

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL



STAR INVESTMENT PARTNERS PTY LTD

19906

1. DEFINITIONS

- 1.1. Data Subject means the person to whom the Personal Information relates;
- 1.2. FAIS Act means the Financial Advisory and Intermediary Services Act, No. 37 of 2002;
- 1.3. FSCA means the Financial Sector Conduct Authority;
- 1.4. FSP means financial services provider;
- 1.5. Information Regulator means the Office of the Information Regulator as established in terms of section 39 of POPIA, to monitor and enforce compliance with both POPIA and PAIA;
- 1.6. PAIA means the Promotion of Access to Information Act No. 2 of 2000, as amended;
- 1.7. Personal Information means any information relating to an identifiable natural person, or to the extent applicable, a juristic person. This includes, but is not limited to information relating to race, gender, sex, pregnancy, marital status, ethnic and social origin, colour, sexual orientation, age, physical or mental health, religion, disability, language, information relating to educational, medical, financial, criminal or employment history, any identifying number, email address, physical address, telephone number, location information, online identifier or biometric Personal Information;
- 1.8. POPIA means the Protection of Personal Information Act No. 4 of 2013;
- 1.9. Process or Processing means any activity concerning Personal Information including 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 restriction, degradation, erasure or destruction of information;
- 1.10. Record/s means any recorded information regardless of the form, including, for example, written documents, audio, digital and video materials. A Record requested from a public or private body refers to a Record that is in that body's possession regardless of whether that body created the Record;
- 1.11. Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information;
- 1.12. Joint Standard 1 of 2023 means the FSCA and Prudential Authority Joint Standard on Information Technology Governance and Risk Management.

2. INTRODUCTION

- 2.1. Star Investment Partners (Pty) Ltd is an authorised FSP in terms of the FAIS Act and is regulated by the FSCA. The FSP number is 19906.
- 2.2. Star Investment Partners (Pty) Ltd was established in 2011 and is a licensed (with the FSCA) FSP II Discretionary Investment Manager. At the outset we focused on partnering with investment experts in different disciplines with a view to bringing such expertise to our clients. This partnership philosophy has developed further as we incorporated feedback from client partners. The regulatory environment has also changed significantly

with the legal separation of duties between a Financial Adviser (FSP I) (ADVICE) and an Investment Manager (FSP II) (DISCRETIONARY MANAGEMENT).

3. PURPOSE OF PAIA MANUAL

This PAIA Manual may be used by the public to:

- 3.1.1. check the categories of Records held by the FSP that are available without having to submit a formal PAIA request;
- 3.1.2. understand how to make a request for access to a Record of the FSP, by providing a description of the subjects on which the FSP holds Records and the categories of Records held on each subject;
- 3.1.3. know which Records of the FSP are available in accordance with other legislation;
- 3.1.4. access the relevant contact details of the persons who will assist the public with the Records they intend to access;
- 3.1.5. know where to access the Information Regulators guide on how to use PAIA;
- 3.1.6. know whether the FSP will process personal information, for what purpose personal information is processed and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.1.7. know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.1.8. know if the FSP has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.1.9. know whether the FSP has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed, specifically in accordance with the security and resilience requirements of Joint Standard 1 of 2023.

4. COMPANY CONTACT DETAILS

Head Office Physical Address: Canal Edge 2, Unit 13, Tyger Waterfront, Carl Cronje Drive, Bellville, South Africa, 7530

Head Office Postal Address: Canal Edge 2, Unit 13, Tyger Waterfront, Carl Cronje Drive, Bellville, South Africa, 7530

Telephone No.: +27 (0)861 777 574 (Option 6)

E-mail: phil@starip.co.za

Website: www.starip.co.za

Information Officer: Robert Foster

Tel no.: +27 (0)82 885 2980

E-mail: robert@starip.co.za

4. ACCESS TO RECORDS

4.1. PAIA grants a requester access to certain Records of a private body if the said Records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest.

4.2. Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner, at the rates provided.

4.3. The contact details of the Information Regulator are as follows:

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

E-mail address: infoereg@justice.gov.za

Website: <https://infoeregulator.org.za/>

4.4. The Information Regulator has, in terms of section 10(1) of PAIA, as amended, made available a Guide on how to use PAIA (the Guide), in an easily comprehensible form and manner. The Guide is available in each of the official languages and in braille, and can be obtained from the Information Regulator's website: <https://infoeregulator.org.za/paia-guidelines/>

4.5. If your PAIA request is denied, or there is no response from a public or private body for access to Records, a complaint can be lodged with PAIAComplaints@infoeregulator.org.za.

5. SCHEDULE OF RECORDS

Marketing: Fund Fact Sheets, Newsletters (Available on website)

Company Related: FAIS, FICA, Compliance Policies, License, Internal Rules and Procedures, MOI, Directors, Auditors, Share Register (Request for access)

Client Related: Portfolio Statements, Quarterly Portfolio Reports, Mandates (Request for access)

6. RECORDS AVAILABLE IN TERMS OF SOUTH AFRICAN LEGISLATION

Records are kept in accordance with the following legislation:

Companies Act, 71 of 2008

Promotion of Access to Information Act, 2 of 2000

Basic Conditions of Employment Act, 75 of 1997

Consumer Protection Act, 68 of 2008

Compensation for Occupational Injuries and Health Diseases Act, 130 of 1993

Copyright Act, 98 of 1978

Electronic Communications and Transactions Act, 25 of 2002

Employment Equity Act, 55 of 1998

Financial Advisory and Intermediary Services Act, 37 of 2002

Financial Intelligence Centre Act, 38 of 2001 (including Beneficial Ownership disclosures)

Financial Sector Regulation Act, 9 of 2017

Conduct of Financial Institutions (COFI) Act

FSCA Joint Standard 1 of 2023 (IT Governance and Risk Management)

Income Tax Act, 95 of 1967

Labour Relations Act, 66 of 1995

Occupational Health & Safety Act, 85 of 1993

Protection of Personal Information Act, 4 of 2013

Skills Development Act, 9 of 1999

Trademarks Act, 194 of 1992

Unemployment Insurance Act, 63 of 2001

Value Added Tax Act, 89 of 1991

7. DESCRIPTION OF SUBJECTS AND CATEGORIES OF RECORDS

Strategic Documents: Annual Reports, Strategic Plan, Annual Performance Plan, Financial Records.

Human Resources: HR policies, personnel records, employment contracts, disciplinary records, salary and PAYE records, leave records, training records, SARS payment records, Skills Development Levies, UIF.

Information Technology: Cloud processing agreements, cybersecurity resilience assessments, and IT governance frameworks in line with Joint Standard 1 of 2023.

8. FORM OF A REQUEST FOR INFORMATION

8.1. A requester must use the prescribed Form 2 to request access to the information.

8.2. Form 2 can be accessed at: <https://inforegulator.org.za/paia-forms/>

The direct link to download the PDF version of Form 2 is: <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

8.3. The request must be addressed to the Information Officer as indicated in clause 4.

8.4. The requester must provide sufficient detail on Form 2 to establish who is requesting the information and in what format.

8.5. The requester must provide sufficient detail in respect of contact details and preferred manner of notification.

8.6. The requester must explain the right they are seeking to exercise or protect and the reason the Record is required.

8.7. After the company has decided on the request, the requester must be notified in the required form.

8.8. If granted, an access fee must be paid for search, reproduction, and preparation time exceeding the prescribed hour. A Form 3 needs to be completed, available at:

<https://inforegulator.org.za/paia-forms/>

8.9. If refused, the FSP must notify the requester.

9. PRESCRIBED FEES

9.1. A requester seeking Records containing their own Personal Information is not required to pay a request fee.

9.2. Every other requester must pay the required request fee. Fee is amended from time to time.

9.3. If preparation requires more than six hours, a deposit (not more than one third of the access fee) shall be paid. A requestor may lodge an application with a Court against the tender/payment of the request fee and/or deposit.

9.4. Records may be withheld until fees have been paid.

9.5. Fees for private bodies are as per Annexure B of the PAIA regulations.

10. PROCESSING OF PERSONAL INFORMATION (POPIA)

10.1. The FSP processes Personal Information in terms of POPIA.

10.2. A Data Subject is entitled to access Personal Information held by the Responsible Party, including the identity of third parties who have had access to it.

10.3. Cross-Border Transfers: Where Personal Information is transferred outside South Africa (e.g., cloud hosting), the FSP ensures the recipient is subject to a law or agreement that provides an adequate level of protection consistent with POPIA Section 72.

10.4. To view the FSPs Privacy Policy, contact the Information Officer as per clause 4.

11. AVAILABILITY OF THE MANUAL

11.1. This manual is available for inspection at the offices of the company during normal business hours. Free of charge.

11.2. A copy is also made available on the website of the FSP.

12. ACCEPTANCE AND REVIEW

11.1. This PAIA manual is approved by the governing body. It is subject to ongoing monitoring and regular review to ensure continuous compliance with the Promotion of Access to Information Act. Any subsequent amendments will be ratified by the governing body.

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