

**MANUAL IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000**

Version: 4.0

Date of Compilation: 22 June 2021

THE IEMAS GROUP

("Private Body")

GUIDELINES TO ACCESSING OUR INFORMATION

Preamble

Section 51 of The Promotion of Access to Information Act 2 of 2000 ("**PAIA**") requires that the Private Body compile a manual giving information to the public regarding the procedure to be followed in requesting information from the private body for the purpose of exercising or protecting rights.

A request for information includes a request for access to a record containing personal information about the requester or the person on whose behalf the request is made as contemplated in the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

Introduction to this Private Body

The Iemas Group for purposes of this manual includes Iemas Financial Services (Co-Operative) Limited and its subsidiaries Iemas Insurance Brokers (Pty) Limited, Ibelong Rewards (Pty) Limited, Fintech Loyalty (Pty) Limited and Torque Securitisation (RF) (Pty) Limited. The nature of business conducted and other material particulars pertaining to each entity in the Iemas Group are set out in Section 1.

This manual has been compiled not only to comply with the provisions of PAIA, but also to foster a culture of transparency and accountability in our environment and to ensure that members of the public have effective access to information in our possession which will assist them in the exercise and protection of their rights. Inside this document you will be able to view the categories of information which we possess. You will also be shown the correct procedure to follow should you require access to any of this information.

SECTION 1 – DETAILS OF IEMAS GROUP

1. Iemas Financial Services (Co-Operative) Limited (“IFS”)

- 1.1. Registration number: 1996/000001/24
- 1.2. Registered address: Iemas Park South, 1249 Embankment Road, Zwartkop, Ext 7, Centurion, 0157
- 1.3. Postal address: Private Bag X 924, Pretoria, 0001
- 1.4. Telephone number: 012 674 7000
- 1.5. Fax number: 012 674 7043
- 1.6. Head: Mr. B.G Van Vollenhoven
- 1.7. Designated information officer: Mr. J. Goonahsylin
- 1.8. Designated deputy information officer: Ms. Nomtha Lusu
- 1.9. Email address of information officers: informationoffice@iemas.co.za
- 1.10. Website: <https://www.iemasfinancialservices.co.za/>
- 1.11. Nature of business: Credit provision services

2. Iemas Insurance Brokers (Pty) Limited (“IIB”)

- 2.1. Registration number: 2016/335953/07
- 2.2. Registered address: Iemas Park South, 1249 Embankment Road, Zwartkop, Ext 7, Centurion, 0157
- 2.3. Postal address: Private Bag X 924, Pretoria, 0001
- 2.4. Telephone number: 012 674 7000
- 2.5. Fax number: 012 674 7043
- 2.6. Head: Mr. P.D. Wolmarans
- 2.7. Designated information officer: Mr. P.D. Wolmarans
- 2.8. Designated deputy information officer: Mr. I. De Jongh

- 2.9. Email address of information officers: informationoffice@iemas.co.za
- 2.10. Website: <https://www.iemasinsurancebrokers.co.za>
- 2.11. Nature of business: Insurance brokerage services

3. Ibelong Rewards (Pty) Limited (“Ibelong”)

- 3.1. Registration number: 2019/290464/07
- 3.2. Registered address: Iemas Park South, 1249 Embankment Road, Zwartkop, Ext 7, Centurion, 0157
- 3.3. Postal address: Private Bag X 924, Pretoria, 0001
- 3.4. Telephone number: 012 674 7000
- 3.5. Fax number: 012 674 7043
- 3.6. Head: Mr. M.J. Fourie
- 3.7. Designated information officer: Mr. M.J. Fourie
- 3.8. Designated deputy information officer: Mr. L. Volschenk
- 3.9. Email address of information officers: informationoffice@iemas.co.za
- 3.10. Website: N/A
- 3.11. Nature of business: Purchase card services

4. Fintech Loyalty (Pty) Limited (“Fintech”)

- 4.1. Registration number: 2020/278052/07
- 4.2. Registered address: Iemas Park South, 1249 Embankment Road, Zwartkop, Ext 7, Centurion, 0157
- 4.3. Postal address: Private Bag X 924, Pretoria, 0001
- 4.4. Telephone number: 012 674 7000
- 4.5. Fax number: 012 674 7043
- 4.6. Head: Ms. S. Fourie

- 4.7. Designated information officers: Ms. S. Fourie
- 4.8. Designated deputy information officer: Mr. N. Botha
- 4.9. Email address of information officer: informationoffice@iemas.co.za
- 4.10. Website: N/A
- 4.11. Nature of business: Loyalty Rewards

5. Torque Securitisation (RF) Limited (“Torque”)

- 5.1. Registration number: 2012/030043/06
- 5.2. Registered address: Iemas Park South, 1249 Embankment Road, Zwartkop, Ext 7, Centurion, 0157
- 5.3. Postal address: Private Bag X 924, Pretoria, 0001
- 5.4. Telephone number: 012 674 7000
- 5.5. Fax number: 012 674 7043
- 5.6. Head: T. O’Connell
- 5.7. Designated information officer: Mr. T. O’Connell
- 5.8. Designated deputy information officer: Ms. S. Babulal
- 5.9. Email address of information officers: informationoffice@iemas.co.za
- 5.10. Website: N/A
- 5.11. Nature of business: Securitisation

SECTION 2 - THE OFFICIAL GUIDE

In accordance with section 10 of PAIA, the South African Human Rights Commission (SAHRC) has published a Guide containing information reasonably required by a person wishing to exercise or protect any right in terms of PAIA or POPIA. This Guide was updated and made available by the Information Regulator on its website (<https://www.justice.gov.za/inforeg>) and contains the following information:

1. Part 1 – Why access to information (this sets out the objects of PAIA);
2. Part 2 – Access to information;
3. Part 3 – How to make a request for access to information (this includes details of the fees to be paid and explains your remedies in law regarding acts, omissions, rights, and duties, including how to lodge an internal appeal and a court application);
4. Part 4 – When access to a record may be refused;
5. Part 5 – General information;
6. Part 6 – Public bodies from which you can access records.

Enquiries regarding the Guide can be addressed to the Information Regulator, the contact details of which are as follows:

Address: The Information Regulator (South Africa)
33 Hoofd Street, Forum III, 3rd Floor Braampark
P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: <https://www.justice.gov.za/inforeg>

E-mail: inforeg@justice.gov.za.

SECTION 3 - INFORMATION AVAILABLE IN TERMS OF PAIA

1. STATUTORY INFORMATION

- 1.1. Annual financial statements including annual accounts, directors' reports, auditor's reports.
- 1.2. Branch register;
- 1.3. Certificate of change of name;
- 1.4. Certificate of registration;
- 1.5. Constitution;
- 1.6. Directors' attendance register;

- 1.7. Member's attendance register;
- 1.8. Minute book and resolutions passed at board/general meetings;
- 1.9. Proxy forms;
- 1.10. Register of directors and certain managers;
- 1.11. Register of directors' and managers' interests in contracts or undertakings;
- 1.12. Register of members;
- 1.13. Register of mortgages, debentures, and fixed assets;
- 1.14. Returns relating to directors;

2. ACCOUNTING RECORDS

- 2.1. Annual financial statements;
- 2.2. Books of account including journals and ledgers;
- 2.3. Delivery notes, orders, invoices, statements, receipts, vouchers, and bills of exchange;

3. STATUTORY EMPLOYEE RECORDS

- 3.1. Arbitration awards;
- 3.2. Attendance register;
- 3.3. Collective agreements;
- 3.4. Date of birth of each employee;
- 3.5. Determinations made in terms of the wage act;
- 3.6. Employees' names and occupations;
- 3.7. Employment equity plan;
- 3.8. Expense accounts;
- 3.9. Records of foreign employees;
- 3.10. Records of strikes, lockouts, or protest action.

- 3.11. Remuneration paid to each employee;
- 3.12. Salary and wages register;
- 3.13. Staff records (after date of employment ceases);
- 3.14. Time worked by each employee;
- 3.15. Wages register;

4. *OTHER EMPLOYEE RECORDS*

- 4.1. Code of conduct;
- 4.2. Confidentiality and restraint agreements;
- 4.3. Disciplinary records;
- 4.4. Employee contracts and conditions of employment;
- 4.5. Employee correspondence;
- 4.6. Group personal accident;
- 4.7. Incentive schemes;
- 4.8. Insurance and pension scheme;
- 4.9. Internal evaluation records;
- 4.10. Loan scheme;
- 4.11. Maternity leave policy;
- 4.12. Relocation policy;
- 4.13. Staff loan schemes;
- 4.14. Study assistance schemes;

5. *CUSTOMER DETAILS*

- 5.1. Address;
- 5.2. Affordability analysis;

- 5.3. Age;
- 5.4. Appointments and mandates;
- 5.5. Contact information;
- 5.6. Credit records;
- 5.7. Current employment and history;
- 5.8. Financial information (Income / bank information);
- 5.9. Full names;
- 5.10. Gender;
- 5.11. Identification number, employee number and member number;
- 5.12. Language;
- 5.13. Marital status;
- 5.14. Next of kin and spouse;

6. *FIXED PROPERTY*

- 6.1. Asset register;
- 6.2. Building plans;
- 6.3. Leases;
- 6.4. Mortgage bonds or other encumbrances to fixed property.
- 6.5. Title deeds;

7. *MOVABLE PROPERTY*

- 7.1. Asset register;
- 7.2. Deeds of pledge.
- 7.3. Finance and lease agreements;
- 7.4. Notarial bonds;

8. AGREEMENTS AND CONTRACTS

- 8.1. Agreements with contractors, suppliers and third parties;
- 8.2. Agreements with governmental agencies;
- 8.3. Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion, or other alliance agreements;
- 8.4. Customer agreements concerning provision of products and services;
- 8.5. Purchase, lease, and sale agreements;

9. TAXATION

- 9.1. Copies of all income tax returns and other tax returns and documents;

10. LEGAL

- 10.1. Complaints, pleadings, briefs, and other documents pertaining to any actual, pending or threatened litigation, arbitration, or investigation;
- 10.2. Licences, permits and authorisations;
- 10.3. Settlement agreements;

11. INSURANCE

- 11.1. Claim records;
- 11.2. Details of insurance coverage's, limits, and insurers.
- 11.3. Insurance policies;

12. SALES AND MARKETING

- 12.1. Brochures, newsletters, pamphlets, and advertising materials;
- 12.2. Marketing elections;
- 12.3. Product lists;
- 12.4. Sales records;

SECTION 4 - INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Where applicable to our operations, information is also available in terms of certain provisions of the following statutes, as amended:

Relevant Legislation	Relevant Entity (IFS / IIB / Ibelong / Fintech / Torque)
1. Basic Conditions of Employment Act 75 of 1997	IFS / IIB / Ibelong / Fintech / Torque
2. Broad-Based Black Economic Empowerment Act 53 of 2003	IFS / IIB / Ibelong / Fintech / Torque
3. Companies Act 71 of 2008	IIB / Ibelong / Fintech / Torque
4. Compensation for Occupational Injuries and Diseases Act 130 of 1993	IFS / IIB / Ibelong / Fintech / Torque
5. Competition Act 89 of 1998	IFS / IIB / Ibelong / Fintech / Torque
6. Consumer Protection Act 68 of 2008	IFS / IIB / Ibelong / Fintech / Torque
7. Co-operatives Act (14 of 2005)	IFS
8. Debt Collectors Act 114 of 1998	IFS
9. Electronic Communications and Transactions Act 25 of 2002	IFS / IIB / Ibelong / Fintech / Torque
10. Employment Equity Act 55 of 1998	IFS / IIB / Ibelong / Fintech / Torque
11. Financial Advisory and Intermediary Service Act 37 of 2002	IIB
12. Financial Intelligence Centre Act 38 of 2001	IFS / IIB / Ibelong / Fintech / Torque
13. Financial Services Ombud Schemes Act 37 of 2004	IIB
14. Home Loan And Mortgage Disclosure Act 63 of 2000	IFS

15. Income Tax Act 58 of 1962	IFS / IIB / Ibelong / Fintech / Torque
16. Insolvency Act 24 of 1936	IFS / IIB / Ibelong / Fintech / Torque
17. Labour Relations Act 66 of 1995	IFS / IIB / Ibelong / Fintech / Torque
18. Long-term Insurance Act 52 of 1998	IIB
19. National Credit Act 34 of 2005	IFS
20. National Payment System Act 78 of 1998	IFS
21. National Road Traffic Act 93 of 1996	IFS / IIB / Ibelong / Fintech / Torque
22. Occupational Health and Safety Act 85 of 1993	IFS / IIB / Ibelong / Fintech / Torque
23. Pension Funds Act 24 of 1956	IFS / IIB / Ibelong / Fintech / Torque
24. Promotion of Access to Information Act 2 of 2000	IFS / IIB / Ibelong / Fintech / Torque
25. Promotion of Equality And Prevention Of Unfair Discrimination Act 4 of 2000	IFS / IIB / Ibelong / Fintech / Torque
26. Protected Disclosures Act 26 of 2000	IFS / IIB / Ibelong / Fintech / Torque
27. Protection of Personal Information Act 4 of 2013	IFS / IIB / Ibelong / Fintech / Torque
28. Short-term Insurance Act 53 of 1998	IIB
29. Skills Development Act 97 of 1998	IFS / IIB / Ibelong / Fintech / Torque
30. Skills Development Levies Act 9 of 1999	IFS / IIB / Ibelong / Fintech / Torque
31. Tobacco Products Control Act 83 of 1993	IFS / IIB / Ibelong / Fintech / Torque
32. Unemployment Insurance Act 63 of 2001	IFS / IIB / Ibelong / Fintech / Torque
33. Value-added Tax Act 89 of 1991	IFS / IIB / Ibelong / Fintech / Torque

SECTION 5 - PROCEDURE FOR REQUESTING ACCESS TO THE ABOVE INFORMATION

If you wish to request access to any of the above categories of information, you are required to complete a prescribed request form (FORM C – Request for Access to Record of Private Body). This form is available from:

- The relevant information officers (whose contact details are in Section 1 above);
- The Information Regulator (<https://www.justice.gov.za/infoereg>);
- The Department of Justice and Constitutional Development website (www.doj.gov.za).

There is a prescribed fee (payable in advance) for requesting and accessing information in terms of PAIA.

You may also be called upon to pay the additional fees prescribed by regulation for searching for and compiling the information which you have requested, including copying charges. It is important to note that access is not automatic – you must identify the right you are seeking to exercise or protect and explain why the record you request is required for the exercise or protection of that right. You will be notified in the manner indicated by you on the request form whether your request has been approved.

SECTION 6 - INFORMATION AUTOMATICALLY AVAILABLE

The following categories of records are automatically available for inspection, purchase, or photocopying. In other words you do not need to request this information in terms of PAIA.

Request forms for these categories of information are also available from the relevant information officer, whose contact details appear in Section 1 of this manual.

1. Newsletters;
2. Pamphlets/Brochures;
3. Advertising material.

SECTION 7 – AVAILABILITY OF THE MANUAL

1. This manual is currently available as follows:

- 1.1. On the relevant website as per Section 1 above;

- 1.2. At our principal place of business as per Section 1 above;
- 1.3. At the offices of the Information Regulator.

SECTION 8 – POPIA DISCLOSURES

1. Our purpose in processing of Personal Information:

- 1.1. In order to render credit provision-, financial-, card and related services, we will process personal information. of members, clients, debtors, creditors, business partners, contractors, contracting third parties and employees in conducting our business, which include communicating, marketing, transacting, contracting, or dealing with them, as well as making reports or disclosures about them in terms of any applicable legislation.

2. Description of the categories of data subjects and of the information or categories of information relating thereto:

- 2.1. The categories of data subjects are our members, our clients, our debtors, our creditors, our business partners, our contractors, contracting third parties and our employees.
- 2.2. The categories of information are information relating to race, gender, pregnancy, marital status, national, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, belief, culture, language, birth, education history, medical history, financial history, criminal history, employment history, identifying numbers or symbols, e-mail address, physical address, postal address, telephone number, location information, online identifiers, biometric information, personal opinions, views or preferences, correspondence sent and views or opinions of another individual or entity about the data subject.

3. The recipients or categories of recipients to whom the personal information may be supplied:

- 3.1. The categories of recipients are our business partners, our contractors, contracting third parties, our employees, credit bureaus and governmental agencies or institutions.

4. Planned trans-border flows of personal information:

- 4.1. We currently do not, neither do we plan to transfer personal information about a data subject to a third party who is in a foreign country.

5. General description allowing a preliminary assessment of the suitability of the information security measures to be implemented by us to ensure the confidentiality integrity and availability of the information which is to be processed:

5.1. We secure the integrity and confidentiality of personal information in our possession or under our control by means of appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information, and unlawful access to or processing of personal information. These measures include:

5.1.1. The implementation, execution and revisiting of a data risk management policy to identify all reasonably foreseeable internal and external risks to personal information in our possession or under our control.

5.1.2. Conducting frequent data risk security audits.

5.1.3. Using data risk security experts to ensure that safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards and deploying generally accepted information security practices.

5.1.4. Mirroring personal information off-site on servers under our control.

5.1.5. Ensuring anyone processing personal information on our behalf processes such information only with our knowledge or authorisation and that they are obliged to treat personal information which comes to their knowledge as confidential and not to disclose it.
