

PHUMULA

RETIREMENT FUND

Registration Number: 12/8/390

PROMOTION OF ACCESS TO INFORMATION MANUAL

**PREPARED IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION ACT,
NO. 2 OF 2000 (AS AMENDED)**

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1. Some useful words to know

The Act	- means the Pension Funds Act, No. 24 of 1956
The Board	- means the group of persons appointed or elected as board members in terms of the Rules of the Fund and the Act
FSCA	- means the Financial Sector Conduct Authority which is a public body that regulates and supervises retirement funds such as the Fund
The Fund	<ul style="list-style-type: none"> - means the Phumula Retirement Fund as named on the first page of this Manual and introduced in Clause 2 - is also referred to as “we” or “us” in this Manual
Information Officer	<ul style="list-style-type: none"> - means the head of the Fund. The Principal Officer, as the head of the Fund, may delegate this role to someone else. The Information Officer is the person who will handle your PAIA and POPIA requests
Information Regulator	- means the public body that enforces compliance with PAIA and POPIA
Manual	- means this Promotion of Access to Information Manual
PAIA	- means the Promotion of Access to Information Act, No. 2 of 2000
Personal Information	- means any information about a living human being or an existing company, close corporation, or other juristic person, provided that the human being or juristic person are capable of being identified. It includes both public and private information. It includes Special Personal Information. It excludes purely statistical information and de-identified information.
POPIA	- means the Protection of Personal Information Act, No. 4 of 2013, which legislation protects certain persons’ Personal Information

Record - means any recorded information of all forms (including written, electronic, labelled, illustrative, or visual records) that the Fund possesses or controls, whether or not the Fund created them or when they came into existence

Rules of the Fund - means the rules and amendments to the Rules of the Fund, as registered by the FSCA

Special Personal Information - means specific types of special/sensitive Personal Information which are set out in POPIA with general and special processing grounds. Special Personal Information is Personal Information about religious or philosophical beliefs, race or ethnicity, trade union membership or political persuasion, health or sex life relationship status, biometric information and criminal behaviour

You or your - means the requestor of information

2. Introducing the Fund

The Phumula Retirement Fund, previously known as the Johannesburg Municipal Pension Fund, is a defined benefit pension fund registered in terms of the Act.

The Fund provides a retirement savings vehicle for members and ultimately pays benefits to members, and their dependants, when they withdraw, die or retire.

The Fund and the City of Johannesburg Pension Fund ('CJPF') were both previously linked to the same participating employer. However, the Fund closed to new entrants and future service accrual, effective 1 October 2008, and no longer has a participating employer.

The above relationship has resulted in Fund members being dual members of the Fund and the CJPF. The Fund therefore has historical information, and receives ongoing information, from the CJPF and from the employer through the CJPF.

The Fund is a private body under PAIA and a responsible party for many of its activities under POPIA.

The Fund is governed by a Board consisting of 12 (twelve) Trustees and up to 12 (twelve) Alternates, and 2 (two) Independent Trustees.

The Board is elected, and appointed, as per the Rules of the Fund and therefore changes. The current Board is as follows:

Trustees	
In-service member representatives	In-service member alternate representatives
Ms J Eagle, EM, RA	Ms R Perreira
Mr E Livesey, EM	Vacant
Mr R Mathlo, RA	Mr M Phoko
Pensioner representatives	Pensioner alternate representatives
Mr P Brockmann, EA	Vacant
Mr L de Bruyn, EM, RM	Vacant
Ms F Feig, EM, RM	Mr R Nay
Ms J Laas	Vacant
Mr P Louwrens, EA, RA	Mr T Efthymiades
Mr G Luden (Principal Officer)	Vacant
Ms E Ndaba	Ms G Moletsane
Mr D Venter, EA	Vacant
Ms C Wiltshire	Mr G Shenker, EA
Independent Trustees	
Mr C Bösenberg, EM, RM	N/A
Ms E van Coller, EA, RA	N/A

3. Contact details of the Fund and its administrator

You can contact the Fund, or its administrator, to make your request using the contact details below.

Information Officer - **Principal Officer**
Mr Graham Luden

Email address - grahaml@phumulafund.co.za

Contact number - 011 511 9540

Address	- Physical address	Postal address
	(Registered address)	PO Box 2611
	Second Floor, North Wing	Johannesburg
	Oakhurst Office Park	2001
	11-13 St. Andrews Road	
	Parktown	
	2193	

Fund administrator**Alexander Forbes Financial Services (Pty) Ltd**

Email address	-	Deferred members zzPhumulaRetirementFund@alexforbes.com	Pensioners PensionerQueries@alexforbes.com
Contact number	-	Deferred members 0860 100 333	Pensioners 0860 333 225
Address	-	115 West Street Sandown Sandton 2196	

4. The aim of the Promotion of Access to Information Act

The aim of PAIA is to give effect to the constitutional right of access to information held by any private or public body that is required for the exercise or protection of your rights.

PAIA therefore provides you with the right of access to information held by public and private bodies when you request such information in accordance with the provisions of PAIA, for the exercise or protection of any of your or another person's rights.

If you make such a request, a public or private body must release the information unless PAIA or any other relevant law states that the records containing such information may not be released.

5. The Promotion of Access to Information Act and this Manual

The purpose of this Manual is to give effect to the constitutional right of access to information and the protection of your Personal Information to allow you to exercise or protect your rights or another person's rights.

Please note that your rights to access information from the Fund may differ if you are a member or a third party.

The Fund respects members and third parties' rights to access information from the Fund and wants to ensure that persons, especially members and their beneficiaries, are aware of how they can make requests to the Fund, the purposes that the Fund processes information and what records the Fund possesses and processes. In addition, it is important for persons to know what records the Fund holds, about whom, and who these records are available to and whether they are available with or without a formal PAIA request being required.

This Manual is the Fund's Section 51 Manual effective 1 January 2022 and will be made available as prescribed in addition to the standard Guide issued by the Information Regulator.

This Manual will be reviewed from time to time.

6. A Guide about the Promotion of Access to Information Act

The process of submitting a PAIA request can be quite daunting. The Information Regulator has therefore prepared a Guide, available in all eleven official languages and Braille, to assist you in understanding your rights to information in terms of PAIA.

The Guide is also helpful and can assist you in making your request and understanding PAIA. The Guide will help you with what assistance you can get from us, the Information Regulator, the format of your request, the fees that are payable and the legal remedies available to you (including lodging a complaint with the Information Regulator or applying to court).

Copies of the Guide, in all eleven official languages, are available at our registered offices during working hours, the Fund's website or the Fund's Information Officer.

In addition, the Guide is available at the offices of the Information Regulator or on its website.

The Information Regulator can be contacted as follows:

Information Regulator

- Email address - General emails:
enquiries@inforegulator.org.za
- Complaints:
PAIAComplaints@inforegulator.org.za
POPIAComplaints@inforegulator.org.za
- Contact number - 010 023 5200

Information Regulator

- | | | |
|---------|------------------------------|----------------|
| Address | - Physical address | Postal address |
| | JD House, 27 Stiemens Street | P.O. Box 31533 |
| | Braamfontein | Braamfontein |
| | Johannesburg | Johannesburg |
| | 2001 | 2017 |
- Website - <https://inforegulator.org.za>

7. Other relevant documents

The Fund has a Data Protection Policy and Privacy Notice which are available for free in electronic format from the Fund's Information Officer.

These documents are also available on the Fund's website www.phumulafund.co.za.

8. In terms of what legislation does the Fund hold records?

The Fund is subject to many different laws (as amended and/or replaced). We have set out some of the key laws currently applicable to the Fund. This list is therefore not intended to be exhaustive.

Law	Rights to information and obligations for the Fund
Basic Conditions of Employment Act, No. 75 of 1997	
Broad-Based Black Economic Empowerment Act, No. 53 of 2003 and the Financial Sector Charter	Rights to Information about transformation plans and statistics
Constitution of the Republic of South Africa 108 of 1996	General access to information
Divorce Act, No. 70 of 1979 and Maintenance Act, No. 99 of 1998	May require the Fund to provide information about a member's pension interest or Fund Credit to court officials, non-member spouses or family members (and their legal representatives)
Financial Advisory and Intermediary Services Act, No. 37 of 2002	Insofar as this act, and the codes issued under this act, apply to the Fund, this law creates certain rights to information to customers of the Fund and Regulators of the Fund
Financial Institutions (Protection of Funds) Act, No. 28 of 2001	Regulator's rights to information about investments. For example, for enforcement purposes
Financial Intelligence Centre Act, No. 38 of 2001	Rights to information by the Financial Intelligence Centre to protect against money laundering and other financial crimes

Law	Rights/obligations created
Financial Sector Regulation Act, No. 9 of 2017	Rights of Regulators, Ombuds and the Financial Services Tribunal to access information from the Fund. For example, in relation to licensing, supervision, transformation, registers, on-site inspections, investigations and enforcement actions. Standards issued under this act may also require provision of information. Disclosure requirements prescribed by the FSCA. Information to be made available to the FSCA by the Fund or its liquidator on registration and deregistration and for purposes of supervision, investigation, inspection, oversight of the Board and other Fund officials, dissolution, or liquidation of the Fund and enforcement. Information prescribed by the FSCA to be made available to stakeholders of the Fund.
Income Tax Act, No. 58 of 1962	Rights of the South African Revenue Service to information from the Fund, its members and beneficiaries. For example, when the Fund is paying benefits.
Insurance Act, No. 18 of 2017	Rights to information related to any insured benefits by the insured (the Fund)
Labour Relations Act, No. 66 of 1995	
Maintenance Act, No. 99 of 1998	
Promotion of Access to Information Act, No. 2 of 2000 and the Protection of Personal Information Act, No. 4 of 2013	Rights to this Manual and the Guide and certain information about Personal Information the Fund processes as explained in this Manual.
Pension Funds Act, No. 24 of 1956	Rights of members to access Rules, the last revenue account and balance sheet, last valuation report, Section 17 and 18 reports, complaints responses to complainants, retirement benefit counselling documentation, benefit statements and Section 14 transfer communication. Adequate and appropriate information to members and beneficiaries regarding rights, benefits and duties in terms of the Rules of the Fund.
Prevention of Organised Crime Act, No. 121 of 1998	Right to information by certain public institutions to protect against financial crimes

Law	Rights/obligations created
Promotion of Administrative Justice Act, No. 3 of 2000	Insofar as the Fund's decisions are administrative actions, this act requires written reasons to be provided for decisions.
Value Added Tax Act, No. 89 of 1991.	

The Fund is also subject to subordinate legislation, such as Conduct Standards issued by the FSCA and Joint Standards and Prudential Standards.

The above legislation may require additional procedural and substantive requirements for accessing information.

9. Information that is automatically available

We can provide you with the following information without you making a formal PAIA request.

Category of records automatically available Section 52(1)(a) of PAIA	Manner of access to Records Section 52(1)(b) of PAIA
For inspection in terms of Section 52(1)(a)(i)	
Available to all members, beneficiaries and the Information Regulator a) Rules and amendments b) Fund registration and approval documents c) Investment Policy Statement d) Fund Code of Conduct e) Communication Policy f) Complaints Policy g) Data Protection Policy h) Benefit counselling documents i) Fund general member communications.	For inspection Contact the Information Officer Several of the records are also available on the Fund's website.
For purchasing in terms of Section 52(1)(a)(ii) of PAIA: Not applicable	
For copying in terms of Section 52(1)(a)(ii) of PAIA: Not applicable	
Available free of charge in terms of Section 52(1)(a)(iii) of PAIA	
Available to each member a) Your most recent benefit statement and projection statement b) Your Fund records c) A progress update on your claim.	Electronically by email Contact the Fund's administrator

Available free of charge in terms of Section 52(1)(a)(iii) of PAIA	
Available to all members and beneficiaries	Electronically by email
<ul style="list-style-type: none"> a) Rules and amendments b) Fund registration and approval documents c) Fund's latest Annual Financial Statements d) Fund's latest Statutory Actuarial Valuation e) Investment Policy Statement f) Fund Code of Conduct g) Communication Policy h) Complaints Policy i) Data Protection Policy j) Fund general member communications k) Other Fund policies adopted from time to time. 	<p>Contact the Information Officer</p> <p>Several of the records are also available on the Fund's website.</p> <p>a, b, c and d are available from the FSCA, in terms of Section 22 of the Act, to any person upon payment of the prescribed fees.</p>

10. What records are held by the Fund which must be formally requested before the information is supplied?

<ul style="list-style-type: none"> • Minutes of Board meetings and resolutions • Board agenda packs • Tender documentation • Fund indemnity policies • Unclaimed benefits information • Records of the operations of the Fund • Communication to specific members • Member and beneficiaries' Personal Information, including health information • Spouses, ex-spouses, partners and family members (including children) of members Personal Information • Fund service provider agreements and investment mandates • Information about service providers • Correspondence and returns to regulatory authorities 	<ul style="list-style-type: none"> • Correspondence with the South African Revenue Service • Reports to the South African Reserve Bank • Board and other Fund official's Personal Information, including FICA documents • Board election forms and outcomes • Death benefit investigations • Nomination of beneficiary forms and beneficiary information in respect of deceased members • Section 14 transfer and recognition of transfer documentation • Claims forms and information including bank accounts and tax information • Divorce and maintenance orders • Complaints and complaints management • Housing loans related to members • Legal opinions and litigation • Fees and expenses.
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11. What procedure should you follow to obtain information or records from the Fund that require a formal request?

To request information from the Fund, you must please do both of the following:

Use the prescribed Form 2 that is available on the Information Regulator's website and at the end of this Manual (Annexure A).

The request must be made to the Fund's Information Officer.

If you are unable to read or write you may make a verbal request to the Fund's Information Officer.

When completing your PAIA form you must please:

Provide sufficient detail on your request form to enable us to identify your record and the requestor (you, if you are the requestor)

Indicate which form of access is required e.g. inspection, electronic or hard copy

Indicate if there is a particular manner (way) to be used to inform the requestor (e.g. email or post) and state the particulars needed to be informed this way (e.g. email address)

Identify the right that the requestor is seeking to exercise or protect

Give an explanation of why the requested record is required for the exercise or protection of that right

If the request is being made on behalf of someone else - give proof of the capacity of the requestor (we will need to be satisfied of this)

Note: If you do not use the prescribed form or do not complete it properly, your request may be rejected, refused (if sufficient information is not provided) or delayed.

All PAIA requests that we receive are evaluated and carefully considered in accordance with PAIA. Sometimes we may have to refuse your request and sometimes we are required to refuse your request. For example, the Fund must protect someone else's privacy (including a deceased person), someone else's confidential information, the safety of persons and property and records that are privileged in legal proceedings.

12. How long will it take to make a decision about your request?

We will, within 30 (thirty) days of receipt of your request, decide whether to grant or refuse the request and give notice with reasons (if required) to that effect. Please see Annexure B (Form 3).

The 30 (thirty) day period which we have to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large amount of information, or the request requires a search for information held at another office of the Fund and the information cannot reasonably be obtained within the original 30 (thirty) day period. We will notify you in writing if we require an extension.

13. Remedies available to you when the Fund refuses a request

13.1 Internal Remedies

If the Information Officer refuses your request, or you are not satisfied with his answer, please refer to the Fund's Complaints Policy. Please note that the external remedies available in the Complaints Policy may not apply in all circumstances.

Alternatively, you can exercise other external remedies at your disposal. Please see the Guide for more information.

13.2 External Remedies

If you are not satisfied by a decision made by the Fund, for example for refusing access, for imposing access fees, or for extending the time period in which the response is due, you may apply to court for relief within 180 days of receiving the decision. The decision of the Fund will be reviewed by a court and a decision will be made by the court as to whether or not to provide access to the requested records. Please see the Guide for more information about fees.

14. Fees

Generally, fees need to be paid both for making a request and to cover the cost of providing access to records in terms of a request. There are, however, some exceptions.

If the requestor is granted access to the records they requested and they are not exempted from paying any fees, the Fund can charge the prescribed fees. The Fund may also decide not to charge fees.

Please see the Guide for further information about fees.

Protection of Personal Information

15. How do you request your Personal Information under the Protection of Personal Information Act?

Requests for Personal Information under POPIA must be made in accordance with the provisions of PAIA as set out in this Manual. The current request form is attached at the end of this Manual.

16. Your rights under the Protection of Personal Information Act

To request confirmation of whether we hold Personal Information about you and a description or record of it

To request information about which third parties have access to your Personal Information

To request us to correct or delete your Personal Information if it is inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained

To request us to delete or destroy your information if we are no longer authorised to keep it

To object to us processing your Personal Information

17. The Fund processes Personal Information to perform high level activities

The Fund processes Personal Information to perform the following high level activities:

- 17.1 Trustees, other Fund officials, including the Principal Officer, and Fund employees – appointment, election, ongoing fit and proper requirements, evaluation and removal
- 17.2 General – Many activities performed by the Board related to the Fund’s operations and investments. This will include Fund information and membership data
- 17.3 Payment of benefits to a member leaving the Fund other than on transfer, for example on withdrawal, death or retirement. This includes the payment of divorce settlements, even though this is not an exit event
- 17.4 Immunising of liabilities through the purchase and management of bonds in terms of the Fund Rules

- 17.5 Investments (Strategy, administration and management)
- 17.6 Management of fidelity insurance for the Board
- 17.7 Member communication, including the use of communication channels such as the Fund's website, including retirement counselling, production and distribution of benefit statements and benefit projection statements provided to members and previous members
- 17.8 Lump sum death benefits, payable by the Fund under Section 37C of the Act, including investigations, allocations and payment decisions
- 17.9 Payment of pensions
- 17.10 Nomination of beneficiaries by member
- 17.11 Actuarial and valuation activities, including reporting
- 16.1 Financial statements and prescribed reporting
- 17.12 Requests for information and complaints
- 17.13 Establishing, registration, termination, liquidation of the Fund and transfers in and out of the Fund and surplus apportionments
- 17.14 Appointment, contracting and termination of service providers, appointees, agents and ongoing monitoring and reporting of service providers
- 17.15 Meetings, Sub-Committee meetings, packs, agendas, resolutions, minutes, receiving and storage of Fund information.

18. The Fund processes Personal Information for the following purposes

- 18.1 Mainly to provide benefits in terms of its Rules for its members and former members as well as the dependants of such persons upon the death of a member. These benefits are provided on withdrawal or retirement from the Fund or upon the death of a member
- 18.2 To process divorce orders
- 18.3 To pay pensions to Fund pensioners
- 18.4 To manage and oversee the Fund's fidelity insurance
- 18.5 To investigate and then exercise its discretion concerning the allocation of lump sum death benefits
- 18.6 To manage historical housing loans
- 18.7 To comply with information requests by the Fund's regulators and to provide information and reporting as required by law and regulators
- 18.8 To manage or oversee transfers into and out of the Fund

- 18.9 To manage registration, liquidation and rule amendments of the Fund
- 18.10 To manage Fund officials and employees, potential Fund officials and employees, service providers, operators and the officials and employees of service providers and operators so as to facilitate or manage their appointment, removal, assessment, monitoring, fitness for office, service capability, delivery, performance and other relevant factors
- 18.11 To direct, control and oversee the operations, administration and investments of the Fund and to comply with duties set out in the Act (and its successors), including Section 7D of this Act and other relevant law
- 18.12 To ensure the Fund's Board and committees meet regularly, prepare agenda, minutes, resolutions and other Fund documentation and administration
- 18.13 To provide relevant and appropriate communication to members of the Fund and other stakeholders
- 18.14 To manage requests for information and complaints related to the Fund
- 18.15 To maintain, amend, consolidate or otherwise manage the Rules and other documentation of the Fund.

19. Description of categories of data subjects and the Personal Information the Fund holds for them

We hold the following Personal Information for the following categories of data subjects. Some of this Personal Information is Special Personal Information and some of it is children's Personal Information.

	Category of data subject	Category of Personal Information we hold for them
1.	Members of the Fund	<p>Membership records with details and dates of joining and leaving the Fund, identity or other numbers, dates of birth, age, nationality, retirement age, employee numbers, employer details, any member information prescribed to be held by the FSCA, members' contact details, including cell phone numbers and addresses, tax numbers, transfers received from other funds for the member, minimum individual reserves or accounts, employment status and reasons for leaving employment, health and disability information, divorce and maintenance information and orders (including information contained therein about ex-spouses, partners, ex-partners, living arrangements, spouses, family and children), unclaimed benefits and housing loans. Elections regarding payment of benefits, investment of benefits when the member leaves the fund.</p> <p>Member's financial advisor details</p> <p>Tax payable with respect to member, tax directives and applications, PAYE, knowledge of members' tax affairs e.g. if they are not in order.</p> <p>Bank account details.</p>

Category of data subject		Category of Personal Information we hold for them
1.	Members of the Fund (continued)	In the case of pensioners, in addition to the above, postal address, pension, medical scheme or medical scheme subsidy information, insurance deduction information, subscription/pension deduction information and spouse information. In the case of child pensions in payment, child information.
2.	Beneficiaries and potential beneficiaries of the Fund, children of member, spouse of member, other family members and life partners of member (For example, dependants as defined in the Act or nominees as contemplated in Section 37C of the Act and actually nominated by members, including persons nominated on nomination of beneficiary forms.)	Identity number, age, percentage nomination, relationship to member, sex-life information. Address and other contact information, banking records, employment status, occupation, financial (assets and income statements), children, family members, living arrangements, account numbers and details, criminal behaviour, divorce and maintenance information, partner, spouse and ex-partner and spouse information, caregiver, health, medical records, life expectancy information, education, training, paternity. Other information required to determine dependency.
3.	Ex-spouses or spouses of members	Their representatives, contact details, identity or other numbers, age, marital status, membership of a fund, bank account information, tax information.
4	Former members of the Fund	Unclaimed benefit information Member records.
5.	Trustees and other Fund officials, including the Principal Officer	Full names, identity or other number, date of birth, nationality, occupation, contact details, and date of appointment, conflicts and declarations of interest, board memberships, in some cases other employment or provisions of services information and remuneration information, training, education, qualifications, experience, fit and proper requirements information, criminal record, professional body membership and disciplinary information, Name of employer, directorships, prescribed Personal Information, FICA information, reasons for removal from office. Bank account details.
6.	Service provider companies and persons within those companies. Contractors and agents of the Fund as well as their directors and management	Company name, company registration number, FICA information, any due diligence or tender information, including previous criminal behaviour or other forms of misconduct, fit and proper information. Contractual arrangements, errors and omissions, information about claims or litigation, conflicts and declarations of interest, qualifications, licenses, professional body membership, prescribed information. Bank account details. Directors and management identity or other number, contact details, fit and proper requirements information, legal, compliance and regulatory information.

20. The recipients or categories of recipients to whom Personal Information may be supplied by the Fund

The Fund may provide certain Personal Information of data subjects to the following persons for purposes of the Fund, for example to the extent that they may provide services contracted to the Fund, to perform statutory duties, to comply with or facilitate court orders, to determine complaints and to regulate and supervise the Fund.

The category numbers below refer to the table in Clause 19.

Fund service providers	Category of data subject
the Fund's administrator	1 to 4 and 6
the Fund's actuary and valuator	1 to 6 to the extent they are required for appointment, actuarial exercises or valuations
the Fund's auditor	1 to 6
the Fund's consultant, including benefit and investment consultants	1 to 4 and 6
the Fund's insurers and insurance brokers	Potentially 1 to 6, depending on claims and for purchasing the insurance
the Fund's legal provider/s	Potentially 1 to 6, depending on claims and for appointment
the Fund's tracing agent/s	1 to 4, but limited information required for appointment and tracing persons specified in the categories so as to pay benefits or other monies owing
the Fund's death benefit investigation service provider	1 to 3 to the extent required for appointment and investigation of lump sum death benefits
Basic lump sum death benefit related Personal Information of beneficiaries to other beneficiaries	1, 2 and 5 to the extent required and lawful
the FSCA, Prudential Authority, South African Reserve Bank, the Information Regulator and relevant Authorities and Regulators	1 to 6 to the extent required
the South African Revenue Services, the Financial Intelligence Centre and other government entities	1 to 6 to the extent required
Ombud (For example. the Pension Funds Adjudicator) as well as the Financial Services Tribunal	1 to 6 to the extent required
Court appointees	1 and 5 to the extent required and lawful
the Board, other Fund officials and Fund employees	1 to 6 to the extent required and lawful
spouses, ex-spouses of members and their representatives	1 and 5 to the extent required and lawful
other persons lawfully entitled to receive Fund Personal Information	1 to 6 to the extent required.

21. Planned flow of Personal Information out of South Africa

The Fund and its service providers may make use of cloud-based storage (outside of the Fund's Pension Fund Office) to store or transfer Personal Information. In addition, the Fund may transfer Personal Information out of South Africa if a member, beneficiary or payee is outside of South Africa and their own Personal Information is provided to them.

The Fund may lawfully transfer or process Personal Information outside of South Africa if it ensures that the relevant security measures are in place before it does so. Currently the Fund transfers or processes Personal Information outside of South Africa as follows:

Countries	
Dropbox	United States and locations around the world, including Australia, Germany, Japan and the United Kingdom
Zoom	United States, as well as countries outside of the European Economic Area, Switzerland, and the United Kingdom.

22. General description of security measures of the Fund

The Fund and its service providers employ 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:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the information technology infrastructure
- Passwords and encryption.

For more information, please request our Data Protection Policy or Privacy Notice from our Information Officer. Copies are also available on the Fund's website.

23. The Fund relies on authorisations, justifications or grounds to process Personal Information lawfully

POPIA requires the Fund to process Personal Information in compliance with the eight conditions set out in POPIA and other requirements. The Fund relies on justifications and authorisations permitted in terms of POPIA to process Personal Information lawfully, including children's Personal Information and Special (sensitive) Personal Information.


For more information, please request our Data Protection Policy or Privacy Notice from our Information Officer. Copies are also available on the Fund's website.

24. Availability of this Manual

A copy of this Manual is available for inspection free of charge from the Fund's Pension Fund Office (registered office) between 09h00 and 15h00 on weekdays, excluding public holidays. Fees may be charged for copies.

A copy is also available on the Fund's website, www.phumulafund.co.za.

Signed on this 19th day of October 2023

DocuSigned by:

EC9D96E83DBE4FA...

Graham Luden
Information Officer
Phumula Retirement Fund

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

(Address)

E-mail address: _____

Fax number: _____

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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<p><i>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.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>			
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	
<i>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.</i>	
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)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester/person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer

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	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provider to the requestor			
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	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provider to the requestor			
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 number: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information Officer