



LIBERTY
In it with you

Access to Information Manual.

*Published in terms of Section 51 of the Promotion of
Access to Information Act, 2 of 2000*

Table of Contents

1	INTRODUCTION.....	3
2	AVAILABILITY OF THIS MANUAL.....	3
3	REQUESTS FOR INFORMATION.....	4
4	GROUP PRIVACY OFFICER CONTACT DETAILS.....	4
5	LIBERTY PRIVACY PRACTICES.....	4
6	TYPES OF RECORDS HELD BY LIBERTY.....	5
7	STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST.....	10
8	HOW TO SUBMIT REQUEST FOR ACCESS.....	13
10	CONSIDERING YOUR REQUEST.....	14
11	YOUR REMEDIES.....	15
12	ANNEXURE 1:.....	16
	REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY.....	16
13	ANNEXURE 2:.....	21
	FEEES IN RESPECT OF PRIVATE BODIES.....	21
14	ANNEXURE 3:.....	23
	WHOLLY AND PARTIALLY OWNED SUBSIDIARIES OF LIBERTY.....	23
15	ANNEXURE 4:.....	25
	LIBERTY HOLDINGS LIMITED – BASIC INFORMATION.....	25
16	DEFINITIONS, ACRONYMS AND ABBREVIATIONS.....	26
17	REVISION HISTORY.....	28

1 INTRODUCTION

This access to information manual is in respect of Liberty Holdings Limited including all wholly or partially owned subsidiaries and associated juristic persons, hereinafter referred to as “Liberty”. Refer to **Annexure 3** of this document for a complete list of subsidiaries.

This access to information manual (“Manual”) provides an outline of the types of records held by Liberty and explains how one may submit requests for access to these records in terms of the Promotion of Access to Information Act, 2 of 2000 (the “Act”).

The Act gives effect to everyone’s constitutional right of access to information held by private sector bodies (e.g. companies) or public bodies (i.e. Government institutions) that is required for the exercise and/or protection of the requester’s rights.

For further guidance, contact the Information Regulator. They have compiled a [PAIA guide](#) in each official language of South Africa on how to exercise your rights under PAIA.

Physical address: The Information Regulator (South Africa)
 JD House, 27 Stiemens Street
 Braamfontein
 2001

Postal address: PO Box 31533, Braamfontein, 2017

Telephone number: +27 10 023 5207

Fax number: +27 11 403 0668

PAIA Complaints email: PAIAComplaints@info regulator.org.za

POPIA Complaints email: POPIAComplaints@info regulator.org.za

General enquiries email: enquiries@info regulator.org.za

2 AVAILABILITY OF THIS MANUAL

You, the requester, can access this Manual on our website (www.liberty.co.za) and <https://www.libertyholdings.co.za> websites, at the head office of the Liberty Holdings Limited normal business hours or by requesting a copy by e-mail from the Group Privacy Office as provided for in paragraph 4 below.

3 **REQUESTS FOR INFORMATION**

You may submit your request for information records to the Information Officer as provided for in paragraph 4 below. It is recommended that you read this manual first, in particular paragraphs 6 through 9, before submitting any requests.

4 **GROUP PRIVACY OFFICER CONTACT DETAILS**

Information Officer: M Mothepu

Deputy Information Officer: N Duma

P O Box 10499
Johannesburg
2000

Tel: +27 11 408 2559

Tel: +27 11 408 5027

E-mail: privacy@liberty.co.za

5 **LIBERTY PRIVACY PRACTICES**

5.1 **We collect personal or other information to:**

- Meet our responsibilities to customers, employees and other natural or juristic persons;
- Follow your instructions;
- Inform you of new services; and
- Make sure our business suits your needs.

5.2 **Personal information may be received from or provided to:**

- any regulatory authority (like the Financial Services Board) and the regulators they appoint for the various financial sectors
- comply with any regulation passed under the relevant legislation, or any legal process
- protect and defend Liberty's rights and property (including Liberty's intellectual property).
- protect public interest
- Brokers / advisers / intermediaries
- Group companies, including STANLIB Limited and/or Standard Bank Group
- Third party service providers in order to uphold contractual obligations or service customers.

5.3 **Trans border information flows**

Liberty may share with or receive personal information from parties as set out above, where these parties reside outside of the Republic of South Africa. All operations are required to abide by Liberty's policies, procedures and guidelines, regardless of legislative requirements for data protection in these countries. Such countries include:

- Lesotho
- Swaziland
- eSwatini
- Namibia
- Botswana
- Tanzania
- Kenya
- Mauritius
- Uganda
- South Sudan
- Ghana
- Nigeria
- Zambia
- Malawi
- Mozambique

5.4 **Employee personal information may be received from or provided to:**

- Pension / provident funds and/or their trustees
- Medical aid funds
- Recruitment companies
- Credit bureaux

5.5 **Our security practices**

- We are committed and obliged to implement all reasonable controls to safeguard access to your personal information.
- Where third parties are required to process your personal information in relation to the purposes set out in this manual and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.
- All use of our website and transactions through it are protected by encryption (secret codes) in line with international standards.

6 **TYPES OF RECORDS HELD BY LIBERTY**

Liberty maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

6.1 **Company records**

The following are records pertaining to Liberty's own affairs:

- Finance and accounting records
- Human Resources;
- Strategy;
- Shareholders;
- Intermediaries;
- Operational records;
- Technology;
- Compliance and Risk;
- Subsidiary;
- Contractors; and
- Directors

6.1.1 **Description of the categories of Data Subjects and of the information or categories of information relating held by Liberty and Subsidiaries**

Categories of data subjects	Categories of records held
<p>Customers including policy holders / investors / beneficiaries / trustees / life assured / claimants / guardians</p>	<p>Personal information as defined by the Protection of Personal Information Act, No. 04 of 2013, includes, but is not limited to, name, South African identity number or other identifying number (e.g. passport), date of birth, citizenship, telephone number(s), email address(es), income tax numbers, physical and postal addresses, financial information (e.g. fund or portfolio details), banking information (including account numbers),</p> <p>Special personal information includes, but is not limited to, health information, financial information, sexual orientation, political affiliation, biometric information and information of minors.</p> <p>For juristic persons: entity name, registration number, income tax number, tax information, contact details for representative persons.</p> <p>FICA documentation used to verify identity and details of customer.</p>
<p>Advisers / brokers / Liberty entrepreneurs executors / agents of executors /</p>	<p>Personal Information which include license numbers, physical addresses, contact details, compliance officer details.</p>
<p>Directors</p>	<p>Personal Information which include ID numbers, name, financial information as required for statutory reporting</p>
<p>Investment Portfolio</p>	<p>Personal Information relating to details of investment portfolios</p>

Employees	<p>Personal Information and Special Information which includes ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal / background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension / provident fund information), details related to employee performance, disciplinary procedures.</p> <p><i>“Employee” refers to any person who works for or provides services to or on behalf of Liberty and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting any work or services for Liberty. This includes, without limitation, heads of departments, managers, all permanent, temporary and part-time staff as well as contract workers.</i></p>
Consultants / contractors	<p>Personal Information of dependent on the nature of the consultant or contractor but may include any details under “Employees” or “Service Providers” categories.</p>
Service Providers, including outsourced / hosted services, auditors	<p>Personal Information which includes company registration details, income tax and VAT registration details, BEE certificates, payment details including bank accounts, invoices, contractual agreements, addresses, contact details, any records a third party has provided to Liberty; and Records generated by or within Liberty pertaining to work or services, including transactional records.</p>

6.2 Other Parties

Records are kept in respect of other parties, including without limitation contractors, suppliers, departments, service providers. Alternatively, such other parties may possess records which can be said to belong to Liberty. The following records fall under this category:

- Employee, work or service-related records which are held by another party as opposed to being held by Liberty; and
- Records held by Liberty pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

6.3 Publicly available records

We set out the records which are already publicly available without a request for

access in terms of the Act being necessary. Records that include, but are not limited to, information relating to:

- Group annual Financial statements;
- Group interim audited report.
- Board of Directors and Committee Mandates' information
- Governance documents
- Product, policy documentation and conditions
- Media and insights
- Company and Subsidiary Registration number
- Memorandum of Incorporation (MOI)

6.4 Records available in accordance with other legislation

Legislation	Records available in accordance with other legislation
Long Term Insurance Act 52 of 1998	<ul style="list-style-type: none"> - the person's Details (Name and surname, contact number, identity number, phone number, age, address, bank account details) - his or her date of birth - the person's country of residence; - if the person's country of residence is other than the Republic, the person's address in the country of residence; - the person's occupation; and, his or her contact particulars
Pension Funds Act 24 of 1956	<ul style="list-style-type: none"> - Membership details (Name and surname, contact number, identity number, phone number, age, address, bank account details) - Contribution records - Member Benefit Statements - Tax applications, directives and certificates (where applicable) - Member choice forms - Member claim forms Beneficiary nomination details - Information furnished to the Fund at claim stage to execute the duties in terms of section 37C of the Pension Funds Act
Medical Schemes Act 131 of 1998	<ul style="list-style-type: none"> - Records provided by a member or defendant (identity number, phone number, age, address, bank account details) - Records provided by a member or defendant to a third party acting for or on behalf of Liberty - Records provided by a third party - Records relating to members or defendants (including but not limited to name and surname, contact number, identity number, passport number, phone number, age, address, bank account details)
Collective Investments Schemes Control act 45 of 2002	<ul style="list-style-type: none"> - Members/ investors Details (Name and surname, contact number, identity number, passport number, phone number, age, address, bank account details) - Financial statement - Association license - Employment history - Proposed resolution by investors - Certificate of registration of conversion
Companies Act 61 of 1973	<ul style="list-style-type: none"> - Shareholder Records - Secretarial Records - Audit Records - Banking Records - Directors Details

<p>Employment Equity Act 55 of 1998</p> <p>Basic Conditions of Employment Act 75 of 1997</p> <p>Employment Equity Act 55 of 1998.</p>	<ul style="list-style-type: none"> - Employee name and surname, contact number, identity number, passport number, phone number, age, address, bank account details) - Family Records (i.e. next of kin name and surname, contact number) - Medical Details - Professional History (Occupation, Qualification) - Demographic details (Age, Income, Gender, Location) - Financial Records (Salary, Banking Details, SARS related information) - Behavioural data (Criminal checks, performance, disciplinary)
<p>Financial Intelligence Centre Act 38 of 2001</p>	<ul style="list-style-type: none"> - Identity of prospective or existing client and occupation - Ownership and Control Structure of the Client / Entity - Information regarding the business relationship (nature and purpose of business) - The source of income / funds / wealth that the client expects to use during the business relationship - The anticipated level and nature of the activity that is to be undertaken during the business relationship - The nature and extent of the activity / business activity that the client may be involved in
<p>Compensation for Occupational Injuries and Diseases Act 130 of 1993</p>	<ul style="list-style-type: none"> - Record statistics and information regarding the occurrence and causes of accidents and occupational diseases - Employee Identification Details & Documents - Employee to submit to medical examination - A register or other record of wages, time worked, payment for piece work and overtime and all other prescribed particulars, and he shall at all reasonable times produce such register - Any document that is seen as evidence: e.g.; sworn statement
<p>Financial Advisory and Intermediary Services Act 37 of 2002</p>	<ul style="list-style-type: none"> - Clients' identification Details & Document - Demographic records Demographic details (Age, Income, Gender, Location) - Financial records - Records of premature cancellations of transactions or financial products by clients - Records of complaints received together with an indication whether or not any such complaints have been resolved - Full and proper accounting records - Records of all funds received and payments made and of all assets, liabilities and financial transactions of the Office
<p>Unemployment Insurance Act 63 of 2001</p>	<ul style="list-style-type: none"> - Address of the business, and any of its branches, of the Employer - The names, identification numbers and monthly remuneration of each of its employees and must state the address at which the employee is employed - Employee Identification Details & Documents - Financial Records (Salary, Banking Details, SARS) - The amount of benefits for purposes of section 13(3); - The benefits the applicant is entitled to in terms of section

7 STEPS TO CONSIDER BEFORE SUBMITTING A REQUEST

The following steps must be considered before submitting a request:

7.1 Step 1: Are you requesting your own information?

All Liberty clients are allowed access to their **own information** without having to use the request for access to information procedures as set out in the Promotion of Access to Information Act, including, but not limited to:

- Policy documents
- Account information
- Personal Records
- Voice recordings

All Liberty clients should contact the relevant call centre or department to request access to their **own information**. Please note that there may be administration costs associated with retrieval of certain types of information records.

7.2 **Step 2: Are you entitled to use the Act to request access?**

Please take note of section 7(1) of the Act which states:

“This Act does not apply to a record of a public body or a private body if:

- (a) that record is requested for the purpose of criminal or civil proceedings;
- (b) so requested after the commencement of such criminal or civil proceedings, as the case may be; and
- (c) the production of or access to that record for the purpose referred to in paragraph (a) is provided for in any other law.”

If section 7(1) applies, you may not bring a request in terms of this Act. You must use the rules and procedures for the retrieving of information of the relevant legal forum and proceedings you are involved in. Liberty reserves the right to claim all expenses and other damages incurred as a result of a requester submitting a request in contravention of section 7(1).

7.3 **Step 3: Does the information requested exist in the form of a record?**

Please note that the Act only applies to records that are in existence at the time of us receiving your request. The Act does not compel anyone to create a record which is not yet in existence at the time the request is made. For instance, the Act cannot be used to obtain reasons for a decision taken by Liberty if such reasons are not in the form of a record.

7.4 **Step 4: Is the record in the possession or under the control of Liberty?**

The Act provides that the record requested must be in our possession or under our control. Therefore, even if a record was created by Liberty or at some point in Liberty’s possession (but no longer in Liberty’s control at the time of your request), you must seek access to the record from the party under whose possession or control it is.

8 HOW TO SUBMIT REQUEST FOR ACCESS

Please consider the steps in paragraph 7 above before submitting your request. Once you are satisfied that none of the foregoing prohibitions apply to you, you may proceed to submit a request as follows:

8.1 Request form

Please complete the request form in Annexure 1 to this Manual (the "Request Form"). (together with the relevant request fee which we explain below) to our Group Privacy Officer's email address or our physical address. You can send the completed request form as is or under the cover of a separate letterhead.

In the Request Form, you need to provide sufficient information to enable us to adequately identify –

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address, fax number or email address of the requester or describes the right that they have to seek to exercise or protect and
- explains why they need the requested record to exercise or protect that right
- The requester must ensure that the completed form;

We will evaluate and consider all requests we receive in a proper manner, timeously.

8.2 Description of the right

Take care to adequately describe the right which you are seeking to protect or enforce by means of the records requested. Please note that the courts have indicated that access to the records must be "necessary" for the exercise or protection of the right so stated.

It is important to note that Liberty may refuse you access to the records requested if the right is not clearly defined or where the right you claim to seek to exercise or protect does not qualify as a right as contemplated in the Act.

8.3 Representatives

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

8.4 Illiteracy or disability

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

8.5 Prescribed fees

- (a) The prescribed fees, where applicable, as provided for in paragraph 9.2 below must be paid and proof of payment (e.g. copy of deposit slip) must be submitted following your request.
- (b) The requester will be notified where the Group Privacy Officer requires a deposit (calculated from the access fee).
- (c) You must submit proof of payment before your request can be processed.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

9 PRESCRIBED FEES

9.1 The Act provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

9.2 The requester, other than a *personal requester**, must pay the prescribed R140.00 request fee, following submission of the request and provide a deposit slip as proof of payment which must follow the Request Form.

* "*personal requester*" means a requester seeking access to a record containing *personal information*** about the requester.

** "*personal information*" means information about an identifiable individual, including, but not limited to—

(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual;

(b) information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;

(c) any identifying number, symbol or other particular assigned to the individual;

(d) the address, fingerprints or blood type of the individual;

(e) the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;

(f) correspondence sent by the individual that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(g) the views or opinions of another individual about the individual;

(h) the views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and

(i) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual,

but excludes information about an individual who has been dead for more than 20 years.

- 9.3 If the search for and preparation of the record (for disclosure), including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, Liberty will request you to pay as a deposit, the prescribed portion of the access fee which would be payable if the request is granted.
- 9.4 Liberty may withhold a record until the requester has paid the fees as indicated in **Annexure 2**.
- 9.5 A requester whose request has been granted must pay the applicable access fee for reproduction, search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- 9.6 You may ask for a refund of the deposit if your request for access is refused.

10 **CONSIDERING YOUR REQUEST**

- 10.1 Liberty will have deemed to have received your request when all of the requirements in respect of the Act have been met.
- 10.2 Subject to the provisions in the Act in respect of extension of time periods, Liberty will process the request within 30 days, unless you have stated special reasons which would satisfy Liberty that circumstances dictate that the above time periods not be complied with.
- 10.3 You will be informed in writing whether access has been granted or denied.
- 10.4 The main grounds for Liberty to refuse a request for information relate to the:
- 10.4.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- 10.4.2 mandatory protection of the commercial information of a third party, if the record contains:
- trade secrets of that third party;
 - financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - information disclosed in confidence by a third party to Liberty, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- 10.4.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 10.4.4 mandatory protection of the safety of individuals and the protection of property;
- 10.4.5 mandatory protection of records which would be regarded as privileged in legal proceedings;
- 10.4.6 the commercial activities of Liberty, which may include:

- trade secrets of Liberty;
- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Liberty; and
- information which, if disclosed could put Liberty at a disadvantage in negotiations or commercial competition;
- a computer program which is owned by Liberty, and which is protected by copyright; and

10.4.7 the research information of Liberty or a third party, if its disclosure would disclose the identity of Liberty, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

10.5 In addition, we may refuse your request:

10.5.1 if you do not use the correct form;

10.5.2 if you do not comply with the process set out in this manual;

10.5.3 if you do not provide sufficient information on the form, or;

10.5.4 if you delay in providing any additional information, we require from you.

11 YOUR REMEDIES

Liberty does not have internal appeal procedures. As such, the decision made by the Liberty is final. If your request is denied, you are entitled to lodge a complaint with the Regulator first before approaching the court to apply for appropriate jurisdiction for relief.

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

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.)

Description of record or relevant part of the record:	

Reference number, if available	
--------------------------------	--

Any further particulars of record	

TYPE OF RECORD
(Mark the applicable box with an "X")

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 (<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	

MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/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>)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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.

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) *A request fee must be paid before the request will be considered.*
- b) *You will be notified of the amount of the access fee to be paid.*
- c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*

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

13 ANNEXURE 2:

FEES IN RESPECT OF PRIVATE BODIES

DESCRIPTION	Rand
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.	2,00
For every photocopy black and white of an A4-size page or part thereof	2,00
For every printed black and white copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2,00
For a copy in a computer-readable form on— Flash drive (to be provided by requestor) Compact disc	40,00
- If provided by requestor -	40,00
- If provided to the requestor	60,00
Transcription of visual images, for an A4-size page or part thereof	Service to be outsourced. Will depend on quotation from Service provider.
Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
For a transcription of an audio record, for an A4-size page or part thereof	24,00
For a copy of an audio record on— Flash drive (to be provided by requestor) Compact disc	40,00
- If provided by requestor	40,00
- If provided to the requestor	60,00
The request fee payable by a requester	140,00
The access fees payable by a requester as follows:	
For every photocopy black and white of an A4-size page or part thereof	2,00
For every printed black and white copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2,00
For a copy in a computer-readable form on— Flash drive (to be provided by requestor) Compact disc	40,00
- If provided by requestor -	40,00
If provided to the requestor	60,00
Transcription of visual images, for an A4-size page or part thereof	Service to be outsourced. Will depend on quotation from Service provider.
Copy of visual images	Service to be outsourced. Will depend on quotation from

	Service provider.
For a transcription of an audio record, for an A4-size page or part thereof	24,00
For a copy of an audio record on—	
Flash drive (to be provided by requestor)	40,00
Compact disc	
- If provided by requestor	40,00
If provided to the requestor	60,00
For purposes of section 54 (2) of the Act, the following applies:	
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	145,00
To not exceed a total cost of	435,00
Deposit: If search exceeds 6 hours	One third of amount per request
Postage, e-mail or any other electronic transfer	Actual expense, (if any)

14 ANNEXURE 3:

WHOLLY AND PARTIALLY OWNED SUBSIDIARIES OF LIBERTY

Wholly Owned Subsidiaries

Dotcoza Proprietary Limited	STANLIB Namibia Unit Trust Management Company Limited
Eq-Fin Proprietary Limited	STANLIB Namibia Unlisted Investment Management Proprietary Limited
Frank Financial Services Proprietary Limited	STANLIB Property Development Proprietary Limited
Lexshell 615 Investments Proprietary Limited	STANLIB Tanzania Limited
Liberty Active Proprietary Limited	STANLIB Uganda Limited
Liberty Administrators Proprietary Limited	STANLIB Wealth Management Nominees Proprietary Limited
Liberty Group Limited	STANLIB Wealth Management Proprietary Limited
Liberty Group Properties Limited	Stonehouse Capital Proprietary Limited
Liberty Growth Proprietary Limited	Swan Reinsurance Protected Cell Captive (Mauritius)
Liberty Health Proprietary Limited	United Funeral Insurance Limited
Liberty Holdco Nigeria Limited	
Liberty Holdings Botswana Proprietary Limited	
Liberty Holdings Namibia Proprietary Limited.	
Liberty Holdings Zambia Limited	
Liberty Life Botswana Proprietary Limited	
Liberty Life Insurance Zambia Limited	
Liberty Life Lesotho Limited	
Liberty Life Namibia Limited	
Liberty Linked Investment Platform Nominee (RF) Proprietary Limited	
Liberty Linked Investment Platform Proprietary Limited	
Liberty Nominees Proprietary Limited	
Liberty Propco Proprietary Limited	
Liberty Properties (Swaziland) Proprietary Limited	
Liberty Properties Zambia Limited	
Liberty Securities Proprietary Limited	
Liberty Wealth Consultancy Proprietary Limited	
Libsub1 Proprietary Limited	
LibSub2 Proprietary Limited	
LPH Properties Limited	
STANLIB Asset Management Proprietary Limited	
STANLIB Collective Investments (RF) Proprietary Limited	
STANLIB Credit Alternatives Diversified Credit 1GP Proprietary Limited	
STANLIB Credit Alternatives Enhanced Yield 1GP Proprietary Limited	
STANLIB Eswatini Proprietary Limited	
STANLIB Fund Managers Jersey Limited	
STANLIB Infrastructure GP 1 Proprietary Limited	
STANLIB Infrastructure GP 2 Proprietary Limited	
STANLIB Infrastructure GP 3 Proprietary Limited	
STANLIB Infrastructure GP 4 Proprietary Limited	
STANLIB Kenya Limited	
STANLIB Limited	
STANLIB Multi-Manager Proprietary Limited	
STANLIB Namibia Proprietary Limited	

Partially Owned Subsidiaries

1 Invest Fund Managers Proprietary Limited
2 Degrees Properties Proprietary Limited
CfC Investments Limited
Liberty Blue Consultancy Limitida (Mozambique)
Liberty General Insurance Uganda Limited
Liberty Kenya Holdings Plc
Liberty Life Assurance Kenya Limited
Liberty Life Assurance Uganda Limited
Liberty Life Swaziland Limited
Liberty Two Degrees Limited
STANLIB Lesotho Proprietary Limited
STANLIB REIT Fund Managers Proprietary Limited
The Heritage Insurance Company Kenya Limited
Yala Consulting and Actuaries Proprietary Limited

Associated Juristic Persons

AV Fund Managers Proprietary Limited (21,7% acquired by STANLIB Limited wef 25 March 2022)
Hereford Financial Services Proprietary Limited
JHI Retail Proprietary Limited
Marder Holdings Proprietary Limited
Mobilife Financial Services Proprietary Limited
Morebo Wealth Proprietary Limited
The Financial Services Exchange Proprietary Limited
The Heritage Insurance Company Tanzania Limited

Associated Juristic Persons

Amalgam Defined Benefit Pension Fund (36817)
Amalgam Defined Benefit Provident Fund (36818)
Amalgam Defined Contribution Pension Fund (The) (35871)
Amalgam Defined Contribution Provident Fund (34152)
Amalgam Investment Choice Pension Fund (36241)
Amalgam Investment Choice Provident Fund (36224)
Corporate Selection Pension Fund (36006)
Corporate Selection Pension Fund No 2 (36440)
Corporate Selection Retirement Fund (27024)
Corporate Selection Retirement Fund No 2 (36438)
Liberty Defined Contribution Pension Fund (36943)
Liberty Pension Fund (16176) Liberty Provident Fund (15367)
Lifestyle Provident Fund (Umbrella) (25693)
Lifestyle Retirement Annuity Fund (6776)
Lifestyle Retirement Preserver Pension Plan (27974)
Lifestyle Retirement Preserver Provident Fund (27975)
LPFA Umbrella Pension Fund (37866) LPFA Umbrella Provident Fund (37867)

LIBERTY HOLDINGS LIMITED – BASIC INFORMATION

Physical Address Liberty

Group Limited Liberty

Centre

1 Ameshoff Street

Braamfontein

Johannesburg 2001

Postal Address

P O Box 10499

Johannesburg 2000

Other contact details

Tel: (011) 408 3911

Fax: (011) 408 2326

Internet site: <http://www.liberty.co.za>

Company Registration Number

Registration no: 1957/002788/06

16 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

1.1 Definitions

- 1.1.1 “**Access fee**” means a fee prescribed for the purposes of section 22(6) or 54(6), as the case may be;
- 1.1.2 “**Data subject**” means the person to whom personal information relates;
- 1.1.3 “**Deputy Information Officer**” means the designated individual in the public or private body who is responsible for assisting the Information Officer with the PAIA Request;
- 1.1.4 “**Guide**” means the guide on how to use PAIA by any person who wishes to exercise any right contemplated in Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 04 of 2013, as contemplated in section 10 of PAIA;
- 1.1.5 “**Head**” of, or in relation to, a private body means -
- (a) in the case of a natural person, including a person referred to in paragraph (c) of the definition of “political party”, that natural person or any person duly authorised by that natural person;
 - (b) in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
 - (c) in the case of a juristic person -
 - (i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - (ii) the person who is acting as such or any person duly authorised by such acting person; or
 - (d) in the case of political party, the leader of the political party or any person duly authorised by that leader;
- 1.1.6 “**Information Officer**”
In relation to, a public body -
- (a) in the case of a national department, provincial administration or organisational component -
 - (i) mentioned in Column 1 of Schedule 1 or 3 to the Public Service Act, 1994 (Proclamation 103 of 1994), means the officer who is the incumbent of the post bearing the designation mentioned in Column 2 of the said Schedule 1 or 3 opposite the name of the relevant national department, provincial administration or organisational component or the person who is acting as such; or
 - (ii) not so mentioned, means the Director-General, head, executive director or equivalent officer, respectively, of that national department, provincial administration or organisational component, respectively, or the person who is acting as such;
 - (b) in the case of a municipality, means the municipal manager appointed in terms of section 82 of the Local Government: Municipal Structures Act, 1998 (Act 117 of 1998), or the person who is acting as such; or
in the case of any other public body, means the chief executive officer,
 - (c) or equivalent officer, of that public body or the person who is acting as such;
In relation to, a private body-
 - (d) means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;
- 1.1.7 “**Information Regulator**” means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act, 2013;
- 1.1.8 “**Internal appeal**” means an internal appeal to the relevant authority in terms of section 74;
- 1.1.9 “**Person**” means a natural person or a juristic person;

- 1.1.10 **“Personal information”** means information relating to an identifiable natural person, including, but not limited to -
- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - (b) information relating to the education or the medical, financial, criminal or employment history of the person;
 - (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assigned to the person;
 - (d) the biometric information of the person;
 - (e) the personal opinions, views or preferences of the person;
 - (f) 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;
 - (g) the views or opinions of another individual about the person; and
 - (h) 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, but excludes information about an individual who has been dead for more than 20 years;
- 1.1.11 **“Political party”** means -
- (a) any entity that accepts donations principally to support or oppose any registered political party or its candidates, in an election as defined in section 1 of the Electoral Act, 1998 (Act No. 73 of 1998);
 - (b) any registered political party as defined in the Electoral Act, 1998; or
 - (c) a natural person who is an independent candidate.
- 1.1.12 **“Private body”** means -
- (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
 - (b) a partnership which carries or has carried on any trade, business or profession; or
 - (c) any former or existing juristic person; or
 - (d) a political party but excludes a public body;
- 1.1.13 **“Public body”** means -
- (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
 - (b) any other functionary or institution when
 - (i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - (ii) exercising a public power or performing a public function in terms of any legislation;
- 1.1.14 **“Record”** of, or in relation to, a public or private body, means any recorded information -
- (a) regardless of form or medium;
 - (b) in the possession or under the control of that public or private body, respectively; and
 - (c) whether or not it was created by that public or private body, respectively;
- 1.1.15 **“Request for access”**, in relation to -
- (a) a public body, means a request for access to a record of a public body in terms of section 11; or

(b) a private body, means a request for access to a record of a private body in terms of section 50;

1.1.16 **“Request for access”**, in relation to -

(a) a public body, means

- (i) any person (other than a public body contemplated in paragraph (a) or (b)(i) of the definition of 'public body', or an official thereof) making a request for access to a record of that public body; or
- (ii) a person acting on behalf of the person referred to in subparagraph (i);

(b) a public body, means

- (i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
- (ii) a person acting on behalf of the person contemplated in subparagraph(i);

1.1.17 **“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;

1.1.18 **“Third party”**, in relation to a request for access to -

(a) a record of a public body, means any person (including, but not limited to, the government of a foreign state, an international organisation or an organ of that government or organisation) other than -

- (i) the requester concerned; and
- (ii) a public body; or

(b) a record of a private body, means any person (including, but not limited to, a public body) other than the requester,

but, for the purposes of sections 34 and 63, the reference to 'person' in paragraphs (a) and (b) must be construed as a reference to 'natural person';

1.1.19 **“The Act”** means the Promotion of Access to Information Act 2 of 2000 as amended, and includes any regulation made and in force in terms of section 92.

1.2 LIST OF ACRONYMS AND ABBREVIATIONS

Constitution	Constitution of the Republic of South Africa, Act No. 108 of 1996
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Administrative Justice Act, 2000
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator

17 VERSION HISTORY

Version no.	Purpose of revision	Review date
V1	Initial Access to Information Manual	May 2021
V2	Review by the Information Regulator	March 2023