



PAIA MANUAL

Pineapple Tech PTY LTD

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1. Definitions

- **Company** refers to Pineapple Tech (Pty) Ltd (FSP Number 48650) a duly authorized Financial Services Providers (hereinafter referred to as the FSP).
- **PAIA** stands for the Promotion of Access to Information Act 2 of 2000.
- **POPI** refers to the Protection of Personal Information Act 4 of 2013.
- **Information Regulator** is the regulatory body established in terms of Section 39 of POPI.
- **Person** means any natural or juristic entity.
- **Private Body** refers to:
 - An individual who is or was engaged in any trade, business, or profession in that capacity;
 - A partnership engaged in any trade, business, or profession, past or present;
 - Any past or present juristic entity, excluding public bodies.
- **Public Body** includes:
 - Any government department or administration at the national, provincial, or municipal level;
 - Any other official body exercising powers or performing duties under the Constitution or any provincial legislation, or executing public functions in terms of any law.
- **Head** of a private body refers to:
 - In the case of an individual, that individual or any authorised representative;
 - In the case of a partnership, any partner or authorised representative;
 - For juristic entities, the chief executive officer or equivalent, or an authorised person acting on their behalf.
- **Information Officer** is the head of a private body.
- **Deputy Information Officer** is a person to whom the Information Officer's powers or duties under POPI have been delegated.
- **Requester** in relation to a private body, is any individual, including public bodies or officials, seeking access to a record of the Company or acting on behalf of such an individual.
- **Personal Requester** is a requester seeking access to a record containing personal information about themselves.
- **Personal Information** refers to any information about an identifiable living person or, where applicable, an identifiable existing juristic entity. This includes, but is not limited to, information related to race, gender, sex, pregnancy, marital status, national origin, color, sexual orientation, age, health, religion, belief, culture, language, education, financial history, and more.



- **Request for Access** refers to a request for access to a record of the FSP under Section 50 of PAIA.
- **Record** encompasses any recorded information, regardless of form or medium, held by the Company, whether or not it was created by the FSP.
- **Data Subject** is the individual to whom the personal information relates.
- **Third Party** in relation to a request for access to a record held by the FSP, is any person other than the requester.
- **Processing** refers to any operation involving personal information, including collection, storage, updating, retrieval, alteration, use, distribution, and destruction.

2. Purpose of the PAIA Manual

The Promotion of Access to Information Act, 2000, enforces Section 32 of the Constitution, which guarantees the right to access information held by the State or any other entity, public or private, when such information is necessary for exercising or protecting any rights.

The objectives of PAIA include:

- Promoting transparency and accountability within public and private entities by ensuring the right to access information.
- Actively encouraging a society where South Africans have effective access to information to fully exercise and protect their rights.

Pineapple acknowledges everyone's right to access information and is committed to providing access to its records, provided the procedural requirements set by PAIA and POPI are met.

This PAIA Manual serves as a resource for the public to:

- o Identify the categories of records held by the entity that are available without submitting a formal PAIA request;
- o Understand how to request access to a record, including a description of the subjects on which the entity holds records and the categories of those records;
- o Learn about the records available according to other legislation;
- o Access the relevant contact details of the Information Officer and Deputy Information Officer for assistance with accessing records;
- o Access the guide on using PAIA as updated by the Regulator;
- o Determine whether the entity processes personal information, the purpose of such processing, and the categories of data subjects and related information;



- o Identify the recipients or categories of recipients to whom personal information may be provided;
- o Know if the entity plans to transfer or process personal information outside South Africa and to whom it may be supplied;
- o Confirm that the entity has implemented appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information to be processed.

3. Right of Access and Categories of Information Records

3.1. Right of Access

The Information Officer and/or Deputy Information Officer may only grant access to a record held by the Company if:

- The record is required for exercising or protecting any rights;
- The requester complies with the procedural requirements related to a request for access;
- Access to the record is not refused based on any of the grounds for refusal outlined below.

Refer to Annexure D for a comprehensive list of the Categories of Information Records that may be requested and their availability.

3.2. Categories of Information Records Available Without Request

Before submitting a request under PAIA, customers of the Company should consider whether other mechanisms are available to receive their information. All customers are entitled to access their own policy-related information without lodging a formal PAIA request.

CATEGORY OF RECORDS	TYPE OF RECORDS	Available on Request
Records which are policyholders entitled to	Policy information related to a client's policy, such as policy schedule, policy wording, premium payments, and claims history.	X
Information that employees are entitled to	Employment contract information	X



4. The Decision-Making Process

4.1. Notice

Upon receiving a request for access, the Information Officer and/or Deputy Information Officer will notify the requester of receipt and any applicable fee that must be paid before processing the request. Refer to Annexure F for a detailed breakdown of fees. Personal requesters are exempt from request fees.

The notice must include:

- The deposit amount (if any);
- Information on how the requester can lodge a complaint with the Information Regulator or apply to a court against the payment of the request fee or deposit;
- The procedure and timeline for lodging the complaint or application.

Unless third-party notification provisions apply, the Information Officer and/or Deputy Information Officer must, within 30 days of receiving the request, decide whether to grant the request and notify the requester of the decision.

If the request pertains to a record involving a third party, the Information Officer must take reasonable steps to inform that third party of the request within 21 days. The third party may, within 21 days, make representations as to why the request should be refused or provide written consent for the disclosure of the record. The third party will be informed of the decision and their right to appeal within 30 days.

4.2. Request Granted

If the request is granted, the notice must include:

- The access fee (if any) to be paid;
- The form in which access will be provided;
- Information on how the requester can lodge a complaint with the Information Regulator or apply to a court against the access fee or the form of access granted.

4.3. Request Refused

If the request is refused, the notice must:

- Provide sufficient reasons for the refusal, citing the relevant provision of PAIA;
- Exclude any reference to the content of the records;



- Inform the requester of their right to lodge a complaint with the Information Regulator or apply to a court against the refusal, along with the procedure and timeline for doing so.

If reasonable steps have been taken to find a requested record, and there are grounds to believe that the record:

- Is in the Company's possession but cannot be found, or
- Does not exist,

The head of the Company must notify the requester via affidavit or affirmation that it is not possible to provide access to that record, detailing all steps taken to locate it.

4.4. Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are grounds for refusing a request for access. Access will not be granted if any grounds for refusal are found, as detailed below:

- The Act prohibits the unreasonable disclosure of personal information of third-party natural persons to requesters, including information about deceased persons, with exceptions as per Section 63(2) of the Act.
- Requests relating to records containing third-party information concerning trade secrets, financial or commercial information, or confidentially supplied information that could harm the third party's interests must be refused unless the information relates to public safety or environmental risks.
- Disclosure of information that breaches a confidentiality agreement with a third party is prohibited.
- Requests that could endanger the life or safety of an individual, compromise the security of a building, system, or transportation means, or prejudice methods or systems for protecting an individual under a witness protection scheme or public safety may be refused.
- Records privileged from production in legal proceedings may not be disclosed unless the privilege has been waived.
- The Company may refuse access to records containing its own information if such disclosure would harm its commercial interests, although information must be released if it pertains to the results of product or environmental testing.

A record must be disclosed if its disclosure would reveal evidence of a legal contravention, a public safety risk, or if the public interest in disclosure outweighs the harm.

4.5. Right to Appeal



If a requester is dissatisfied with a refusal to grant access, they may apply to a court for relief within 30 days of the decision. Similarly, a third party dissatisfied with a decision to grant access may also apply to a court within 30 days of the decision.

The court may review the record(s) in question but may not disclose the contents. The court is empowered to issue any just and equitable order, including confirming, amending, or setting aside the decision, requiring actions to be taken or refrained from, or awarding costs.

5. Processing of Personal Information in terms of the Protection of Personal Information Act 4 of 2013

Pineapple collects and uses personal information as defined under POPI to fulfil its duties and obligations to data subjects and as a financial services entity.

The personal information of the following categories of data subjects is processed:

- Employees and job applicants
- Third-party suppliers
- Regulatory bodies
- Business partners
- Policyholders

5.1. Purpose of Processing Personal Information

The Company collects and processes personal information for the following purposes:

- Fulfilling responsibilities to customers;
- Fulfilling responsibilities to employees;
- Meeting contractual obligations to third-party service providers;
- Informing customers of products and services;
- Complying with legal and regulatory requirements;
- Protecting the Company's legitimate interests in business dealings.

5.2. Recipients of Personal Information



PERSONAL INFORMATION CATEGORY	RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Policyholder policy information, Company documents, Annual financial statements, statutorily required reports	Regulatory Authorities
Contracts with third-party partners	Any legal or juristic person with an appropriate legal basis & Third-party service provider
Product performance, policy documentation	Insurer
Investigation	Law enforcement agencies

5.3. Categories of Personal Information Processed

1. First name 2. Middle name 3. Last name 4. Initials 5. If disclosure of the name itself would reveal information about the person.	GENERAL IDENTIFICATION INFORMATION
6. E-mail address 7. Physical address 8. Telephone number 9. Location information 10. Online identifier	GENERAL CONTACT DETAILS
11. Any identifying number 12. Identifying symbol 13. Other particular assignment to a person 14. The name of the person if it appears with other personal information relating to the person 15. Birth of the person 16. Age	ID/PASSPORT NUMBER/POLICY NUMBER/ SHAREHOLDER NUMBER/DATE OF BIRTH/PAY CODE
17. Personal opinions 18. Personal views 19. Personal preferences 20. Views/opinions of/another individual about a person 21. Beliefs/philosophical beliefs 22. Conscience 23. Political persuasion	VIEWS, ASSESSMENTS, OPINIONS, RECOMMENDATIONS
24. Marital status	MARITAL STATUS
25. Financial history	FINANCIAL HISTORY



26. Employment history	EMPLOYMENT HISTORY
27. Correspondence sent of a private or confidential nature	CORRESPONDENCE SENT OF A PRIVATE OR CONFIDENTIAL NATURE

5.4. Planned Trans-boarder Flows of Personal Information

In some cases, the Company may need to send personal information to service providers outside South Africa. The Company will ensure that personal information is only sent to countries with data protection laws similar to those of South Africa unless the recipient agrees to adhere to South Africa's information protection principles. Third parties with whom information is shared are required to comply with applicable data protection laws, and internal measures are in place to ensure they have appropriate safeguards.

The Company employs security controls, both electronic and physical, to maintain confidentiality and prevent unauthorised access or damage to information. The Company's cybersecurity strategy aligns with industry standards to ensure effective risk management.

Data subjects have the following remedies:

- Lodge a complaint with the Company's Complaints Team at complaints@pineapple.co.za or with the Company's Deputy Information Officers (as per Annexure A);
- If unsatisfied, lodge the complaint with the Information Regulator;
- Institute civil action for damages in a court with jurisdiction.

The Company's Information Privacy Policy is available on its website at www.pineapple.co.za.

6. Information Security Measures

The Company implements security controls designed to protect the confidentiality, integrity, and availability of information. Information security is achieved through a set of responsibilities, controls, standards, processes, and systems to meet the Company's information security objectives.

7. Availability of the Manual

A copy of this manual is available:

- On the Company website at www.pineapple.co.za;
- At the Company's premises at 4A Sandown Valley Crescent, Sandown, during normal business hours;



- To any person upon request and upon payment of a reasonable prescribed fee;
- To the Information Regulator upon request.

8. Updating of the Manual and Annexures

This PAIA Manual is a working document that will be reviewed periodically. The Company's Information Officers will regularly update this manual as required. The PAIA manual is compiled under Section 51 of the Act and includes the provisions outlined above.

Annexure A: Contact Details & Business Type
This section provides the Company's postal and street address, phone and fax number and, if available, the e-mail address of the head of the Company.
Annexure B: 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.
Annexure C: Statutory Records
This section provides a description of various statutes in terms of which the Company is required to maintain records.
Annexure D: Availability and Category of Records
This section provides a list of records held by the Company 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. The section also provides a description of the category of data subject(s) to whom the respective records relate 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 Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a "PAIA Request", requires the requester to lodge a formal request as provided for in Annexure E.
Annexure E: Request Procedure and Form
This section sets out the procedure required to obtain access to a record indicated as a "PAIA Request" in Annexure D.
Annexure F: Prescribed Fees
This section sets out the fees that are payable to the Company prior to processing a request to obtain access to a record held by the Company.
Annexure G: Duty of Information Officer
This section provides the duties of the Company's Information Officer.
Annexure H & I: Deputy Information Officer Appointment
This section provides for the formal appointment of a Deputy Information Officer where so required.

9. Acknowledgement of ownership

This Policy is owned by the Company as defined above.



As Information Officers of the Company, we, Sizwe Ndlovu and Ndabenhle Ngulube, hereby confirm the adoption of this document as part of the Company's internal Policies.



Sizwe Ndlovu
Information Officer



Ndabenhle Ngulube
Deputy Information Officer



Annexure A: Contact Details & Business Type

Company contact Details:

Postal/Street Address: 4A Sandown Valley Crescent,
Sandown,
Sandton
2196

Chief Executive Officer:

Pineapple Tech Pty Ltd (FSP48650):

Name and surname: Marnus Van Heerden

Email address: marnus@pineapple.co.za

Information Officer:

Pineapple Tech Pty Ltd (FSP48650):

Name and surname: Sizwe Ndlovu

Email address: sizwe@pineapple.co.za

Deputy Information Officer:

Pineapple Tech Pty Ltd (FSP48650):

Name and surname: Ndabenhle Ngulube

Email address: ndabenhle@pineapple.co.za

The Company conducts its main type of business in the following sector:

Finance & Business Services



Annexure B: Section 10 PAIA Guide

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.

Requesters are referred to the guide in terms of Section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

The guide is available in all South African languages, free of charge, and any person may request a copy of the guide.

A copy of the guide may be obtained by contacting the South African Human Rights Commission at:

Postal Address: The South African Human Rights Commission, PAIA Unit,
Private Bag 2700,
Houghton,
2041

Telephone Number: 077 877 3600

Website: www.sahrc.org.za



Annexure C: Statutory Records

The Company maintains statutory records and information in terms of the following legislation:

1. Basic Conditions of Employment Act;
2. Companies Act;
3. Compensation of Occupational Injuries and Diseases Act;
4. Consumer Protection Act;
5. Electronic Communications and Transaction Act;
6. Employment Equity Act;
7. Financial Advisory & Intermediary Services Act;
8. Financial Intelligence Centre Act;
9. Income Tax Act;
10. Insolvency Act;
11. Labour Relations Act;
12. Occupational Health and Safety Act;
13. Short-term Insurance Act;
14. Skills Development Act;
15. Value Added Tax Act



Annexure D: Availability and Category of Records

The following records may be accessed by request from the Company. The grounds of refusal are set out in paragraph 3.2 above.

1. Personnel Records – Requested by the Company’s personnel only:
 - 1.1 Personal Records supplied by the employees;
 - 1.2 Records provided by a third party relating to employees;
 - 1.3 Conditions of employment and other personnel-related contractual and quasi legal records;
 - 1.4 Correspondence related to personnel;
 - 1.5 Training records and material
2. Client Related Records – Requested by the Company’s clients only:
 - 2.1 Records provided by a client to a third party acting for or on behalf of the Company;
 - 2.2 Records provided by a third party;
 - 2.3 Records generated within the Company related to its clients; and
 - 2.4 Records provided by the Company to client.
3. Records related to the Company

Record	Subject	Availability
Public Affairs	Public Product Information	1
	Public Corporate Records	1
	Media Releases	1
	Published newsletters	1
	Magazine Articles	1
Regulatory & Administrative	Permits, Licenses or Authorities	1
	Conflict of Interest Management Policy	1
	Complaints Policy	1
Financial Matters	Financial Statements	12
	VAT, TAX and PAYE records (company and employees)	12
	Accounting and banking details	12
	Invoices	12
	Asset register	12
	Management accounts	12



Company Secretarial and Legal	Statutory records not available at Companies and Intellectual Property Commission (CIPC)	12
	Minutes and related meeting information	12
	Record of executive, board and shareholder decisions taken and related information	1,12
	Trademark information	1
	General contract documentation	6,12
Marketing	Working papers	10,12,13
	Market information	12,13
	Public customer information	12
	Performance and sales records	2,12
	Marketing strategies	12
	Customer database	12
	Brand related information	12
Human Resources	Personal Information of Employees	12
	Employment contracts	12
	Employment Equity Plan	12
	Disciplinary Records	12
	Performance Management Records	12
	Salary Records	12
	Employee Benefit Records	12
	Disciplinary Code	12
	Leave Records	12
	Training Records	12
	Policies and procedures	12
	Disaster recovery	12
	IT governance records	12
Third Party	Rental Agreements	6,12
	Non-disclosure Agreements	6,12
	Supplier Contracts	6,12

Key:

1	May be disclosed	Publicly accessible
2	May not be disclosed	Request after the commencement of criminal or civil (Section 7)
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the Requester of information (Section 61)
5	May not be disclosed	Unreasonable disclosure
6	May not be disclosed	Likely to harm the commercial or financial interest of third parties (Section 64(a)(b))



7	May not be disclosed	Likely to harm the company or Third Party in contract or other negotiations (Section 64(c))
8	May not be disclosed	Would breach a duty of confidence to a Third Party in terms of an agreement (Section 65)
9	May not be disclosed	Likely to compromise the safety of individuals or protection of private property (Section 66)
10	May not be disclosed	Legally privileged documents (Section 67)
11	May not be disclosed	Environmental testing/investigation which reveals public safety/environmental risks (Section 64 and 68(2))
12	May not be disclosed	Commercial information of Private Body (Section 68)
13	May not be disclosed	Likely to prejudice research and development information of the company or a Third Party (Section 69)
14	May not be refused	Disclosure in public interest (Section 70)



Annexure E: Request Procedure and Form

To assist in processing your request, please fill out and submit the form provided below to the email addresses of the Information Officers listed in Annexure A.

Upon receipt of your request, the Information Officer will acknowledge it and inform you if any prescribed fees are required before the request can be processed. You can find a detailed breakdown of these fees in Annexure F.

After processing your request, the Information Officer will notify you of the outcome and any additional fees that may be applicable.

Please note that PAIA includes several grounds for refusing access to information.

When filling out the form below, please ensure that you:

- Clearly identify the person requesting access to the information.
- Provide sufficient details to help the Deputy Information Officer locate the specific information being requested.
- Specify the preferred format in which you would like to receive the information.
- Include the contact details of the person making the request.
- Indicate the right that needs to be exercised or protected, and explain how the requested information will help in exercising or protecting that right.
- If you wish to receive the decision on your request in a specific manner, please state the desired method and provide the necessary details for that communication.
- If you are requesting information on behalf of someone else, provide proof of authorization to make the request on their behalf.



REQUEST FORM

A. Particulars of Private Body	
The Head:	
B. Particulars of person requesting access to the record	
i. The particulars of the person who requests access to the record must be recorded below	
ii. Furnish an address in the Republic to which information must be sent	
iii. Proof of the capacity in which the request is made, if applicable, must be attached	
Full Name & Surname:	
Identity Number:	
Postal Address:	
Telephone Number:	
Email Address:	
Capacity:	
C. Particulars of person whose behalf request is made	
This section must be completed ONLY if a request for information is made on behalf of another person	
Full Name & Surname:	
Identity Number:	
D. Particulars of Record	
i. Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
ii. If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of record:	
Reference Number:	
Any further particulars:	
E. Fees	
i. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid	
ii. You will be notified of the amount required to be paid as the request fee	
iii. 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	
iv. If you qualify for exemption of the payment of any fee, please state the reason therefor	
Reason for exemption:	
F. Form of access to record	



If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability and indicate in which form the record is required

Disability:	
Form in which required:	

Mark the appropriate box with an "X"

- i. Your indication as to the required form of access depends on the form in which the record is available
- ii. Access in the form requested may be refused in certain circumstances, in such a case you will be informed if access will be granted in another form
- iii. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1. If the record is in written or printed form:

- Copy of record	
- Inspection of record	

2. If record consists of visual images:

- View of the images	
- Copy of the images	
- Transcription of the images	

3. If the record consists of recorded words or information which can be reproduced in sound:

- Listen to the soundtrack	
- Transcription of the soundtrack	

4. If the record is held on computer or in an electronic or machine-readable form:

- Printed copy of record	
- Copy in computer readable form	

Please indicate the preferred method of delivery

- By hand	
- By email	
- By post	

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any 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:
H. Notice of decision regarding the request for access
You will be notified in writing whether your request has been approved/ denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request
How would you prefer to be informed of the decision regarding your request for access to the record?
I. Signature
Signed at:
Date:
Signature of Requester/Person whose behalf request is made:



Annexure F: Prescribed Fees

The following conditions apply to requests other than personal requests:

- A requester is required to pay an initial request fee before the processing of the request can begin.
- If preparing the requested record takes more than the prescribed six hours, an additional deposit will be required.
- A requester has the right to lodge an application with a court to challenge the payment of the request fee and/or deposit.
- Access to the records may be withheld until all applicable fees have been paid in full.
- The fee structure can also be found on the South African Human Rights Commission's website at www.sahrc.org.za.

1. ACCESS FEES FOR REPRODUCTION	
For every photocopy of an A4-sized page or part thereof	R1.10
For every photocopy of an A4-sized page or part thereof held on a computer or in electronic or machine-readable form.	R0.75
For a copy in a computer-readable form on memory stick	R7.50
For a copy in a computer-readable form on compact disk	R70.00
For a transcription of visual images for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record for an A4-sized page of part thereof	R20.00
For a copy of an audio record	R30.00
2. ACCESS FEE FOR TIME SPENT	
The time reasonably required to search for the record for disclosure and preparation	R30.00/hr or part thereof
3. REQUEST FEE	
For a request for access to a record by a person other than a personal Requester	R50.00
4. DEPOSIT	
One third of the access fee is payable as a deposit by the Requester	
5. TOTAL FEE	
When a copy of a record must be posted to the Requester	R9.75
6. APPEAL FEES	
For lodging an internal appeal against the refusal of a request for access to a record	R50.00
7. VAT	
Pineapple Tech Pty Ltd, is a Private Body registered under the Value Added Tax Act, 1991 will add VAT to all of the above-mentioned fees	



Annexure G: Information Officer Duties

Section 55(1) of POPIA outlines the duties and responsibilities of an Information Officer, which include the following:

1. The Information Officer and Deputy Information Officer must stay informed about the latest developments in POPIA and PAIA.
2. The Information Officer must have a thorough understanding of the organization's business operations and procedures.
3. Encouraging the organization's compliance with the conditions for the lawful processing of personal information.
4. Managing requests made to the organization under the provisions of POPIA.
5. Collaborating with the Regulator on investigations conducted under Chapter 6 of POPIA in relation to the organization.
6. Additional duties and responsibilities of the Information Officer, as stipulated in regulation 4 of POPIA, include ensuring that:
 - o A compliance framework is developed, implemented, monitored, and maintained.
 - o A personal information impact assessment is conducted to ensure that adequate measures and standards are in place to comply with the conditions for lawful processing of personal information.
 - o A manual is developed, monitored, maintained, and made available as prescribed in sections 14 and 51 of PAIA, as amended.
 - o Internal procedures and systems are developed to process requests for information or access to it.
 - o Internal awareness sessions are conducted regarding the provisions of POPIA, its regulations, codes of conduct, or information provided by the Regulator.
 - o Copies of the manual are provided to any person upon request, subject to a fee determined by the Regulator from time to time.




Annexure H: Deputy Information Officer Appointment

Under the Protection of Personal Information Act, the head of a private body is designated as the Information Officer for that body. The Information Officer has the authority to delegate any powers or duties conferred by POPIA to a Deputy Information Officer.

Pineapple Tech Pty Ltd has appointed a Deputy Information Officer to manage and facilitate requests for access to records held by the Financial Service Provider ("FSP"). This delegation does not prevent the person who made the delegation from exercising the delegated powers or performing the duties themselves. The delegation can be withdrawn or amended in writing at any time by the person who made the delegation.

The Deputy Information Officer has the authority to engage with all staff members of the FSP and request any records held by the FSP. If a manager believes that a particular record should not be disclosed to the Deputy Information Officer, they must provide reasons for this decision to the Information Officer, who will make the final determination.

As the appointed Information Officer of the FSP, I, Sizwe Ndlovu, hereby appoint Ndabenhle Ngulube as the FSP's Deputy Information Officer.


Sizwe Ndlovu
Information Officer
Ndabenhle Ngulube



Deputy Information Officer