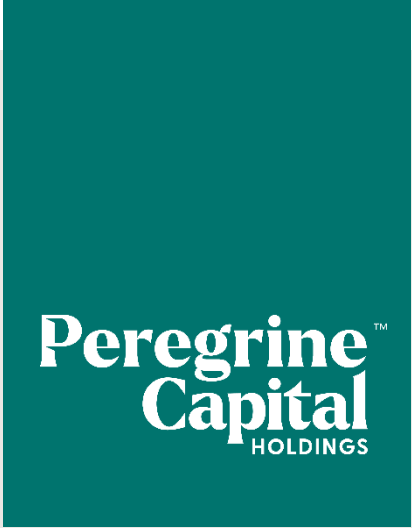




PAIA MANUAL



Version	Date updated	Responsible Person	Summary of changes	Date approved by the Board
V.1	21 January 2025	Monica de Beer	Approval by the Board of Directors	21 January 2025

**This manual has been prepared in accordance with
Section 51 of the Promotion of Access to Information Act, No 2 of 2000 (“PAIA”) and
the Protection of Personal Information Act, No 4 of 2013 (“POPIA”)**



Contents

1. INTRODUCTION..... 6

2. CONTACT DETAILS6

3. THE ACT7

4. APPLICABLE LEGISLATION.....7

5. REQUEST PROCEDURE/FORM FOR REQUEST8

6. TYPES OF RECORD9

7. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION..... 11

8. AUTOMATICALLY AVAILABLE INFORMATION 13

9. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA14

10. AVAILABILITY OF THE MANUAL..... 15

Annexure A16

Annexure B20

Annexure C21

Annexure D22

Annexure E25

Annexure F..... 27



THE PEREGRINE CAPITAL HOLDINGS GROUP

Registration number: 2022/761654/07

This manual applies to Peregrine Capital Holdings Proprietary Limited and its South African subsidiaries, namely Peregrine Capital Proprietary Limited, Peregrine Capital Solutions Proprietary Limited, Peregrine Capital Collective Investments (RF) Proprietary Limited and Tiercel Capital Proprietary Limited ("Peregrine" or the "Company").



1. INTRODUCTION

Peregrine Capital Holdings Proprietary Limited is an investment holding company whose subsidiaries provide a variety of wealth and asset management services. Peregrine Capital Proprietary Limited is an asset management company and is a registered as a financial services provider in terms of the Financial Advisory and Intermediary Service Act.

Peregrine Capital Solutions Proprietary Limited is a shared services entity for the Peregrine Capital Holdings group of companies.

Peregrine Capital Collective Investments (RF) Proprietary Limited is a collective investment scheme management company and is registered with the Financial Sector Conduct Authority as a manager of collective investment schemes in terms of the Collective Investment Schemes Control Act, 2002.

Tiercel Capital Proprietary Limited is a marketing and public relations entity which services the Peregrine Capital Holdings group.

2. CONTACT DETAILS

The responsibility for administration of and compliance with PAIA and POPIA, has been delegated by the Chief Executive Officer (Jacques Conradie) of the Company to the Information Officer of the Company.

Requests to be directed as follows:

Name of body	Peregrine Capital Holdings Proprietary Limited
	Peregrine Capital Proprietary Limited
	Peregrine Capital Collective Investments (RF) Proprietary Limited
	Peregrine Capital Solutions Proprietary Limited
Information Officer	Henry Huysamen
Physical Address	10 th Floor, 1 Park Lane
	39 Wierda Road West
	Wierda Valley
	Sandown, 2196
	Sandton
Postal Address	PO Box 650361
	Benmore
	2010
Telephone Number	+27 11 722 7403
Email address	dataprotection@peregrine.co.za
Website	www.peregrine.co.za

3. THE ACT

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability in South Africa.

PAIA and POPIA give effect to the constitutional right of access to information which is held by private sector or public bodies, that is required for the exercise and or protection of the requester's right.

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If 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. The forms and tariff are dealt with in paragraphs 6 and 7 of PAIA.

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator and the Information Officer free of charge. Any request for public inspection of the Guide at the office of the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with Form 1 of Annexure A to Regulations relating to the Promotion of Access to Information, 2021¹ ("PAIA Regulations"). Please refer to Annexure C.

4. APPLICABLE LEGISLATION

- 4.1. Consumer Protection Act, 68 of 2008
- 4.2. Companies Act, 71 of 2008
- 4.3. Income Tax Act, 58 of 1962
- 4.4. Protection of Personal Information Act, 4 of 2013
- 4.5. Basic Conditions of Employment Act, 75 of 1997
- 4.6. Occupational Health and Safety Act, 85 of 1993
- 4.7. Employment Equity Act, 55 of 1998
- 4.8. Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- 4.9. Unemployment Insurance Act, 30 of 1966
- 4.10. Value Added Tax Act, 89 of 1991
- 4.11. Copyright Act, 98 of 1978
- 4.12. Electronic Communications and Transactions Act, 25 of 2002
- 4.13. Trade Marks Act, 194 of 1993
- 4.14. Financial Intelligence Centre Act
- 4.15. Financial Advisory and Intermediaries Services Act
- 4.16. Collective Investment Schemes Control Act
- 4.17. Foreign Account Tax Compliance Act
- 4.18. The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (European Union)

¹ GNR.757 of 27 August 2021.

5. REQUEST PROCEDURE/FORM FOR REQUEST

Records held by the Company may be accessed on request only once the requirements for access have been met.

A requester is any person making a request for access to a record of the Company.

A requester must comply with all the procedural requirements contained in PAIA relating to a request for access to a record.

5.1 Completion of the prescribed form

Any request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A to promulgated under the PAIA Regulations and should be specific in terms of the record requested. Please refer to Annexure A.

A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

POPIA provides that a data subject may, upon proof of identity, request the Company to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.

POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, the Company must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.

Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.

POPIA provides that a data subject may object, at any time, to the processing of personal information by the Company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Annexure E and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.

A data subject may also request the Company to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or destroy or delete a record of personal information about the data subject that the Company is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as Annexure F.

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

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

5.2 Proof of identity

As indicated in the prescribed form, proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

5.3 Payment of the prescribed fees

There are two categories of fees which are payable:

- The request fee: R140
- The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Annexure B.

Section 54 of PAIA entitles the Company to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Annexure B promulgated under the PAIA Regulations. Please refer to Annexure D

Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

5.4 Timelines for consideration of a request for access

Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 promulgated under the PAIA Regulations.

Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary

5.5 Grounds for refusal of access and protection of information

There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put the Company (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by the Company.

Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record

6. TYPES OF RECORD

6.1 Records available without requesting access in terms of PAIA

We set out below the subjects and categories of records that are, subject to access being denied as set out in PAIA. Records are held on the following subjects:

- Personnel records;
- Client-related records;
- Private body records; and
- Records in the possession of or pertaining to other parties.

6.2 Records available on request

6.2.1 Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

6.2.2 Client related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records.

6.2.3 Private body records

A private body's records relate to the body's own affairs and are considered to include, but not limit to:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

6.2.4 Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and

- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

7. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Where applicable to its operations, Peregrine retains records and documents in terms of the legislation listed in the non-exhaustive list below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these statutes shall be made available for inspection by interested parties in terms of the requirements and conditions of the relevant Act and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of PAIA and the relevant legislation.

Legislation	Records
Basic Conditions of Employment Act, 1997	- Employee details. - Labour relations reports. - Information regarding dismissals for dishonesty-related behaviour. - Information on disability, trade union membership, race and religion. - Employee next of kin or emergency contact details. - Conflict-of-interest declarations. - Education information. - Health and safety records. - Leave records. - Internal evaluations and performance records. - Disciplinary records. - Training records. - Background checks.
Broad-based Black Economic Empowerment Act, 2003	- Skills development section on the Financial Services Council report (no unique identifiers). - BBBEE status - BBBEE status of suppliers. - Supplier employee information. - Contractor and supplier agreements. - List of suppliers, products, services and distributors.
Companies Act, 2008	- MOI; - Minutes of meetings; - Records pertaining to directors and shareholders; - Other records and correspondence.
Compensation for Occupational Injuries and Health Diseases Act, 1993	Record of the earnings and other prescribed particulars of all employees.
Employment Equity Act, 1998	Employment equity plans and targets.

Legislation	Records
Financial Advisory and Intermediary Services Act, 2002	▪ Disclosure and appointment letter; ▪ Telephone recordings; ▪ Records of training and experience; ▪ Records of advice.
Financial Intelligence Centre Act, 2001	▪ Identification and verification records; ▪ Client due-diligence records; ▪ Applications for credit or credit agreements; ▪ Risk management and compliance programme.
Income Tax Act, 1962	▪ IT3; ▪ IRP5; ▪ Monthly EMP201 file; ▪ Semi-annual EMP501 file; ▪ Unemployment Insurance Fund (UIF) files; ▪ PAYE information; ▪ SDL information; ▪ VAT record; ▪ Ledgers; ▪ Journals; ▪ Bank statements; ▪ Invoices; ▪ Other books of accounts; ▪ Electronic representations of information.
Insolvency Act, 1936	▪ Contracts with the client, third party, and between the client and other persons; ▪ Details of contracts, clients, third party entered into with Peregrine; ▪ Details of transactions carried out with Peregrine; ▪ Engagement letters ▪ Minutes of meetings; ▪ Records of correspondence or enquiries from Clients or anyone acting on Clients' behalf; and ▪ Other Records and correspondence/
Labour Relations Act, 1995	▪ Disciplinary records, including outcomes; ▪ Labour relations reports; ▪ Arbitration awards.
Occupational Health & Safety Act, 1993	Occupational health and safety (OHS) reports including the following: – ▪ Learning history report; ▪ OHS agreement; ▪ OHS appointment letters;

Legislation	Records
	- Data Centre procedure documents - Incident reports; - Personal information for workmen's compensation; - Personal information of visitors to our premises and branches; - CCTV footage.
Prevention and Combating of Corrupt Activities Act, 2004	- Corrupt or fraudulent employee, client or merchant activities; - Reports on corrupt and fraudulent activities to law enforcement agencies.
Promotion of Access to Information Act, 2000	- The PAIA manual; - PAIA guide; - PAIA forms.
Protection of Personal Information Act, 2013	- Document Retention Policy; - Internal and External Privacy Policy; - Personal Information Sharing Policy; - Protection of Personal Information Policy; - Subject Access Request Policy; - Security Compromises Policy - Cyber and Information Security Policy.
Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002	- Acceptable Use Policy; - Remote Access Policy.
Value Added Tax Act, 1991	- Invoices; - Tax invoices; - Credit note; - Debit notes; and - Bank statements.

8. AUTOMATICALLY AVAILABLE INFORMATION

In terms of section 52(1)(a) 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 in terms of this Act, including such categories available for inspection in terms of legislation other than this Act; for purchase or copying from the private body; and from the private body free of charge; and how to obtain access to such records.

In terms of regulation 5 of the PAIA Regulations, the head of a private body, may compile and keep a description of the categories of records contemplated in section 52(1)(a) of PAIA that are voluntarily disclosed or automatically available without a requester having to request access thereto. If such a description is compiled and kept, it must be updated as soon as practically possible after any amendment to the description occurs and made available –

- to the Information Regulator;
- on the website of Peregrine; and
- for inspection, at the registered head office of Peregrine concerned during normal office hours.

Peregrine has voluntarily decided to make such list available here below.

- Information that is obtainable via the Peregrine website about Peregrine is automatically available and need not be formally requested in terms of this Manual.
- The following categories of Records are automatically available for inspection, purchase or photocopying and the Regulator can access such information via the links provided below:
 - Portfolio information and fund factsheets which are available at <https://www.peregrine.co.za/funds>
 - Annual Investor letters and investor communication which are available <https://www.peregrine.co.za/insights>
 - Corporate Profile, Leadership and Strategy which are available at <https://www.peregrine.co.za/our-people>
 - Sustainability and ESG Commitments which are available at <https://www.peregrine.co.za/responsible-investing>
 - Media Releases which are available at <https://www.peregrine.co.za/insights>

9. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

9.1. Purpose of Processing

The Company processes Personal Information, which includes but is not limited to, rendering of services to our customers, employee administration; providing or managing any information on products, transacting with our suppliers; maintaining customer records, recruitment purposes, apprenticeship and bursary purposes, travel purposes, general administration, financial and tax purposes, legal purposes, health and safety purposes, visitor access monitoring purposes, managing the premises and facilities, investigating of and preventing fraud, debt recovery and responding to website enquiries

9.2. Types of personal information held by the Company

Categories of individual and juristic entities	Categories of Personal Information held	Availability
Employees	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, employee disability information, employee pension and provident fund information, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history, time and attendance records	Not automatically
Suppliers/Service Providers	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, BBB-EE certificates, invoices, contractual documentation	Not automatically
Directors and Shareholders	Name, surname, ID numbers, financial information as required for statutory reporting	Not automatically
New Job Applicants	Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, information about your current level of remuneration, including	Not automatically



Categories of individual and juristic entities	Categories of Personal Information held	Availability
	benefit entitlements, whether or not you have a disability for which Peregrine Capital needs to make reasonable adjustments during the recruitment process, and information about your entitlement to work in South Africa	
Website Visitors	Name, emails address, company name, job title and telephone number	Not automatically
Visitors	Physical access records, electronic access records scans and CCTV records	Not automatically available

9.3. Transborder Flows of Personal Information

The Company may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. The Company will take the necessary steps to ensure that services providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

9.4. Sharing of Personal Information

The Company may share personal information with:

- other companies forming part of the Company's group of companies located outside of South Africa;
- services providers who perform services on behalf of the Company; and
- third party suppliers.

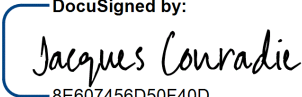
9.5. The Company's security measures to protect personal information

The Company takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. The Company has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. The Company will take steps to ensure that third party providers who process personal information on behalf of the Company apply adequate safeguards as required in terms POPIA.

10. AVAILABILITY OF THE MANUAL

The manual is available for inspection, on reasonable prior notice, at the office of the Company free of charge. Copies of the manual of the Company are also available on the Company's website and at its head office.

SIGNED

DocuSigned by:

8E607456D50E40D...

JACQUES CONRADIE

2025-06-18 | 08:04 SAST

Date:

Annexure A

Form 2: Request for access to record

Note:

- Proof of identity must be attached by the requester.
- 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):	
Cellular:	
Facsimile	
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):	
Cellular:	
Facsimile	
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 or 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 *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*

Postal services to postal address

Postal services to street address

Courier service to street address

Facsimile of information in written or printed format *(including transcriptions)*

E-mail of information *(including soundtracks if possible)*

Cloud share/file transfer

Preferred language:

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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 request fee must be paid before the request will be considered.

You will be notified of the amount of the access fee to be paid.

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.

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 (Please specify)

Signed at _____ on this _____ day of _____ 20_____

Signature of requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of information officer