



PAIA MANUAL

INTRODUCTION

The Promotion of Access to Information Act 2 of 2000 (PAIA) is a critical piece of legislation that promotes transparency and accountability in South Africa. As a private entity, Pinnacle Marketing (Pty) Ltd recognizes the importance of providing access to information whilst respecting privacy and confidentiality.

Transparency is a core value in our operations and we believe that open access to information fosters trust and strengthens our relationships with various stakeholders, including our valued clients. PAIA encourages private bodies like ours to uphold transparency while safeguarding sensitive data.

Although transparency is essential, we acknowledge that certain limitations exist. PAIA recognizes circumstances where access may be restricted, such as protecting trade secrets or personal information. Our commitment is to strike a balance between openness and legitimate restrictions.

We maintain various records, including financial data, personnel files, contracts and operational documents. In this Manual, we outline the categories of records we hold, their format, and the relevant costs involved (if applicable). Whether electronic or physical, these records contribute to our business operations and decision-making processes.

As a private entity, we have also appointed an Information Officer, who is responsible for managing information requests under PAIA. The Information Officer serves as the contact point for individuals seeking access to records. You can find the contact details for our Information Officer in this Manual, with instructions on how to submit your particular request.

We are committed to complying with PAIA and ensuring that individuals can exercise their right to access information. By providing this Manual, we further demonstrate our commitment to transparency, accountability and responsible information management.

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ADOPTION

The below confirms acknowledgement by the Compliance Function that the PAIA Manual 2024 as stated below has been adopted:

FSP Name	Pinnacle Marketing
FSP No.	15017
Version	V1 2024
Owner	Ruark Jewell
Review Date	06/02/2024

PURPOSE

PAIA gives effect to Section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any person or private body, when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- Foster a culture of transparency and accountability in public and private bodies by giving effect to the right to access information; and to
- Actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

Pinnacle Marketing (Pty) Ltd recognizes everyone's right to access information and is committed to provide access to the company records where the proper procedural requirements as set out by the Promotion of Access to Information Act 2 of 2000 and the Protection of Personal Information Act 4 of 2013.

Pinnacle Marketing (Pty) Ltd.'s PAIA Manual is compiled in accordance with Section 51 of the Act and contains the below provisions:

Contact Details and Business Type	This section provides Pinnacle Marketing (Pty) Ltd.'s postal and physical address, phone, fax and email address of the Head of the company.
Section 10 PAIA Guide	This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.
Statutory Records	This section provides a description of the various statues in terms of which Pinnacle Marketing (Pty) Ltd is required to maintain records.
Availability of Records	This section provides a list of records held by Pinnacle Marketing (Pty) Ltd along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. This section also provides a description of the category of data subjects to who the respective records relates along with an indication of the purpose for which the record is being kept. Records that are indicated as freely available can be accessed by contacting the Information Officer without having to follow any formal procedures. Records that are indicated as a PAIA request require a requester to lodge a formal request as provided in the Request Procedure.
Prescribed Fees	This section sets out the fees that are payable to Pinnacle Marketing (Pty) Ltd by the requester prior to the company processing a request to obtain access to a record held by Pinnacle Marketing (Pty) Ltd.
Information Officer Appointment	This section provides for the formal appointment of the Information Officer.
Processing of Personal Information	This section sets out the applicable aspects for the processing of personal information.
Request Procedure	This section sets out the procedure required to be followed by a requester to obtain access to a record indicated as a PAIA request in the Availability of Records section.
Outcome of Request and Fees Payable	This section sets out the outcome of a request to a requester and the fees payable by the requester.

DEFINITIONS

PERSONAL INFORMATION

Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, existing juristic person, including but not limited to information concerning:

- Race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;
- Information relating to the education or medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views or preferences of the person;
- 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;
- The views or opinions of another individual about the person; and
- 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.



DATA SUBJECT

This refers to the natural or juristic person to whom personal information relates, such as an individual client or product supplier.



PROCESSING

The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:



- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any other form; or
- Merging, linking as well as any restriction, degradation, erasure or destruction of information.

PRIVATE BODY



A natural person who carries or has carried on any trade, business or profession, but only in such capacity.

A partnership which carries or has carried on any trade, business or profession.

Any former or existing juristic person, but excludes a public body.

INFORMATION OFFICER



The Information Officer is responsible for ensuring the organisation's compliance with the Protection of Personal Information Act 4 of 2013.

REQUESTER



In relation to a private body, means any person, including, but not limited to a public body or an official thereof, making a request for access to a record of Pinnacle Marketing (Pty) Ltd or a person acting on behalf of such person.

RECORD



Any recorded information regardless of the form or medium, in the possession or under the control of Pinnacle Marketing (Pty) Ltd irrespective of whether or not it was created by Pinnacle Marketing (Pty) Ltd.

AVAILABILITY OF THE MANUAL

A copy of the Manual is available:

- On our website www.pinnaclemarketing.co.za;
- At our offices for public inspection during normal business hours;
- To any person upon request and upon payment of a reasonable prescribed fees; and
- To the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in the Prescribed Fees section, shall be payable per each A4 size photocopy made.

DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or Deputy Information Officer are responsible for:

- Publishing and proper communication of the Manual, i.e. creating awareness;
- The facilitation of any request for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete/full record or only part of a record;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the Manual for accuracy and communicating any amendments.

RIGHT TO ACCESS

The Information Officer may only provide access to any record held by Pinnacle Marketing (Pty) Ltd to a requester if:

- The record is required for the exercise or protection of any right;
- The requester complies with the procedural requirements relating to a request for access to that record; and
- Access to that record is not refused in terms of any of the grounds for refusal as listed below.

The requester must complete and submit Request Access Form to Pinnacle Marketing (Pty) Ltd.

GROUND FOR REFUSAL

The Information Officer must assess whether there are any grounds for refusing a request for access. Where any grounds for refusal are found, a request for access will not be granted and the Information Officer must complete an Outcome of Request Form and submit the Form to the requester.

However, despite finding any grounds for refusal, access to the record will be provided where:

- The disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk; and
- The public interest in disclosing the record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted. If a request for access is made with regard to a record containing information that would justify a ground for refusal, every part of the record which does not contain, and can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

Mandatory protection of privacy for a third party who is a natural person:	
Grounds for Refusal	The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual).
No Grounds for Refusal	<ul style="list-style-type: none">▪ The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned;▪ The record consists of information that is already publically available;▪ The record consists of information that was given to Pinnacle Marketing (Pty) Ltd by the individual to whom it relates and the individual was informed by or on behalf of Pinnacle Marketing (Pty) Ltd before it is given, that the information belongs to a class of information that would or might be made available to the public;▪ The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18, or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest;▪ The record consists of information about an individual who is deceased and the requester is the individual's next of kin or making the request with the written consent of the individual's next of kin; or▪ The record consists of information about an individual who is or was an official of Pinnacle Marketing (Pty) Ltd and which relates to the position or functions of the individual including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual and the name of the individual on a record prepared by the individual.

Mandatory protection of commercial information of a third party:	
Grounds for Refusal	<ul style="list-style-type: none"> ▪ The record consists of information that contains trade secrets of a third party; ▪ The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interest of that third party; or ▪ The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition.
No Grounds for Refusal	<ul style="list-style-type: none"> ▪ The record consists of information about a third party who has consented in writing to its disclosure to the requester concerned; or ▪ The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk, the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation.

Mandatory protection of certain confidential information of a third party:	
Grounds for Refusal	The record consists of information, the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

Mandatory protection of records privileged from production in legal proceedings:	
Grounds for Refusal	The record consists of information privileged from product in legal proceedings unless the person entitled to the privilege has waived the privilege.

Mandatory protection of safety of individuals and proportion of property:	
Grounds for Refusal	<ul style="list-style-type: none"> ▪ The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual; ▪ The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport or any other property; or ▪ The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

Commercial information of Pinnacle Marketing (Pty) Ltd	
Grounds for Refusal	<ul style="list-style-type: none"> ▪ The record consists of information that contains trade secrets of Pinnacle Marketing (Pty) Ltd; ▪ The record consists of information that contains financial, commercial or technical information, other than trade secrets of the company, the disclosure of which would likely cause harm to the commercial or financial interests of Pinnacle Marketing (Pty) Ltd; ▪ The record consists of information, the disclosure of which, could reasonably be expected to put Pinnacle Marketing (Pty) Ltd at a disadvantage in contractual or other negotiations or prejudice Pinnacle Marketing (Pty) Ltd in commercial competition; or ▪ The record is a computer program as defined in Section 1(1) of the Copyright Act 98 of 1978, owned by Pinnacle Marketing (Pty) Ltd, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.
No Grounds for Refusal	The record consists of information about the results of any product or environmental testing or other investigation supplied by Pinnacle Marketing (Pty) Ltd or the result of any such testing or investigation carried out by or on behalf of Pinnacle Marketing (Pty) Ltd and its disclosure would reveal a serious public safety or environmental risk, the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation.

Mandatory protection of research information of a third party and Pinnacle Marketing (Pty) Ltd:	
Grounds for Refusal	<ul style="list-style-type: none"> ▪ The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual; ▪ The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport or any other property; or ▪ The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property.

NOTICE

FEES PAYABLE

Where a request for access has been received, the Information Officer will notify the requester of receipt and the prescribed fee (if applicable) that is payable prior to processing the request. Please refer to Prescribed Fees (pg.13) for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any);
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be; and
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request; and
- Notify the requester of the decision, and if the requester stated that he/she wishes to be informed of the decision in any other manner, inform him/her in that manner, if it is reasonably possible.

GRANTED REQUEST FOR ACCESS

If the request for access is granted, the notice must state:

- The access fee (if applicable) to be paid upon access;
- The form in which access will be given; and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

REFUSED REQUEST FOR ACCESS

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied upon;
- Exclude, from any such reasons, any reference to the contents of the records; and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

UNDISCOVERABLE RECORDS

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record is in Pinnacle Marketing (Pty) Ltd.'s possession but cannot be found or simply does not exist, then the Head of Pinnacle Marketing (Pty) Ltd must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the Head.

CONTACT DETAILS AND BUSINESS TYPE

CONTACT DETAILS	
FSP Name	Pinnacle Marketing (Pty) Ltd
FSP Number	15017
Phone Number	021 879 1109
Email Address	info@pinnaclemarketing.co.za
Postal Address	PO Box 199, Melkbosstrand, 7437
Physical Address	Unit 82 Eden on the Bay Corner of Otto Du Plessis and Sir David Baird Drive Big Bay, Cape Town 7441

HEAD OF PINNACLE MARKETING (PTY) LTD	
Full Name	Carl Smyth
Email Address	carl@pinnaclemarketing.co.za

INFORMATION OFFICER	
Full Name	Ruark Jewell
Phone Number	021 879 1119
Email Address	compliance@pinnaclemarketing.co.za

BUSINESS TYPE	
Agriculture	<input type="checkbox"/>
Mining and quarrying	<input type="checkbox"/>
Manufacturing	<input type="checkbox"/>
Electricity, gas and water	<input type="checkbox"/>
Construction	<input type="checkbox"/>
Retail, motor trade and repair services	<input type="checkbox"/>
Wholesale trade, commercial agents and allied services	<input type="checkbox"/>
Catering, accommodation and other trade	<input type="checkbox"/>
Finance and business services	<input checked="" type="checkbox"/>
Community, special and personal services	<input type="checkbox"/>
Other	<input type="checkbox"/>
If other, please specify	

CONFIRMATION	
Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

SECTION 10 PAIA GUIDE

The Regulator has, in terms of Section 10(1) of PAIA, amended, updated and made available the revised Guide on how to use PAIA, 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. The Guide is available in each of the official languages and also in braille.

The Guide contains the description of:

- The objectives of PAIA and POPIA;
- The postal and physical addresses, phone number and email address of:
 - The Information Officer of every public body; and
 - Every Deputy Information Officer of every public body and private body designated in terms of Section 17(1) of PAIA and Section 56 of POPIA.
- The manner and form of a request for:
 - Access to a record of a public body contemplated in Section 11; and
 - Access to a record of a private body contemplated in Section 50.
- The assistance available for the Information Officer of a public body in terms of PAIA and POPIA;
- The assistance available from the Regulator in terms of PAIA and POPIA;
- 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:
 - An internal appeal;
 - A complaint to the Regulator; and
 - An application with a court against a decision by the Information Officer of a public body, a decision on an internal appeal or a decision by the Regulator or a decision of the head of a private body.
- The provisions of Section 14 and 51 requiring a public body and private body, respectively, to compile a Manual and how to obtain access to a Manual;
- The provisions of Section 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- The notices issued in terms of Section 22 and 54 regarding fees to be paid in relation to requests for access; and
- The regulations made in terms of Section 92.

Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours. The guide can also be obtained upon request to the Information Officer. Alternatively from the Regulator's website <https://justice.gov.za/inforeg/>

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where 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.

CONFIRMATION	
Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

STATUTORY RECORDS

Pinnacle Marketing (Pty) Ltd maintains records and information in terms of the following legislation:

Administration of Estates Act	<input type="checkbox"/>
Arbitration Act	<input checked="" type="checkbox"/>
Auditing Professions Act	<input type="checkbox"/>
Basic Conditions of Employment Act	<input checked="" type="checkbox"/>
Closed Corporations Act	<input checked="" type="checkbox"/>
Collective Investment Schemes Control Act	<input type="checkbox"/>
Companies Act	<input checked="" type="checkbox"/>
Compensation of Occupational Injuries and Diseases Act	<input checked="" type="checkbox"/>
Consumer Protection Act	<input checked="" type="checkbox"/>
Copyright Act	<input checked="" type="checkbox"/>
Customs and Excise Act	<input type="checkbox"/>
Electronic Communications and Transactions Act	<input checked="" type="checkbox"/>
Employment Equity Act	<input checked="" type="checkbox"/>
Financial Advisory and Intermediary Services Act	<input checked="" type="checkbox"/>
Financial Institutions (Protection of Funds) Act	<input type="checkbox"/>
Financial Intelligence Centre Act	<input checked="" type="checkbox"/>
Friendly Societies Act	<input type="checkbox"/>
Income Tax Act	<input checked="" type="checkbox"/>
Insolvency Act	<input checked="" type="checkbox"/>
Labour Relations Act	<input checked="" type="checkbox"/>
Long-Term Insurance Act	<input checked="" type="checkbox"/>
Medical Schemes Act	<input type="checkbox"/>
National Credit Act	<input checked="" type="checkbox"/>
Occupational Health and Safety Act	<input checked="" type="checkbox"/>
Patents Act	<input type="checkbox"/>
Pension Funds Act	<input type="checkbox"/>
Prevention of Organised Crime Act	<input checked="" type="checkbox"/>
Prevention and Combatting of Corrupt Activities Act	<input checked="" type="checkbox"/>
Promotion of Equality and Prevention of Unfair Discrimination Act	<input checked="" type="checkbox"/>
Protection of Constitutional Democracy against Terrorist and related Activities Act	<input checked="" type="checkbox"/>
Short-Term Insurance Act	<input checked="" type="checkbox"/>
Skills Development Act	<input checked="" type="checkbox"/>
Trademarks Act	<input checked="" type="checkbox"/>
Unemployment Insurance Act	<input checked="" type="checkbox"/>
Value Added Tax Act	<input checked="" type="checkbox"/>

CONFIRMATION

Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

AVAILABILITY OF RECORDS

Pinnacle Marketing (Pty) Ltd maintains the following categories of records and related subject matter. The status of the records availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Regulatory and Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health and Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board of Director Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal Correspondence	PAIA Request	Internal Communication	Employees
	Insurance Policies held by the company	PAIA Request	Risk Management	Organisation

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	SETA Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
Training Manual	PAIA Request	Internal Referencing	Organisation	

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product/Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Client	Client Database	PAIA Request	Internal Referencing	Client
	Client Agreements	PAIA Request	Internal Referencing	Client
	Client Files	PAIA Request	Internal Referencing	Client
	Client Instructions	PAIA Request	Internal Communication	Client
	Client Correspondence	PAIA Request	External Communication	Client

CATEGORY	RECORD	AVAILABILITY	PURPOSE	DATA SUBJECT
Third Party	Rental Agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise Agreements	PAIA Request	Contractual Agreement	Third Party
	Non-Disclosure Agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

CONFIRMATION	
Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

PRESCRIBED FEES

The following applies to requests (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (6), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted);
- A requester may lodge an application with a court against the payment of the request fee and/or deposit; and
- Records may be withheld until the fees have been paid.

NO.		FEE
1	The request fee payable by every requester.	R140.00
2	Photocopy/printed black and white copy of A4 size page.	R2.00
3	Printed copy of an A4 size page.	R2.00
4	For a copy in a computer-readable form on:	R40.00
	▪ Flash drive (to be provided by requester)	
	▪ Compact disc:	
	· Provided by the requester.	R40.00
	· Provided to the requester.	R60.00
5	For a transcription of visual images per A4 size page.	Service to be outsourced. Will depend on Quote.
6	Copy of visual images.	
7	Transcription of an audio record per A4 size page.	R24.00
8	Copy of an audio record on:	R40.00
	▪ Flash drive (to be provided by requester)	
	▪ Compact disc:	
	· Provided by the requester.	R40.00
	· Provided to the requester.	R60.00
9	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.	R140.00
	Not to exceed a total cost of:	R435.00
10	Deposit if search exceeds 6 hours.	1/3 of amount per request in terms of 2 to 8.
11	Postage, email or any other electronic transfer.	Actual expense

INFORMATION OFFICER

Pinnacle Marketing (Pty) Ltd has appointed an Information Officer to facilitate any requests to access records held by the company. This delegation does not prohibit the Head from exercising power concerned or performing the duties him/herself. The delegation may at any time be withdrawn or amended in writing by the Head of Pinnacle Marketing (Pty) Ltd.

The Information Officer need not have any specific qualifications but must have a thorough understanding of Pinnacle Marketing (Pty) Ltd.'s functional departments and business processes.

The Information Officer has the authority to approach all staff and to request all records held by the company. Where a manager is of the opinion that access to a record should not be granted to the Information Officer, reasons for this decision shall be provided to the Information Officer and Head who will make the final decision on the matter.

The Information Officer is responsible for:

- Publishing and proper communication of the Manual (creating Manual awareness);
- Facilitating any requests for access;
- Providing adequate notice and feedback to the requester;
- Determining whether to grant a request for access to a complete record or only part thereof;
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format; and
- Reviewing the Manual for accuracy and communicating any amendments.

I, Ruark Jewell, a Key Individual of Pinnacle Marketing (Pty) Ltd accepts and confirms the appointment as Information Officer:

CONFIRMATION	
Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

PURPOSE OF PROCESSING PERSONAL INFORMATION

As an insurance intermediary, we process personal information for the following reasons:

- We process personal information of clients and potential clients in order to provide financial products and services;
- We process personal information of service providers, vendors and outsourced services for contractual and legal purposes; and
- We process personal information of contracted employees, mandated Representatives, volunteers and internships for labour related purposes.

DESCRIPTION OF CATEGORIES OF DATA SUBJECTS AND INFORMATION CATEGORIES

CLIENTS	Names, ID numbers, contact information, address details, risk item details, beneficiary details and banking details.
SERVICE PROVIDERS	Names, registration numbers, VAT details, address details, contact information, trade secrets, commercial information and banking details.
EMPLOYEES	Names, ID numbers, address details, contact information, race, gender, broad medical information, employment history, qualification details and banking details.

RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED TO

CATEGORY	RECIPIENT
Client Information	Insurers, underwriters, regulators and law enforcement agencies.
Service Provider Information	Insurers, underwriters, regulators and law enforcement agencies.
Employee Information	Insurers, underwriters, regulators, law enforcement agencies, qualification authorities and the department of labour.

PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

No personal information processed by Pinnacle Marketing (Pty) Ltd is transferred or will be transferred across borders, and all cloud services are based in South Africa.

GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES IMPLEMENTED TO ENSURE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF INFORMATION

As per our electronic data security policies, we ensure that the personal information that we process is protected at all times by ensuring that the following measures are applied at all times, monitored and reviewed on a regular basis:

- Digital security measures such as anti-virus software, data encryption, firewalls and so forth;
- Physical security measures such as access-controlled server rooms, alarm systems and so forth; and
- Implemented policies and procedures, including training for all staff members.

REQUEST FOR ACCESS TO RECORD FORM

NOTE

Proof of identity must be attached by the requester. If the request is made on behalf of another person, proof of authorisation must be attached to this form.

Please send this Form and any supporting documentation to the Information Officer utilizing the following details:

INFORMATION OFFICER	
Physical Address	Unit 82 Eden on the Bay, Cnr. Otto Du Plessis and Sir David Baird Drive Big Bay Cape Town – South Africa 7441
Postal Address	PO Box 199 Melkbosstrand 7347
Email Address	compliance@pinnaclemarketing.co.za

Request made in my own name.	<input type="checkbox"/>
Request made on behalf of another person.	<input type="checkbox"/>

PERSONAL INFORMATION - REQUESTER	
Capacity	
Full Name	
ID Number	
Telephone Number	
Cellphone Number	
Fax Number	
Email Address	
Physical Address	
Postal Address	

Should the request be on behalf of another person, please complete the below relating to your personal information:

PERSONAL INFORMATION - DATA SUBJECT	
Full Name	
ID Number	
Telephone Number	
Cellphone Number	
Fax Number	
Email Address	
Physical Address	
Postal Address	

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 below is inadequate, please continue on a separate page and attach it to this Form. All additional pages must be signed.

DESCRIPTION OF RECORD	
REFERENCE NUMBER	
ANY FURTHER DETAILS	

TYPE OF RECORD	
Record is in written or printed form.	<input type="checkbox"/>
Record comprises of virtual images (including photos, slides, video recordings, computer-generated images, etc).	<input type="checkbox"/>
Record consists of recorded words or information which can be reproduced in sound.	<input type="checkbox"/>
Record is held on a computer or in an electronic or machine-readable form.	<input type="checkbox"/>

FORM OF ACCESS	
Printed copy of record (includes copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form).	<input type="checkbox"/>
Written or printed transcription of virtual images (includes photos, slides, video recordings, computer generated images, etc).	<input type="checkbox"/>
Transcription of soundtrack (written or printed document).	<input type="checkbox"/>
Copy of record on flash drive (including virtual images and soundtracks).	<input type="checkbox"/>
Copy of record on compact disc drive (including virtual images and soundtracks).	<input type="checkbox"/>
Copy of record saved on cloud storage server.	<input type="checkbox"/>

MANNER OF ACCESS	
Personal inspection of record at registered address of 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).	<input type="checkbox"/>
Postal services to postal address.	<input type="checkbox"/>
Postal services to physical address.	<input type="checkbox"/>
Courier service to physical address.	<input type="checkbox"/>
Facsimile of information in written or printed form (includes transcriptions).	<input type="checkbox"/>
Email of information (includes soundtracks if possible).	<input type="checkbox"/>
Cloud share or file transfer.	<input type="checkbox"/>
PREFERRED LANGUAGE	

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 additional pages.	
RIGHT TO BE EXERCISED OR PROTECTED	
EXPLAIN WHY RECORD IS REQUIRED TO EXERCISE OR PROTECT RIGHT	

FEES	
<ul style="list-style-type: none"> ▪ 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 an exemption of the payment of any fee, please state the reason for exemption. 	
REASON FOR EXEMPTION	

PREFERRED CORRESPONDENCE TYPE	
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.	
EMAIL ADDRESS	
FAX NUMBER	
POSTAL ADDRESS	

SIGNATURE SECTION	
Signed at	
Date	
Signature	

FOR OFFICE USE ONLY

REFERENCE	
INFORMATION OFFICER	Ruark Jewell
DATE RECEIVED	
ACCESS FEE	
DEPOSIT (IF ANY)	
SIGNATURE	

OUTCOME OF REQUEST AND FEES PAYABLE

NOTE

If your request is granted:

- The amount of the deposit (if any) is payable before your request is processed; and
- The requested record/portion of the record will only be released once proof of full payment is received.

Please use the reference number hereunder in all future correspondence.

REFERENCE	
INFORMATION OFFICER	Ruark Jewell 021 879 1119 compliance@pinnaclemarketing.co.za
DATE OF REQUEST	

YOU REQUESTED	
Personal inspection of information at registered address of Pinnacle Marketing (Pty) Ltd (including listening to recorded words, information which can be reproduced in sound, or information held on a computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the prescribed fees.	<input type="checkbox"/>

Or

YOU REQUESTED	
Printed copies of the information (includes copies of any virtual images, transcriptions and information held on a computer or in an electronic or machine-readable form).	<input type="checkbox"/>
Written or printed transcription of virtual images (includes photographs, slides, video recordings, computer generated images, etc).	<input type="checkbox"/>
Transcription of soundtrack (written or printed document).	<input type="checkbox"/>
Copy of information on flash drive (including virtual images and soundtracks).	<input type="checkbox"/>
Copy of information on compact disc (including virtual images and soundtracks).	<input type="checkbox"/>
Copy of record saved on cloud storage server.	<input type="checkbox"/>

TO BE SUBMITTED	
Postal services to postal address.	<input type="checkbox"/>
Postal services to physical address.	<input type="checkbox"/>
Courier services to physical address.	<input type="checkbox"/>
Fax information in written or printed form (including transcriptions).	<input type="checkbox"/>
Email information (including soundtracks where possible).	<input type="checkbox"/>
Cloud share or file transfer.	<input type="checkbox"/>
PREFERRED LANGUAGE	

Kindly note that your request has been:

APPROVED	<input type="checkbox"/>
DECLINED	<input type="checkbox"/>

FEES			
ITEM	COST PER A4 PAGE	NO. OF PAGES	TOTAL
Photocopy.			
Printed copy.			
For a copy in a computer-readable form on: <ul style="list-style-type: none"> ▪ Flash drive (to be provided by requester); or ▪ Compact disc: <ul style="list-style-type: none"> · If provided by requester. R40.00 · If provided to the requester. R60.00 			
For a transcription of visual images per A4 size page.	Service to be outsourced. Will depend on quotation from service provider		
Copy of visual images.			
Transcription of an audio record, per A4 size page.	R24.00		
For a copy of an audio record on: <ul style="list-style-type: none"> ▪ Flash drive (to be provided by requester); or ▪ Compact disc: <ul style="list-style-type: none"> · If provided by requester. R40.00 · If provided to the requester. R60.00 			
Postage, email or any other electronic transfer.	Actual costs		
TOTAL COSTS			

DEPOSIT PAYABLE (IF SEARCH EXCEEDS 6 HOURS)	
Yes <input type="checkbox"/> No <input type="checkbox"/>	
Hours of search	
Amount of deposit (calculated on one third of total amount per request)	

THE AMOUNT MUST BE PAID INTO THE FOLLOWING BANK ACCOUNT	
Bank Name	
Account Holder	
Account Type	
Account Number	
Branch Code	
Reference	
Proof of Payment	compliance@pinnaclemarketing.co.za

SIGNATURE SECTION	
Signed at	
Date	
Signature	



For all policy and/or compliance queries please contact us on:

T: 021 879 1119

E: compliance@pinnaclemarketing.co.za

