasonably disclose personal information about a natural person, including a deceased individual (unless that third party or a representative of the deceased gives written permission for access);
- the record contains (a) trade secrets, or (b) financial, commercial, scientific or technical information, or (c) information about research by a third party, which could put that third party at a disadvantage in a negotiation or prejudice him in competition (unless that third party gives written permission for access);
- access would put us in breach of a duty of confidence which we owe to a third party (unless that third party gives written permission for access);
- access could reasonably be expected to (a) endanger someone's life or physical safety, or (b) prejudice or impair the security of a building, structure, system, means of transport or other property;
- the record is privileged from being produced as evidence in legal proceedings (unless the person protected by the privilege has waived that protection);
- if the request is for access to your Personal Information, and you could not provide adequate proof of identity to us.



# Promotion of Access to Information Act

## Fees Payable in respect of Private Bodies

6.1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

6.2. The fees for reproduction referred to in regulation 11(1) are as follows:

		R
(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c)	For a copy in a computer-readable form on -	
	(i) stiffer disc	7,50
	(ii) compact disc	70,00
(d)	For a transcription of visual images,	
	(i) for an A4-size page or part thereof	
		40,00
	(ii) for a copy of visual images	60,00
(e)	For a transcription of an audio record,	
	(i) for an A4-size page or part thereof	20,00
	(ii) for a copy of an audio record	30,00

6.3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

6.4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

		R
6.4.1. (a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c)	For a copy in a computer-readable form on -	
	(i) stiffer disc	7,50
	(ii) compact disc	70,00
(d)	For a transcription of visual images,	
	(i) for an A4-size page or part thereof	
		40,00
	(ii) for a copy of visual images	60,00
(e)	For a transcription of an audio record,	
	(i) for an A4-size page or part thereof	20,00
	(ii) for a copy of an audio record	30,00

- (f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
- 6.4.2. For purposes of section 54(2) of the Act, the following applies:
  - (a) Six hours as the hours to be exceeded before a deposit is payable; and
  - (b) one third of the access fee is payable as a deposit by the requester.
- 6.4.3. The actual postage is payable when a copy of a record must be posted to a requester.

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**  
 (Section 53(1) of the Promotion of Access to Information Act, 2000  
 (Act No. 2 of 2000))  
**[Regulation 10]**

**A. Particulars of private body**

The Compliance Officer  
 PO Box 44684, Claremont, 7735

Physical Address:  
 7<sup>th</sup> Floor, MontClare Place Cnr of Campground and Main Roads, Claremont, 7708

Telephone: +27 21 680-2000  
 Fax: +27 21 680-2100  
 Email address:

**B. Particulars of person requesting access to the record**

*(a) The particulars of the person who requests access to the record must be given below.*  
*(b) The address and/or fax number in the Republic to which the information is to be sent must be given.*  
*(c) Proof of the capacity in which the request is made, if applicable, must be attached.*

<i>SURNAME:</i>			
<i>FIRST NAMES:</i>			
<i>IDENTITY NUMBER:</i>			
<i>POSTAL ADDRESS:</i>			
<i>FAX NUMBER:</i>		<i>TEL NUMBER:</i>	
<i>EMAIL ADDRESS:</i>			
<i>CAPACITY IN WHICH REQUEST IS MADE, WHEN MADE ON BEHALF OF ANOTHER PERSON:</i>			

**C. Particulars of person on whose behalf request is made**

*This section must be completed ONLY if a request for information is made on behalf of another person.*

<i>SURNAME:</i>			
<i>FIRST NAMES:</i>			
<i>IDENTITY NUMBER:</i>			

**D. Particulars of record**

*(a) 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.  
(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form.  
The requester must sign all the additional folios.*

**1. Description of record or relevant part of the record:**

**2. Reference number, if available:**

**3. Any further particulars of record:**

**E. Fees**

*(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.  
(b) You will be notified of the amount required to be paid as the request fee.  
(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 for exemption from payment of fees:**

**F. Form of access to record**

*If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.*

**Disability:**

**Form in which record is required:**

Mark the appropriate box with an X.

NOTES:

(a) Compliance with your request in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

<b>1. If the record is in written or printed form:</b>					
<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record		
<b>2. If record consists of visual images</b> (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images*		
<input type="checkbox"/>		<input type="checkbox"/>	transcription of the images*		
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>					
<input type="checkbox"/>	listen to the soundtrack (audio cassette)	<input type="checkbox"/>	transcription of soundtrack* (written or printed document)		
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>					
<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record*		
<input type="checkbox"/>		<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)		
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO				

**G. Particulars of right to be exercised or protected**

*If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.*

<b>1. Indicate which right is to be exercised or protected:</b>
<b>2. Explain why the record requested is required for the exercise or protection of the aforementioned right:</b>

**H. Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

**How would you prefer to be informed of the decision regarding your request for access to the record?**

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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF REQUESTER / PERSON  
ON WHOSE BEHALF REQUEST IS MADE