

MANUAL of MORTGAGEME (PTY) LTD, registration number 2019/042897/07 (“the Company”).

PURPOSE

The purpose of this document is to serve as the Manual of the Company as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

1. CONTACT PERSON AND ADDRESS DETAILS OF THE COMPANY

The Managing Director of the Company has duly authorised the contact person below to ensure that the Act is complied with:

Contact person:	Kevin Halkerd Information Officer
Postal address:	Postnet Suite 104 Private Bag X11 Birnam Park 2015 Johannesburg South Africa
Street address:	55 Sixth Road Hyde Park Johannesburg Gauteng South Africa
Telephone number:	+27 860 340 000
Email:	informationofficer@e4.co.za
Web address:	www.mortgageme.co.za , and any other web pages under the control of the Company (and which may be linked by hyperlink to the home page or each other).

2. GUIDE ON HOW TO USE THE ACT

The South African Human Rights Commission has compiled a guide, in terms of section 10 of the Act, containing such information as may reasonable be required by a person who wishes to exercise any right contemplated in the Act. This guide was published in the first half of 2005 and access to it, and to any amended versions thereof, can be found on the website of the South African Human Rights Commission at www.sahrc.org.za.

Please direct any queries to:

	The South African Human Rights Commission:
	PAIA Unit
	The Research and Documentation Department
Postal address:	Private Bag 2700
	Houghton 2041
Telephone:	+27 (0)11 877 3600 (switchboard)
Website:	www.sahrc.org.za
e-mail address (general):	info@sahrc.org.za
e-mail address (complaints):	complaints@sahrc.org.za

3. CATEGORIES OF RECORDS AVAILABLE

The following categories of records are automatically available without a person having to request access in terms of this Act:

- Statutory records – all companies
 - Memorandum of incorporation
 - Certificate of incorporation
 - Register of directors
 - CoR prescribed forms
- Corporate communications
 - Press releases
 - Brochures and promotional literature giving information of products and services
- Human resources
 - Employment equity returns
 - Work skills development plan
- Company Investments
 - List of subsidiary companies

- Employee benefits
 - Discovery Health Medical Aid
 - Liberty Life Provident Fund

The above are separate entities and, as such, information pertaining to these entities must be requested directly from them.
- Auditors
 - The Company's auditors are Deloitte , 5 Magwa Cres, Waterval City, Midrand, 2066, Johannesburg.
- Information available on the Company's website(s).

4. RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION

Records are available in accordance with current South African legislation, to the extent that the relevant statute makes disclosure of records compulsory; For example:

- Protection of Personal Information Act No.4 of 2013
- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
- Copyright Act No. 98 of 1978
- Employment Equity Act No. 55 of 1998
- Income Tax Act No. 95 of 1967
- Insolvency Act No. 24 of 1936
- Labour Relations Act No. 66 of 1995
- Occupational Health & Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Trade Marks Act No. 194 of 1993
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

5. DETAIL TO FACILITATE A REQUEST FOR ACCESS TO RECORDS

[as required in terms of section 51(1)(e)]

In order to facilitate a request for access to a record, the Company has in its possession the following categories of records on the subject matters referred to hereunder:

<u>Category</u>	<u>Records</u>
<u>Administration:</u>	<ul style="list-style-type: none">• Operating licenses• Minutes of meetings of the boards of directors• Minutes of management meetings• Minutes of employment equity meetings• Minutes of sub-committee meetings (Risk, Audit, Remuneration)• Correspondence
<u>Human Resources:</u>	<ul style="list-style-type: none">• Employment contracts• Employment Equity Plan (if applicable)• Disciplinary records• Salary records• Disciplinary code• Leave records• Policies• Training records• Training Manuals
<u>Operations:</u>	<ul style="list-style-type: none">• Client records• Production records• Legal agreements and commercial contracts
<u>Finance:</u>	<ul style="list-style-type: none">• Bank and other reconciliations• Budget• Financial statements• Management accounts• Accounting records• Annual financial statements• Invoices• Payment files• Delivery notes• Receipt books• Statutory returns

Certain of the above-mentioned records are of a confidential nature and only accessible to authorised persons.

6. ACCESS TO RECORDS

Records held by the Company may be accessed on request only once the requirements for request for access have been met. A requester means: (i) any person making a request to access the record of that body; or a person acting on behalf of the person referred to in subparagraph (i).

The Act distinguishes between two types of requesters, however this Manual includes a third type of a requester:

(a) Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information. Subject to the provisions of the Act and applicable law, the Company will provide the requested information, or give access to any record regarding the requested personal information. The prescribed fee for reproduction of the information requested will be charged as prescribed in the Act.

(b) Other Requester

This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, the Company is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act and any other applicable law. The prescribed fee for reproduction of the information requested will be charged.

7. PROCEDURE FOR REQUESTING ACCESS TO INFORMATION

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. To request information, either of attached Form A, B or C must be completed and sent to the Information Officer of the Company at the postal or physical address, or electronic mail address stated above. The record requested will be furnished on payment of the prescribed fee, in instances where request for information fees are levied, and a proof of deposit may be requested from the requester in respect of the access fee. The prescribed form must be filled in with enough particularity to at least enable the Information Officer to identify:

- The record or records requested;
- The identity of the requester;
- What form of access is required; and
- The postal, electronic mail address or fax number of the requester.

A requester must state that he or she requires the information in order to exercise or protect the right, and clearly state what the nature of the right to be exercised or protected is. The requester must also provide an explanation as to why the requested record is required to exercise or protect that right.

The Company will process a request within the required time as prescribed in the Act, unless the requestor has stated special reasons which would satisfy the Information Officer that circumstances dictate that this time period not be complied with.

The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires reasons for the decision in any other manner, he or she must state in writing the manner and the particulars required.

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

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer and/or should a requester require the assistance of the Information Officer Deputy in obtaining any record held by the Company, such assistance will be provided by the Information Officer.

Upon receipt of the request, where applicable, the Information Officer will inform any third party affected by the request within 21 days of receipt of the request. The third party must inform the Information Officer why such information should not be made available to the requester within a specified period of time.

8. DECISION

The Company shall, within 30 days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The 30-day period within which the Company must decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company (other than the Head Office) and the information cannot reasonably be obtained within the original 30-day period. The Information Officer will notify the requester in writing should an extension be necessary.

9. FEES

The Act provides for two types of fees:

- a request fee, which will be a standard fee, and
- an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs where applicable.

When a request is received by the Information Officer, the Information Officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any), before further processing of the request. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion (being not more than one third) of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the requester has paid the fee or fees as indicated. 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 in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the requested form. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer will repay the deposit to the requester.

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing

Subject to all applicable law, the Company uses the Personal Information under its care in the following ways:

- Responding to client/prospective client enquiries;
- Sending quotes for products and/or services;
- Processing applications for products and/or services;
- Verifying client/prospective client identities;
- Providing clients with products and/or services;
- Improving the Company's products and/or services by analysing it for trends;
- Inviting clients/prospective clients to attend events held by the Company;
- Sending clients/prospective clients updates on the latest developments regarding the Company's products and/or services, and
- Sending clients/prospective clients marketing material (including electronic communications) relating to other products and/or services they might be interested in.
- Managing a database of clients/prospective clients;
- Staff administration;
- Keeping of accounts and records;
- Complying with tax laws and other applicable laws; and
- Any other relevant purpose in terms of any applicable law, code or standard.

10.2 Categories of Data Subjects and their Personal Information

Subject to all applicable law, the Company may possess or possesses records relating to clients, suppliers, employees, board and committee members, contractors, service providers, and members of the public:

<u>Data Subject Category</u>	<u>Personal Information Processed</u>
<u>Natural Persons:</u>	Names; contact details; physical and postal addresses; date of birth; ID number; Passport number; Tax related information; nationality; gender; confidential correspondence.
<u>Juristic Persons / Entities:</u>	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, ultimate beneficial owners.
<u>Contracted Service Providers:</u>	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, ultimate beneficial owners.
<u>Employees, Board and Committee Members:</u>	Members Gender; Marital Status; Ethnicity; Age; Home Language, Education information; Financial Information; Employment History; ID number; Physical and Postal address; Contact details; Opinions, Criminal behaviour; Well-being.

9.3 Categories of Recipients for Processing the Personal Information

The Company may supply the Personal Information to service providers who render the following services:

- Capturing and organising of data;
- Storing of data;
- Sending of emails and other correspondence to stakeholders;
- Conducting due diligence checks;
- Assistance in product/service delivery;
- Administration Assistance.

9.4 Actual or Planned Trans-Border Flows of Personal Information

The Company does from time to time have foreign-based clients. The Company also from time to time uses foreign-based service providers to provide its products and/or services. The Company may also be required to share personal information with foreign-based regulators on an *ad hoc* basis.

9.5 General Description of Information Security Measures

The Company employs up to date technology to ensure the confidentiality, integrity and availability of the personal information under its care. These measures include:

- Firewalls;
- Virus protection software and update protocols;
- Secure access control;
- Secure setup of hardware and software making up the IT infrastructure;
- Outsourced service providers who process personal information on behalf of the Company are contracted and audited to implement security controls;
- Confidentiality and non-disclosure agreements

10. GROUNDS FOR REFUSAL

The Information Officer may refuse a request for information for the following reasons:

- (a) Where the disclosure would amount to an unreasonable disclosure of personal information;
- (b) Where the disclosure would amount to disclosure of the trade secrets of a third party;
- (c) Where the disclosure would lead to a revelation of financial, commercial, scientific or technical information of a third party;
- (d) Where such information was supplied in confidence by a third party;
- (e) Where the disclosure would breach the duty of confidence owed to a third party;
- (f) Where the disclosure would endanger the life or physical safety of an individual;
- (g) If the disclosure is prohibited under any applicable law;
- (h) If the disclosure is privileged under legal proceedings or research conducted by or on behalf of a third party; and
- (i) Where the disclosure would compromise the investigation where proceedings are pending.

The following grounds of discretionary refusal will apply:

- (j) Where the disclosure of such information relating to a third party would prejudice the supply of similar information in the future;
- (k) Where the record contains information around crime prevention, detection and prosecution of alleged offenders;
- (l) Where the disclosure would unreasonably reveal consultative material obtained on account of deliberations over formulation of policy, exercise of power or performance of a duty; and
- (m) Where the request is frivolous or vexatious.

11. REMEDIES AVAILABLE IF REQUEST FOR INFORMATION IS REFUSED

11.1 Internal Remedies

The Company does not have an internal appeal procedure. As such, the decision made by the Information Officer is final, and requestors shall have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the Information Officer.

11.2 External Remedies

A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 180 days of notification of the decision, apply to a court for relief. Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 180 days of notification of the decision, apply to a court for relief. For purposes of the Act, a court application must be lodged with a High Court or another court having jurisdiction.

12. AVAILABILITY OF THE MANUAL

The Company's manual is available for inspection, on reasonable prior notice, free of charge, at the registered address stated above and further published on the Company's website. Further copies are also available from the South African Human Rights Commission as provided in the Act.

FORM A

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, No. 2 of 2000)

[Regulation 4]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

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

Full names and surname: _____

Identity number _____

Postal address: _____

Fax number: _____

Telephone number: _____

Email address: _____

Capacity in which request is made, when made on behalf of other person:

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.

Full names and surname: _____

Identity number _____

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 of 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 therefor.

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) Your indication as to the required form of access depends 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.

If the record is in written or printed form –

	copy of record*		inspection of record
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If record consists of visual images –

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)

	view the images		copy the images*		transcription of the images*
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If the record consists of recorded words or information which can be reproduced in sound –

	Listen to the soundtrack (audio file)		transcription of soundtrack* (written or printed document)
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If record is held on computer or in an electronic or machine-readable form–

	printed copy of record*		printed copy of information derived from the record*		copy in computer-readable form*
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*If you requested a copy of transcription of a record (above), do you wish the copy or transcription to be posted to you?

A postal fee is payable.

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.

1. Indicate which right is to be exercised or protected: _____

2. Explain why the requested record is required for the exercising or protection of the aforementioned right: _____

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 thereof 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?

SIGNATURE OF REQUESTER/PERSON ON WHOSE BEHALF THE REQUEST IS MADE:

_____ *[signature]*
_____ *[signatory name]*
_____ *[signatory capacity]*
_____ *[date of signature]*
_____ *[place signature]*

FORM B

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destroying or deletion of a Record of Personal Information about the Data Subject which is in possession or under the control of the Responsible Party and who is no longer authorised to retain the Record of information.

A. DETAILS OF THE DATA SUBJECT	
<i>Name(s) and surname / registered name of Data Subject:</i>	
<i>Unique identifier / identity number / registration number:</i>	
<i>Residential, postal or business address:</i>	
<i>Contact number(s):</i>	
<i>Fax number / E-mail address:</i>	
B. DETAILS OF RESPONSIBLE PARTY	
<i>Name(s) and surname / registered name of Responsible Party:</i>	
<i>Residential, postal or business address:</i>	
<i>Contact number(s):</i>	
<i>Fax number / E-mail address:</i>	

FORM C

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR
DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destroying or deletion of a Record of Personal Information about the Data Subject which is in possession or under the control of the Responsible Party and who is no longer authorised to retain the Record of information.

A. DETAILS OF THE DATA SUBJECT	
<i>Name(s) and surname / registered name of Data Subject:</i>	
<i>Unique identifier / identity number / registration number:</i>	
<i>Residential, postal or business address:</i>	
<i>Contact number(s):</i>	
<i>Fax number / E-mail address:</i>	
B. DETAILS OF RESPONSIBLE PARTY	
<i>Name(s) and surname / registered name of Responsible Party:</i>	
<i>Residential, postal or business address:</i>	
<i>Contact number(s):</i>	
<i>Fax number / E-mail address:</i>	



**PROMOTION OF ACCESS TO INFORMATION
ACT (ACT No. 2 of 2000)**

[version 01-07-2021]

Signature of Data Subject/ designated Person

_____ [signature]

_____ [signatory name]

_____ [date of signature]

_____ [place signature]