# PAIA MANUAL

## Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

**DATE OF COMPILATION: 05/04/2021**
**DATE OF REVISION: 12/08/2025**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

| | | |
|---|---|---|
| 1.1 | **"CEO"** | Chief Executive Officer |
| 1.2 | **"DIO"** | Deputy Information Officer; |
| 1.3 | **"IO"** | Information Officer; |
| 1.4 | **"Minister"** | Minister of Justice and Constitutional Development; |
| 1.5 | **"PAIA"** | Promotion of Access to Information Act No. 2 of 2000 (as Amended; |
| 1.6 | **"PI"** | Personal Information |
| 1.7 | **"POPIA"** | Protection of Personal Information Act No.4 of 2013; |
| 1.8 | **"IR"** | Information Regulator; and |
| 1.9 | **"Republic"** | Republic of South Africa |

## 2. PURPOSE OF PAIA MANUAL

Sentinel Retirement Fund (the Fund) is established with the object of providing annuities or lump sum payments for members or former members of the fund upon their reaching their retirement dates, or for the dependants of such members or former members upon the death of such members or former members. The purpose of this Manual is to help you access information and any other information that the Fund has.

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by the Fund which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the Fund, by providing a description of the subjects on which the Fund holds records and the categories of records held on each subject;

2.3 know the description of the records of the Fund which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the Fund will process PI, the purpose of processing of PI and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the PI may be supplied;

2.9 know if the Fund has planned to transfer or process PI outside the Republic of South Africa and the recipients or categories of recipients to whom the PI may be supplied; and

2.10 know whether the Fund has appropriate security measures to ensure the confidentiality, integrity and availability of the PI which is to be processed.

## 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE FUND

### 3.1. Contact details of the Fund and the Information Officer

**Information Officer**: Ms Philda Mphephu

**Fund Registration Number**: 12/8/1215

**Fund Registered address**: 5TH Floor, 92 Rivonia Rd, Wierda Valley, Sandton, 2196

**Fund Postal address**: PO Box 61172, Marshalltown, 2107

**Telephone number**: +27 11 481 8000

**E-mail**: philda@sentinel.za.com

**Website**: wwww.sentinel.za.com

### 3.2. Deputy Information Officers:

**Name:** Tshepo Dooka-Rampedi
**Tel:** 011 481 8000
**Email:** tshepor@sentinel.za.com

**Name:** Ester Murashiki
**Tel:** 011 481 8000
**Email:** ester@sentinel.za.com

### 3.3. Access to information general contacts: info@sentinel.za.com

## 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights.

4.2 Requests in terms of the PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the PAIA Regulations.

4.3 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille.

4.4 The aforesaid Guide contains the description of-

4.4.1. the objects of PAIA and POPIA;

4.4.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.4.2.1. the IO of every public body, and

4.4.2.2. every DIO of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.4.3. the manner and form of a request for-

4.4.3.1. access to a record of a public body contemplated in section 11[3]; and

4.4.3.2. access to a record of a private body contemplated in section 50[4];

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public Fund must, subject to legislation governing the employment of personnel of the public Fund concerned, designate such number of persons as deputy information officers as are necessary to render the public Fund as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private Fund must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public Fund if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private Fund if-*

*a) that record is required for the exercise or protection of any rights;*
*b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
*c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

4.4.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.4.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.4.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.4.6.1. an internal appeal;

4.4.6.2. a complaint to the Regulator; and

4.4.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.4.7. the provisions of sections 14[5] and 51[6] requiring a public and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.4.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public and private body, respectively;

4.4.9 the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

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[5] *Section 14(1) of PAIA- The information officer of a public Fund must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *Section 51(1) of PAIA- The head of a private Fund must make available a manual containing the description of the information listed in paragraph 4 above.*

[7] *Section 15(1) of PAIA- The information officer of a public Fund, must make available in the prescribed manner a description of the categories of records of the public Fund that are automatically available without a person having to request access*

[8] *Section 52(1) of PAIA- The head of a private Fund may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private Fund that are automatically available without a person having to request access*

[9] *Section 22(1) of PAIA- The information officer of a public Fund to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[10] *Section 54(1) of PAIA- The head of a private Fund to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[11] *Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding- (a) any matter which is required or permitted by this Act to be prescribed;*

*(b) any matter relating to the fees contemplated in sections 22 and 54;*

*(c) any notice required by this Act;*

*(d) uniform criteria to be applied by the information officer of a public Fund when deciding which categories of records are to be made available in terms of section 15; and*

*(e) any administrative or procedural matter necessary to give effect to the provisions of this Act."*

4.5. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.6. The Guide can also be obtained-

4.6.1 upon request to the IO;

4.6.2 from the website of the Regulator https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

4.7 If you would like further guidance on how you can get access to information under PAIA, you may contact the IR. Their contact details are as follows:

| | **Information Regulator (SA)** |
|---|---|
| Address: | Woodmead North Office Park,<br>54 Maxwell Drive Woodmead,<br>Johannesburg,<br>2191 |
| Phone number: | Tel No. +27 10 023 5200 |
| Email: | enquiries@inforegulator.org.za |
| Website: | https://inforegulator.org.za |

## 5. CATEGORIES OF RECORDS OF THE FUND WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

| **Category of records** | **Types of the Record** | Available on Website | Available upon request |
|---|---|---|---|
| Policies | Guide on how to use PAIA | | X |
| Policies | Privacy Notice | | X |
| Administration documents | Forms | | X |
| Policies | Internet Privacy Policy | X | |
| Fund documents | Registered rules of the Fund (including amendments) | X | |
| Fund documents | Annual Financial Statements prepared in terms of section 15(1) of the PFA | X | |
| Fund documents | The last report (if any) by a valuator prepared in terms of section 16 of the PFA | | X |
| Fund documents | The last statement (if any) and report thereon prepared in terms of section 17 of the PFA | | X |

## 6. DESCRIPTION OF THE SUBJECTS ON WHICH THE FUND HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE FUND

| Subjects on which the Fund holds records | Categories of records |
|---|---|
| Claims records | • Claim Notification Forms (Note: from 2013 these are generally submitted electronically)<br>• Calculations (where available), or computerised statement of claim value<br>• Tax Directive Application (where applicable)<br>• Tax Directive (where applicable)<br>• IT 88 notifications<br>• Tax Certificate (Duplicate - where applicable)<br>• Client / broker payment instruction (where applicable)<br>• Section 37D deduction instruction (where applicable)<br>• Copy of any other court order against benefits<br>• Payment letter<br>• Copy of cheque or EFT payment reference<br>• Trustees' Resolution - Disposal of benefit (deaths only)<br>• Copy of death certificate<br>• Statement by Employer (disability only)<br>• Statement by Employee (disability only)<br>• Acceptance / declination letter (disability only) |
| Member Data | • New entrant data<br>• Contribution records<br>• Member Investment Choice investment option / switch forms (where applicable)<br>• Transfer-in data<br>• Statement of member fund value<br>• Additional benefit / surplus / calculations |

| | |
|---|---|
| Section 14 Transfers and Liquidations | • Calculations<br>• Copy of S14(1)(e) certificate (transferee and transferor funds<br>• Option forms (where applicable)<br>• Tax application forms (where applicable)<br>• Tax directives (where applicable)<br>• Tax certificates (duplicate - where applicable)<br>• Payment letter (liquidations only)<br>• Copy of S14 application lodged (transferor fund) |
| Housing Loans | • Application form<br>• Partial settlement as a result of default - claim forms and approval for this payment<br>• Contribution records<br>• Finalised / settled claims record / calculation |
| Funeral Benefit Claims | • Claim form<br>• Copy of death certificate<br>• Payment letter |
| Pensioners | • Special tax directives, including IT 88's, garnishees, etc.<br>• Commutation of pensions - calculations<br>• Pension increase notification<br>• Certificates of existence (COE)<br>• Confirmation of continued studies beyond age 18 years<br>• Death certificates<br>• Annuity option forms<br>• Trustee resolution regarding payments |
| Disability | • Medical Reviews - correspondence only (where applicable)<br>• COCD (certificate of continued disability)<br>• Escalator notification<br>• Payment / benefit confirmation letter<br>• EFT payment reference<br>• Recovery documentation<br>• Letter of suspension |

| | |
|---|---|
| Accounting records | • Deposit slips (where applicable)<br>• EFT files (ACB whilst still applied)<br>• Bank statements of fund bank accounts<br>• Audit files with working papers<br>• Annual financial statements<br>• General Ledgers<br>• Trial balances<br>• Cashbooks and reconciliations to bank account |
| Employee Records | • List of employees' names, identity documents and occupations<br>• Wage/salary records<br>• Letters of appointment and other employee-related contractual and quasilegal records<br>• Employee records including but not limited to curriculum vitae, application forms and qualifications<br>• Correspondence relating to the employees<br>• Human resources policies<br>• Training schedules and manuals<br>• Records in terms of UIF contributions<br>• Records in terms of Skills Development Levy Act<br>• List of dismissed and retrenched employees |
| Third Party Records | • The Fund may possess records pertaining to the other parties including without limitation, trustees, nominated persons, contractors suppliers, services, advisors, auditors, banking institutions, brokers, consultants, investors. Alternatively, such parties may possess records that can be said to belong to the Fund. |
| General records | • Copies of signed rules and amendments<br>• Certain communication with SARS and FSCA<br>• Copies of Pension Funds Adjudicator complaints lodged<br>• Fidelity and indemnity insurance<br>• Fund statutory records<br>• Correspondence to members or former members, where applicable |

| | |
|---|---|
| | • Correspondence to the trustees in respect of fund matters<br>• Copy of service agreements between the fund and its service providers<br>• Copies of communication sent to members of the funds in respect of specific events e.g. Trustees' reports, Member level Investment Choice, changes to death benefit structure, changes to fund structure, etc.<br>• Minute books<br>• Trustees registers<br>• Original or copies of documents relating to insurance, GLA, PHI, dread disease, stated benefits, travel, funeral, fidelity cover, etc. (as applicable to the Fund)<br>• Documentation relating to the review of insurance benefits on an annual basis<br>• Copies of statements detailing the asset values for a fund<br>• Agendas for all meetings to be held Investment manager mandates or policies of insurance, depending on the nature of the investment (if applicable secretarial services are performed) |

The Fund holds records for the purposes of PAIA in terms of the following main laws, among others:

- Constitution of the Republic of South Africa, 1996;
- Consumer Protection Act 68 of 2008;
- Divorce Act 70 of 1979;
- Financial Advisory and Intermediary Services Act 37 of 2002;
- Financial Intelligence Centre 38 of 2001;
- Financial Services Board Act 97 of 1990;
- Income Tax Act 58 of 1962;
- Long-Term Insurance Act 52 of 1998;
- National Credit Act 34 of 2005;
- Pension Funds Act 24 of 1956;
- Prescription Act 68 of 1969;
- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2013;
- Short Term Insurance Act 53 of 1998; and
- Value Added Tax Act 89 of 1991.

# 7. PROCESSING OF PERSONAL INFORMATION

## 7.1 Purpose of Processing PI

The Fund uses PI primarily for the purposes of providing pension fund benefits, retirements, asset management, investments, and wealth management solutions.

This processing also applies to PI which is processed prior to contractual arrangements being concluded.

PI is also used in the Fund's employment processes (recruitment, employee contracts, employment equity, corporate benefits, remuneration, disciplinary action, performance management, training, etc.) and procurement processes (tenders, due diligence, risk management, onboarding, service level evaluations, etc.).

The Fund may use elements of PI in some of its standard business operations, including audits, market research, statistical analysis, product development, or other legitimate business purposes aligned with its business functions and activities. The Fund also processes PI in order to comply with its legal obligations under any statutory or regulatory requirements, or for the purposes of law enforcement, investigations, court proceedings, financial crimes, market conduct, or other matters which may be required in the public interest.

## 7.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

| Categories of Data Subjects | PI that may be processed |
|---|---|
| Individuals (Clients, members, investors, policy holders) | Name, surname, South African identity number or other identifying number (e.g. passport), date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, income tax number, financial information (e.g. remuneration, fund credits, benefits statements, investment portfolio details), banking information including account numbers and health information. May also include the PI of children / minors, if they are listed as beneficiaries or dependants. |
| Entities (corporate clients, funds) | Entity name, registration number, tax-related information, contact details for representatives, trustee PI (as for Individuals). |
| Employees, potential employees, new recruitments | Name, surname, South African identity number or other identifying number, contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information, health information, details related to employee performance, disciplinary |

| | |
|---|---|
| | procedure information. |
| Trustees and Principal Officer | Identity numbers, names, employer, occupation, business address, residential address, copies of identity documentation, proof of residence, contact numbers, email addresses. |
| Consultants / contractors | This will be dependent on the nature of the services provided to the Fund but may include any of the details in the categories for Employees and/or Service providers |
| Service providers, including outsourced or hosted services, auditors, etc. | Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details. |

### 7.3 The recipients or categories of recipients to whom the PI may be supplied

| **Category of PI** | **Recipients or Categories of Recipients to whom the PI may be supplied** |
|---|---|
| Identity number and names, for criminal checks | South African Police Service |
| Qualifications, for qualification verifications | South African Qualifications Authority |
| Credit and payment history, for credit information | Credit Bureaus |
| Death claim resolution, ID numbers, email address, contact information, Maintenance Orders, Member Employer information | Regulators and law enforcement agencies |
| Employee information, PAYE Information, Company tax submissions | South African Revenue Service |
| Benefit statements, information of whether a member has been paid | Magistrates Courts/ Maintenance Officers/ High Court |
| ID numbers, email address, contact information, policyholder data | Medical aid companies, Insurers |
| Member information, Administrator Information, Product provider information | Retirement funds and their trustees and PO |

### 7.4 Planned transborder flows of PI

The Fund makes use of hosted services provided by third parties. These operations may be hosted in various countries resulting in the transfer of PI. In general, the Fund tries to ensure that these service providers are located in jurisdictions with strong data protection legislation, such as the European Union or the United Kingdom and the United States of America. Where this is not possible, data protection requirements are enforced by means of a contractual agreement.

### 7.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The Fund strives to uphold strong global practices and standards as it pertains to information security, and it has adequate directives in place to ensure that the following areas of information security are managed:

- Identity and access management
- Physical and environmental security controls
- Network security
- Protection from viruses and other malware
- Patch management
- Secure remote working
- Acceptable usage of IT equipment and mobile devices
- Encryption of laptops and blocking of USB ports
- IT disaster recovery and backup procedures
- Training and awareness initiatives
- Cyber Security Incident Response
- Active monitoring and review of the IT and business environment

## 8. HOW TO REQUEST ACCESS

The Fund has authorised and designated its IO to deal with all matters relating to PAIA in order to comply with its obligations in terms of PAIA. To request access to a record, please complete **Form 02: Request for Access to Record [Regulation 7]- Public & Private Bodies.**

Please submit the completed form to the Fund's IO together with the relevant request fee. You must pay a request fee as required by law when submitting a request for access to information. You must pay the fees before the Fund hand over any information. You may have to pay a further access fee if the Fund grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure. Details of fees are outlined in **Annexure B of the Regulations of the Promotion of Access to Information.**

Please ensure that the completed form:

- has enough information for the IO to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of the Fund's decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (the Fund will decide whether this proof is satisfactory).

If you do not use the standard form, the Fund may:

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

The Fund will evaluate and consider all requests to it in terms of PAIA. If the Fund approves your request for access to information, then it will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

## 9. GROUNDS FOR REFUSAL

The Fund may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

The Fund will notify you in writing whether your request has been approved or denied within 30 calendar days after it has received a completed request for access form. If the Fund cannot find any requested record or it does not exist, then it will notify you by way of affidavit that it is not possible to give access to that particular record.

## 10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on www.sentinel.za.com ;

10.1.2 head office of Sentinel Retirement Fund for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 11. UPDATING OF THE MANUAL

The IO will on a regular basis update this manual.