

# **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:	<b>TRAZE (PTY) LTD</b>
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:	<a href="mailto:Ronald.gwenzi@zfx.com">Ronald.gwenzi@zfx.com</a>

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

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

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

<b>89)</b>	Unemployment Insurance Contributions Act No. 4 of 2002
<b>90)</b>	US Investment Advisers Act 1940 (amended by Dodd Frank Act)
<b>91)</b>	Value Added Tax Act No. 89 of 1991
<b>92)</b>	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:

<b>SUBJECTS</b>	<b>CATEGORIES OF RECORDS</b>
TRAZE (PTY) LTD COMPANY RECORDS- REGISTER  AVAILABLE FOR INSPECTION	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"> <li>• Subpoena based Hearings,</li> <li>• Summons,</li> <li>• Warrants to search and seize items,</li> <li>• Enforcement Notices, Information</li> <li>• Notices,</li> <li>• HR Interventions,</li> <li>• Public</li> <li>• Hearings,</li> <li>• Plenary Reports and</li> <li>• Investigation report.</li> </ul>
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"> <li>• Accounting Records</li> <li>• Consolidation Records</li> <li>• General Correspondence</li> <li>• Internal Reports and Communications</li> <li>• Management Reports</li> <li>• PAYE Records</li> <li>• Tax Records</li> <li>• Transactional Records</li> <li>• Treasury Records</li> <li>• VAT Records</li> <li>• BBBEE Scorecard</li> </ul>
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"> <li>• Administration Records</li> <li>• System Records</li> <li>• Financial Reports</li> <li>• Internal Reports and Communications</li> <li>• Budgets</li> </ul>
TRAZE (PTY) LTD INTERNAL RISK AND COMPLIANCE	<p>The purpose is to provide the Corporate Offices and Operations</p> <p>with assurance that risks and compliance issues are being</p> <p>appropriately managed across the Company. Records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Audit reports</li> <li>• General Administration Records</li> <li>• General Correspondence</li> <li>• Risk Management Records</li> <li>• Compliance related Records</li> </ul>

	<ul style="list-style-type: none"> <li>Insurance Records</li> </ul>
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"> <li>Advertising and promotional material</li> <li>Company presentations</li> <li>Corporate mission &amp; vision statement</li> <li>Corporate video's</li> <li>Press releases if any</li> </ul>
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"> <li>Disaster Recovery Plans</li> <li>General Correspondence</li> <li>Companywide Contracts and Agreements</li> <li>Policy Records</li> <li>Software Licensing</li> <li>Certifications and Accreditations (IT related)</li> </ul>
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"> <li>Copies of Agreements</li> <li>General Correspondence</li> <li>Immovable Property Records</li> <li>Internal Reports and Communications</li> <li>Legal Records</li> <li>Litigation Records</li> <li>Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright)</li> <li>Statutory Records</li> <li>Working Paper Files</li> </ul>

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"> <li>• race, gender, pregnancy, sex, nationality, marital status, ethnicity, or social origin; colour; sexual orientation; age; physical or mental health and well-being.</li> <li>• belief, religion, conscience, culture, language, and birth,</li> <li>• Education, medical information, financial information, criminal or employment history.</li> <li>• An identifying number or symbol.</li> <li>• Disability, personal opinions, blood type, biometric information.</li> <li>• Views or preferences of a person, correspondence of private or confidential nature, views, or opinions of another person.</li> <li>• Name of a person if it appears with other personal information.</li> <li>• consumer or purchasing pattern.</li> <li>• e-mail address and physical address, location information or online identifier and telephone number and mobile number.</li> </ul>
SPECIAL PERSONAL INFORMATION	<ul style="list-style-type: none"> <li>• A special category of personal information - is religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sex life, criminal.</li> <li>• Behaviour and biometric information.</li> </ul> <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:



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Ronald Gwenzi

Key Individual & Information Officer

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF  
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**

**TO:** THE INFORMATION OFFICER OF TRAZE (PTY) LTD

**CONTACT DETAILS:** \_\_\_\_\_

**EMAIL:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**A. DETAILS OF DATA SUBJECT**

**NOTES:**

- *Accompanying documentation such as Affidavits or other documentary evidence as applicable in support of the objection should be attached.*
- *Submit additional annexures to this form accompanied with a signature on each page if the space provided for in this Form is inadequate.*
- *Form to be completed as is applicable.*

<b>NAME(S) AND SURNAME / REGISTERED NAME OF DATA SUBJECT:</b>	
<b>UNIQUE IDENTIFIER / IDENTITY NUMBER</b>	
<b>PASSPORT NUMBER:</b>	
<b>RESIDENTIAL, POSTAL OR BUSINESS ADDRESS:</b>	Postal Code:
<b>CONTACT NUMBER(S):</b>	
<b>FAX NUMBER / E-MAIL ADDRESS:</b>	

## B. DETAILS OF RESPONSIBLE PARTY

<b>NAME(S) AND SURNAME/REGISTERED NAME NAME OF RESPONSIBLE PARTY:</b>	
<b>RESIDENTIAL, POSTAL OR BUSINESS ADDRESS:</b>	Postal Code:
<b>CONTACT NUMBER(S):</b>	
<b>FAX NUMBER / E-MAIL ADDRESS:</b>	

**C. REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)**  
(Please provide detailed reasons for the objection)

[illegible]

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR  
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION  
IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013  
(ACT NO.4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**

**TO:** THE INFORMATION OFFICER OF TRAZE (PTY) LTD

**CONTACT DETAILS:** \_\_\_\_\_ **EMAIL:** \_\_\_\_\_

**NOTES:**

- *Affidavits or other documentary evidence as applicable should be attached in support of the request.*
- *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- *In respect to any other section, Complete as is applicable.*

Mark the appropriate box with an "x". Request for:

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

**A. DETAILS OF DATA SUBJECT**

<b>NAME(S) AND SURNAME / REGISTERED NAME OF DATA SUBJECT:</b>	
<b>UNIQUE IDENTIFIER / IDENTITY NUMBER</b>	
<b>PASSPORT NUMBER:</b>	
<b>RESIDENTIAL, POSTAL OR BUSINESS ADDRESS:</b>	Postal Code:
<b>CONTACT NUMBER(S):</b>	
<b>FAX NUMBER / E-MAIL ADDRESS:</b>	

**B. DETAILS OF RESPONSIBLE PARTY**

<b>NAME(S) AND SURNAME/REGISTERED NAME NAME OF RESPONSIBLE PARTY:</b>	
<b>RESIDENTIAL, POSTAL OR BUSINESS ADDRESS:</b>	Postal Code:
<b>CONTACT NUMBER(S):</b>	
<b>FAX NUMBER / E-MAIL ADDRESS:</b>	

**C. INFORMATION TO BE:** \_\_\_\_\_

**D.** REASONS FOR \*CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and

or REASONS FOR \*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request)

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**REQUEST FOR ACCESS TO RECORD OF TRAZE (PTY) LTD**  
**(Section 53(1) of the Promotion of Access to Information Act, 2000**  
**(Act No. 2 of 2000) – also applicable to the POPI Act**  
**in terms of [Regulation 7]**

**TO:** THE INFORMATION OFFICER OF TRAZE (PTY) LTD

**CONTACT DETAILS:** \_\_\_\_\_ **EMAIL:** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**A. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD**

**NAMES:** \_\_\_\_\_ **SURNAME:** \_\_\_\_\_

**IDENTITY/PASSPORT NUMBER:** \_\_\_\_\_

**ADDRESS:** \_\_\_\_\_

**EMAIL:** \_\_\_\_\_ **MOBILE/TELEPHONE:** \_\_\_\_\_

Mark with an "X"

- ☐ Request is made in my own name
- ☐ Request is made on behalf of another person.

**NOTES:**

- *The particulars of the person who requests access to the record must be given below.*
- *The email address or physical address in the Republic to which the information is to be sent must be given.*
- *Proof of the capacity in which the request is made, if applicable, must be attached.*

**B. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE**

**NOTES:**

- *This section must be completed **ONLY** if a request for information is made on behalf of another person.*
- *If a request is for records containing personal information, the request must be made by the person to whom the personal Information relates unless exceptional circumstances can be proven.*

<b>FULL NAMES:</b>	
<b>SURNAME:</b>	
<b>IDENTITY/PASSPORT NUMBER:</b>	
<b>RESIDENTIAL/BUSINESS ADDRESS:</b>	
<b>EMAIL ADDRESS:</b>	
<b>CONTACT NUMBER: CELL/TELL</b>	

### C. TYPE OF RECORD

#### NOTES:

- *Mark the applicable box with an "X"*

<b>RECORD IS IN WRITTEN OR PRINTED FORM</b>	<input type="checkbox"/>
<b>RECORD COMPRISES VIRTUAL IMAGES (THIS INCLUDES PHOTOGRAPHS, SLIDES, VIDEO RECORDINGS, COMPUTER-GENERATED IMAGES, SKETCHES, ETC)</b>	<input type="checkbox"/>
<b>RECORD CONSISTS OF RECORDED WORDS OR INFORMATION WHICH CAN BE REPRODUCED IN SOUND</b>	<input type="checkbox"/>
<b>RECORD IS HELD ON A COMPUTER OR IN AN ELECTRONIC, OR MACHINE-READABLE FORM</b>	<input type="checkbox"/>

### D. PARTICULARS OF RECORD REQUESTED

#### NOTES:

- *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 is inadequate, please continue on a separate page and attach it to this form.*
- *All additional pages by the requester must be signed.*

<b>DESCRIPTION OF RECORD OR RELEVANT PART OF THE RECORD:</b>	
<b>REFERENCE NUMBER, IF AVAILABLE:</b>	
<b>ANY FURTHER PARTICULARS OF RECORD:</b>	

## E. FORM OF ACCESS

### NOTES:

- Mark the applicable box with an "X"

<b>PRINTED COPY OF RECORD (INCLUDING COPIES OF ANY VIRTUAL IMAGES, TRANSCRIPTIONS AND INFORMATION HELD ON COMPUTER OR IN AN ELECTRONIC OR MACHINE-READABLE FORM)</b>	<input type="checkbox"/>
<b>WRITTEN OR PRINTED TRANSCRIPTION OF VIRTUAL IMAGES (THIS INCLUDES PHOTOGRAPHS, SLIDES, VIDEO RECORDINGS, COMPUTER-GENERATED IMAGES, SKETCHES, ETC)</b>	<input type="checkbox"/>
<b>TRANSCRIPTION OF SOUNDTRACK (WRITTEN OR PRINTED DOCUMENT)</b>	<input type="checkbox"/>
<b>COPY OF RECORD ON FLASH DRIVE (INCLUDING VIRTUAL IMAGES AND SOUNDTRACKS)</b>	<input type="checkbox"/>
<b>COPY OF RECORD ON COMPACT DISC DRIVE (INCLUDING VIRTUAL IMAGES AND SOUNDTRACKS)</b>	<input type="checkbox"/>

## F. MANNER OF ACCESS

### NOTES:

- Mark the applicable box with an "X"

<b>PERSONAL INSPECTION OF RECORD AT REGISTERED ADDRESS OF PUBLIC/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)</b>	<input type="checkbox"/>
<b>POSTAL SERVICES TO POSTAL ADDRESS</b>	<input type="checkbox"/>

<b>POSTAL SERVICES TO STREET ADDRESS</b>	<input type="checkbox"/>
<b>COURIER SERVICE TO STREET ADDRESS</b>	<input type="checkbox"/>
<b>FACSIMILE OF INFORMATION IN WRITTEN OR PRINTED FORMAT (INCLUDING TRANSCRIPTIONS)</b>	<input type="checkbox"/>
<b>E-MAIL OF INFORMATION (INCLUDING SOUNDTRACKS IF POSSIBLE)</b>	<input type="checkbox"/>
<b>PREFERRED LANGUAGE: (NOTE THAT IF THE RECORD IS NOT AVAILABLE IN THE LANGUAGE YOU PREFER, ACCESS MAY BE GRANTED IN THE LANGUAGE IN WHICH THE RECORD IS AVAILABLE)</b>	<input type="checkbox"/>

## G. FEES

### NOTES:

- 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.
- You will be notified of the amount required to be paid as the request fee.
- 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 exemption of the payment of any fee, please state the reason for exemption.

**Reason:** \_\_\_\_\_

\_\_\_\_\_

## H. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

### NOTES:

- If the provided space is inadequate, please continue on a separate page and attach it to this Form.
- The requester must sign all the additional pages.

<b>INDICATE WHICH RIGHT IS TO BE EXERCISED OR PROTECTED:</b>	
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<b>EXPLAIN WHY THE RECORD REQUESTED IS REQUIRED FOR THE EXERCISE OR PROTECTION OF THE AFOREMENTIONED RIGHT:</b>	
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## I. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

How would you prefer to be informed of the decision regarding your request for access to the record?

**Postal Address:** \_\_\_\_\_

**Email:** \_\_\_\_\_

*(All Postage related requests are payable)*

### NOTES:

- *You will be notified in writing whether your request has been approved/denied.*
- *If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

<b>ANOTHER MANNER:</b>	
<b>SPECIFY MANNER:</b>	
<b>NECESSARY PARTICULARS:</b>	

**RIGHT TO RESTRICTION OF PROCESSING**

## IN TERMS OF

SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

**TO:** THE INFORMATION OFFICER OF TRAZE (PTY) LTD

**CONTACT DETAILS:** \_\_\_\_\_

**EMAIL:** \_\_\_\_\_

**A. RIGHTS TO RESTRICTION OF PROCESSING****NOTES:**

1. The data subject shall have the right to obtain from the information officer restriction of processing where one of the following applies:
  - a. The accuracy of the personal data is contested by the data subject, for a period enabling the Information Officer to verify the accuracy of the personal data;
  - b. The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  - c. The Information Officer no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the Information Officer before the restriction of processing is lifted.

**B. PARTICULARS OF PERSON REQUESTING RESTRICTION OF PROCESSING**

<b>FULL NAMES:</b>	
<b>SURNAME:</b>	
<b>IDENTITY/PASSPORT NUMBER:</b>	
<b>RESIDENTIAL/BUSINESS ADDRESS:</b>	
<b>EMAIL ADDRESS:</b>	
<b>CONTACT NUMBER: CELL/TELL</b>	

C. PARTICULARS OF RIGHTS TO RESTRICTION OF PROCESSING

NOTES:

- If the provided space is inadequate, please continue on a separate page and attach it to this Form.
- The requester must sign all the additional pages.

<p>INDICATE WHICH DATA IS SUBJECT TO RETSRICTION OF PROCESSING FOR EXERCISE OF RIGHTS:</p>	
<p>EXPLAIN WHY THE RECORD IS REQUIRED FOR RESTRICTION OF PROCESSING IN THE EXERCISE OR PROTECTION OF THE AFOREMENTIONED RIGHT:</p>	

**IN TERMS OF  
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013  
(ACT NO.4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**

**TO:** THE INFORMATION OFFICER OF TRAZE (PTY) LTD

**CONTACT DETAILS:** \_\_\_\_\_

**EMAIL:** \_\_\_\_\_

## **A. RIGHT TO DATA PORTABILITY**

### **NOTES:**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to an Information Officer, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Information Officer without hindrance from the Information Officer to which the personal data have been provided, where:
  - a. The processing is based on consent; and
  - b. The processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one Information Officer to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Information Officer.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

## **B. PARTICULARS OF PERSON REQUESTING RIGHTS TO DATA PORTABILITY**

<b>FULL NAMES:</b>	
<b>SURNAME:</b>	
<b>IDENTITY/PASSPORT NUMBER:</b>	
<b>RESIDENTIAL/BUSINESS ADDRESS:</b>	
<b>EMAIL ADDRESS:</b>	
<b>CONTACT NUMBER: CELL/TELL</b>	

**C. PARTICULARS OF RIGHT TO DATA PORTABILITY TO BE EXERCISED****NOTES:**

- *If the provided space is inadequate, please continue on a separate page and attach it to this Form.*
- *The requester must sign all the additional pages.*

<b>INDICATE WHICH DATA TO BE SUBJECT FOR DATA PORTABILITY TO EXERCISE RIGHTS:</b>	
<b>EXPLAIN WHY THE RECORD REQUESTED IS REQUIRED FOR THE EXERCISE OF RIGHTS:</b>	

**D. Notice of decision regarding request for access** You will be notified in writing whether your request has been approved/denied. If you wish to be informed 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?

\_\_\_\_\_ Signed at \_\_\_\_\_

on this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

REQUESTOR FULL NAMES: \_\_\_\_\_ Duly authorized

## **SOUTH AFRICAN INFORMATION REGULATOR**

### **INFORMATION REGULATOR CONTACT DETAILS:**

#### **PHYSICAL ADDRESS:**

JD House, 27 Stiemens Street  
Braamfontein  
Johannesburg 2001

#### **POSTAL ADDRESS:**

P.O Box 31533  
Braamfontein  
Johannesburg, 2017

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

**COMPLAINTS EMAIL:** [Complaints.IR@justice.gov.za](mailto:Complaints.IR@justice.gov.za)

**GENERAL ENQUIRIES EMAIL:** [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)