

MANUAL

PREPARED IN ACCORDANCE WITH SECTION 51 OF

**THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000
("the Act")**

FOR

**SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD
(Registration Number 2000/009471/07)
("the Company")**

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Company Overview

SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD is a private company that develops and provides software and related services to the distribution, life assurance, short term insurance and investment markets in the financial services industry.

Part I Contact Details

(Information required under Section 51(1)(a) of the Act)

Name of body: SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD

Physical address: 2nd Floor
Spotlight House
3 Derby Downs Office Park
University Road
Westville
3630

Postal address: P.O. Box 526
Westville
3630

Head of body: Philippe Moretonas
Telephone no: +27 (0) 31 203 7600
Fax no: +27 (0) 865 146546
Email: PhilippeM@iress.co.za

Part II Section 10 Guide on how to use the Act

(Information required under Section 51(1)(b) of the Act)

A guide on how to use the Act is to be compiled by the Human Rights Commission in terms of Section 10 of the Act by no later than August 2003. Any queries should be directed to:

The South African Human Rights Commissioner:
PAIA Unit, The Research and Documentation Department

Postal address: Private Bag 2700
Houghton
2070

Telephone: +27 11 484 8300
Fax: +27 11 484 7149
Website: www.sahrc.org.za
E-mail: PAIA@sahrc.org.za

Part III Copy of Notice

(Copy of Notice, in any, required under Section 51(1)(c) of the Act).

Currently not applicable.

Part IV Records available in terms of any other Legislation

(Description of records available under Section 51(1)(d) of the Act)

For the purposes of this manual and the Act, the records held by SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD are categorized by the nature of the content thereof as follows:

- 4.1 Records kept in accordance with other statutory legislation, including but not limited to:
 - 4.1.1 Companies Act Number 61 of 1973;
 - 4.1.2 Income Tax Act 58 of 1962;

- 4.1.3 Value Added Tax Act 89 of 1991;
- 4.1.4 Regional Services Councils Act 109 of 1985;
- 4.1.5 Unemployment Insurance Act 63 of 2001;
- 4.1.6 Labour Relations Act 66 of 1995;
- 4.1.7 Basic Conditions of Employment Act 75 of 1997;
- 4.1.8 Employment Equity Act 55 of 1998;
- 4.1.9 Skills Development Levies Act 9 of 1999;
- 4.1.10 Pension Funds Act 24 of 1956;
- 4.1.11 Medical Schemes Act 131 of 1998;
- 4.1.12 Copyright Act 98 of 1978;
- 4.1.13 Electronic Communications and Transactions Act 25 of 2002.

The above records which are of a public nature are available automatically without a person having to request access thereto in terms of the Act, as envisaged in Section 52.

- 4.2 Records relating to the commercial, financial and professional interests of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD including but not limited to its client data base, fee structures, commercial contracts with third parties and its business plans, systems and procedures;
- 4.3 Records of personal information of present, past and prospective employees and directors of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD;
- 4.4 Records of clients of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD containing personal information, commercial and financial information, information pertaining to contemplated, existing and past litigation, information on agreements, proposals and intellectual and other property of such clients.
- 4.5 The website address of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD is www.iress.co.za and is accessible to anyone who has access to the Internet. The Website contains information in various categories relating to the company, its contact particulars, fields of expertise and its professional staff.

Part V The Request Procedure

(Request for access to records available under Section 51(1)(e) of the Act)

- 5.1 The requester must have the prescribed form being **Schedule 1** hereto to make the request for access to a record. This must be made to the head. This request must be made to the address, fax number or electronic mail address of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD.
- 5.2 The requester must provide sufficient detail on the request form to enable the head to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address or fax number in the Republic. The requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the requester and state the necessary particulars to be so informed.
- 5.3 The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of the right.
- 5.4 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the head.

Part VI Fees

A requester who seeks access to a records containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- 6.1 The head must by notice require the requester (other than a personal requester) to pay the prescribed request fee (if any) before further processing the request.
- 6.2 The fee that the requester must pay is R50. The requester may lodge an application to the court against the tender or payment of the request fee.
- 6.3 After the head has made a decision on the request, the requester must be notified in the required form.

6.4 If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

Part VII Other Information as may be prescribed

(Other information as may be prescribed under Section 51(1)(f)).

The Minister of Justice and Constitutional Development has not made any regulations in this regard.

Part VIII Availability of Manual

(Availability of manual under Section 51(3))

An unabridged version of this manual is available for inspection by the general public upon request, during office hours and free of charge at the office of SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD, this is also available on our website: www.iress.co.za. Copies may also be requested from the South African Human Rights Commission.

Part VIII Fees Payable

(Prescribed fee structure in respect of private bodies)

9.1 The fees for reproduction of a record as referred to in section 52(3) are as follows -

| | |
|--|--------|
| For every photocopy of an A4 size page or part thereof - | R1,10 |
| For every printed copy of an A4-size page or part thereof - | R0,75 |
| For a copy of a stiffer disc - | R7,50 |
| For a copy of a compact disc - | R70,00 |
| For a transcript of visual images for an A4 size page or part thereof - | R40,00 |
| For a copy of visual images - | R60,00 |
| For a transcript of an audio record, for an A4-size page or part thereof | R20,00 |
| For a copy of an audio record - | R30,00 |

9.2 The request fee payable by a requester, other than a personal requester is R50,00.

9.3 If the head of the company or if the head of information is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable equal to one third of an amount of R30 for each hour or part thereof, exceeding the six hours.

The forms and fee structure prescribed under the Act are available at the website of the Department of Justice and Constitutional Development (www.doj.gov.za) under the "regulations" section.

Part X Information or records not found

10.1 If all reasonable steps have been taken to find a record and such a record cannot be found or if the records do not exist, then the head of the company or the head of information shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

10.2 The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the head of the company or the head of information with every person who conducted the search.

10.3 The notice as set out in 10.1 shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.

10.4 If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by the head of the company or the request liaison officer.

10.5 The attention of the requester is drawn to the provisions of Chapter 4 of Part 3 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requester.

FORM B
REQUEST FOR ACCESS TO A RECORD OF

SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 4]

A. Particulars:

| |
|---|
| <p>The Head of Information: Warren Holmes SPOTLIGHT WEALTH MANAGEMENT (PTY) LTD 2nd Floor, Spotlight House, 3 Derby Downs Office Park, University Road, Westville, 3630 P.O. Box 526, Westville, 3630 Tel No: +27 (0) 31 203 7600, Fax No: +27 (0) 865 146546, Email: admin@spotlight.co.za</p> |
|---|

B. Particulars of person requesting access to the record

- | |
|---|
| <ol style="list-style-type: none">1. <i>The particulars of the person who requests access to the</i>2. <i>Furnish an address and/or fax number in the Republic to which information must be sent.</i>3. <i>Proof of the capacity in which the request is made, if applicable, must be attached.</i> |
|---|

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____

Contact telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person: (attach proof of capacity, power of attorney, resolution)

C. Particulars of person on whose behalf request is made

| |
|---|
| <p><i>This section must only be completed if a request for information is made on behalf of another person.</i></p> |
|---|

Full names and surname: _____

Identity number: _____

D. Particulars of record

1. *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.*
2. *If the space provided for is sufficient to complete this section, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.*

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

1. *A request for access to the record will only be processed after a request fee has been paid, unless you are exempted from paying such fee.*
2. *You will be notified of the amount required to be paid as the request fee.*
3. *The fee payable for access to the record depends on the form in which access is required.*
4. *If you believe that you qualify for exemption of the payment of the prescribed fee, please state the reason for your belief.*

Reason for exemption from payment of fees:

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 for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

| Disability | Form in which required |
|------------|------------------------|
| | |
| | |
| | |

Mark the appropriate box with an "X".
NOTES:

1. *Your indication as to the required form of access depends on the form in which the record is available.*
2. *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.*
3. *The fee payable for access to the record, if any, will partly be determined by the form in which access is requested.*

| | | | |
|---|-----------------|--------------------------|----------------------|
| 1. If the record is in written or printed form | | | |
| <input type="checkbox"/> | Copy of record* | <input type="checkbox"/> | Inspection of record |

| | | | |
|---|-----------------|--------------------------|-----------------------------|
| 2. If record consists of visual images (This includes photographs, slides, video recordings, computer generated images, sketches, etc.) | | | |
| <input type="checkbox"/> | view the images | <input type="checkbox"/> | copy the images* |
| <input type="checkbox"/> | | <input type="checkbox"/> | transcription of the images |

| | | | |
|--|---|--------------------------|--|
| 3. If record consists of recorded words or information which can be reproduced in sound | | | |
| <input type="checkbox"/> | Listen to the sound track (audio cassette) | <input type="checkbox"/> | transcription of soundtrack (written or printed document) |

| 4. If record is held on computer or in an electronic or machine-readable form | | | |
|---|-------------------------|--|--|
| | printed copy of record* | | printed copy of information derived from the record* |
| | | | copy in computer readable form* (stiffy or compact disk) |

Mark your choice below.

REMEMBER: If you require a record to be posted to you, you will have to pay a postal fee.

| | | |
|--|------------|-----------|
| If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? | Yes | No |
| A postal fee is payable | | |

G. Particulars of right to be exercised or protected

If the space provided for is insufficient to complete this section, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected

2. Explain why the requested record is required for the exercising or protection of the aforementioned right

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved. 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 will you be informed of the decision regarding your request for access to the record?

Signed at _____ on this _____ day of _____ 20 _____

SIGNATURE OF REQUESTER/PERSON
ON WHOSE BEHALF REQUEST IS MADE