

**Information Manual  
prepared in terms of  
section 51 of the  
Promotion of Access to  
Information Act 2 of  
2000 as Amended  
(PAIA 31 of 2019)**

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## **INFORMATION MANUAL FOR MOMENTUM GROUP LIMITED**

**Prepared in terms of section 51 of the Promotion of Access to Information Act, Act 2 of 2000 as Amended (PAIA 31 of 2019)**

### **1 INTRODUCTION**

The Promotion of Access to Information Act, no 2 of 2000 as amended through the Promotion of Access to Information Amendment Act 31 of 2019 (“the Act”) gives effect to the constitutional right of access to any information in records held by public (government) or private (non-government) bodies that is required for the exercise of protection of any rights. Where a valid request is made in terms of the Act, Momentum Group is obliged to release the information, except where the Act expressly provides that the information may or must not be released.

#### **1.1 THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA, 1996**

Section 14 of the Constitution of the Republic of South Africa, 1996, provides the right to privacy. POPIA gives effect to the constitutional right to privacy provided in section 14 of the Constitution: -

- i) By safeguarding a person’s personal information when processed by public and private bodies.
- ii) In a manner which balances the right to privacy with any other rights, including the rights in the Bill of Rights in Chapter 2 of the Constitution, particularly the right to access to information; and
- iii) Subject to justifiable limitations, including but not limited to effective, efficient, and good governance and the free flow of personal information, particularly trans-border transfers.

Section 9 of PAIA recognises that the right of access to information is subject to certain justifiable limitations aimed at, amongst others:

- a) the reasonable protection of privacy.
- b) commercial confidentiality; and
- c) effective, efficient, and good governance.

#### **1.2 THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

Section 55(2) of POPIA requires Momentum Group and its subsidiaries to register its Information Officers and Deputy Information Officers with the Regulator before taking up their respective duties in terms of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) and the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

Regulation 4 (1) (c) of the POPIA Regulations confirms the publication requirement of PAIA when it stipulates that “...a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 15 of PAIA.” The requirement for a manual is then extended to include POPIA requirements when section 17 of POPIA provides that a “...responsible party must maintain the documentation of all processing operations under its responsibility as referred to in section 14 or 51 of the Promotion of Access to Information Act”.

## 2 LIST OF ACRONYMS, ABBREVIATIONS AND DEFINITIONS

The following definitions apply in relation to the reading of this document:

| Name                 | Definition   |
|----------------------|--|
| CEO                  | Chief Executive Officer  |
| Data Subject         | A data subject is a person to whom Personal Information relates.   |
| DIO                  | Deputy Information Officer   |
| IO                   | Information Officer means the person that is responsible for discharging the duties and responsibilities assigned to the “head” of the private institution, such as the managing director or any person duly appointed by the managing director.   |
| IR                   | Information Regulator  |
| Minister             | Minister of Justice and Correctional Services  |
| Momentum Group       | Refers to Momentum Group Limited with registration number 2000/031756/06   |
| Other Requester      | means any person making a request for access to a record.  |
| PAIA                 | Promotion of Access to Information Act No. 2 of 2000 (as Amended)  |
| Personal Information | According to the POPI Act “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples, can be found at the following link: <a href="https://www.gov.za/documents/protection-personal-information-act">https://www.gov.za/documents/protection-personal-information-act</a> . |
| Personal Requester   | means any person making a request for access to a record containing personal information about the requester.  |
| POPIA                | Protection of Personal Information Act No.4 of 2013  |
| Requester            | means any person making a request for access to a record.  |
| Regulator            | Information Regulator  |
| Third Party          | means any natural or juristic person other than, the requester, a party that acting on behalf of the requester, or alternatively Momentum Group itself.  |

### **3 PURPOSE OF THIS PAIA MANUAL**

The purpose of this manual is to provide assurance to the regulator and the public on the processes at Momentum Group Ltd and its subsidiaries to avail information to requesters, and that Momentum Group complies with the requirements of both PAIA and POPIA.

The manual is useful for the public to: -

- Understand how to make a request for access to a record held at Momentum Group.
- Access all the relevant contact details of the persons who will assist the public with records they intend to access.
- Know the remedies available from Momentum Group regarding request for accessing information before approaching the Information Regulator or Courts.
- A description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- If Momentum Group will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- If Momentum Group has planned to transfer or process personal information outside the Republic of South Africa, the recipients or categories of recipients to whom the personal information may be supplied.
- Know whether Momentum Group has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

It is important to note that the Act recognises certain limitations to the right of access to information, including, but not limited to limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution of the Republic of South Africa.

### **4 KEY CONTACT DETAILS FOR MOMENTUM GROUP**

The Chief Executive Officer Momentum Group has authorised the Momentum Group Chief Privacy Officer as the Information Officer for Momentum Group.

|                 |                                      |
|-----------------|--------------------------------------|
| Name:           | Ms Jeanine Norden                    |
| Designation:    | Momentum Group Chief Privacy Officer |
| Postal Address: | PO Box 7400, Centurion, 0046         |

Physical Address: Momentum Group  
268 West Avenue  
Centurion  
0157

Contact Number: +27 12 671 8911

E-mail: [dataprivacy@mmltd.co.za](mailto:dataprivacy@mmltd.co.za)

Website <https://www.momentumgrouppltd.co.za>

The Chief Executive Officer of Momentum Group has designated the Group Forensic Services Head as the Deputy Information Officer for Momentum Group.

Name: Mr Rajeev Keso

Designation: Head of Group Compliance, Legal & Market Conduct

Postal Address: PO Box 7400, Centurion, 0046

Physical Address: Momentum Group  
268 West Avenue  
Centurion  
0157

Contact Number: +27 12 671 8911

E-mail: [dataprivacy@mmltd.co.za](mailto:dataprivacy@mmltd.co.za)

#### **4.1 THE INFORMATION REGULATOR OF SOUTH AFRICA**

The Information Regulator is required in terms of the Act to compile a guide in every official language, in an easily comprehensible form and manner, as may be required by a person who wishes to exercise any right contemplated in the Act.

Any enquiries regarding this guide should be directed to:

Postal Address: The Information Regulator (South Africa)  
PO Box 31533  
Braamfontein

2017

Telephone Number: +27 10 023 5200

**Email Addresses**

General enquiries: [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)

Complaints: [paiacomplaints@infoeregulator.org.za](mailto:paiacomplaints@infoeregulator.org.za)

## **5 APPLICABILITY TO MOMENTUM GROUP LIMITED**

Momentum Group Limited is a South African-based financial services group. Our client-facing and specialist brands enable businesses and people from all walks of life to achieve their financial goals.

We help people grow their savings, protect their assets, and invest for the future. We also help companies and organisations care for and reward their employees and members. Momentum Group provides practical financial solutions for people, communities, and businesses.

Momentum Group Limited is a registered company in terms of the Companies Act, act 71 of 2008 as Amended and is listed on the Johannesburg Stock Exchange.

The Momentum Group of companies falls within the definition of a private body; therefore, the sections in the Act, pertaining to private bodies will be applicable.

This manual applies to Momentum Group and all its South African based registered companies, insofar companies are its subsidiaries and are legal entities. For ease of reference a non-exhaustive list of entity names/trading names are provided in paragraph 13 of this manual. Access to the records of any subsidiary company of Momentum Group Limited not listed in this manual may be requested from the Information Officer.

This manual is available for inspection, free of charge, at the physical address of Momentum Group.

### **5.1 AVAILABILITY OF THIS MANUAL**

This manual is available in English at:

- Momentum Group's physical address
- Websites
- On request from the Information Officer

## **6 GENERAL SUBJECTS AND CATEGORIES ON WHICH RECORDS ARE HELD AT MOMENTUM GROUP**

NOTE: Momentum Group does not provide information on categories of records which are available without a person having to request access and/or are automatically available.

**Products and Services**

Long-term insurance products Savings products  
 Unit Trust products  
 Investment and risk products to groups and schemes Short-term insurance products  
 Linked Investment services.  
 Administration of Retirement Annuities and Pension Funds Actuarial and consulting services to the retirement industry Trust Services  
 Managed care services to the healthcare industry Health Care products  
 Administration of medical schemes

**Company Records**

Finance and supporting documentation. Actuarial  
 Client Care  
 Product Management  
 All records kept in terms of law related to managing legal entities of Momentum Group. Distribution  
 Marketing  
 Information Technology Human Resources

**Subjects on which records are held**

Shareholders Board Members Directors Employees\* Officials Consultants Investors  
 Service providers Subsidiary companies Advisers.  
 Independent brokers  
 Clients  
 Banking Institutions  
 External companies/contractors Policyholders

**The following records are held in respect of the abovementioned subjects**

Confidential Personal Commercial Financial  
 Group/company incorporation Group/company financial Group/company departments Strategy.  
 Contractors Investors  
 Subsidiary companies Advisers

Consultants Information Technology Clients\*\*

Products and services Contracts

Rules of Funds Scientific Research Operational Trade Business

Internal group/company divisions Group/company structure Policyholders

Shareholders External companies Brokers

Directors Employees

Banking Institutions Official/Legal

Policy documents

### **6.1 THE ACCESSIBILITY OF THE DOCUMENTS LISTED BELOW MAY BE SUBJECT TO THE GROUNDS OF REFUSAL: - EMPLOYEE RECORDS:**

"Employee" refers to any person who works for or provides services to or on behalf of Momentum Group and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Momentum Group and includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers. Employee Records may include the following:

- Personal records provided by employees.
- Records provided by a third party relating to employees.
- Conditions of employment and other employee related contractual and quasi-legal records.
- Correspondence relating to employees; and
- Training schedule/s and material.

### **6.2 CLIENT RELATED RECORDS**

A "client" refers to any natural or juristic entity that receives services from Momentum Group. Client Records may include the following:

- Records provided by a client to an intermediary.
- Records provided by a third party.
- Records generated by or within Momentum Group, relating to clients, including transactional records.

### **6.3 MOMENTUM GROUP COMPANY RECORDS**

These records include but are not limited to the records that Momentum Group holds of their own affairs. Company records may include the following:

- Financial records
- Internal correspondence
- Information technology
- Operational records
- Product records
- Statutory records
- Communications
- Internal Policies and Procedures
- Human Resources records
- Administration records, Service level agreements, contracts, and other agreements

#### **6.4 CLIENT CARE RECORDS**

- Policy/contract documents
- Applications
- Amendments
- Financial transactions
- Alterations
- General information

#### **6.5 ALTERNATE RECORDS**

- Company secretarial records
- Databases
- Marketing records
- Treasury-related records
- Securities and equities
- Records held by an official of Momentum Group

These records include but are not limited to the records which pertain to Momentum Group's own affairs.

#### **6.6 OTHER RECORDS**

Further records are held pertaining to:

- Shareholders
- Directors
- Employees
- Officials

- Intermediaries
- Service Providers

## 7 CATEGORIES OF DATA SUBJECTS ON WHICH MOMENTUM GROUP HOLD RECORDS

| Category of data subject   | Categories of information and records*  |
|--|---|
| Employees of Momentum Group  | Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, sexual orientation, trade union membership, religious or philosophical beliefs, biometric information (photos) |
| Clients of Momentum Group  | Name, ID or registration number, address, financial information, credit check results, health information, application form, policy documents, VAT number, tax number, tax certificates, CCTV footage, biometric information (photos), call recordings, vehicle, and driver registration information, payment records, geo-location, policy information, contact person information if the client is a juristic person.   |
| Business partners that Momentum Group partner with for delivering certain products | Name, registration number, contact details, cashbacks, CCTV footage   |
| Third parties with whom Momentum Metropolitan conduct business services with       | Name, registration number, financial information, contract details, CCTV footage  |
| Contractors at Momentum Group  | Name, surname, physical address, registration number, financial information, contract, contractor name, ID number of contractors, CCTV footage, vehicle and driver registration information, biometric information (photos)   |

| Category of data subject                | Categories of information and records*   |
|---|--|
| Suppliers and Vendors of Momentum Group | Name, registration number, financial information, contract, tender documents, CCTV footage |

## 8 DESCRIPTION OF RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

A requester may also request information that is available in terms of other legislation. Please refer to **Annexure B** for such legislation and records.

## 9 CATEGORIES OF DATA SUBJECTS, THE INFORMATION RELATION TO DATA SUBJECTS, AND PURPOSES THAT MOMENTUM GROUP PROCESSES PERSONAL INFORMATION

In terms of POPIA, data may only be processed for a specific purpose. Momentum Group has various products and services and the reason for processing data differs will depend and differ based on the nature of the data that is collected, the data subject and the specific product and or service applicable. The purpose is disclosed either explicitly or implicitly when the data is collected. The [Momentum Group Privacy Policy](#) elaborates on how data is collected in Momentum Group.

Below follows the categories of Data Subjects, the information held relating to Data Subjects, and purposes that Momentum Group processes Personal Information.

### 9.1 CLIENT DATA

Client data is collected at various collection points as part of engagements with clients and provides Momentum Group the ability to provide products and services to our clients. By means of example, the data may be collected as part of an application process, during a claims process in assessing a client's financial needs, in administering a client's health plan, assessing a client's risk profile or investment needs or for research purposes. Momentum Group may also acquire data about our clients from third parties and process the data provided from credit bureaus or other industry bodies, a client's employer, health care providers or other providers to\*:

- conduct underwriting
- perform a risk assessment on a client
- consider claims
- provide financial advice
- process medical expenses/claim on behalf of a medical scheme
- process a product/service application
- conduct research

**\*Note: the list above may not be an exhaustive list.**

## **9.2 EMPLOYEE DATA**

Momentum Group processes employee data for business administration purposes, such as payroll purposes. Employee data is also processed to the extent required by legislation. For example, the disclosure of employee's financial information to the Commissioner for the South African Revenue Services (SARS) in terms of the Income Tax Act 58 of 1962 and employees' special personal information in terms of the Employment Equity Act 55 of 1998.

## **9.3 MOMENTUM GROUP COMPANY DATA**

These records include, but are not limited to, the records that pertain to Momentum Group's own affairs. These include the following:

- Financial records and reports
- Operational Records
- Communication
- Product and services records
- Administrative records (E.g., Legal Agreements, contracts, service-level agreements)
- Information Technology
- Statutory records and reports
- Internal policies, procedures, and standards
- Human Resources data and records
- Company Intellectual Property

## **9.4 THIRD PARTY AND EXTERNAL RECORDS**

These records include data acquired either in the public domain or from third party providers directly and include but may not be an exhaustive list, to be able to process payments or perform functions on Momentum Group's behalf, because of an outsourced service or as part that is provided by the third party.

In performing these tasks Momentum Group may process, collect, store, collate or disclose personal or special personal information. This may include the following information:

- Employee, client (being juristic or non-juristic entities) or private body records that are held by external third parties, other than subsidiaries of the Momentum Group.
- Financial records, correspondence, contractual records, payment records, records provided by other parties or records that third parties provided to Momentum Group or its subsidiaries that are held within the Momentum Group that may pertain to other parties.

- Momentum Group may keep records pertaining to other parties, including contractors, suppliers' subsidiaries, holdings, joint-venture entities, service providers or entities that Momentum Group may have a shareholding in.

## **10 RECEIPTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED TO**

A requester is any party who request access to a record that is held by Momentum Group. A requester is entitled to request access to their own information or information pertaining to third parties, where the requester has a legitimate interest to protect or is appropriately authorised.

Further to this, and subject to the nature of the information requested, Momentum Group may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (such as the National Credit Regulator in terms of the National Credit Act 34 of 2005) – please reference list above for more examples.
- Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data held by Momentum Group in terms of the applicable rules (such as the Competition Commission of the Competition Act 89 of 1998)
- The South African Revenue Service, or another similar authority.
- The Department of Labour, or other similar authority.
- A contracted third party who requires the information to provide healthcare services to a member or their dependents on their health plan.
- Anyone making a successful application for access in terms of PAIA
- Auditing and accounting bodies (both internal and external)
- Research or academic institutions (where applicable)
- Information regarding a data subject's creditworthiness with any credit bureau or credit provider, industry association or other association where Momentum Group operates in, provided it is in line with the provisions in POPIA, the relevant POPIA codes of conduct and the National Credit Act 34 of 2005.

## **11 TRANSBORDER FLOWS OF PERSONAL INFORMATION**

Momentum Group may transfer personal information to third parties who are outside the borders of South Africa. When transferring the data to alternative jurisdiction's, it is done for certain products or services. Personal Information may also be stored (processed) in the cloud or on data servers that are located outside the borders of South Africa. Momentum Group will only do so in line with the provisions set out in POPIA and after a full assessment has been performed on the provider and the country has been fully assessed, with sufficient security safeguards and measures in place.

## **12 MEASURES IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY, AND AVAILABILITY OF THE INFORMATION TO BE PROCESSED**

### **12.1 INFORMATION SECURITY**

The confidentiality and protection of client's data is a high priority for Momentum Group. Information Security deals with Momentum Group's Information, IT and Cyber security capability and practices.

Information security is implemented in Momentum Group through robust, repeatable, and tested processes with will define responsibilities and controls in place. Policies, Standards controls, roles and responsibility, reporting structures and escalation structures have been put in place with reporting structures to ensure that the structure is consistently evaluated and reported on

### **12.2 SPECIFIC MEASURES IMPLEMENTED BY MOMENTUM GROUP TO ENSURE INFORMATION SECURITY**

Please note that the below, is not an exhaustive list of measures that are implemented.

- Firewall protection, malware protection, network encryption and virus protection are in place.
- Ransomware protections are in place.
- Laptop and mobile Data encryption is in place.
- Computer and laptop portal blocking is in place.
- Lock boxes for hard copy data storage are in place.
- Secure hard copy disposable facilities with shredding infrastructure are in place.
- Secure processes for secure back up of data are in place.
- Momentum Group enforce strong passwords and two-tier authentication processes.
- Anti-phishing and anti-spam software are in place.
- A clean desk policy is enforced.
- Wi-Fi security is in place.
- Network and data access control through a managed active directory is in place.
- A managed disposal of data no longer needed is in place.
- A managed disposal of old IT equipment is in place.

## **13 ACCESSING RECORDS HELD BY MOMENTUM GROUP**

Records held by Momentum Group will be accessed only once the prerequisite requirements for access have been met by a requester. A requester is any person making a request for access to a record of or held by Momentum Group. There are two types of requesters:

a) Personal requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester.

Momentum Group will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested could be charged.

b) Other requester

This requester (other than a personal requester) is entitled to request access to information on third parties. However, Momentum Group is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

#### **14 REQUEST PROCEDURE FOR ACCESSING RECORDS**

- a) A requester requiring access to information held by a Momentum Group entity must complete the prescribed Form C (Annexure C) which is published on Momentum Group's website, or an applicable website of any Momentum Group entity, or available at request from the Information Officer.
- b) Submit the completed form to the Information Officer at the postal or physical address, or electronic mail address recorded in paragraph 2 of this manual and where applicable pay a request fee and a deposit, where so advised.
- c) The prescribed form must be completed with enough particularity to at least enable the Information Officer to identify:
  - i. The record or records requested.
  - ii. The identity number of the requester.
  - iii. The form of access required if the request is granted.
  - iv. The e-mail, postal address, or fax number of the requester.
- d) If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.
- e) The requester must state that he/she requires the information to exercise or protect a right and clearly state what the nature of the right to be exercised or protected is. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.
- f) Momentum Group will process the request within 30 days, unless the requester has

stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods could not be complied with.

- g) The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.
- h) If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.
- i) Where applicable, the requester must pay the prescribed fee if applicable before any further processing can take place.

## **15 DECISION ON PROVIDING INFORMATION**

- a) Momentum Group will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- b) The 30-day period within which Momentum Group must decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request is for a large volume of information, or the request requires a search for information held at another office of Momentum Group and the information cannot reasonably be obtained within the original 30-day period. The Information Officer will notify the requester in writing should an extension be sought.

## **16 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS**

**Momentum Group may refuse a request for information based on the following:**

- a) Mandatory protection of the privacy of a third party who is a natural person, that would involve the unreasonable disclosure of personal information of that natural person.
- b) Mandatory protection of the commercial information of a third party, if the record contains:
  - i. Trade secrets of that third party.
  - ii. Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
  - iii. Information disclosed in confidence by a third party to Momentum Group, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- c) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation.
- d) Mandatory protection of the safety of individuals and the protection of property.

- e) Mandatory protection of records which would be regarded as privileged in legal proceedings.
- f) The commercial activities of Momentum Group, which may include:
  - iv. Trade secrets of Momentum Group.
  - v. Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of Momentum Group.
  - vi. Information which, if disclosed, could put Momentum Group at a disadvantage in negotiations or commercial competition.
  - vii. A computer program which is owned by Momentum Group, and which is protected by copyright.
- g) The research information of Momentum Group or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- h) Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

## **17 REMEDIES AVAILABLE WHEN MOMENTUM GROUP REFUSES A REQUESTOR**

### a) Internal Remedies

Momentum Group does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer will have to exercise external remedies at their disposal.

### b) External Remedies

A requester or a third party, who is dissatisfied with an Information Officer's refusal to disclose information, or the disclosed information may within 30 days of notification of the decision, apply to the Constitutional Court, the High Court or another court of similar status for relief.

## **18 FEES**

### a) The Act provides for two types of fees, namely:

- i. A request fee, which will be a standard fee; and
- ii. An access fee will be calculated considering reproduction costs, search and preparation time and cost, as well as postal costs.

### b) When the request is received by the Information Officer, the officer will by notice require the requester, other than a personal requester, to pay the regulated prescribed

request fee (if any) before further processing of the request.

- c) The Information Officer can withhold a record until the requester has paid the fees as indicated.
- d) A requester whose request for access to a record has been granted, must pay an access fee for reproduction, for search, preparation and for any time reasonably required more than the prescribed hours to search for and prepare the record(s) for disclosure including arrangements to make it available in the requested format.

**NOTE: Not requesting a fee will be at the discretion of the Information officer.**

## **19 UPDATING OF THE MANUAL**

This manual is prepared by the Information Officer, Jeanine Norden, and will be updated as any changes to relevant legislation, processes, or persons responsible occur.

The current manual has been updated and published in August 2025.

## 20 ANNEXURE A

A comprehensive list of all Momentum Group companies is available from the Momentum Group company secretariat. Kindly refer to the Momentum Group Website for the details of the company secretary. The annexure below lists all active companies that are 100% owned.

| <b>Active companies 100% owned by Momentum Group</b>   |
|--|
| 129 Rivonia Road Proprietary Limited   |
| Adapt GL Proprietary Limited   |
| Adapt Office Suits Proprietary Limited   |
| Allens Nek PFS (Pty) Ltd   |
| Amandla Ilanga SPV (RF) Proprietary Limited  |
| Anrobrite Proprietary Limited  |
| Avison Young Eris SA Proprietary Limited   |
| BDC Property Partners Proprietary Limited  |
| Botsogo Health Plan Proprietary Limited  |
| Chuma Mall Proprietary Limited   |
| Cold Trade Proprietary Limited   |
| Crown Agents Investment Management Limited   |
| Curate Investments (Pty) Ltd   |
| Equilibrium Investment Management Proprietary Limited <i>(previously Momentum Investment Consulting Proprietary Limited)</i> |
| ERIS Investments Holdings Proprietary Limited  |
| Eris Parallel Investments (RF) Proprietary Limited <i>(previously known as CDC Parallel Investments (Pty) Ltd)</i>           |
| Eris Properties East Africa Proprietary Limited  |
| Eris Properties Eswatini Proprietary Limited   |
| Eris Properties Namibia Proprietary Limited  |
| ERIS Property Fund Carry Vehicle Proprietary Limited   |
| ERIS Property Holdings Proprietary Limited   |
| Eris Residential Ballito Proprietary Limited   |
| Euroguard Insurance Company PCC Limited  |

| Active companies 100% owned by Momentum Group   |
|---|
| Euroguard Insurance Managers Limited  |
| Genie Trade Proprietary Limited   |
| Guardrisk Allied Products & Services Proprietary Limited  |
| Guardrisk Group Proprietary Limited   |
| Guardrisk Insurance Company Limited   |
| Guardrisk Insurance Company Mauritius Limited PCC   |
| Guardrisk Insurance Management Limited  |
| Guardrisk International Limited PCC   |
| Guardrisk Life International Limited  |
| Guardrisk Life Limited  |
| Guardrisk Microinsurance Limited <i>(previously Momentum Structured Insurance Limited)</i>  |
| Guardrisk Premium Finance Proprietary Limited   |
| Hammarsdale PFS Proprietary Limited   |
| JCF Nominees Limited  |
| Kambanji EPG Proprietary Limited  |
| Kemparkto Proprietary Limited   |
| Landplan Beleggings Proprietary Limited   |
| MC Wealth Services Proprietary Limited  |
| Metropolitan Botswana Share Incentive Trust   |
| Metropolitan Capital Proprietary Limited  |
| Metropolitan Franchise Proprietary Limited <i>(previously Momentum Insurance Solutions Proprietary Limited (previously Alexander Forbes Direct Pty Ltd)</i> |
| Metropolitan Health Lesotho Proprietary Limited   |
| Metropolitan International Holdings Proprietary Limited   |
| Metropolitan International Support Proprietary Limited  |
| Metropolitan Lesotho Asset Managers Proprietary Limited   |
| Metropolitan Lesotho Limited  |
| Metropolitan Life Insurance Ghana LTD <i>(previously Metropolitan Life Insurance Ghana Limited)</i>   |
| Metropolitan Pensions Trust Ghana LTD <i>(previously Metropolitan Pensions Trust Ghana Limited (Mpt).)</i>  |

| Active companies 100% owned by Momentum Group  |
|--|
| Mill Street Development Proprietary Limited  |
| MMI Short Term Insurance Administration Proprietary Ltd  |
| Molope Proprietary Limited   |
| Momentum Africa Investment Management Limited (Mauritius)  |
| Momentum Africa Investments LLC  |
| Momentum Alternative Investments Proprietary Limited   |
| Momentum Asset Management (Namibia) Proprietary Limited  |
| Momentum Asset Management Nominees (RF) Proprietary Limited  |
| Momentum Asset Management Proprietary Limited  |
| Momentum Collective Investments (RF) Proprietary Ltd   |
| Momentum Collective Investments Namibia Limited  |
| Momentum Consult Proprietary Limited   |
| Momentum Consultants and Actuaries Proprietary Limited   |
| Momentum Finance Proprietary Limited ( <i>previously Momentum Metropolitan Finance Company Proprietary Limited</i> )                             |
| Momentum Global Investment Management Limited  |
| Momentum Group Limited ( <i>previously Momentum Metropolitan Holdings Limited</i> )  |
| Momentum Group-Wide Services Proprietary Limited ( <i>previously Momentum Metropolitan Infrastructure &amp; Operations Proprietary Limited</i> ) |
| Momentum Health Consultants Proprietary Limited  |
| Momentum Healthcare Distribution Proprietary Limited   |
| Momentum Insurance Company Limited ( <i>previously Alexander Forbes Short Term Insurance Company Limited</i> )                                   |
| Momentum Insurance Limited ( <i>previously Alexander Forbes Insurance Company Namibia Limited</i> )  |
| Momentum Insure Company Limited ( <i>previously Momentum Short term Insurance Company Limited</i> )  |
| Momentum International Insurance PCC Limited   |
| Momentum Investments Management Proprietary Limited  |
| Momentum Isabelo (RF) Proprietary Limited ( <i>previously Momentum Metropolitan Isabelo (RF) (Pty) Ltd</i> )                                     |
| Momentum Lending Proprietary Limited ( <i>previously Momentum Metropolitan Lending Proprietary Limited</i> )                                     |
| Momentum Life Botswana Proprietary Limited   |
| Momentum Metropolitan ESD Trust  |

| Active companies 100% owned by Momentum Group  |
|--|
| Momentum Metropolitan Life Limited   |
| Momentum Multi-Manager Proprietary Limited ( <i>previously Momentum Outcome-Based Solutions Proprietary Limited</i> )                    |
| Momentum Multiply Proprietary Limited ( <i>previously Healthvybe Proprietary Limited</i> )   |
| Momentum Mutual Fund ICC Limited   |
| Momentum Property Investments Proprietary Limited  |
| Momentum Rosslyn Development Proprietary Limited ( <i>previously MMH Rosslyn Development (Pty) Ltd</i> )                                 |
| Momentum Securities Nominees (RF) Proprietary Limited  |
| Momentum Securities Proprietary Limited  |
| Momentum Services Private Limited ( <i>previously Momentum Metropolitan Services Private Limited</i> )                                   |
| Momentum Strategic Investments (UK) Limited ( <i>previously Momentum Metropolitan Holdings (UK) Limited</i> )                            |
| Momentum Strategic Investments Proprietary Limited ( <i>previously Momentum Metropolitan Strategic Investments Proprietary Limited</i> ) |
| Momentum Thebe Ya Bophelo Proprietary Limited  |
| Momentum Trust Limited   |
| Momentum Umhlanga Proprietary Limited ( <i>previously Momentum Metropolitan Umhlanga Pty Ltd</i> )                                       |
| Momentum Wealth International Limited  |
| Momentum Wealth Namibia Nominees Proprietary Limited   |
| Momentum Wealth Namibia Proprietary Limited  |
| Momentum Wealth Nominees (RF) Proprietary Limited  |
| MPOF Hammersdale Proprietary Limited   |
| MPOF Rosslyn Development (Pty) Ltd   |
| MWI Nominees Limited   |
| MWI Secretaries Limited  |
| Myhealth Administrators Proprietary Limited  |
| Nala Units Proprietary Limited   |
| New Smal Construction Company Proprietary Limited  |
| Onghelo Trading Enterprises Proprietary Limited  |
| Pelgrim Investments Proprietary Limited  |
| Protea Glen Property Investments Proprietary Limited   |

| <b>Active companies 100% owned by Momentum Group</b>  |
|---|
| Rilarex (Pty) Ltd                                     |
| Rise Student Developments Proprietary Limited         |
| SBC Ins Limited (Startupboot)                         |
| SMH Land Development Proprietary Limited              |
| The Edge Trust  |
| The GAP Trust   |
| Umgeni Development 1 Proprietary Limited              |
| Umgeni Development 2 Proprietary Limited              |
| Umgeni Development 3 Proprietary Limited              |
| Umgeni Development No 4 Proprietary Limited           |
| Units of Blackwood Proprietary Limited                |
| Units on Birbeck Proprietary Limited                  |
| Units on Jorissen Proprietary Limited                 |
| Units on Main Proprietary Limited                     |
| Units on Park Street Proprietary Limited              |
| Units on Station Square Proprietary Limited           |
| Units on Twickenham Proprietary Limited               |
| Von Brandis Square Development Co Proprietary Limited |
| Vulindlela Centre Proprietary Limited                 |
| Workers Health Investments Proprietary Limited        |
| Zest Life Investments Proprietary Limited             |
| Zuri Property Solutions Proprietary Limited           |

| Active companies where Momentum Group is the majority shareholder  |
|--|
| 102 Rivonia Road Proprietary Limited   |
| Anthemis Exponential Ventures LLP  |
| Eris Properties Ghana Limited  |
| Eris Properties Poland   |
| ERIS Property Group Proprietary Limited  |
| Gamaphuteng Enterprises Proprietary Limited  |
| IMG Affiliates 2B Proprietary Limited (previously RMI Investment Managers Affiliates B2 Proprietary Limited) |
| Investment Managers Group Proprietary Limited (IMG)  |
| Mall of the North West Proprietary Limited   |
| MAREF Mon Tresor Investments 2 Limited   |
| Metropolitan Health (Botswana) Proprietary Limited   |
| Metropolitan Health Corporate Proprietary Limited  |
| Metropolitan Health Insurance Ghana LTD (previously Metropolitan Health Insurance Ghana Limited)             |
| Metropolitan Life of Botswana Limited  |
| Momentum Health Proprietary Limited ( <i>previously Momentum Health Solutions (Pty) Ltd</i> )                |
| Momentum Metropolitan Namibia Limited  |
| Momentum Mozambique LDA  |
| Momentum Short Term Insurance Limited (incorporated in Namibia)  |
| MPOF General Partner Proprietary Limited   |
| MPOF Investments GP1 Proprietary Limited   |
| Taung Square Proprietary Limited   |
| Tsumeb Mall Proprietary Limited  |

## 21 ANNEXURE B

Description of the records which are available in accordance with any other legislation.

**\*Note: The below is not an exhaustive list of legislation and records related to legislation that is available.**

| <b>*Legislation</b>  | <b>*Available records held at Momentum Group</b>  |
|--|---|
| Basic Conditions of Employment Act 75 of 1997                      | Employee and contractor contracts,<br>Leave policy, etc.  |
| Collective Investment Schemes Act 45 of 2002                       | Application forms, withdrawal forms etc.<br>Fund fact sheets  |
| Companies Act 71 of 2008, as Amended                               | Audited Financial statements  |
| Compensation of Occupational Injuries and Diseases Act 130 of 1993 | Workman's compensation application forms<br>Rules   |
| Competition Act 89 of 1998   | Momentum Group Dawn Raid Policy, Momentum Group<br>Code of Conduct, Momentum Group Conflict of Interest Policy  |
| Consumer Protection Act 68 of 2008                                 | Momentum Group Application forms, contracts etc advises the public among others, of<br>Momentum Group promoting fair business practices and protecting consumers from<br>unconscionable, unfair, unreasonable, unjust, or improper trade practices and deceptive,<br>misleading, unfair or<br>fraudulent conduct. |
| Copyright Act 98 of 1978   | Reference to trademarks and intellectual property rights as indicated on<br>Momentum Group designs, documents, services et.   |
| Electronic Communications and Transactions Act 25 of 2002          | Details of application of electronic transactions, signatures related to<br>Application forms, withdrawal forms etc   |
| Employment Equity Act 55 of 1998                                   | BBEE Certificates, legally required submissions, standards, and applications  |

|  |  |
|--|--|
| Financial Intelligence Centre Act 38 of 2001as Amended       | Momentum Group Risk Management and Compliance programmes   |
| Financial Institutions Protection of Funds Act 28 of 2001    | Advice documents, Fund Fact sheets to confirm safe custody and administration of funds and trust property by Momentum Group.                       |
| Financial Markets Act 19 of 2012                             | Personal account trading policy: Prohibit insider trading, and other market abuses.  |
| Income Tax Act 58 of 1862 and Value Added Tax Act 89 of 1991 | Value Added Tax Registration<br>IRP2/3/5's to employees and investors<br>VAT invoicing   |
| Labour Relations Act 66 of 1995                              | Momentum Group Code of Conduct, Momentum Group Grievance and Disciplinary Policy, etc  |
| Long-Term Insurance Act 52 of 1998                           | Financial Service Provider certificates, Product descriptions, product rules and advice records etc.   |
| Medical Schemes Act 131 of 1998                              | Applications forms, claim forms, administration rules etc.   |
| National Credit Act 34 of 2005, as Amended                   | Momentum Group guidance note on application of NCA. Reports to NCA.  |
| Occupational Health and Safety Act 85 of 1993                | Training notes and guidance notes to employees to provide for the health and safety of employees at work and for the health and safety of persons. |
| Pension Funds Act 24 of 1956                                 | Policyholder Protection Rules<br>Pension Fund Regulations  |
| Protection of Personal Information Act 4 of 2013             | Momentum Group Privacy Policy, details of Information officers, Deputy Information officers, Appointment certificates, POPIA and PAIA manuals      |
| Short-term Insurance Act 53 of 1998, as Amended              | Financial Service Provider certificates, Product descriptions, product rules and advice records etc.   |

|   |   |
|---|---|
| Skills Development Levies Act 9 of 1999 | Legally required submissions, standards, and applications   |
| Trademarks Act 194 of 1993              | Reference to trademarks and intellectual property rights as indicated on Momentum Group designs, documents, services and information on registered trademarks held by Momentum Group. |
| Trust Property Control Act 57 of 1998   | Momentum Group Trust trading guidelines, application forms, i.e., services rendered to trust property owners.   |
| Unemployment Insurance Act 63 of 2001   | Information on salary deductions, contributions, and applications to Fund   |

22 PRESCRIBED FORM TO BE COMPLETED BY A REQUESTER

**FORM 2**

**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

**NOTE:**

- 1. Proof of identity must be attached by the requester.
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer  
 268 West Avenue  
 Die Hoewes  
 Centurion  
 0157  
 Email: [dataprivacy@mmltd.co.za](mailto:dataprivacy@mmltd.co.za)  
 Tel: +27 (0)11 669 1000

Mark with an "X"

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

| PERSONAL INFORMATION   |           |  |            |
|--|-----------|--|------------|
| Full Names   |           |  |            |
| Identity Number  |           |  |            |
| Capacity in which request is made <i>(when made on behalf of another person)</i> |           |  |            |
| Postal Address   |           |  |            |
| Street Address   |           |  |            |
| E-mail Address   |           |  |            |
| Contact Numbers  | Tel. (B): |  | Facsimile: |
|  | Cellular: |  |            |
| Full names of person on whose behalf request is made <i>(if applicable):</i>     |           |  |            |

|                 |  |
|-----------------|--|
| Identity Number |  |
| Postal Address  |  |

| <b>PARTICULARS OF RECORD REQUESTED</b>   |  |
|--|--|
| <i>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 must be signed.)</i> |  |
| Description of record or relevant part of the record:  |  |
|  |  |
|  |  |
|  |  |
| Reference number, if available   |  |
| Any further particulars of record  |  |
|  |  |
|  |  |
|  |  |

| <b>TYPE OF RECORD</b>  |  |
|--|--|
| <i>(Mark the applicable box with an "X")</i>   |  |
| Record is in written or printed form   |  |
| Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> |  |
| Record consists of recorded words or information which can be reproduced in sound  |  |
| Record is held on a computer or in an electronic, or machine-readable form   |  |

| <b>FORM OF ACCESS</b>  |  |
|--|--|
| <i>(Mark the applicable box with an "X")</i>   |  |
| Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i> |  |

|   |  |
|---|--|
| Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> ) |  |
| Transcription of soundtrack ( <i>written or printed document</i> )  |  |
| Copy of record on flash drive ( <i>including virtual images and soundtracks</i> )   |  |
| Copy of record on compact disc drive ( <i>including virtual images and soundtracks</i> )  |  |
| Copy of record saved on cloud storage server  |  |

| <b>MANNER OF ACCESS</b><br><i>(Mark the applicable box with an "X")</i>   |  |
|---|--|
| Personal inspection of record at registered address of public/private body ( <i>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</i> ) |  |
| Postal services to postal address   |  |
| Postal services to street address   |  |
| Courier service to street address   |  |
| Facsimile of information in written or printed format ( <i>including transcriptions</i> )   |  |
| E-mail of information ( <i>including soundtracks if possible</i> )  |  |
| Cloud share/file transfer   |  |
| Preferred language<br><i>(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)</i>  |  |

| <b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>   |  |
|--|--|
| If the provided space is inadequate, please continue on a separate page and attach it to this Form.<br>The requester must sign all the 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:   |  |
|  |  |
|  |  |

| FEES   |  |
|--|--|
| <p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>c) 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.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</p> |  |
| Reason   |  |
|  |  |
|  |  |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication<br><i>(Please specify)</i> |
|----------------|-----------|---|
|                |           |   |

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_

\_\_\_\_\_  
*Signature of Requester / person on whose behalf request is made*

-----  
*FOR OFFICIAL USE*

|   |  |
|---|--|
| Reference number:   |  |
| Request received by:<br>(State Rank, Name and Surname of Information Officer) |  |
| Date received:  |  |
| Access fees:  |  |
| Deposit (if any):   |  |

\_\_\_\_\_  
*Signature of Information Officer*

**23 PRESCRIBED FORM TO BE COMPLETED FOR A COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION BY A REQUESTER**

**FORM 5**

COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013(ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 7]

Note:

*Affidavits or other documentary evidence in support of the request must be attached.*

*If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page*

Reference Number.....

Mark the appropriate box with an "x".

Complaint regarding:

- Alleged interference with the protection of personal information
- Determination of an adjudicator.

| PART I                                   | ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION<br>(Section 74(1) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)) |
|--|---|
| A  | PARTICULARS OF COMPLAINANT  |
| Surname of complainant:                  |   |
| Full names of complainant:               |   |
| Identity number of complainant:          |   |
| Residential, postal or business address: |   |
|  |   |
|  |   |
|  | Code (       )  |

|  |   |
|--|---|
| Contact number(s):   |   |
| Fax number:  |   |
| E-mail address:  |   |
| <b>B</b>   | <b>PARTICULARS OF BODY/RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION</b>      |
| Full names and surname of person interfering with personal information (if the person is a natural person) |   |
| Name of public or private body (if not a natural person):  |   |
| Residential address ( <i>if applicable</i> ): postal address or business address:                          |   |
|  |   |
|  |   |
|  | (Code )   |
| Contact number(s):   |   |
| Fax number:  |   |
| E-mail address:  |   |
| <b>C</b>   | <b>REASONS FOR COMPLAINT (<i>Please provide detailed reasons for the complaint</i>)</b> |
|  |   |

| PART II   | GRIEVANCE REGARDING DETERMINATION OF ADJUDICATOR<br><i>(Section 74(2) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013))</i> |  |
|---|--|--|
| A   | PARTICULARS OF COMPLAINANT   |  |
| Surname of complainant:   |  |  |
| Full names of complainant:  |  |  |
| Identity number of complainant:   |  |  |
| Residential, postal or business address:  |  |  |
|   |  |  |
|   |  |  |
|   | Code ( )   |  |
| Contact number(s):  |  |  |
| Fax number:   |  |  |
| E-mail address:   |  |  |
| B   | PARTICULARS OF ADJUDICATOR   |  |
| Full names and surname of adjudicator   |  |  |
| Name and surname of the responsible party <i>(if it is a public or private body):</i> |  |  |
| Name of responsible party <i>(if it is a public or private body):</i>                 |  |  |
| Residential, postal or business address:  |  |  |
|   |  |  |
|   |  |  |
|   | (Code )  |  |
| Contact number(s):  |  |  |
| Fax number:   |  |  |
| E-mail address:   |  |  |

| C | REASONS FOR COMPLAINT <i>(Please provide detailed reasons for the grievance)</i> |
|---|--|
|   |  |

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
*Signature of complainant/person aggrieved*