



GROUP

GCI SHORT TERM (PTY) LTD FSP: 47528

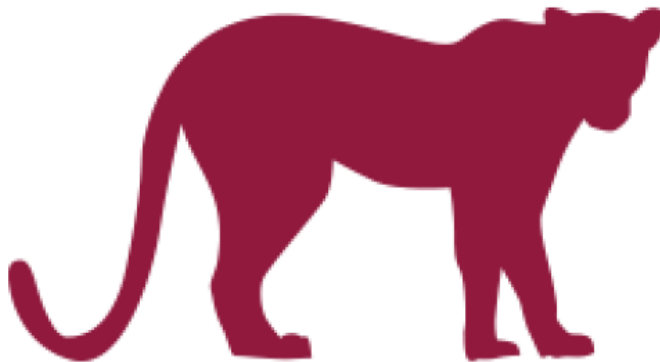
GCI HEALTH (PTY) LTD FSP: 13833

GCI ASSET MANAGEMENT (PTY) LTD FSP: 821

GCI EMPLOYEE BENEFITS (PTY) LTD FSP: 24763

GCI WEALTH (PTY) LTD FSP: 35901

PAIA MANUAL



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1 INTRODUCTION

This manual is published in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (PAIA) and provides an outline of the type of records and personal information which **GCI** holds. The manual also explains how to submit requests for access to these records in terms of PAIA.

The objective of PAIA is to give effect to the constitutional right to access to information, which is held by a public or private body and which is required for the exercise or protection of any rights. PAIA recognises the right entrenched in Section 32 of the Constitution of the Republic of South Africa (1996) and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

Accordingly, requests for access to information held by **GCI** will be made in accordance with the prescribed procedures and at the rates provided.

This PAIA manual is published on the **GCI** website at www.gci.co.za under the compliance Tab.

Alternatively, a copy can be requested from the information officer.

2 DEFINITIONS

2.1 PAIA

Promotion of Access to Information Act 2 of 2000.

2.2 POPIA

Promotion of Personal Information Act 4 of 2013.

2.3 Information Regulator

Regulator established in terms of Section 39 of POPIA.

2.4 Person

Natural person or a juristic person.

2.5 Information Officer

The Information Officer is responsible for ensuring **GCI**'s compliance with PAIA and POPIA, supported by the governing body and department heads.

In the absence of an Information Officer, the Chief Executive Officer of **GCI** will be responsible for performing the Information Officer's duties.

Once appointed, the Information Officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties. Deputy Information Officers can also be appointed to assist the Information Officer.

2.6 Private Body

A private body means:

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

2.7 Public Body

A public body means:

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- any other functionary or institution when:
 - o exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - o exercising a public power or performing a public function in terms of any legislation.

2.8 Head

Head, in relation to, a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
 - o the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - o the person who is acting as such or any person duly authorised by such acting person

2.9 Requester

Requester in relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person.

2.10 Personal Requester

Means a requester seeking access to a record containing personal information about the requester.

2.11 Personal Information

Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person;
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

2.12 Request for Access

Means a request for access to a record of the organisation in terms of section 50 of PAIA.

2.13 Record

Means any recorded information, regardless of form or medium, including:

- Writing on any material;

- Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.

2.14 Data Subject

This refers to the natural or juristic person to whom personal information relates, such as an individual client or a company that supplies GCI with products or other goods.

2.15 Third Party

Third Party in relation to a request for access to a record held by the organisation, means any person other than the requester.

2.16 Processing

The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as any restriction, degradation, erasure or destruction of information.

3 CONTACT DETAILS AND BUSINESS TYPE

GCI is a Group of the below authorised Financial Services Providers (FSPs):

GCI Wealth (Pty) Ltd FSP No. 35901	GCI Employee Benefits (Pty) Ltd FSP No. 24763
GCI Short Term (Pty) Ltd FSP No. 47528	GCI Asset Management (Pty) Ltd FSP No. 821
GCI Health (Pty) Ltd FSP No.13833	

The registered contact details for GCI are:

Chief Executive Officer: Alex Cook
 Address: 346 Ontdekkers Road, Florida, Roodepoort, 1709
 Company Email: info@gci.co.za
 Information Officer Email: popia@gci.co.za
 Tel: +27 11 768 1022
 Registration number: GCI Group Reg: 2008/005343/07
 Website: www.gci.co.za

4 SECTION 10 PAIA GUIDE

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Requesters are referred to the guide in terms of section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

The guide is available in all South African official languages free of charge and any person may request a copy of the guide.

A copy of the guide may be obtained by contacting the South African Human Rights Commission at:
 Address: The South African Human Rights Commission, 27 Stiemens Street, Braamfontein
 Telephone Number: +27 11 877 3600
 Fax Number: +27 11 403 0625
 Website: www.sahrc.org.za

5 STATUTORY RECORDS

GCI maintains statutory records and information in terms of the following legislation:

- Basic Conditions of Employment Act (No. 75 of 1997);
- Companies Act (No. 71 of 2008);
- Consumer Protection Act (No. 68 of 2008);
- Electronic Communications and Transactions Act (No. 25 of 2002);
- Employment Equity Act (No. 55 of 1998);
- Financial Advisory and Intermediary Services Act (No. 37 of 2002);
- Financial Intelligence Centre Act (No 38 of 2001);
- Income Tax Act (No. 58 of 1962);
- Labour Relations Act (No. 66 of 1995);
- Long-Term Insurance Act (No. 52 of 1998);
- Medical Schemes Act (No. 131 of 1998);
- Occupational Health and Safety Act (No. 85 of 1993);
- Pension Funds Act (No. 24 of 1956);
- Prevention of Organised Crime Act (No. 121 of 1998);
- Promotion of Access to Information Act (No. 2 of 2000);
- The Protection of Personal Information Act (No. 4 of 2013);
- Protection of Constitutional Democracy against Terrorist and related Activities Act (33 of 2004);
- Prevention and Combating of Corrupt Activities Act (No. 12 of 2004);
- Short Term Insurance Act (No. 53 of 1998); and
- Unemployed Insurance Act (No. 63 of 2001).

6 AVAILABILITY OF RECORDS

GCI maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category	Record	Availability	Purpose	Data Subject
Public Affairs	Public Product Information	Freely Available	Convey Public Information	GCI
	Public Corporate Records	Freely Available	Convey Public Information	GCI
	Media Releases	Freely Available	Convey Public Information	GCI
	Published Newsletters	Freely Available	Convey Public Information	GCI
	Magazine Articles	Freely Available	Convey Public Information	GCI
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	GCI
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	GCI
	Complaints Policy	Freely Available	Statutory Requirement	GCI
	FICA RMCP	PAIA Request	Statutory Requirement	GCI
	Health & Safety Plan	PAIA Request	Statutory Requirement	GCI
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	GCI
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	GCI
	Register of Members	PAIA Request	Statutory Requirement	GCI

	Register of Board of Directors	PAIA Request	Statutory Requirement	GCI
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by GCI	PAIA Request	Risk Management	GCI
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	GCI
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	GCI
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	GCI
Financial	Financial Statements	PAIA Request	Internal Referencing	GCI
	Financial and Tax Records	PAIA Request	Statutory Requirement	GCI
	Asset Register	PAIA Request	Internal Referencing	GCI
	Management Accounts and Reports	PAIA Request	Internal Referencing	GCI
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	GCI
	Banking Records and Statements	PAIA Request	Internal Referencing	GCI
	Electronic Banking Records	PAIA Request	Internal Referencing	GCI
Marketing	Market Information	PAIA Request	Internal Referencing	GCI
	Product Brochures	PAIA Request	Internal Referencing	GCI
	Advertisements	PAIA Request	Internal Referencing	GCI
	Performance Records	PAIA Request	Internal Referencing	GCI
	Product / Service Sales Records	PAIA Request	Internal Referencing	GCI
	Marketing Strategies	PAIA Request	Internal Referencing	GCI
Client	Client Database	PAIA Request	Internal Referencing	Clients
	Client agreements	PAIA Request	Internal Referencing	Clients
	Client Files	PAIA Request	Internal Referencing	Clients
	Client Instructions	PAIA Request	Internal Communications	Clients
	Client Correspondence	PAIA Request	External Communications	Clients
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

Records that are indicated as “Freely Available” can be accessed by contacting the Information Officer, without having to follow any formal procedures. Records that are indicated as a “PAIA Request”, requires the requester to lodge a formal request.

7 REQUEST PROCEDURE

To facilitate the processing of your request, kindly complete and submit the form attached hereto as Annexure A. Send the completed form to the e-mail address of the Information Officer as indicated in Section 3.

The Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Section 8 for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected;
- where such records are already otherwise publicly available;
- instances where public interest are not served;
- the mandatory protection of commercial information of a third party;
- the mandatory protection of certain confidential information of a third party.

When completing the form below please:

- indicate the identity of the person seeking access to the information;
- provide sufficient particulars to enable the deputy information officer to identify the information requested;
- specify the format in which the information is required;
- indicate the contact details of the person requiring the information;
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right;
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed; and
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

8 PRESCRIBED FEES

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted);
- A requestor may lodge an application with a court against the render / payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid;
- The fee structure is also available on the South African Human Rights Commission’s website at www.sahrc.org.za.

No.	Description	Fee
1.	The fee for a copy of the manual as contemplated in regulation 9(2)(c), for every photocopy of an A4-size page or part thereof	R1.10
2.	The fees for reproduction referred to in regulation 11(1) are as follows:	-
	a) For every photocopy of an A4 size page or part thereof	R1.10
	b) For every printed copy of an A4 size page or part thereof held on a computer or in electronic readable form	R0.75
	c) For a copy in a computer-readable form on stiffy disc	R7.50
	d) For a copy in a computer-readable form on compact disc	R70.00

	e) For a transcription of visual images, for an A4 size page or part thereof	R40.00
	f) For a copy of a visual image	R60.00
	g) For a transcription of an audio record	R20.00
	h) For a copy of an audio record	R30.00
3.	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	R50.00
4.	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(3):	-
	a) For every photocopy of an A4 size page or part thereof	R1.10
	b) For a printed copy of an A4 size page or part thereof held on a computer or in electronic readable form	R0.75
	c) For a copy in a computer readable form on stiffy disc	R7.50
	d) For a copy in a computer readable form on compact disc	R70.00
	e) For a transcription of visual images, for an A4 size page or part thereof	R40.00
	f) For a copy of a visual image	R60.00
	g) For a transcription of an audio record, for A4 size page or part thereof	R20.00
	h) For a copy of an audio record	R30.00
5.	The actual postage fee is payable when a copy of a record must be posted to a requester	-
6.	For purposed of section 54(2) of the Act, the following applies:	-
	a) Six hours as the hours to be exceeded before a deposit is payable	-
	b) One third of the access fee is payable as a deposit by the requester	-

9 DUTIES OF THE INFORMATION OFFICER

GCI will appoint an Information Officer and where necessary, a Deputy Information Officer to assist the Information Officer.

GCI's Information Officer is responsible for ensuring compliance with PAIA and POPIA, supported by the governing body and relevant department heads.

In the absence of an Information Officer, the Chief Executive Officer of **GCI** will assume the role of the Information Officer. Consideration will be given on an annual basis to the re-appointment or replacement of the Information Officer and the re-appointment or replacement of any Deputy Information Officers.

The Information Officer will be registered with the South African Information Regulator established under POPIA prior to performing his or her duties.

GCI's Information Officer is responsible for:

- Taking steps to ensure **GCI's** reasonable compliance with the provision of PAIA and POPIA.
- Keeping the governing body updated about **GCI's** information protection responsibilities under PAIA and POPIA. For instance, in the case of a security breach, the Information Officer must inform and advise the governing body of their obligations pursuant to POPIA.
- Continually analysing privacy regulations and aligning them with **GCI's** personal information processing procedures. This will include reviewing **GCI's** information protection procedures and related policies.
- Ensuring that POPIA Audits are scheduled and conducted on a regular basis.
- Ensuring that **GCI** makes it convenient for data subjects who want to update their personal information or submit POPIA related complaints to **GCI**. For instance, maintaining a "contact us" facility on **GCI's** website.
- Encouraging compliance with the conditions required for the lawful processing of personal information.
- Ensuring that employees and other persons acting on behalf of **GCI** are fully aware of the risks associated with the processing of personal information and that they remain informed about **GCI's** security controls.

- Support the scheduling and overseeing the awareness training of employees and other individuals involved in the processing of personal information on behalf of **GCI**.
- Addressing employees' PAIA and POPIA related questions.
- Addressing all PAIA and POPIA related requests and complaints made by **GCI**'s data subjects.
- Working with the Information Regulator in relation to any ongoing investigations. The Information Officer will therefore act as the contact point for the Information Regulator authority on issues relating to the processing of personal information and will consult with the Information Regulator where appropriate, with regard to any other matter.

The Deputy Information Officer will assist the Information Officer in performing his or her duties.

10 RIGHT OF ACCESS

The Information Officer and/or Deputy Information Officer may only provide access to any record held by **GCI** to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below

11 GROUNDS FOR REFUSAL

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access. Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which:

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person

Grounds for Refusal:

- The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).

No Grounds for Refusal:

- The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information that is already publicly available;
- The record consists of information that was provided to **GCI** by the individual to whom it relates and the individual was informed by or on behalf of **GCI**, before it is given, that the information belongs to a class of information that would or might be made available to the public;
- The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest;
- The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin;
- The record consists of information about an individual who is or was an official of **GCI** and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual in the course of employment.

B: Mandatory Protection of Commercial Information of a Third Party

Grounds for Refusal

- The record consists of information that contains trade secrets of a third party;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;
- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned;
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

D: Mandatory Protection of Safety of Individuals and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual;
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property;
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

E: Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

F: Commercial Information GCI

Grounds for Refusal

- The record consists of information that contains trade secrets of **GCI**;
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of **GCI**, the disclosure of which would likely cause harm to the commercial or financial interests of **GCI**;
- The record consists of information, the disclosure of which, could reasonably be expected to put **GCI** at a disadvantage in contractual or other negotiations or prejudice **GCI** in commercial competition;
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by **GCI**, except insofar as it is required to give access to a record to which access is granted in terms of PAIA

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by **GCI** or the results of any such testing or investigation carried out by or on behalf of **GCI** and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation).

G: Mandatory Protection of Research Information of a Third Party and GCI

Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage;
- The record consists of information that contains information about research being or to be carried out by or on behalf of **GCI**, the disclosure of which would be likely to expose **GCI**, a person that is or will be carrying out the research on behalf of **GCI**, or the subject matter of the research to serious disadvantage.

12 NOTICE

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Section 8 for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be;
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access;
- The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal;
- Exclude, from any such reasons, any reference to the content of the records'; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

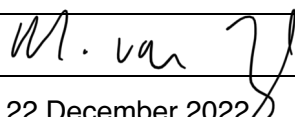
- Is in **GCI**'s possession, but cannot be found, or
- Simply does not exist,


the CEO of **GCI** must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the CEO.

13 PLAN ADOPTION

By signing this document, the governing body authorise GCI's adoption of the processes and procedures outlined herein.

Name and surname	Alex Cook
Capacity	Group CEO
Signature	
Date	2022/12/23

Name and surname	Marc van Zyl
Capacity	Group COO
Signature	
Date	22 December 2022

Name and surname	Hanlie Lazare
Capacity	GCI Group Compliance Officer
Signature	
Date	

ANNEXURE A: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53(1) of the PAIA Act No. 2 of 2000

Regulation 10

A. Particulars of Private Body	
Name:	GCI Group
Address:	346 Ontdekkers Road, Florida, Roodepoort, 1709
Company Email:	info@gci.co.za
Tel:	+27 11 768 1022
Reg No.:	GCI Group Reg: 2008 / 005343 / 07
B. Particulars of person requesting access to the record	
Full names & surname:	
Identity number:	
Postal address:	
Telephone number:	
Email address:	
Capacity:	
C. Particulars of person on whose behalf request is made	
<i>This section must be completed ONLY if a request for information is made on behalf of another person</i>	
Full names & surname:	
Identity number:	
D. Particulars of Record	
<i>(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you;</i>	
<i>(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages.</i>	
Description of record:	
Reference number:	
Any further particulars:	
E. Fees	
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. GCI will, upon receipt of your request, notify you of the amount required to be paid as the request fee. 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. If you qualify for exemption of the payment of any fee, please state the reason for exemption below:	
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 hereunder, please state your disability and indicate in which form the record is required.	
Disability:	
Form in which required:	

Mark the appropriate box with an "X"	
(i) Your indication as to the required form of access depends on the form in which the record is available;	
(ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form;	
(iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	
1) If the record is in written or printed form:	
- copy of record	
- inspection of record	
2) If record consists of visual images:	
- view the images	
- copy of the images	
- transcription of the images	
3) If the record consists of recorded words or information which can be reproduced in sound:	
- listen to the soundtrack	
- transcription of the soundtrack	
4) If the record is held on computer or in an electronic or machine-readable form:	
- printed copy of record	
- copy in computer readable form	
Please indicate the preferred method of delivery:	
- By hand	
- Email	
- Post	
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 additional folios.	
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:	
H. Notice of decision regarding the 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?	
Signed at _____ on this _____ day of _____ 20_____.	
Requester/person's signature on whose behalf request is made: _____	