

# Steer PAIA Manual

October 2025

#### Introduction

The Promotion of Access to Information Manual ("manual") is published in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act No. 4 of 2013 ("POPIA"). This Manual gives effect to the constitutional right of access to information but recognises limitations to this right including, but not limited to, the reasonable protection of privacy, commercial confidentiality, and good governance.

Important to this Manual the following annexures apply:

Annexure A: The Request for Access to a Copy of the Guide Annexure B: Request for Access to Records in Terms of PAIA

Annexure C: Fees in Respect of Access to Records
Annexure D: Outcome of Request and Fees Payable

Annexure E: Request for Record/Description of Personal Information in

Terms of POPIA

Annexure F: Objection to the Processing of Personal Information in Terms of

**POPIA** 

Annexure G: Request for Correction/Deletion of Personal Information in

Terms of POPIA

### Objective

This Manual will enable you to know what types of information we hold, the manner and form in which a request for information must be submitted in terms of PAIA and POPIA, as well as the grounds on which a request may be denied. It further defines how you may object to the processing of your personal information and/or request a correction or deletion of your personal information.

## Scope and overview

Steer Capital (Pty) Ltd ("Steer") is a private company duly incorporated in the Republic of South Africa, with registration number

#### **Definitions**

In this Manual, unless the context otherwise indicates:

Client means any natural or juristic entity that receives services from Steer;

Data subject means the person to whom personal information relates as defined in POPIA;

**Employee** means all permanent and temporary employees of Steer, including consultants, temporary workers, and directors;

**Personal information** means information relating to you that includes, but is not limited to:

- a. information relating to race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth;
- information relating to education, or medical, financial, criminal or employment history;
- c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to you;
- d. biometric information;
- e. personal opinions, views or preferences;
- f. correspondence sent by you that is implicitly or explicitly of a private or confidential nature, or further correspondence that would reveal the contents of the original correspondence;
- g. your opinions or views about another individual; and
- h. your name, if it appears with other personal information relating to you, or if the disclosure of your name itself would reveal information about you;

#### **Record** means any recorded information:

- a. regardless of form or medium;
- b. in the possession or under the control of Steer, respectively; and
- c. whether or not it was created by Steer, respectively;

**Requestor** means the person requesting access to the records.

#### Contact details

STEER duly appointed an Information Officer to oversee compliance with this manual. The relevant contact details are:

Information Officer Dennis du Plessis

Direct telephone number: +27 871600099

E-mail address: info@steercapital.co.za

Physical address:

6 Kipling Street, Dan Pienaar, Bloemfontein

Website: www.steercapital.co.za

#### INFORMATION REGULATOR'S GUIDE

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 available by the Information Regulator. The Guide is also made available in English and Afrikaans at the offices of Steer or by requesting it from the Information Officer. Any request for public inspection of the Guide at the office of the Information Regulator or a request for a copy of the Guide from the Information Officer must substantially correspond with ANNEXURE A.

#### CATEGORIES OF RECORDS HELD BY STEER

The categories of records held by Steer are listed in the table below according to the respective divisions. A category of record in this Manual does not imply that a request for access to such a record would be granted. All requests for access will be evaluated on a case-by-case basis by the Information Officer. Information that is obtainable via our website is automatically available and thus there is no need to formally request this in terms of this Manual.

Division	Category
Company Secretarial and Legal	Statutory company records Minutes and related meeting information Records of executive, board and shareholder decisions, and related documentation General agreement documentation Securities and equities Terms of reference for board and board committees Shareholder information Legally privileged material Internal legal opinions Legal Policies and procedures
Compliance	Compliance policies and procedures Regulatory licence Regulatory and industry body reports Compliance reports Complaints register Gift register Training register Conflict of Interest register Fit and proper documentation of Representatives, Key Individuals
Executive Office	Business continuity plan Strategic plans Research information belonging to Steer, whether conducted itself or commissioned from a third party

Division	Category
Finance	Invoices Audit records Annual financial statements Rental agreements Bank statements Management accounts Tax, VAT and PAYE records Payroll Service provider information Professional indemnity insurance Going concern assessment
Human Resources	Employee records Employment contracts Employment-related policies and procedures Health and safety records Employment equity records Training/learning and development records Job applicant information Reports to industry body
Information Technology	Information technology policies and procedures Disaster recovery plan and tests System security tests

Division	Category
Marketing	Market information Media releases Internal publications and newsletters Communicating with clients by email or SMS Advertising and promotional material (including marketing brochures)
Operational	Records provided by clients Records provided by third parties regarding clients Records provided by clients' Clients' transactional records Correspondence with clients Service agreements entered into with third parties
Risk	Risk Register Risk Tolerance Framework

# RECORDS AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

Information may also be available in terms of, among others, the following legislation:

- +Basic Conditions of Employment Act No. 75 of 1997.
- +Broad-Based Black Economic Empowerment Act No. 53 of 2003.
- +Companies Act No. 71 of 2008.
- +Compensation for Occupational Injuries and Diseases Act No. 130 of 1993.
- +Competition Act No. 89 of 1998.
- +Copyright Act No. 98 of 1978.
- +Electronic Communications and Transactions Act No. 25 of 2002.
- +Employment Equity Act No. 55 of 1998.
- +Financial Advisory and Intermediary Services Act No. 37 of 2002.
- +Financial Intelligence Centre Act No. 38 of 2001.
- +Financial Markets Act No. 19 of 2012.
- +Income Tax Act No. 58 of 1962.
- +Insolvency Act No. 24 of 1936.
- +Insurance Act No. 18 of 2017.
- +Intestate Succession Act No. 81 of 1987.
- +Labour Relations Act No. 66 of 1995.
- +Long-Term Insurance Act No. 52 of 1998.
- +Occupational Health and Safety Act No. 85 of 1993.
- +Pension Funds Act No. 24 of 1956 and the Policyholder Protection Rules and Pension Fund Regulations.
- +Prevention and Combating of Corrupt Activities Act No. 12 of 2004.
- +Prevention of Organised Crime Act No. 121 of 1998.
- +Protected Disclosures Act No. 26 of 2000.
- +Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004.
- +Skills Development Act No. 97 of 1998.
- +Trust Property Control Act No. 57 of 1988.
- +Unemployment Insurance Act No. 30 of 1966.
- +Value-Added Tax Act No. 89 of 1991.

Although we have used our best endeavours to supply you with a list of applicable legislation, it is possible that the above list may be incomplete. This list will be reviewed annually.

#### GROUNDS FOR THE REFUSAL OF ACCESS IN TERMS OF PAIA

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

- The protection of personal information of a third person (who is a natural person) from unreasonable disclosure 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/or
- information disclosed in confidence by a third party to Steer.
- The disclosure of the record could put that third party at a disadvantage in negotiations or commercial competition.
- The protection of confidential information if the disclosure would constitute a breach of a duty or confidence to a third party in terms of an agreement.
- The protection of confidential information of third parties if it is protected in terms of any agreement or legislation.
- The protection of the safety of individuals and the protection of property.
- The protection of records which would be regarded as privileged in legal proceedings.
- The protection of commercial activities of Steer, which may include:
- trade secrets;
- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Steer;
- information which, if disclosed, could put Steer at a disadvantage in negotiations or commercial competition; and
- a computer program which is owned by Steer and which is protected by copyright.
- The protection of research information of Steer or a third party which disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

#### REMEDIES AVAILABLE TO A REQUESTOR ON THE REFUSAL OF ACCESS

There is no internal appeal procedure that may be followed a request to access information has been refused. The decision made by the Information Officer is final. If a requestor is not satisfied with the outcome of the request, they are entitled to apply to the Information Regulator or a court of competent jurisdiction, within 180 (one hundred and eighty) days of the decision, to take the matter further.

11.2 Where a third party is affected by the request for access, and the Information Officer has decided to grant access to a record, the third party has 180 (one hundred and eighty) days in which to appeal the decision in a court.

#### PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE POPIA

- Steer will collect, use, and share your personal information in accordance with its Privacy Policy. This policy is available on our website or upon request from the Information Officer.
- In terms of POPIA you may, upon proof of identity, request Steer to confirm, free of charge, the personal information that it holds about you. To exercise this right, please contact our Information Officer.
- You may request a record, or a description of the personal information held by Steer about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to your personal information. To do so, complete the request form in ANNEXURE E to this Manual and submit the request to the Information Officer. You may be required to pay a fee for this service, as indicated in ANNEXURE C. The Information Officer will provide you with the amount payable before providing the service including the banking details that the fees must be paid into.
- You may object at any time, free of charge, to the processing of personal information by Steer, on reasonable grounds, unless legislation provides for such processing. If you want to object to the processing of your personal information, please complete the prescribed form attached hereto as ANNEXURE F and submit it to the Information Officer.
- You may request Steer to correct the personal information held about you if it is inaccurate, irrelevant, excessive, outdated, incomplete, misleading or has been obtained unlawfully. To request the correction of your personal information you would need to complete ANNEXURE G. This form must be submitted to the Information Officer.
- If you wish Steer to destroy or delete a record of personal information about you that we are no longer authorised to retain in terms of POPIA, please complete ANNEXURE G to this Manual and submit it to the Information Officer.

#### Availability of this manual

This manual will be available on www.steercapital.co.za or by submitting a request for a copy to the Information Officer using the contact details in clause 5 of this Manual.

#### REMEDIES AVAILABLE TO A REQUESTOR ON THE REFUSAL OF ACCESS

There is no internal appeal procedure that may be followed a request to access information has been refused. The decision made by the Information Officer is final. If a requestor is not satisfied with the outcome of the request, they are entitled to apply to the Information Regulator or a court of competent jurisdiction, within 180 (one hundred and eighty) days of the decision, to take the matter further.

11.2 Where a third party is affected by the request for access, and the Information Officer has decided to grant access to a record, the third party has 180 (one hundred and eighty) days in which to appeal the decision in a court.

#### PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE POPIA

- Steer will collect, use, and share your personal information in accordance with its Privacy Policy. This policy is available on our website or upon request from the Information Officer.
- In terms of POPIA you may, upon proof of identity, request Steer to confirm, free of charge, the personal information that it holds about you. To exercise this right, please contact our Information Officer.
- You may request a record, or a description of the personal information held by Steer about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to your personal information. To do so, complete the request form in ANNEXURE E to this Manual and submit the request to the Information Officer. You may be required to pay a fee for this service, as indicated in ANNEXURE C. The Information Officer will provide you with the amount payable before providing the service including the banking details that the fees must be paid into.
- You may object at any time, free of charge, to the processing of personal information by Steer, on reasonable grounds, unless legislation provides for such processing. If you want to object to the processing of your personal information, please complete the prescribed form attached hereto as ANNEXURE F and submit it to the Information Officer.
- You may request Steer to correct the personal information held about you if it is inaccurate, irrelevant, excessive, outdated, incomplete, misleading or has been obtained unlawfully. To request the correction of your personal information you would need to complete ANNEXURE G. This form must be submitted to the Information Officer.
- If you wish Steer to destroy or delete a record of personal information about you that we are no longer authorised to retain in terms of POPIA, please complete ANNEXURE G to this Manual and submit it to the Information Officer.