SA HOME LOANS

ACCESS TO INFORMATION MANUAL

As required by Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and to address requirements of Protection of Personal Information Act 4 of 2013 ("POPIA")
of

SAHL INVESTMENT HOLDINGS (PROPRIETARY) LIMITED
("the Holding Company")

its wholly owned subsidiary

SA HOME LOANS (PROPRIETARY) LIMITED

("the Company")

And

Including all Special Purpose Vehicles managed by the Company
SAHL Life Assurance Company Limited;
and SAHL Insurance Company Limited.

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1. Abbreviations

Abbreviation	Definition
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
IR	Information Regulator
POPIA	Protection of Personal Information Act No.4 of 2013
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as Amended

2. Introduction

2.1. The Promotion of Access to Information Act, 2 of 2000 (PAIA), was enacted to give effect to Section 32 of the Constitution of the Republic of South Africa, which provides for the right of access to information held by the State, as well as information held by another person or private body, where such information is required for the exercise or protection of any rights.

2.2. PAIA promotes transparency and accountability by granting individuals the right to access information necessary to exercise or protect their rights. Public and private bodies are obliged to consider and, where appropriate, provide access to requested information, except where the Act lawfully restricts disclosure.

2.3. As SA Home Loans Group is a Responsible Party in terms of the Protection of Personal Information Act, 4 of 2013 (POPIA) – we are committed to ensuring that the processing, storage, and disclosure of personal information are conducted lawfully and in accordance with PAIA and POPIA.

3. Regulatory Framework

3.1. Promotion of Access to Information

i. PAIA gives effect to Section 32 of the Constitution, which provides for the right of access to information held by another person that is required for the exercise and / or protection of any right.

ii. PAIA seeks to promote a society in which you have access to information to enable you to exercise and protect your rights, and to promote a culture of transparency and accountability. Section 51 of PAIA requires all private bodies to compile a manual containing various information including:

- the company details
- a description of the records of the company
- means by which a record may be accessed

iii. The company is a private body and therefore this manual has been compiled in terms of, and in order to comply with the applicable provisions of PAIA, including but not limited to Section 51.

3.2. Protection of Personal Information

i. The purpose of POPIA is to give effect to Section 14 of the Constitution, being the constitutional right to privacy by protecting Personal Information and regulating the processing of personal information.

4. Purpose of the Manual:

4.1. The purpose of this manual is to:

i. aid in the access to information which is held by the Company and the related entities listed in Annexure B
ii. to balance the constitutional right to the access of information with the right to privacy by protecting personal information
iii. check the categories of records held by the Company which are available without a person having to submit a formal PAIA request
iv. have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records of, and the categories of records held on each subject
v. know the description of the records of the Company which are available in accordance with any other legislation
vi. access the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access
vii. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it
viii. know if the Company 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
ix. know the description of the categories of data subjects and of the information or categories of information relating thereto
x. know the recipients or categories of recipients to whom the personal information may be supplied
xi. know if the Company has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
xii. know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

5. Company Details and Key Contact Details

5.1. This manual applies to the Holding Company, its wholly owned subsidiary SA Home Loans Proprietary Limited ("the Company"), its divisions, subsidiaries, related and interrelated companies and managed entities listed in Annexure B to this manual.

5.2. SAHL Investment Holdings Proprietary Limited (the Holding Company) and its subsidiaries, managed, consolidated, and related entities (listed in Annexure B) shall be referred to herein as "the SA Home Loans Group".

5.3. The Holding Company's details are as follows –

Registration Number	1998/004570/07
Postal Address	PO BOX 3918, Durban, 4000
Physical Address	2 Milkwood Crescent, Milkwood Park, La Lucia Ridge, Durban, 4051
Telephone Number	031-560 5300
General contact Email address for the company	admin@sahomeloans.com
Chief Executive Officer	Robert Kelso
Information Officer	Sikhumbuzo Mthembu

Deputy Information Officer	Noluthando Mwelase
Information Officer Email Address	InformationOfficer@sahomeloans.com
Website	https://www.sahomeloans.com/

5.4. The Company's details are as follows -

Registration Number	2006/035436/07
Postal Address	PO BOX 3918, Durban, 4000
Telephone Number	031-560 5300
General contact Email address for the company	admin@sahomeloans.com
Chief Executive Officer	Robert Kelso
Information Officer	Sikhumbuzo Mthembu
Deputy Information Officer	Noluthando Mwelase
Information Officer Email Address	InformationOfficer@sahomeloans.com
Website	https://www.sahomeloans.com/

6. PAIA Guide – How to use and access the Guide

6.1. The Information Regulator is an independent body established in terms of Section 39 of the Protection of Personal Information Act 4 of 2013.

6.2. The Information Regulator is empowered to monitor and enforce compliance by public and private bodies with the provisions of the Promotion of Access to Information Act, 2000 (Act 2 of 2000), and the Protection of Personal Information Act, 2013 (Act 4 of 2013).

6.3. The Information Regulator has compiled a PAIA guide. The purpose of the Guide is to provide information that is needed by any person who wishes to exercise any right contemplated in the Promotion of Access to Information Act of 2000 (PAIA) and Protection of Personal Information Act, 2013 ("POPIA").

6.4. The guide can be obtained by making a written request to the Information Officer (InformationOfficer@sahomeloans.com) or from the website of the Information Regulator (https://inforegulator.org.za/paia-guidelines/).

6.5. A copy of the guide is available for public inspection during normal office hours in the following languages:

i. English
ii. IsiZulu
iii. Afrikaans

6.6. Further queries to the Information Regulator can be directed as follows:

Postal Address	P.O Box 31533 Braamfontein Johannesburg 2017
Physical Address	JD House 27 Stiemens Street Braamfontein Johannesburg, 2001
General Queries Email Address	enquiries@inforegulator.org.za
PAIA Complaints	PAIAComplaints@inforegulator.org.za
POPIA Complaints	POPIAComplaints@inforegulator.org.za

7. Records of the Company

7.1. A description of the records held by the holding company, its divisions, subsidiaries, related and interrelated companies and managed entities, is set out in the table below:

CATEGORIES OF RECORDS FOR EACH	FORM HELD	AVAILABILITY
1.COMPANY SECRETARIAL RECORDS		
Company Incorporation	Electronic and physical	Not automatically available (Request by email)
Names of Directors	Electronic and physical	Not automatically available (Request by email)
Names of Executive Management	Electronic and physical	Automatically available (Available on website)
2. FINANCIAL RECORDS OF SAHL		
Financial statements and agreements	Electronic and physical	Not automatically available (Request by email)
Banking Details	Electronic and physical	Not automatically available (Request by email)
Documents relating to taxation of the company	Electronic and physical	Not automatically available (Request by email)
3. EMPLOYEES		
List of Employees	Electronic and physical	Not automatically available (Request by email)
Personal information of employees	Electronic and physical	Not automatically available (Request by email)
Employee contracts of employment	Electronic and physical	Not automatically available (Request by email)
Salaries of Employees	Electronic and physical	Not automatically available (Request by email)
Leave records	Electronic and physical	Not automatically available (Request by email)

4. COMPANY POLICIES AND DIRECTIVES		
Internal relating to employees and the company	Electronic and physical	Not automatically available (Request by email)
External relating to clients and other third parties	Electronic and physical	Not automatically available (Request by email)
5. AGREEMENTS OR CONTRACTS		
Standard Agreements	Electronic and Physical	Not automatically available (Request by email)
Contracts concluded with customers	Electronic and Physical	Not automatically available (Request by email)
Third party contracts (such as Service Level Agreements etc.)	Electronic and Physical	Not automatically available (Request by email)
Office management contracts	Electronic and Physical	Not automatically available (Request by email)
Supplier contracts	Electronic and Physical	Not automatically available (Request by email)
6. REGULATORY		
Licenses or Authorities	Electronic and Physical	Not automatically available (Request by email)
7. CUSTOMER INFORMATION		
Customer Details	Electronic and physical	Not automatically available (Request by email)
Contact details of individuals within customers	Electronic and physical	Not automatically available (Request by email)
Communications with customers	Electronic and physical	Not automatically available (Request by email)
Records relating to customers including transactional records	Electronic and physical	Not automatically available (Request by email)
8. PUBLISHED INFORMATION		
External Newsletters and Circulars	Electronic and physical	Subscribe on website or follow social media accounts
Internal Newsletters and Circulars	Electronic and physical	Not automatically available (Request by email)
Information on the company published by third parties	Electronic and/or physical	Not automatically available (Request by email)
Published promotional and advertising material	Electronic only	Automatically available
Published information pertaining to SAHL's products and services	Electronic only	Automatically available (SAHL Website)

As the Company is concerned about protecting the confidential information of its customers, any request for customer information must be clearly explained, having regard to Sections 63 to 67 of PAIA and the provisions of POPIA.

8. Subjects and Categories of Records

8.1. The table below sets out the subjects and categories of records held by the holding company, its divisions, subsidiaries, related and interrelated companies and managed entities. In the event you require access to any of the records listed below, you may request access to them.

CATEGORIES OF RECORDS FOR EACH SUBJECT
1.COMPANY SECRETARIAL RECORDS
Company Incorporation
Names of Directors
Salaries of Directors
Records relating to the appointment and resignation of directors, auditors, secretary, and other officers
Minutes of Board or Director Meetings
Share Register
Share Certificates
Other Statutory Register
Power of Attorneys
Written Resolutions
Proxy forms (in respect of meetings of members of the company)
Register of Debenture holders
Delegation of Authority records
Documents on business processes
Strategic Planning Records
Other Statutory Records
2. FINANCIAL RECORDS OF SAHL
Financial statements
Documents relating to taxation of the company including tax returns
Accounting and Banking Records
Financial Agreements
Invoices
Banking Details
Bank Statements
Auditor Reports
Asset Register
3. INSURANCE OF SAHL
Insurance Policies held by the Company (Including insurance claims and investigation reports)
Register of all immovable property owned by the company
4. INCOME TAX RECORDS
PAYE Records
Corporate Tax Records
Customs Tax
Documents issued to employees for income tax purposes
Records of payments made to SARS on behalf of employees
VAT Records
Regional Services and Skills Development Levies
UIF
Workmen's Compensation

5. EMPLOYEES
List of Employees
Personal information of employees
Employee contracts of employment
Records relating to appointment (including application and appointment letters) and resignation of employee
Salaries of Employees
Leave records
Remuneration records
Medical aid records
Pension fund and Provident fund records
Performance appraisals, internal evaluations, and training records
Disciplinary record of employee
Disciplinary codes
Employment Equity Plan
Health and Safety records
Operating records
Other statutory records
Related Correspondence
6. COMPANY POLICIES AND DIRECTIVES
Internal documents: relating to employees and the company
External documents: relating to clients and other third parties
IT policies relating to systems, standards and procedures
7. AGREEMENTS OR CONTRACTS
Standard Agreements
Contracts concluded with customers
Third party contracts (such as Service Level Agreements etc.)
Office management contracts
Supplier or service contracts
Credit Sales Agreements
Hire Purchase agreements
Non-Disclosure Agreements
Office management contracts
Bond Agreements
Rental Agreement
8. REGULATORY
Licenses or Authorities
Approvals and permits
Agreements
Litigation claims, court documents and records
Submissions to regulatory bodies
9. CUSTOMER INFORMATION
Customer Details
Contact details of individuals within customers
Communications with customers
Customer Complaints
Loan Account Information (Transaction Information)

Marketing preferences
10. PUBLISHED INFORMATION
External Newsletters and Circulars
Internal Newsletters and Circulars
Information on the company published by third parties
11. SYSTEMS, SOLUTIONS, INFORMATION TECHNOLOGY
Intellectual property pertaining to solutions and products developed.
Usage of solutions and products
Disaster recovery records
Software Licensing
Software documentation and manuals
Computer and mobile device usage policy documentation
Information technology security policies, standards and procedures
12. INTELLECTUAL PROPERTY INFORMATION
Copyrights
Designs
Licenses
Patents
Trademarks

9. Records we hold to comply with the law

9.1. Records of the Company, its holding company, divisions, subsidiaries, related and interrelated companies and managed entities, may be kept by or on behalf of the Company in accordance with the following legislation (some of which legislation may not be applicable to the Company), as well as with other legislation that may apply to the Company and/or its subsidiaries from time to time:

BANKING, INVESTMENTS AND FINANCE
Banks Act 94 of 1990;
Bills of Exchange Act 34 of 1964;
Collective Investment Schemes Control Act 45 of 2002;
Financial advisory and Intermediary Services Act 37 of 2002;
Home Loan and Mortgage Disclosure Act 63 of 2000
Securities Services Act 36 of 2004.
Trust Property Control Act 57 of 1988
SA Reserve Bank Act 90 of 1989
Stock Exchange Control Act 1 of 1985
Income Tax Act 58 of 1962;
Insolvency Act 24 of 1936;
Insolvency Act 18 of 2017
National Credit Act 34 of 2005;
Tax Administration Act 28 of 2011;
Value Added Tax Act 89 of 1991.
Currency and Exchanges Act 9 of 1933
The Custody and Administration of Securities Act, No 85 of 1992
HUMAN RESOURCES
Basic Conditions of Employment Act 75 of 1997;
Broad Based Black Economic Empowerment Act 53 of 2003;
Compensation for Occupational Injuries and Disease Act 130 of 1993;
Employment Equity Act 55 of 1998;
Labour Relations Act 66 of 1995;

Occupational Health and Safety Act 85 of 1993;
Protected Disclosures Act 26 of 2000;
Skills Development Act 97 of 1998;
Skills Development Levies Act 9 of 1999;
Unemployment Insurance Act 63 of 2001;
Unemployment Insurance Contributions Act 4 of 2002.
Arbitration Act No 42 of 1965
ANTI-CORRUPTION, FRAUD, ANTI-MONEY LAUNDERING AND ORGANISED CRIME
Prevention & Combating of Corrupt Activities Act 12 of 2004;
Prevention of Organised Crime Act 121 of 1998;
Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004.
Financial Intelligence Centre Act 38 of 2001;
INSURANCE
Insurance Act 18 of 2017
Long-Term Insurance Act 52 of 1998
Short-Term Insurance Act 53 of 1998
COMPLIANCE AND CORPORATE GOVERNANCE
Companies Act 61 of 1973;
Companies Act 71 of 2008;
Competition Act 89 of 1998.
GENERAL
Consumer Protection Act 68 of 2008;
Prescription Act 18 of 1943;
Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
Promotion of Access to Information Act, No 2 of 2000;
Protection of Personal Information Act 4 of 2013;
Cybercrimes Act 19 of 2020;
Administration of Estates Act 66 of 1965.
Alienation of Land Act 66 of 1965
Debt Collectors Act No 114 of 1998
Harmful Business Practices Act 23 of 1999
Medical Schemes Act 131 of 1998
Pension Funds Act 24 of 1956
Non-profit Organisations Act 71 of 1997
COMMUNICATIONS AND IT
Electronic Communications Act 36 of 2005;
Electronic Communications and Transactions Act 25 of 2002;
Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002.
Post Office Act 44 of 1958
COPYRIGHT, INTELLECTUAL PROPERTY AND TRADEMARKS
Copyright Act 98 of 1978;
Intellectual Property Laws Amendment Act 38 of 1997;
Intellectual Property Laws Amendment Act 28 of 2013;
Trademarks Act 194 of 1993.

10. Processing and Protection of Personal Information

10.1. Purpose of Processing of Personal Information

i. The company processes personal information of various categories of people, and personal information is processed for various purposes. These are set out in the SA Home Loans Group Privacy Policy which can be accessed using the link below:

https://www.sahomeloans.com/legal

10.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

i. A data subject is defined as the person to whom personal information relates to.

ii. SA Home Loans Group data subjects are categorised as employees (former, current, and prospective employees), clients (including prospective clients), and respective third parties. Below is a table that outlines the categories of data subjects and the description of the nature or categories of the personal information which is processed by the Group. The table below is not an exhaustive list.

Categories	Personal Information
Clients/Customers	Name, surname, contact details, registration numbers, identity numbers (including passport numbers), proof of income, proof of address, financial details (including credit history), banking details, employment information, biometric, beneficiary, and juristic and corporate entity information (including beneficial ownership information).
Employees (including applicants)	Name, surname, identity numbers (including passport number), marital status, address, qualifications, gender, health/medical information, race, children, spouse and family, beneficiaries, criminal, financial, employment history, opinions and views, credit, curriculum vitae, biometric, closed-circuit television ("CCTV") footage, monitoring of business communication platforms, employee disciplinary and performance information, pension fund information and beneficiaries, next of kin, disability status and training records
Service Providers and Suppliers	Names, addresses, company registration numbers, VAT numbers, addresses, banking details, tax numbers, PAYE numbers, and contact details, supplier representative and supplier employee information
Shareholders	Name, address, contact details, relevant information and records pertaining to shareholding.
Directors	Name, surname, identity number (including passport number, contact details, gender, postal and physical address, curriculum vitae, information pertaining to checks conducted for Compliance purposes, conflict of interest declarations, education, and qualification.
Visitors to SAHL premises and branches	Full names, contact details, and car registration details.

10.3. The recipients or categories of recipients to whom the personal information may be supplied

i. SA Home Loans Group will share information for various reasons, some of which are stipulated in our Privacy Policy as well as to authorised persons (which have been duly authorised by yourself) or with third parties – which are set out in the Privacy Policy. This will be done in line with applicable laws and when required. The type/category of personal information to be shared with the recipient is dependent on the reason for processing.

ii. Below is a table which outlines the recipient or categories of recipients and the type of personal information which may be shared with them:

Category of personal information	Recipients to whom the personal information may be supplied
Identity number (including passport number), full names, employee	HR Service Providers and Operators (Recruitment, OE, Payroll and Learning and Development)

numbers, contact details, employment dates, performance history, statutory requirements (including tax), PAYE numbers, banking details, addresses, salary information and medical information.	
Identity numbers, names and surnames, addresses, source of income, facial biometrics, juristic and corporate entity information (including beneficial ownership information).	Customer Due Diligence Purposes (Screening and Verification Service Providers)
Credit and payment history for credit information	Credit Bureaus
Name, surname, contact details, addresses, registration numbers, identity numbers (including passport number), juristic and corporate entity information, relevant bond information and transactions from inception.	Regulatory institutions/bodies and Legal Service Providers.
Name, surname, contact details, addresses, registration numbers, identity numbers (including passport number), juristic and corporate entity information, relevant bond information and transactions from inception.,	Business partners for business related purposes and transactions.
Name, surname, contact details, registration numbers, identity numbers (including passport numbers), proof of income, proof of address, financial details (including credit history), banking details, employment information, biometric, beneficiary, and juristic and corporate entity information (including beneficial ownership information). relevant bond information and transactions from inception.	Operators (suppliers, vendors and other third parties) who provide SAHL Group with services or to whom any functions or activities have been outsourced (including, but not limited to, cloud service providers) and who process personal information on SAHL Group's behalf.

10.4. Actual Or Planned Transborder Flow of Personal Information

i. Any transfer of personal information across borders shall require the data subject's consent. However, if obtaining their consent is not reasonably practicable, we may transfer the information if it is for the data subject's benefit, and they would likely have given consent had it been reasonably practicable to obtain it.

ii. We will ensure that anyone with whom we have an agreement for the storage and/or processing of Personal Information agrees to treat the Personal Information with the same level of protection as we are obliged to do.

10.5. General Description of Information Security Measures

i. SA Home Loans Group takes all reasonable precautions in line with generally accepted information security practices and makes use of up-to-date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care.

ii. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT infrastructure
- Outsourced Service Providers who process Personal Information on behalf of SA Home Loans Group are contracted to implement security controls.

iii. For further information regarding the above please refer to the SAHL Group Privacy Policy which can be accessed using the link below: https://www.sahomeloans.com/legal

11. How you can Request Access

11.1. To comply with our obligations in terms of PAIA, an Information Officer has been appointed to deal with all matters relating to PAIA and POPIA. In order to request access to a record which is available upon request please complete the Request for Access to Record Form which is available as Annexure A or at https://inforegulator.org.za/paia-forms/ and submit the completed form at the physical address, general contact email address or the Information Officer email address provided above.

11.2. Form of request: The requester must use the prescribed form to make the request for access to a record. This request must be made to the Information Officer.

11.3. For your request to be considered please ensure that the completed form:

i. Has sufficient detail on the request form to enable the Information Officer to identify the record which has been requested, the requester and the form of access you require.

ii. States your email address, postal address, and other relevant contact details and provide any other way that the requester would like to be informed of the decision relating to the request other than in writing.

iii. Identifies the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

iv. The requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the head of the private body (If a request is made on behalf of another person).

11.4. You will be notified in writing whether your request has been approved or denied within 30 calendar days after receipt of the completed Request for Access to Record Form. Should any record of the company requested by you not be found or not exist, the company will, notify you that it is not possible to give access to that record.

Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and POPIA.

12. Decision Regarding Request

12.1. PAIA provides for numerous grounds upon which the company may refuse to grant you access to a record held by the company. These grounds for refusal are to protect –

12.2. The Privacy of Another Person

i. We may refuse to give you access to a record if access would unreasonably disclose a natural person's personal information, including a deceased person.

ii. Access will not be refused in certain circumstances, such as follows:

- Consent has been obtained from the person who the information pertains to.
- The information is publicly available.
- The information belongs to a class of information, and the private body notified the individual upfront that the specific class of information might be made public.

iii. The record is physical or mental health information or information about someone's well-being who is:

- under the requester's care and below 18 years, or
- incapable of understanding the nature of the request and giving access would be in the individual's best interests.

iv. The information is about a deceased person and:

- the requester is the next of kin, or
- the request is made with the written consent of the individual's next of kin.

v. The information is about a person who is, or was an executive at your organisation, and the information relates to their position or functions.

12.3. Commercial Information of Another Company

i. Access to a record may be refused if the requested record contains:

- trade secrets of a third party,
- financial, commercial, scientific, or technical information and the disclosure could cause harm to the financial or commercial interests of that third party,
- information and the disclosure could put the third party at a disadvantage in negotiations or commercial competition.

12.4. Confidential Information of Another Person

i. Access to a requested record will be refused if its disclosure would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

12.5. The Safety of Individuals and Property

i. Access to a requested record may be refused if it could reasonably be expected to endanger an individual's life or physical safety. Access to a request may be refused if its disclosure would be likely to prejudice or impair the security of:

- a building, structure, or system, including a computer or communication system,
- a means of transport,
- any other property,
- methods, systems, plans or procedures for the protection of someone in a witness protection scheme,
- the public, or a part of the public, or
- the security of the property contemplated above.

12.6. Records Privileged from Production in Legal Proceedings

Access to a requested record may be refused if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

12.7. Research Information

Access to a requested record that contains research done by us or a third party may be refused if disclosing it would disclose our identity, the researcher's or the subject matter of the research and would place the research at a serious disadvantage.

13. Remedies Available if Request for Information is refused

13.1. Internal Remedies

i. There are no internal appeal procedures. As such, the decision made by the information officer pertaining to a request is final, and requestors will have to exercise external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the Information Officer.

13.2. External Remedies

i. A requestor that is dissatisfied with the information officer's refusal to disclose information, may:

- Apply to a court with appropriate jurisdiction for relief within 180 days of us notifying you of our decision. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.
- Submit a complaint to the Information Regulator by sending an email to PAIAComplaints@inforegulator.org.za

14. Access To Records

If your request for access to records of SA Home Loans Group is approved, access will be provided in a reasonable form, unless you have requested access in a specific form.

15. Fees

15.1. A requester who seeks access to a record 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 as the law prescribes.

15.2. The prescribed fees must be paid before access to the record is granted. The Information Officer will provide the requester with the respective application process and applicable fees.

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

16. Availability of the Manual

The manual is available for inspection in English in electronic format on the company website and on

reasonable prior notice, at the office of the company free of charge.

17. Revision and Approval:

This PAIA Manual will be reviewed in line with the SAHL Policy Framework by the Information Officer and Deputy Information Officer on an ongoing basis and will be updated as and when material changes are made to it, amendments will be tabled before the Chief Executive Officer for approval. Upon approval, the amended version will be placed on the SA Home Loans website (www.sahomeloans.com) with no prior notice.

ANNEXURE A

REQUEST FOR ACCESS TO INFORMATION FORM/REQUEST FOR ACCESS TO RECORD

Note: 1. Proof of identity must be attached by the requester.

2. If requests are made on behalf of another person, proof of such authorisation, must be attached to this form.

To: The Information Officer
2 Milkwood Crescent, Milkwood Park
La Lucia Ridge
4051

Email Address: InformationOfficer@sahomeloans.com

Mark the appropriate box with an "X"

☐ **Request is made in my own name**

☐ **Request is made on behalf of another person**

PERSONAL INFORMATION

Surname		First names	
Identity number		E-mail address	
Telephone no.		Facsimile no.	
Postal address			
Street address			
Capacity in which request is made *(when made on behalf of another person)*			
PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (IF APPLICABLE)			
Surname		First names	
Identity number		E-mail address	
Telephone no		Facsimile no.	
Postal address			
Street Address			
PARTICULARS OF RECORDS REQUESTED *Provide full particulars of the record to which access is requested, including the reference number/loan account number/ policy number etc if that is known to you, to enable the record to be located. (If the space provided is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*			
Reference Number (Loan Account Number/Policy Number):			
DESCRIPTION OF RECORD OR RELEVANT PART OF THE RECORD			

ANY FURTHER PARTICULARS OF RECORD	
TYPE OF RECORD *(Mark the applicable box with an X)*	
Record is in written or printed form	
Record compromises of virtual images *(this includes photographs, slides, video, recordings, computer generated images, sketches etc)*	
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	
FORM OF ACCESS TO RECORD *(Mark the applicable box with an X)*	
Printed Copy of Record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or Printed transcription of virtual images *(this includes photographs, slides, video, recordings, computer generated images, sketches etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	
MANNER OF ACCESS *(Mark the applicable box with an X)*	
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.)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
Email of information *(including soundtracks if possible)*	
Cloud Share/File Transfer	
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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *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.*	
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:	

NOTICE OF DECISION REGARDING REQUEST FOR ACCESS		
SA Home Loans will notify you of the outcome of your request in writing, within 30 days of its receipt. Please indicate your preferred manner of correspondence:		
Postal Address	**Facsimile**	**Electronic communication *(Please specify)***

PRIVACY NOTICE
I/we hereby acknowledge and undertake to comply with all provisions of the Protection of Personal Information Act No. 4 of 2013 when processing any personal information which may be contained in the disclosure of the information made available to me. I/we understand that it is my/our responsibility to maintain any personal information provided as a result of this request in the strictest confidence and only to use it for the purposes for which it was requested.

SIGNATURE	
Signed at:	Date:
Signature of the Requester:	

ANNEXURE B - LIST OF ENTITIES

Information relating to the following entities may be accessed in terms of this Manual

Name of Entity	Registration Number
SAHL Investment Holdings Proprietary Limited	**1998/004570/07**
SA Home Loans Proprietary Limited	**2006/035436/07**
ABL Home Loans (RF) Limited	2014/064933/07
ABL Home Loans Security SPV (RF) Proprietary Limited	2014/086 344/07
Alpha Housing Warehouse (RF) Proprietary Limited	2012/215 104/07
Alpha Housing Warehouse Security SPV (RF) Proprietary Limited	2013/029 953/07
Amber House Fund 2 (RF) Limited	2012/065 316/06
Amber House Fund 2 Security SPV (RF) Proprietary Limited	2012/065 313/07
Amber House Fund 3 (RF) Limited	2013/020 920/06
Amber House Fund 3 Security SPV (RF) Proprietary Limited	2013/020 863/07
Amber House Fund 4 (RF) Proprietary Limited	2013/148 286/07
Amber House Fund 4 Security SPV (RF) Proprietary Limited	2013/148 295/07
Amber House Fund 5 (RF) Limited	2017/052 607/06
Amber House Fund 5 Security SPV (RF) Proprietary Limited	2017/052 626/07
Amber House Fund 6 (RF) Limited	2019/292 306/06
Amber House Fund 6 Security SPV Proprietary Limited	2019/292 329/07
Amber House Fund 7 (RF) Limited	2019/292 339/06
Amber House Fund 7 Security SPV Proprietary Limited	2019/292 353/07
Blue Banner Securitisation Vehicle RC1 Proprietary Limited	2001/003 182/07
Calibre Mortgage Fund (RF) Proprietary Limited	2013/065 862/07
Calibre Mortgage Fund Security SPV (RF) Proprietary Limited	2013/077 170/07
Crimson Castle Proprietary Limited	2022/654 108/07
Crimson Castle Security SPV Proprietary Limited	2022/654 152/07
Main Street 65 Proprietary Limited	2001/004 041/07
Milkwood Home Loans (RF) Limited	2014/082 840/06
Milkwood Home Loans Security SPV (RF) Proprietary Limited	2014/077 685/07
Multinet Property Partners (Pty) Ltd	2023/710571/07
SA Home Loans Foundation NPC	2019/234 501/08
SAHL Insurance Company Limited	2006/008 359/06
SAHL Life Assurance Company Limited	2004/014 380/06
SAHL Office Park Proprietary Limited	2012/026 326/07
Simply Home Loans (RF) Limited	2024/652569/06
Simply Home Loans Security SPV (RF) (Pty) Limited	2024/652588/07
South African Housing Development Fund (RF) Proprietary Limited	2015/157 170/07
South African Mortgage Fund (RF) Proprietary Limited	2015/157 196/07
South African Mortgage Fund 1 (RF) Proprietary Limited	2015/160 456/07
South African Mortgage Fund 1 Security SPV (RF) Proprietary Limited	2015/160 428/07
South African Mortgage Fund Security SPV (RF) Proprietary Limited	2015/160 470/07

The Interest Rate Cap Company Proprietary Limited	2008/000 816/07
The Mortgage Protection Company Pty Ltd	2023/774841/07
The RCS Home Loan Warehouse (Pty) Ltd	2005/029 295/07
The South African Home Loans Hedge Company Proprietary Limited	2005/013 298/07
The Thekwini Fund 1 Proprietary Limited	2000/014 666/07
The Thekwini Fund 17 (RF) Limited	2020/916 910/06
The Thekwini Fund 17 Security SPV (RF) Proprietary Limited	2020/916926/07
The Thekwini Fund 18 (RF) Limited	2015/327 767/06
The Thekwini Fund 18 Security SPV (RF) Proprietary Limited	2015/327 312/07
The Thekwini Fund 19 (RF) Limited	2017/052 656/06
The Thekwini Fund 19 Security SPV (RF) Proprietary Limited	2017/052 676/07
The Thekwini Fund 20 (RF) Limited	2018/418 593/06
The Thekwini Fund 20 Security SPV (RF) Proprietary Limited	2018/418 640/07
The Thekwini Fund 3 Proprietary Limited	2003/004 691/07
The Thekwini Fund 3 Security SPV (RF) Proprietary Limited	2014/166 803/07
The Thekwini Warehousing Conduit (RF) Limited	2005/007 604/06
The Thekwini Warehousing Conduit Security SPV (RF) Proprietary Limited	2005/006 599/07