

TRAZE (PTY) LTD

PAIA MANUAL

**SECTION 51 MANUAL PROMOTION OF ACCESS TO INFORMATION ACT NO.
2 OF 2000**

FOR TRAZE (PTY) LTD

IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT NO.2 OF 2000 AS AMENDED (PAIA)

AND SECTION 55 OF THE PROTECTION OF PERSONAL INFORMATION ACT
NO. 4 OF 2013 AS AMENDED (POPI ACT)

TRAZE (PTY) LTD MANUAL

Ver1.1 2023

PAIA MANUAL HAS BEEN PREPARED FOR THE FOLLOWING ORGANISATION

NAME OF ENTITY: TRAZE (PTY) LTD

REGISTRATION NUMBER: 2016 / 164943 / 07

1. OBJECTIVE:

This manual has been compiled in accordance with the Promotion of Access to Information Act No. 2 of 2000 ("the Act") and serves as part of the manual for TRAZE (PTY) LTD accompanied by the above-mentioned data regulations and legislations herein. Section 51 of the Act requires that we as a private body compile a manual giving information to the public regarding the procedures to be followed in requesting information from us for the purpose of exercising or protecting rights. The aim of this manual is to assist potential requesters, who intend to obtain documents or records from the company in terms of the Act, by providing them with the processes to be followed in initiating such requests.

2. CONDUCT OF BUSINESS:

- 2.1** TRAZE (PTY) LTD (Pty) Ltd, is a private company Registered under the Laws of the Republic of South Africa and Carrying on business as Financial Services Provider (FSP) authorised by the Financial Services Conduct Authority with FSP 48248.
- 2.2** TRAZE (PTY) LTD is a subsidiary of Zeal holdings Limited, a financial institution specializing in providing multi-asset trading services including currencies (foreign exchange, forex or FX), commodities, indices, shares and cryptocurrencies to institutional and retail investors, and is mainly compensated for its broking services through bid/ask price differences (spread) and/or commissions.
- 2.3** TRAZE (PTY) LTD is committed to upholding the principles enshrined in the Constitution and national legislation including but not limited to PAIA and POPIA. The former contains the key principles of good governance, transparency, and accountability.
- 2.4** PAIA, as amended by section 110 of POPIA, was promulgated to give effect to the constitutional right of access to information

held by the State or by another person, which information is required for the exercise or protection of any rights.

3. PARTICULARS IN TERMS OF THE SECTION 51 OF SOUTH AFRICA ISSUED PAIA MANUAL

CONTACT DETAILS (SECTION 51(1) (A) OF THE PAIA ACT)

The Key Individual of TRAZE (PTY) LTD, Ronald Gwenzi, who is the Head of TRAZE (PTY) LTD as defined in the Act, tasked to receive, and address all requests for information that have been made in accordance with the Act.

All requests for information made in terms of the Act, directed to the company, should be addressed to the Information Officer or Head at:

Head of the Organisation: **TRAZE (PTY) LTD**
Designation: Key Individual and Information Officer
Contact Person: Ronald Gwenzi

Postal address: Dock Road Junction
Cnr Dock Road and Stanley Street V&A
Waterfront
Cape Town
Postal Code 8001
South Africa

Telephone number: +27 790 463 207
Email address: Ronald.gwenzi@zfx.com

4. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10: SECTION 51(1) (B)

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. For purposes of PAIA, TRAZE (PTY) LTD is a private body.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in sections 8 & 10 of this Manual.

Section 23 of POPIA (read with sections 18 and 53 of PAIA), grants a data subject (a customer, employee or third party) a right to request

confirmation of records containing their personal information being held by TRAZE (PTY) LTD, which confirmation shall be provided free of charge. The requester can subsequently request a copy of the record or a description of the personal information contained within the record, subject to the fees prescribed by PAIA. Requesters are referred to the Guide in terms of Section 10 of PAIA which has been compiled by the South African Human Rights Commission ("SAHRC"), which contains information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC or at their website at <http://www.sahrc.org.za> It is available in all of the official languages. Please direct any queries to the address below:

The Guide is available for inspection, inter alia, at the offices of the:

PHYSICAL ADDRESS:

The Information Regulator
JD House, 27 Stiemens Street
Braamfontein
Johannesburg
Gauteng
2001

Postal Address:
P.O. Box 31533
Braamfontein
2017

WEBSITE: <https://www.justice.gov.za/inforeg/contact.html>

E-MAIL: enquiries@inforegulator.org.za

5. APPLICABLE LEGISLATION – AUTOMATIC AVAILABILITY OF CERTAIN RECORDS

Records are available in accordance with the following current South African legislation and any amendments thereof and regulations thereto (only to the extent that the relevant Act is applicable, and which therefore makes disclosure of records compulsory):

RELEVANT LAWS AND LEGISLATION, APPLICABLE CODES, RULES, STANDARDS, DIRECTIVES, CHARTERS, NOTES AND CIRCULARS

ARTICLE NUMBER	REFERENCE
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1)	Administration of Estates Act 66 of 1965
2)	ASISA Standard on Living Annuities
3)	ASISA Standards Applicable to Collective Investment Scheme Industry
4)	Auditing Professions Act No 26 of 2005
5)	Banks Act 94 of 1990
6)	Basic Conditions of Employment Act 75 of 1997
7)	Broad-based Black Economic Empowerment Act 53 of 2003
8)	Civil Union Act 17 of 2006
9)	Code for responsible investing in South Africa (Crisa)
10)	Collective Investment Schemes Control Act 45 of 2002 and subordinate legislation
11)	Companies Act No. 71 of 2008
12)	Company Securities (Insider Dealing) (Bailiwick of Guernsey) Law, 1996
13)	Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
14)	Competitions Act 89 of 1998
15)	Constitution of RSA Act 108 of 1996
16)	Constitution of the Republic of South Africa No 108 of 1996
17)	Consumer Affairs (Unfair Business Practices) Act 71 of 1988
18)	Consumer Protection Act 68 of 2008
19)	Copyright Act 98 of 1978
20)	Currencies and Exchanges Act 9 of 1993
21)	Data Protection (Bailiwick of Guernsey) Law, 2001 (Consolidated text)
22)	Divorce Act 70 of 1979
23)	Electronic Communications Act No 36 of 2005
24)	Electronic Communications and Transactions Act 25 of 2002
25)	Employment Equity Act No. 55 of 1998
26)	Employer-Employee
27)	Employment Equity Act No 55 of 1998
28)	Estate Duty Act 45 of 1995
29)	Exchange Control Regulations

30)	Financial Advisory and Intermediary Services Act 37 of 2002 and subordinate
31)	Financial Institutions (Protection of Funds) Act 28 of 2002
32)	Financial Intelligence Centre Act 38 of 2001 and subordinate legislation
33)	Financial Markets Act 19 of 2012 and subordinate legislation
34)	Financial Services Board Act 97 of 1990
35)	Financial Services Ombud Schemes Act 37 of 2004
36)	Foreign Account Tax Compliance Act (FATCA)
37)	FSB Directives and Circulars (Not legislation)
38)	General Data Protection Regulation- No. 4 of 2013 Protection of Personal Information Act
39)	Handbook for Financial Services Businesses on Countering Financial Crime
40)	Hazardous Substances Act No. 15 of 1973
41)	Income Tax Act 58 of 1962 and subordinate legislation
42)	Income Tax Act No. 58 of 1962
43)	Insolvency Act 24 of 1936
44)	Inspection of Financial Institutions Act 80 of 1998
45)	Insurance Act 19 of 2017 and regulations made under the Act
46)	Intellectual Property Laws Amendment Act No 28 of 2013
47)	Intestate Succession Act 81 of 1989
48)	JSE Ltd Rules and Directives
49)	King Code of Conduct for Corporate Governance (not legislation)
50)	Labour Relations Act 66 of 1995
51)	Licensees (Capital Adequacy) Rules 2010
52)	Long-Term Insurance Act 52 of 1998 and subordinate legislation
53)	Maintenance of Surviving Spouse Act 27 of 1990
54)	Matrimonial Property Act 88 of 1985
55)	Medical Schemes Act No. 131 of 1998
56)	National Credit Act No. 34 of 2005
57)	National Environment Management Act No. 107 of 1998
58)	National Environmental Management: Air Quality Act No. 39 of 2004
59)	National Environmental Management: Waste Act No. 59 of 2008

60)	National Health Act No. 61 of 2003
61)	National Water Act No. 36 of 1998
62)	Occupational Health and Safety Act No. 85 of 1993
63)	Pension Funds Act No. 24 of 1956
64)	Pensions Funds Act 24 of 1956 and subordinate legislation
65)	Prevention and Combating of Corrupt Activities Act 12 of 2004
66)	Prevention of Organised Crime Act 121 of 1998
67)	Promotion of Access to Information Act No. 2 of 2000
68)	Promotion of Administrative Justice Act 3 of 2000
69)	Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
70)	Prospectus Rules 2007
71)	Protected Disclosures Act No. 26 of 2000
72)	Protection of Constitutional Democracy against Terrorist and Related Activities
73)	Protection of Personal Information Act No. 4 of 2013
74)	Regulation of Interception of Communications and Provision of Communication – Related Information Act No. 70 of 2002
75)	SARS Director Circulars and Notes
76)	Securities Transfer Tax Act 25 of 2007
77)	Securities Transfer Tax Administration Act 26 of 2007
78)	Skills Development Act 97 of 1998
79)	Skills Development Levies Act No. 9 of 1999
80)	Tax Administration Act 28 of 2011
81)	The Authorised Collective Investment Schemes (Class B) Rules 2013 (the Class)
82)	The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
83)	The Licensees (Code of Business Rules 2014)
84)	The Protection of Investors (Bailiwick of Guernsey) Law, 1987
85)	Tobacco Products Control Act of 1993
86)	Trademarks Act 194 of 1993
87)	Trust Property Control Act 57 of 1989
88)	UK Bribery Act 2010

89)	Unemployment Insurance Contributions Act No. 4 of 2002
90)	US Investment Advisers Act 1940 (amended by Dodd Frank Act)
91)	Value Added Tax Act No. 89 of 1991
92)	Wills Act 7 of 1953

6. SCHEDULE OF RECORDS

RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

The following categories of records are automatically available without a person having to

request access in terms of PAIA:

SUBJECTS	CATEGORIES OF RECORDS
TRAZE (PTY) LTD COMPANY RECORDS- REGISTER AVAILABLE FOR INSPECTION	<ul style="list-style-type: none"> Share Register Dividend Register Financial Statements Integrated annual Report Appointments/resignation of Directors Share dealings of directors Dividend declarations Mergers and acquisitions Corporate transactions Circulars to shareholders Notices of general meetings Shareholders' meeting minutes (For shareholders only) Special and general meetings of the company Annual general meeting of the company

Records are subject to TRAZE (PTY) LTD Record Policies, Procedures and Processes, and will be access and version controlled depending on the classification.

The Company has in its possession the following categories of records on the subject matters referred to hereunder and for which a request for access

needs to be made in terms of PAIA or the POPI Act:

SUBJECTS	CATEGORIES OF RECORDS
INVESTIGATION AND COMPLIANCE	<ul style="list-style-type: none"> • Subpoena based Hearings, • Summons, • Warrants to search and seize items, • Enforcement Notices, Information • Notices, • HR Interventions, • Public • Hearings, • Plenary Reports and • Investigation report.
TRAZE (PTY) LTD CORPORATE FINANCE	<p>The corporate Finance department maintains financial and management accounts for the Company and provides back-office activities that support Integrated Treasury and Cash Management. Corporate Account records comprise the following main categories:</p> <ul style="list-style-type: none"> • Accounting Records • Consolidation Records • General Correspondence • Internal Reports and Communications • Management Reports • PAYE Records • Tax Records • Transactional Records • Treasury Records • VAT Records • BBBEE Scorecard
TRAZE (PTY) LTD CHIEF EXECUTIVE OFFICER'S OFFICE	<p>The Chief Executive's office records comprise the following main categories:</p> <ul style="list-style-type: none"> • Administration Records • System Records • Financial Reports • Internal Reports and Communications • Budgets
TRAZE (PTY) LTD INTERNAL RISK AND COMPLIANCE	<p>The purpose is to provide the Corporate Offices and Operations with assurance that risks and compliance issues are being appropriately managed across the Company. Records comprise the following main categories:</p> <ul style="list-style-type: none"> • Audit reports • General Administration Records • General Correspondence • Risk Management Records • Compliance related Records

	<ul style="list-style-type: none"> • Insurance Records
CORPORATE COMMUNICATIONS, PRODUCT, SALES AND MARKETING	<p>The Corporate Communications and Marketing team control communications and marketing to the Company. Corporate Communications records consist of the following main categories:</p> <ul style="list-style-type: none"> • Advertising and promotional material • Company presentations • Corporate mission & vision statement • Corporate video's • Press releases if any
IT DEPARTMENT	<p>TRAZE (PTY) LTD outsourced IT Department is responsible for developing, supporting and providing assurance on the implementation of IT policies, procedures, standards and best practice in the Company. IT department records comprise the following main categories:</p> <ul style="list-style-type: none"> • Disaster Recovery Plans • General Correspondence • Companywide Contracts and Agreements • Policy Records • Software Licensing • Certifications and Accreditations (IT related)
LEGAL DEPARTMENT	<p>The outsourced Legal department provides assistance with all corporate legal matters material to the Company.</p> <p>Legal department records comprise the following main categories:</p> <ul style="list-style-type: none"> • Copies of Agreements • General Correspondence • Immovable Property Records • Internal Reports and Communications • Legal Records • Litigation Records • Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright) • Statutory Records • Working Paper Files

A person (customer, employee or third party) has the right to request access in terms of section 23 of POPIA:

SUBJECTS	CATEGORIES OF RECORDS
PERSONAL INFORMATION	<p>Any recorded piece of information relevant to a data subject, including but not limited to the following, which can be in either electronic format or hard copy:</p> <ul style="list-style-type: none"> • race, gender, pregnancy, sex, nationality, marital status, ethnicity, or social origin; colour; sexual orientation; age; physical or mental health and well-being. • belief, religion, conscience, culture, language, and birth, • Education, medical information, financial information, criminal or employment history. • An identifying number or symbol. • Disability, personal opinions, blood type, biometric information. • Views or preferences of a person, correspondence of private or confidential nature, views, or opinions of another person. • Name of a person if it appears with other personal information. • consumer or purchasing pattern. • e-mail address and physical address, location information or online identifier and telephone number and mobile number.
SPECIAL PERSONAL INFORMATION	<ul style="list-style-type: none"> • A special category of personal information - is religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sex life, criminal. • Behaviour and biometric information. <p>Where personal information is referenced, it will automatically include special personal information unless otherwise indicated.</p>

7. FORM OF REQUEST

7.1 TRAZE (PTY) LTD hereby avails Form A to E to acknowledgement if the rights of the data subject in the rendering of services accordingly.

7.1 For purposes of facilitating a request in terms of the Act, a description of the records and the categories in which these subjects

are classified which are held by the company are provided in our information policies.

7.2 Some Categories of records may be subject to the grounds for refusal of access to Records.

7.3 The records listed in the categories of IOI information may be formally requested, but access to parts of these records or the whole record may be refused on legal grounds.

7.3.1 Access will also be refused where requests are clearly frivolous and or vexatious.

7.4 The Information Officer may grant a request for access to a record of the Regulator, if -

7.4.1 The disclosure of the record would reveal evidence of a substantial contravention of,

7.4.2 or failure to comply with the law.

7.4.3 and the public interest in the disclosure of the record clearly outweighs the harm contemplated in any of the grounds for refusal of access to records.

8. THE REQUEST PROCEDURES:

8.1 All requests should be made to the information officer via the forms provided from TRAZE (PTY) LTD, Form A-E.

9. TO FACILITATE THE PROCESSING OF YOUR REQUEST, KINDLY:

9.1 Use the prescribed forms From A to E in the Forms section when a request is made to a private body (TRAZE (PTY) LTD) or business.

9.2 The form must be addressed and submitted to the head of the private body or Information Officer at his/ her address, fax number, or electronic mail address.

9.3 The form must:

9.3.1 Provide sufficient particulars to enable the head of the private body to identify the record/s requested and to identify the requester,

9.3.2 Indicate which form of access is required,

9.3.3 specify a postal address or fax number of the requester in the Republic,


- 9.3.4 identify the right that the requester is seeking to exercise or protect, and
- 9.3.5 Provide an explanation of why the requested record is required for the exercise or protection of that right,
- 9.3.6 if in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary particulars to be informed in the other manner,
- 9.3.7 If the request is made on behalf of another person, to submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the head of the private body.

10. TRAZE (PTY) LTD MANUAL AVAILABILITY

This TRAZE (PTY) LTD manual is available for inspection as follows:

- 10.1 For viewing online on the company website at <https://traze.com/>
- 10.2 In hard copy, to be viewed free of charge by appointment during office hours, at the Johannesburg office of TRAZE (PTY) LTD
- 10.3 The manual is obtainable for inspection, on reasonable prior notice, free of charge. Copies of the manual of the Company are also available on the Company's website.

SIGNED BY:



Ronald Gwenzi

Key Individual & Information Officer