



**ROZENDAL PARTNERS (PTY) LTD**  
**PAIA MANUAL**

**Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000  
(as amended)**

<b>Version Control</b>			
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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |                    |   |
|-----|--------------------|---|
| 1.1 | <b>“CIO”</b>       | Chief Information Officer   |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer  |
| 1.3 | <b>“Minister”</b>  | Minister of Justice and Correctional Services                     |
| 1.4 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000 (as Amended) |
| 1.5 | <b>“POPIA”</b>     | Protection of Personal Information Act No.4 of 2013               |
| 1.6 | <b>“Regulator”</b> | Information Regulator   |
| 1.7 | <b>“Republic”</b>  | Republic of South Africa  |

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the CIO and DIO who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has the appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ROZENDAL PARTNERS MANUAL**

#### **3.1. Chief Information Officer (CIO)**

Name: Paul Stuart Whitburn  
Tel: +27 21 286 6716  
Email: [info@rozendal.com](mailto:info@rozendal.com)

#### **3.2. Deputy Information Officer (DIO)**

Name: Madeleine Walsh  
Tel: +27 21 286 6716  
Email: [info@rozendal.com](mailto:info@rozendal.com)

#### **3.3. Access to information general contacts**

Email: [info@rozendal.com](mailto:info@rozendal.com)

### 3.3 Office Details

Postal Address: PostNet Suite #66, Private bag X1, Vlaeberg, 8018

Physical Address: Office 2-01B Lifestyle on Kloof, 50 Kloof Street, Gardens, Cape Town, 8001

Telephone: +27 21 286 6716

Email: [info@rozendal.com](mailto:info@rozendal.com)

Website: [www.rozendal.com](http://www.rozendal.com)

## 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of
- 4.3.1. the objects of PAIA and POPIA;
  - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of
    - 4.3.2.1. the CIO of every public body, and
    - 4.3.2.2. every DIO of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as DIO as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as DIO as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

- 4.3.3. the manner and form of a request for
  - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging
  - 4.3.6.1. an internal appeal;
  - 4.3.6.2. a complaint to the Regulator; and
  - 4.3.6.3. an application with a court against a decision by the CIO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-  
a) that record is required for the exercise or protection of any rights;  
b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and  
c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA- The CIO of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
  - 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained
- 4.5.1. upon request to the CIO;
  - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6 A copy of the Guide is also available at the company's premises in the following two official languages, for public inspection during normal office hours:

#### 4.6.1 English & Afrikaans

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<sup>7</sup> Section 15(1) of PAIA- The CIO of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The CIO of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the CIO of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

**5. CATEGORIES OF RECORDS OF ROZENDAL PARTNERS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

<b>Category of records</b>	<b>Types of the Record</b>	<b>Available on Website</b>	<b>Available on request</b>
Marketing - information	Minimum Disclosure Documents	X	X
Marketing – information	Investor Letters	X	X
Marketing - information	Radio Interviews	X	X
Marketing - information	Articles	X	X
Marketing – information	Investor Presentations	X	X

**6. DESCRIPTION OF THE RECORDS OF ROZENDAL PARTNERS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

<b>Category of Records</b>	<b>Applicable Legislation</b>
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Tax Records	Income Tax Act No. 58 of 1962
VAT Records	Value-Added Tax Act No. 89 of 1991
Client Mandates	Financial Advisory & Intermediary Services Act No. 37 of 2002
FICA Onboarding Questionnaire	Financial Intelligence Centre Act No. 38 of 2001
B-BBEE Exemption Affidavit	Broad-Based Black Economic Empowerment Act No. 53 of 2003
Professional Indemnity	Insurance Act No. 18 of 2017
Insurance	Prevention and Combating of Corrupt Activities Act No. 12 of 2004
FICA Onboarding Questionnaire	Prevention of Organised Crime Act No. 121 of 1998
	Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004



**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY ROZENDAL PARTNERS**

Subjects on which the body holds records	Categories of records
Management & Operations	Strategic Business Plan Business Continuity & Succession Plan Minutes of Meetings Shareholder Register Correspondence
Clients	RMCP Process Documentation Personal Identification and Contact Details
Finances	Invoices Accounting Policy Annual financial statements Management Accounts Asset register Rental agreements Bank statements Tax, VAT and PAYE records
Human Resources	HR Policies & Procedures Advertised Posts Employee Records
Compliance	Compliance policies and procedures Regulatory licenses Compliance Reports Complaints Register Gifts Register / Conflict of Interest register Fit and proper documentation
Marketing	Newsletters Client communication by e-mail Advertising and promotional material

**8. PROCESSING OF PERSONAL INFORMATION**

**8.1 Purpose of Processing Personal Information**

In respect of clients who have invested funds into the Rutherford Model Portfolios.

**8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto**

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	name, address, registration numbers or identity numbers, employment status, bank details, income tax numbers, Ultimate Beneficial Ownership details (if applicable)
Service Providers	names, registration number, vat numbers, address, qualifications, bank details
Employees	address, qualifications, gender, tax numbers, banking details, salary records, PAYE records, employment records.

**8.3 The recipients or categories of recipients to whom the personal information may be supplied.**

<b>Category of personal information</b>	<b>Recipients or Categories of Recipients to whom the personal information may be supplied</b>
Any personal information	Rozendal Partners does not share clients' personal information with parties other than agreed upon and consented to by clients.

**8.4 Planned transborder flows of personal information.**

Rozendal Partners makes use of Microsoft 365 and data is stored on secure Dropbox storage servers. Dropbox is designed with multiple layers of protection, including secure data transfer, encryption, network configuration, and application-level controls distributed across a scalable, secure infrastructure (<https://www.dropbox.com/business/trust/security/architecture>).

**8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.**

Users have restricted access to data records according to their function. Data is stored on Microsoft 365 server and each user is required to maintain an additional back-up on their laptop.

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on the Rozendal Partners website at [www.rozendal.com](http://www.rozendal.com);

9.1.2 head office of Rozendal Partners for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## **10. UPDATING OF THE MANUAL**

The DIO of Rozendal Partners will on a regular basis update this manual.

**ANNEXURE A: REQUEST FOR ACCESS TO RECORDS**

**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 Chief 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.:		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.		Facsimile	
	Cellular			
<b>PARTICULARS OF RECORD REQUESTED</b>				
<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>				
Description of record or relevant part of the record:				
Reference number, if available				
Any further particulars of record				
<b>TYPE OF RECORD</b> <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				
<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>				
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>				
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>				
Transcription of soundtrack <i>(written or printed document)</i>				
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>				
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>				
Copy of record saved on cloud storage server				

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of private body <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <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:	

<b>FEEES</b>	
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*

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**FOR OFFICIAL USE**

<i>Reference number:</i>	
<i>Request received by: (Name And Surname of CIO)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

\_\_\_\_\_  
**Signature of CIO: Rozendal Partners**