



TD Administrative Services (Pty) Ltd

# PAIA MANUAL

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

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|--------------------|--|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer  |
| 1.2 | <b>“IO”</b>        | 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; and   |
| 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 Information Officer 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 of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has 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 TD ADMINISTRATIVE SERVICES (PTY) LTD**

**3.1. Director**

Name: Sarah Jane Doak  
Tel: 086 111 2348  
Email: sj@tdas.co.za

**3.2. Chief Information Officer**

Name: Roxanne Shepherd  
Tel: 086 111 2348  
Email: roxanne@tdas.co.za

**3.3 Access to information general contacts**

Email: enquiries@tdas.co.za

### 3.4 Head Office

**Physical / Postal Address:**

Unit 1, Coram Park, 86 Ferero Avenue, Randpark Ridge, Randburg, 2169

**Telephone:**

086 111 2348

International - +27 11 791 0083

**Email:**

enquiries@tdas.co.za

**Website:**

www.tdas.co.za

## 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 Information Officer of every public body, and

- 4.3.2.2. every Deputy Information Officer 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>;
- 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;

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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 deputy information officers 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 deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<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.*

- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer 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;
- 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>.

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<sup>5</sup> Section 14(1) of PAIA- The information officer 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.

<sup>7</sup> Section 15(1) of PAIA- The information officer 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 information officer 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 information officer 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.”

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. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

## **5. CATEGORIES OF RECORDS OF TD ADMINISTRATIVE SERVICES (PTY) LTD) WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

TD Administrative Services (Pty) Ltd conducts business as a financial services provider. We are an authorised service provider in terms of the Financial Advisory and Intermediary Service Act. Our FSP license number is 7379.

### **Schedule of Records held at the offices of the business**

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;
- The protection of commercial information held concerning any third party (for example trade secrets);
- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would jeopardize the safety or life of an individual;
- Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived;
- Disclosures of details of any computer programme;
- Disclosures that will put TD Administrative Services (Pty) Ltd at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;

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**This version December 2021**

- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of TD Administrative Services (Pty) Ltd
- Disclosures of any record containing information about research and development being carried out or about to be carried out by TD Administrative Services (Pty) Ltd

**These records may only be made available if the following criteria are fulfilled:**

- **the record is required for the exercise or protection of any right; and**
- **the requestor complies with the procedural requirements set out in the Act relating to a request; and**

<b>Records</b>	<b>Subject</b>	<b>Availability</b>
Administration	<ul style="list-style-type: none"> <li>• Correspondence, founding documents, statutory returns</li> </ul>	<b>On request in terms of PAIA – this request must be in terms of the above criteria.</b>
FAIS	<ul style="list-style-type: none"> <li>• FSCA regulatory details (contact details and products approved)</li> </ul>	<b>FSCA website – <a href="http://www.fsc.co.za">www.fsc.co.za</a></b> <b>TDAS website – <a href="http://www.tdas.co.za">www.tdas.co.za</a></b>
Operations	<ul style="list-style-type: none"> <li>• General Correspondence</li> </ul>	<b>On request in terms of PAIA – this request must be in terms of the above criteria</b>
Products administered	<ul style="list-style-type: none"> <li>• Details of products administered</li> </ul>	<b>On request or via <a href="http://www.tdas.co.za">www.tdas.co.za</a></b>
Financial	<ul style="list-style-type: none"> <li>• Financial Statements</li> <li>• Financial and Tax Records (Company &amp; Employees)</li> <li>• Asset Register</li> <li>• Management Accounts</li> </ul>	<b>On request in terms of PAIA – this request must be in terms of the above criteria</b>



**6. DESCRIPTION OF THE RECORDS OF TD ADMINISTRATIVE SERVICES (PTY LTD) WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

*NB: Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable legislation.*

Records	
CoR18.3 – Company Registration	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY TD ADMINISTRATIVE SERVICES (PTY) LTD**

Subjects on which the body holds records	Categories of records
Financial	- Annual Reports
Human Resources	- HR policies and procedures - Employees records
Compliance	- Conflict of interest policy - FICA internal Rules - Risk Management - TCF Rules
Information Technology	- Electronic Access Control Policy

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>- GAPP Manual</li> <li>- Password Protection Policy</li> <li>- Information and data breach security policy</li> <li>- Acceptable use policy</li> <li>- Workstation and Laptop policy</li> </ul>
POPIA	<ul style="list-style-type: none"> <li>- Protection of personal information</li> <li>- Filing and document destruction</li> </ul>

**8. PROCESSING OF PERSONAL INFORMATION**

**8.1 Purpose of Processing Personal Information**

*This is covered under the POPI manual which is available on request / available on the website – [www.tdas.co.za](http://www.tdas.co.za)*

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

*This is covered under the POPI manual which is available on request / available on the website – [www.tdas.co.za](http://www.tdas.co.za)*

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

*This is covered under the POPI manual which is available on request / available on the website – [www.tdas.co.za](http://www.tdas.co.za)*

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

*This is covered under the various policy manuals issued by TD Administrative Services (Pty) Ltd and listed above under point 7.*

## 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on [www.tdas.co.za](http://www.tdas.co.za);

9.1.2 head office of TD Administrative Services (Pty) Ltd 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

A Director of TD Administrative Services (Pty) Ltd will on a regular basis update this manual.

***Issued by***

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**SARAH JANE DOAK**

**DIRECTOR**

Revision History

Date of Change	Responsible	Summary of Change
September 2015	SJD	First Version
June 2021	SJD	Removed references to SAHRC and replaced with reference to the regulator
December 2021	SJD	Reviewed and checked for completeness