PSG Wealth Preservation Pension Fund

(Fund number: 12/8/37189)

Promotion of access to information manual

November 2025

Prepared in terms of Section 51 of the Promotion of Access to Information Act and The Protection of Personal Information Act.

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1. Introduction and Purpose

The Promotion of Access to Information Act ("PAIA") gives effect to the constitutional right of access to information held by public and private bodies, where such information is required for the exercise or protection of any rights. This manual outlines the procedures to be followed when requesting access to records held by the PSG Wealth Preservation Pension Fund ("the Fund"), and explains how to obtain information under PAIA and the Protection of Personal Information Act ("POPIA").

In terms of section 51 of PAIA, every private body — which includes a preservation fund — must compile and make available a manual that describes:

- the structure and functions of the organisation;
- the categories of records it holds;
- the process to be followed and the forms to be used when requesting information;
- any fees that may be payable; and
- the remedies available should access be refused.

The Fund is further subject to POPIA, which requires that personal information be collected, processed, stored, and shared in a lawful and transparent manner. Accordingly, the Fund respects the right of access to information and adopted this manual as prescribed by section 51 of PAIA read with Regulation 4(1) POPIA.

This manual therefore serves to:

- inform members, beneficiaries, participating employers, regulators, and the public of the types of information held by the Fund;
- explain how to request access to such information in accordance with PAIA and POPIA;
- promote transparency, accountability, and good governance within the Fund; and
- ensure that requests for information are handled in a lawful, fair, and efficient manner.

The Fund must ensure that:

1. An Information Officer is formally appointed and registered with the Information Regulator;
2. This manual is reviewed and updated at least once every twelve months or whenever material changes occur in the Fund's operations, rules, or contact details;
3. The manual is available at the Fund's registered office, submitted to the Information Regulator, and published on the website; and
4. Internal procedures are in place to ensure timely responses to information requests, proper record-keeping, and confidentiality of member data in compliance with PAIA and POPIA.

2. The Fund

The Fund is a registered pension fund organisation established in terms of the Pension Funds Act and approved by the South African Revenue Service (SARS) under the Income Tax Act.

The Fund's purpose is to promote and facilitate long-term retirement savings for its members, ensuring that they are financially secure upon retirement. It achieves this by protecting and preserving a member's retirement savings when they leave a retirement fund before reaching retirement age, in accordance with its registered rules and applicable legislation, and by paying benefits to members or their beneficiaries when certain life events occur — such as retirement or death. Its primary purpose is to keep the money invested for retirement, rather than having members withdraw and spend their accumulated benefits prematurely.

The Fund is governed by a Board of Trustees who act in the best interests of members and beneficiaries and who are responsible for ensuring compliance with the Pension Funds Act, FSCA directives, and all other relevant laws and standards of good governance.

Membership of a preservation fund is typically voluntary and provides members with tax-efficient saving opportunities, as investment growth is tax-deferred, enabling members to maximise their long-term retirement outcomes.

3. Contact Details

Information Officer	Linda Kleynscheldt
Postal Address	Building 1, The Ingress, Corner Magwa and Lone Crescent, Waterfall City, 2090
Physical Address	Building 1, The Ingress, Corner Magwa and Lone Crescent, Waterfall City, 2090
Telephone	+27 (11) 996 5200
Email	linda.kleynscheldt@psg.co.za
Website	https://www.psg.co.za/save-and-invest/retirement-products#retirement-annuity

4. Categories of Information Held by the Fund

A. Internal Records (may be subject to confidentiality)

- Registered rules of the Fund
- Last set of audited financial statements and auditor report
- Last actuarial valuation report
- Full names and terms of office of the Board of Trustees, the Principal Officer and the Deputy Principal Officer
- Board of Trustee resolution register

- Investment policy statement and reports
- Policies and procedures (e.g. governance, unclaimed benefits, communication, cybersecurity etc.)
- Compliance reports

B. Member and Beneficiary Information

- Membership records (applications, benefit details, fund values, investment choices/ switches, transfer-in data)
- Beneficiary nominations
- Claim forms and any benefit payment records
- Section 37D deductions instructions
- Court orders
- Member-specific transfer documents
- Tax directive application documents
- Death benefit investigations and resolutions
- Correspondence with members and beneficiaries

C. Statutory and Regulatory Submissions

- FSCA registration documents and amendments
- SARS approval

D. Other Information

- Newsletters, communication materials and annual trustee reports

5. Records Available Without a Formal Request

The following records may be available without submitting a PAIA request:

- Fund Rules and amendments (upon request to the Administrator)
- Member benefit statements (upon request from the relevant member)
- Annual financial statements summary (via the Annual Information Booklet)
- Communication material issued to members (upon request to the Administrator or Principal Officer)

6. Records Available Only on Request

Certain records containing confidential, personal or commercial information may only be disclosed upon formal written application and after consideration of the PAIA and POPIA provisions.

7. Request Procedure

Complete the Form C prescribed under PAIA – this is available on request from the Information Officer or at the following link (Form 2): https://inforegulator.org.za/paia-forms/

Submit it to the Information Officer via email, hand delivery or post.
The completed request form must clearly:

- provide sufficient particulars to identify both the requester and the record(s) sought;
- specify the preferred form of access (e.g. copies, inspection, or electronic record);
- include the requester's email or postal address;
- describe the right the requester wishes to exercise or protect;
- state the reason the requested record is required for the exercise or protection of that right;
- indicate if the requester wishes to be informed of the decision by a method other than in writing; and
- include proof of authority or capacity if the request is made on behalf of another person.

The Information Officer will determine whether the proof provided is satisfactory.
Pay the prescribed request fee (if applicable).

8. Timeframe for Responding to PAIA Requests

The Information Officer is required to process all requests for access to information within the time limits prescribed by PAIA as set out below:

- Initial response: The Information Officer must make a decision and notify the requester within 30 calendar days of receiving a properly completed request form. The written response must indicate whether access has been granted or refused and, if refused, provide the reasons for such refusal.
- Extension of time: If the request is complex, requires consultation with a third party, or involves a large volume of records, the Information Officer may extend the 30-day period by no more than an additional 30 calendar days. The requester must be informed in writing before the original 30-day period expires and the notice must include the reason for the extension and the expected completion date.
- Deemed refusal: If no response is provided within the prescribed period (including any lawful extension), it will be deemed that the request has been refused. The requester may then lodge a complaint with the Information Regulator or apply to a court for relief.
- Third-party consultation: Where the requested record contains information about a third party, the Information Officer must notify that party within 21 days of receiving the request and allow them 21 days to make representations before finalising the decision.

These timeframes ensure that all requests are managed fairly, efficiently and in accordance with the provisions of PAIA.

9. Grounds for Refusal of Access

In certain instances, the Information Officer may, in accordance with PAIA, refuse access to a record or provide only partial access. These provisions balance the right of access to information with the protection of privacy, confidentiality, and legitimate business or legal interests.

The Information Officer will assess each request on its merits and may rely on one or more of the following grounds for refusal:

Protection of personal privacy (Section 63): Access must be refused if disclosure would unreasonably reveal personal information about a third party, including identity details, medical or financial information, or private correspondence.

Protection of third-party commercial information (Section 64): Access may be refused if the record contains:

- trade secrets of a third party;
- financial, commercial, scientific, or technical information that could cause harm to that party's commercial interests; or
- information supplied in confidence that could place the third party at a disadvantage in negotiations or competition.

Confidential information supplied by third parties (Section 65): Access must be refused where disclosure would breach a duty of confidence owed to a third party, unless that third party consents in writing.

Safety and law-enforcement interests (Sections 66 and 67). Access may be denied if disclosure would:

- endanger the life or physical safety of any person;
- prejudice the prevention, detection, or investigation of an offence;
- reveal confidential sources or law-enforcement methods; or
- facilitate the commission of an offence.

Legal privilege (Section 67): Records that are subject to legal professional privilege, such as communications between the Fund and its attorneys, may not be disclosed.

Protection of the Fund's own commercial interests (Section 68): The Fund may withhold access to information that:

- contains its own trade secrets or confidential business information;
- could prejudice the Fund's commercial or financial position; or
- relates to confidential research or investment strategies.

Operations of public bodies (Section 69): Access may be refused where disclosure would compromise the effective functioning or decision-making of a public body, such as the FSCA, SARS, or the Information Regulator.

Protection of research information (Section 70): Access may be refused where disclosure of research being conducted by or on behalf of the Fund or a third party could expose the subject matter or methodology to harm before completion.

Publicly available records: Access may be denied if the information requested is already publicly accessible — for example, in published Fund reports, regulatory filings, or on official websites.

Partial access and reasons for refusal: Where possible, the Information Officer will grant partial access by redacting or omitting the exempt portions of a record. Any refusal of access will be communicated in writing, with reasons for the decision and an explanation of the requester's right to complain to the Information Regulator or apply to court for relief.

10. Remedies

If a request is refused, the requester may lodge a complaint with the Information Regulator by completing Form 5, available at https://inforegulator.org.za/paia-forms/, and emailing it to: PAIAComplaints@inforegulator.org.za.

11. Processing of Personal Information (POPIA Compliance)

The Fund processes personal information in accordance with the Protection of Personal Information Act (POPIA). This section explains how the Fund collects, uses, stores, and protects personal information, and outlines the rights of individuals whose information it holds.

- **Categories of personal information collected**
  The Fund collects and retains personal information necessary for the administration and governance of the Fund. This may include:
  - Member and beneficiary details (e.g. names, ID numbers, contact details, dependants, and next of kin).
  - Employment information.
  - Financial and banking details for benefit payments.
  - Medical and disability information relevant to benefit entitlement.
  - Trustee, principal officer, deputy principal officer and service-provider information used for governance and operational purposes.

- **Purpose for processing personal information**

  The Fund processes personal information to:

  - Administer and pay benefits due to members and beneficiaries.
  - Verify the identity and eligibility of members and dependants.

- Comply with legal obligations under the Pension Funds Act, Income Tax Act, Financial Sector Regulation Act and other relevant legislation and regulatory instruments.
- Maintain accurate records and facilitate effective communication.
- Conduct governance, risk management, actuarial, and audit functions.
- Report to regulators and other authorities as required by law.

- **Recipients of personal information**

  Personal information may be shared only when necessary for legitimate Fund operations or where disclosure is required by law. Typical recipients include:

  - The Fund's administrator, auditor, actuary, investment managers, and insurers.
  - Regulatory bodies such as the Financial Sector Conduct Authority (FSCA), South African Revenue Service (SARS), Financial Intelligence Centre (FIC), and the Information Regulator.
  - Beneficiaries, dependants, or other parties lawfully entitled to the information.
    All third parties handling Fund information are subject to confidentiality and data-protection obligations.

- **Cross-border transfers**

  If any personal information is transferred or stored outside South Africa — such as on cloud-based or international systems — this will only occur where:

  - adequate data-protection measures or legal safeguards are in place; or
  - the data subject has provided consent.

- **Data-subject rights**

  Individuals whose personal information is processed by the Fund ("data subjects") have the right to:

  - request access to their personal information held by the Fund;
  - request correction, deletion, or destruction of inaccurate or outdated information;
  - object to certain types of processing, where legally permissible; and
  - lodge a complaint with the Information Regulator if they believe their information has been processed unlawfully.

  All such requests must be submitted in writing to the Fund's Information Officer.

- **Security safeguards**

  The Fund applies appropriate technical and organisational measures to protect personal information against loss, unauthorised access, or misuse. Access to personal information is limited to individuals and service providers who require it for legitimate Fund purposes and who are bound by confidentiality undertakings.

- **Responsibility of the Information Officer**

  The Fund's Information Officer is responsible for ensuring compliance with both PAIA and POPIA, including overseeing data-protection practices, handling information requests, maintaining compliance records, and engaging with the Information Regulator as required.

11. Fees

The fee structure for accessing information is prescribed under the regulations relating to PAIA, published in Government Notice (GN) R757 of 27 August 2021.

A requester may be required to pay:

- A request fee, and
- An access fee (if copies or time are required for preparation).

12. Availability of the Manual

This manual is available:

- For inspection at the Fund's registered office;
- On the website at https://www.psg.co.za/support/legal.

13. Information Regulator Contact Details

The Information Regulator (South Africa)
Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Tel: +27 (0)10 023 5200/ toll free: 0800 017 160
Email: enquiries@inforegulator.co.za
Website: https://inforegulator.org.za/

14. Updates and Review

This manual will be reviewed and updated at least every 12 months or following significant legislative or structural changes to the Fund as required.

Signed on this 11th day of May 2026.

Chairman

Information Officer