

# PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (HEREINAFTER REFERRED TO AS THE "ACT")

## MANUAL FOR LUNAR CAPITAL (PTY) LTD

REGISTRATION: 2015/013022/07

Prepared in terms of Section 51 of the Promotion of Access to Information Act No. 2 of  
2000

### 1. DEFINITIONS

**“CEO”** means the chief executive officer.

**“Information Officer” or “IO”** 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.

**“Information Regulator”** means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act, 2013;

**“Other Requester”** means any person making a request for access to a record.

**“Personal information”** means information relating to an **identifiable natural** person.

Non-natural or juristic persons are not included, and the information of any person who has been dead for more than 20 years is also excluded. This includes:

- information relating to a person’s race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth
- information relating to a person’s education, medical, financial, criminal or employment history
- any identifying number (eg. ID, Policy, Passport), symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to a person
- biometric information
- personal opinions, views or preferences of the person
- correspondence sent by the person that is implicitly or explicitly private or confidential or further correspondence that would reveal the contents of the original correspondence
- views or opinions of another individual about the person
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

**“Personal Requester”** means any person making a request for access to a record containing personal information about the requester.

**"Private body"** is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).

**“Requester”** means any person making a request for access to a record.

## 2. INTRODUCTION

The Promotion of Access to Information Act gives effect to the constitutional right of access to any information held by the state or another person that is required for the exercise or protection of any rights. Section 51(1) of the Act: The head of a private body or the Information officer must, within six months after coming into existence, compile a manual that contains information regarding the subjects and categories of records held.

This PAIA Manual is useful for the public to:

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 know if the body will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 know if the body 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

1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 2. BUSINESS AND CONTACT DETAILS

Information Officer:	Sabir Mahomed Munshi
Designation:	CEO
Postal Address:	29 Seventh Street, Houghton Estate, 2198
Physical Address:	29 Seventh Street, Houghton Estate, 2198
Phone Number:	083 398 8772
Email Address:	info@lunarcapital.co.za
Website:	www.lunarcapital.co.za

***All requests for access to information (other than information that is available to the public) must be addressed to the Information Officer.***

General Enquiries:	083 398 8772
Email Address:	info@lunarcapital.co.za

## 3. MANUAL AND GUIDELINES

This Manual has been compiled in accordance with the regulatory provisions and to fulfil the requirements of the Act and will regularly be updated. It has been designed to be a guiding, user-friendly and accessible tool for any person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act, 2013. Any enquires relating to this guide should be directed to:

South African Information Regulator  
Telephone 08000 17 160/ 010 023 500  
<https://inforegulator.org.za/>  
Email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

## 4. RECORDS AVAILABLE IN TERMS OF SECTION 52(2) OF THE ACT

*The head of a private body may, on a voluntary and periodic basis, submit to the Minister a description of—*

- a) the categories of records of the private body that are automatically available without a person having to request access in terms of this Act, including such categories available--i) for inspection in terms of legislation other than this Act;
  - ii) for purchase or copying from the private body;*
  - iii) from the private body free of charge; and**
- b) how to obtain access to such records.*

**CATEGORY OF RECORDS AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 52(1)(a) of PAIA**

<b>CATEGORY AND DESCRIPTION</b>	<b>MANNER OF ACCESS TO RECORDS (e.g. website) SECTION 52(1)(b)</b>
<b>FOR INSPECTION IN TERMS OF SECTION 52(1)(a)(i):</b>	
Documents and records are available for regulatory inspection in accordance with applicable legislation.	On request
Share Register is available for inspection in the event of this being required for FICA purposes	On request
FAIS licence is available for inspection on request	On request
<b>AVAILABLE FREE OF CHARGE IN TERMS OF SECTION 52(1)(a)(iii):</b>	
All documents on our website are available for download free of charge.	

**5. RECORDS THAT ARE HELD AT THE OFFICES OF THE BUSINESS**

The following is a list of records held at our offices:

**GOVERNANCE**

- Company incorporation & Founding documents
- Shareholder certificates
- Company structures
- Organisational structures
- Internal company departments or divisions
- Strategy and planning documents
- Trade information
- Risk Management planning and reports
- Official/Legal/Licenses
- Legislation
- Legal opinions
- Statutory Returns

**ADMINISTRATION**

- Correspondence
- Minutes of Management Meetings
- Minutes of Staff Meetings

**HUMAN RESOURCES**

- Conditions of Service
- Employee Records
- Employment Contracts
- General Correspondence
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies
- Statutory Records
- Training Records

**INFORMATION TECHNOLOGY**

- IT Policies and Procedures

**OPERATIONS**

- Client and Customer Registry
- Client contracts

- General Correspondence
- Suppliers' Registry
- Supplier Contracts
- Service level agreements

- Vendor contracts
- Procurement information
- Operational records
- Internal frameworks, policies and procedures
- Complaints & compliance

**FINANCES**

- Annual Financial Statements

- Asset Register
- Banking Records
- Budgets
- Contracts
- Financial Transactions
- General Correspondence
- Insurance Information
- Management Accounts
- Purchase and Order Information
- Tax Records (company & employee)

**STATUTORY RECORDS:**

Records (if any) held in terms of:

- Basic Conditions of Employment 75 of 1997
- Broad Based Black Economic Empowerment Act
- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Competition Act No. 89 of 1998
- Constitution of the Republic of South Africa
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Harmful Business Practices Act 23 of 1999
- Income Tax Act 95 of 1967
- Insolvency Act 24 of 1936
- Intellectual Property Laws Amendments Act 38 of 1997

- Inspection of Financial Institutions Act 80 of 1998
- Labour Relations Act 66 of 1995
- Long Term Insurance Act 52 of 1998
- National Credit Act, 34 of 2000
- Occupational Health & Safety Act 85 of 1993
- Prevention of Organised Crime Act 21 of 1998
- Protection of Businesses Act 99 of 1978
- Promotion of Access to Information Act 2 of 2000
- Protection of Constitutional Democracy Against Terrorist and Related Activities Act
- Short Term Insurance Act 53 of 1998
- Skills Development Act
- Tobacco Products Amendment Act
- Trademarks Act
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 19
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## 6. CATEGORIES OF DATA SUBJECTS

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

**NB:** Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.

DATA SUBJECT CATEGORIES	PERSONAL INFORMATION WHICH MAY BE PROCESSED
Customers/ Clients	Name, Address, Registration or ID numbers, contact details, employment status, financial information, bank details; correspondence
Service Providers	Name, Address, Registration Numbers; ID Numbers; Contact details; Bank details; VAT number
Employees	Name, Address, ID Numbers; Contact details; Bank details; Gender & Race; Fit and Proper Status; Qualifications; Training Data, Employment data, including salary, incentives and performance, correspondence data.

## 7. PROCESSING PURPOSE

### Clients (Prospective and Existing Clients, Beneficiaries, and Related Parties)

Personal information is processed for the following purposes:

- To conduct client onboarding, identification and verification in line with KYC and anti-money laundering requirements
- To comply with obligations under applicable legislation, including FAIS, FICA, tax laws, and other regulatory requirements
- To provide financial and portfolio management services
- To facilitate transactions, administration, and investment management
- To engage with product suppliers, administrators, and other providers on behalf of clients
- To maintain client records and relationship management systems
- To communicate with clients regarding products, services, updates, and regulatory disclosures
- To handle client queries, complaints, and dispute resolution processes
- To comply with audit, governance, and internal control requirements
- To conduct risk management, fraud prevention, and detection activities
- To perform data analytics, research, and service improvement initiatives

- To comply with reporting obligations to regulators, including the Financial Sector Conduct Authority
- To enable business continuity, record keeping, and legal compliance processes
- To establish, exercise, or defend legal rights and obligations, including engagement with courts, legal advisors, and dispute resolution bodies

### **Vendors (Service Providers, Suppliers, and Business Partners)**

Personal information is processed for the following purposes:

- To conduct vendor onboarding, due diligence, and risk assessments
- To verify vendor identity, ownership, and regulatory status
- To perform contract negotiation, management, and administration
- To facilitate procurement and supply chain management processes
- To process payments, invoicing, and financial administration
- To manage service delivery, performance monitoring, and service level agreements
- To ensure compliance with legal, regulatory, and governance requirements
- To conduct background checks, including sanctions screening where applicable
- To manage access to systems, infrastructure, and facilities
- To maintain vendor records and audit trails
- To support internal and external audit processes
- To comply with tax and financial reporting obligations
- To manage disputes, claims, and contractual enforcement
- To support business continuity and operational resilience planning
- To establish, exercise, or defend legal rights, including engagement with legal representatives and courts

### **Staff (Employees, Contractors, Temporary Staff, and Applicants)**

Personal information is processed for the following purposes:

- To conduct recruitment, selection, and onboarding processes
- To verify identity, qualifications, references, and background checks
- To comply with fit and proper requirements (where applicable in financial services)
- To manage employment contracts and employment relationships
- To administer payroll, remuneration, and employee benefits
- To comply with tax, labour, and employment legislation
- To manage leave, attendance, and performance management processes
- To support training, development, and competency requirements
- To ensure workplace health and safety compliance
- To manage disciplinary processes, grievances, and internal investigations
- To engage with labour advisors and dispute resolution bodies, including the Commission for Conciliation, Mediation and Arbitration
- To manage access to systems, infrastructure, and information security controls
- To monitor IT usage, cybersecurity, and data protection compliance
- To conduct internal audits, risk management, and governance processes

- To comply with regulatory reporting obligations
- To maintain employee records and statutory registers
- To support business continuity and operational requirements
- To establish, exercise, or defend legal rights and obligations, including litigation and dispute resolution

Personal information is processed strictly for legitimate business purposes and in accordance with applicable law. Processing is limited to what is necessary, relevant, and adequate for the purpose for which the information is collected and may include processing required to comply with legal obligations, perform contractual duties, pursue legitimate interests, or protect the rights of the organisation or data subjects.

## 8. RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL DATA MAY BE SUPPLIED

CATEGORY OF PERSONAL DATA	RECIPIENTS
Identity number, names, biographical information, (for verification and KYC)	Verification service providers; South African Police Services; Department of Home Affairs; Service/ Product Providers
Contact details (email, telephone, address)	Product suppliers; Communication service providers; IT and CRM providers
Financial information (income, assets, liabilities, banking details)	Product suppliers; Financial institutions; Administrators; Payment processors
Employment and remuneration information	Insurers; Employee benefit administrators; Payroll providers; Employers (where applicable)
Tax information	South African Revenue Service (SARS); Tax advisors; Product suppliers
Beneficiary and dependent information	Product suppliers; Trustees; Executors of estates
Qualifications and professional information	South African Qualifications Authority; Verification agencies
Criminal record information	South African Police Services; Screening providers
Communication records (emails, calls, correspondence)	Internal staff; IT providers; Compliance officers; Regulators; Legal advisors
Complaints, claims, dispute and litigation records	Legal advisors; Insurers; Ombudsman schemes; Courts; Regulators
Legal proceedings and dispute-related information	Legal representatives (attorneys and advocates); Alternative dispute resolution bodies; Courts and tribunals ; Industry ombudsman schemes;

Employment-related information (disciplinary, grievance, HR records)	HR consultants; Labour law advisors
Labour dispute information	The Commission for Conciliation, Mediation and Arbitration (CCMA) and other labour dispute forums; Labour Court; Legal representatives
Banking and transaction records	Banks; Payment service providers; Auditors; Regulators
Digital identifiers (IP address, system logs)	IT service providers; Cybersecurity providers; Cloud hosting providers
Special personal information (where applicable)	Authorised service providers strictly in accordance with applicable law
Outsourced processing data (client and employee information processed by third parties)	Outsourced administrators; Compliance practices; IT managed service providers; Cloud providers; Data hosting providers
Fraud prevention and risk management data	Fraud prevention agencies; Verification providers; Insurers

Personal information may be shared with:

#### **Legal and Dispute Resolution Bodies**

- Legal representatives (attorneys and advocates)
- Courts and tribunals
- Industry ombudsman schemes
- The Commission for Conciliation, Mediation and Arbitration (CCMA) and other labour dispute forums

#### **Regulators and Supervisory Authorities**

Including:

- Financial Sector Conduct Authority
- Financial Intelligence Centre
- SARS
- Information Regulator
- Other statutory and supervisory bodies

#### **Outsourced Service Providers (Operators)**

Personal information may be processed by third parties acting as operators, including:

- Compliance practices (outsourced compliance function)
- IT managed service providers
- Cloud and data hosting providers
- Administrators and platform providers

All such providers are subject to:

- Written operator agreements
- Confidentiality obligations
- Appropriate technical and organisational security measures

Personal information may also be processed and shared where necessary for the establishment, exercise or defence of a legal right or obligation, including engagement with legal representatives, dispute resolution bodies, regulatory authorities, and courts of law.

## **9. CROSS BORDER TRANSFERS**

Personal information may be transferred to, stored, or processed in jurisdictions outside of the Republic of South Africa where this is necessary for legitimate business purposes, including the use of cloud-based systems, service providers or financial product/services providers.

Personal information may be processed using platforms provided by global technology providers such as Microsoft Corporation and Google LLC. These providers operate global infrastructure, and personal information may be stored or processed in data centres located in, inter alia:

- Ireland
- The Netherlands
- Germany
- Finland
- The United Kingdom
- The United States of America

Due to the nature of cloud computing and redundancy architectures, personal information may also be transferred to or accessed from other jurisdictions in which these providers maintain operations from time to time. Where personal information is transferred across borders, the organisation will ensure that:

- The recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection that upholds principles substantially similar to those contained in POPIA; or
- The data subject has consented to the transfer; or
- The transfer is necessary for the performance or conclusion of a contract between the data subject and the organisation; or
- The transfer is otherwise permitted in terms of applicable law

Lunar Capital (Pty) Ltd implements appropriate technical and organisational safeguards to protect personal information during cross-border transfers, including:

- Entering into data processing and cross-border transfer agreements with service providers
- Ensuring that service providers implement industry-standard security measures, including encryption, access controls, and data segregation
- Limiting transfers to what is necessary and proportionate for the purpose of processing
- Conducting risk-based due diligence on service providers and their international data transfer mechanisms

## **10. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF PERSONAL INFORMATION**

Lunar Capital (Pty) Ltd implements a combination of technical and organisational security measures designed to protect personal information against loss, unauthorised access, misuse, alteration, or destruction. These measures are aligned with applicable legal requirements, industry standards, and recognised information security practices.

### **11.1 Governance and Risk Management**

- information security governance framework aligned to applicable regulatory requirements and industry standards
- information security responsibility is assigned at a senior management level, with oversight and reporting to the board or equivalent governing body
- Regular risk assessments are conducted to identify, assess, and mitigate information security risks, including cyber risks
- A formal incident response and breach management process is in place

### **11.2 Access Control and Identity Management**

- Access to personal information is restricted on a need-to-know and role-based basis
- Users are authenticated using secure login credentials, including multi-factor authentication (MFA) where appropriate
- User access rights are reviewed regularly and revoked upon termination or change of role
- Privileged access is strictly controlled, monitored, and logged
- Physical access to systems and records is restricted to authorised personnel only

### **11.3 Data Protection and Encryption**

- Personal information is protected through encryption technologies during transmission and, where appropriate, at rest
- Secure communication protocols (e.g. HTTPS, TLS) are used for electronic data exchange
- Sensitive personal information is subject to enhanced protection measures
- Data masking or anonymisation techniques are used where appropriate

#### **11.4 Network and System Security**

- Firewalls, intrusion detection and prevention systems, and endpoint protection
- Systems are protected against malware, ransomware, and other cyber threats
- Regular patch management and system updates are performed to address vulnerabilities
- Secure configuration standards are applied to systems and devices

Where cloud-based services are utilised, Lunar Capital relies on providers that implement industry-standard security controls, certifications, and safeguards.

#### **11.5 Data Lifecycle Management**

- Personal information is collected, processed, stored, and disposed of in accordance with defined data lifecycle management practices
- Records are retained in line with legal and regulatory retention requirements
- Secure methods are used for the destruction or anonymisation of personal information when no longer required
- Data quality controls are implemented to ensure accuracy and completeness

#### **11.6 Backup, Business Continuity and Disaster Recovery**

- Regular data backups are performed and securely stored
- Backup data is tested periodically to ensure recoverability and integrity
- A Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) are maintained and tested
- Systems are designed to ensure availability and resilience, including failover capabilities where appropriate

#### **11.8 Staff Awareness and Training**

- Employees and contractors receive regular training and awareness programmes on data protection, cybersecurity, and information security practices
- Staff are required to adhere to confidentiality obligations and internal policies
- Disciplinary processes are in place for non-compliance with security requirements

#### **11.9 Incident Management and Breach Notification**

- Security incidents are identified, reported, and managed through a formal incident response process
- Breaches involving personal information are assessed and, where required, reported to the Information Regulator and affected data subjects in accordance with applicable law
- Root cause analysis and remediation measures are implemented following incidents

#### **11.10 Continuous Improvement**

- Lunar Capital (Pty) Ltd adopts a **continuous improvement approach** to information security
- Security measures are regularly reviewed and enhanced in response to:
  - Emerging threats
  - Technological developments
  - Regulatory changes
- Independent assessments, audits, or reviews may be conducted to evaluate the effectiveness of controls

While Lunar Capital (Pty Ltd) implements appropriate, reasonable technical and organisational measures to safeguard personal information, no method of transmission over the internet or electronic storage is completely secure. Accordingly, the organisation does not guarantee absolute security but undertakes to continuously enhance its safeguards in line with evolving risks and industry best practice.

### **11. INFORMATION REQUEST PROCEDURE**

Any person that requires information for the exercise or protection of any rights may request information from a private body.

**Personal requester:** In relation to a personal requester, we will voluntarily provide the requested information, or give access to any record with regard to the requester’s personal information without the requester having to pay an access fee, but the prescribed fees for reproduction of the information requested will be charged.

**Third party requester:** In relation to any other requester, they are entitled to request access to information relating to a third party/ parties. However, we are not obliged to voluntarily grant access.

The requester must fulfil the prerequisite requirements for access in terms of the Act, including payment of the relevant fees.

- The requester must use the prescribed form to make the request for access to a record. A request form is available from our offices.
- The request must be made to the Information Officer named in Section 2 above. This request must be made to the address, or electronic mail address of the business.
- The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required.
- The requester should indicate if any other manner should be used to inform the requester. If this is the case, please furnish the necessary particulars to be so informed.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.
- The prescribed request fee must be attached.

**30 days response:** We will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied, unless the request contains considerations which may require an extension of this term.

**60 days response:** The 30-day period within which we must decide whether to grant or refuse the request, may be extended for a further period of up to a further 30 days if the request is for a large amount/ number of information, or the request requires a search for information held at another office and the information cannot reasonably be obtained within the original 30 day period. Should an extension be required, we will notify the requester in writing and will also provide the procedure involved should the requester wish to apply to either the Information Regulator or to a court against the extension.

Failure to respond to the requester within the thirty-day period constitutes a deemed refusal of the request.

All the information listed above should be provided, failing which the process will be delayed while the private body requests such additional information. The prescribed time periods will not commence until all pertinent information has been furnished.

Please note that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record. Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right; and

- The requestor complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

The Information Officer will take all reasonable steps to find a record that has been requested. If the record cannot be found or does not exist, the Information Officer will notify the requester by way of affidavit or affirmation that it is not possible to give access to the record. This is deemed to be a request refusal. If the record is later found, the requester will be given access if the request would otherwise have been granted.

**IF THE REQUEST IS GRANTED:**

the notification will state the applicable access fee required to be paid, together with the procedure to be followed should the requester wish to apply to court against this fee, and the form in which access will be given.

**IF THE REQUEST IS DECLINED:**

the notification will include adequate reasons for the decision, together with the relevant provisions of the Act relied upon and provide the procedure to be followed should the requester want to apply to court against the decision.

Section 59 provides that the Information Officer may sever a record and grant access only to that portion to which the law does not prohibit access.

If access is granted, access must be given in the form that is reasonably required by the requester, or if the requester has not identified a preference, in a form reasonably determined by the Information Officer.

**12. REFUSAL OF ACCESS**

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;
- The protection of commercial information held concerning any third party (for example trade secrets);
- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would jeopardize the safety or life of an individual;

- Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived;
- Disclosures of details of any computer programme;
- Disclosures that will put the organisation at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of (name of business)
- Disclosures of any record containing information about research and development being carried out or about to be carried out by (name of business)

### **INTERNAL REMEDIES**

We do not have internal appeal procedures. The decision made by the Information Officer is final, and requesters will have to exercise external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

### **EXTERNAL REMEDIES**

A requester or third party dissatisfied with an Information Officer's decision to grant a request for information may apply to a Court (Constitutional Court, the High Court or another court of similar status) for relief within 30 days of notification of the decision. Courts that have jurisdiction over these applications are the

## **13. FEES**

The applicable fees are prescribed in terms of the Regulations promulgated under the Act. There are two basic types of fees payable in terms of the Act.

**Request Fee** The non-refundable request fee of R 50 (excluding VAT) is payable on submission of any request for access to any record. This does not apply if the request is for personal records of the requestor. No fee is payable in such circumstances.

**Access Fee** The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

#### 14. MANUAL AVAILABILITY

This manual will be made available on:

- our website, at [www.lunarcapital.co.za](http://www.lunarcapital.co.za)
- at the principal place of business for public inspection during normal business hours, at no charge
- to any person upon request and upon the payment of a reasonable amount
- to the Information Regulator upon request.

For hard copies, any transmission costs or postage will be for the account of the requester.

#### 15. FEES

##### A. REPRODUCTION FEES (I.E. IN TERMS OF SECTION 52(3) OF THE ACT)

Where a private body has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

DESCRIPTION	AMOUNT
• For every photocopy of an A4-size page or part thereof	1,10
• For every printed copy of an A4-size page or part thereof held on a computer, electronic or machine readable format	0,75
• For a copy in a computer-readable form on Stiffy Disc	7.50
• For a copy in a computer-readable form on Compact Disc	70.00
• A transcription of visual images, for an A4-size page or part thereof	40.00
• For a copy of visual images	60.00
• A transcription of an audio record, for an A4-size page or part thereof	20.00
• To search for a record that must be disclosed – rate per hour or part thereof	30.00

Where a copy of a record needs to be posted the actual postal fees will also payable.

##### B. REQUEST FEES

Where a request is made for access to information on a person other than that requester, a request fee in the amount of R50,00 is payable upfront before we will further process the request received.

### C. ACCESS FEES

#### In terms of section 54(7) of the act, unless exempted in terms of 54(8)

An access fee is payable in instances where access is granted to a requester (other than in instances where the information has been provided automatically on a voluntary basis), unless payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of Section 54 (8).

DESCRIPTION	AMOUNT
• For every photocopy of an A4-size page or part thereof	1,10
• For every printed copy of an A4-size page or part thereof held on a computer, electronic or machine-readable format	0,75
• For a copy in a computer-readable form on Stiffy Disc	7.50
• For a copy in a computer-readable form on Compact Disc	70.00
• A transcription of visual images, for an A4-size page or part thereof	40.00
• For a copy of visual images	60.00
• A transcription of an audio record, for an A4-size page or part thereof	20.00
• To search for a record that must be disclosed – rate per hour or part thereof	30.00

In accordance with Section 54(2) of the Act, upon receipt of a request for access to a record in respect of which the request for access does not apply to a personal requester, the Information Officer may request that an upfront deposit be paid before proceeding with the request.

This deposit will be calculated to be an amount that will not exceed one third of the access fee and would depend on whether the Information Officer is of the opinion that the preparation of the required records will take more than six hours to complete.

**\*Note:** In terms of Regulation 8, Value Added Tax (VAT) Registered entities may add VAT to the prescribed fees.

# FORM 2 REQUEST FOR ACCESS TO RECORD [REGULATION 7]

**NOTE:**

Proof of identity must be attached by the requester.

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

**TO:** The Information Officer

E-mail address:

Fax number:

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 (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

<b>FORM OF ACCESS</b>	
(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)	<input type="checkbox"/>
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	<input type="checkbox"/>
Transcription of soundtrack (written or printed document)	<input type="checkbox"/>
Copy of record on flash drive (including virtual images and soundtracks)	<input type="checkbox"/>
Copy of record on compact disc drive(including virtual images and soundtracks)	<input type="checkbox"/>
Copy of record saved on cloud storage server	<input type="checkbox"/>

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

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

<b>MANNER OF ACCESS</b> (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)	<input type="checkbox"/>
Postal services to postal address	<input type="checkbox"/>
Postal services to street address	<input type="checkbox"/>
Courier service to street address	<input type="checkbox"/>
Facsimile of information in written or printed format ( <i>including transcriptions</i> )	<input type="checkbox"/>
E-mail of information (including soundtracks if possible)	<input type="checkbox"/>
Cloud share/file transfer	<input type="checkbox"/>
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)	<input type="checkbox"/>

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

Postal address	Facsimile	Electronic communication (Please specify)

Signed at this day of 20

X \_\_\_\_\_

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

**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

X \_\_\_\_\_

***Signature of Information Officer***

# FORM 3 OUTCOME OF REQUEST AND OF FEES PAYABLE [REGULATION 8]

**Note:**

If your request is granted the amount of the deposit, (if any), is payable before your request is processed and requested record/portion of the record will only be released once proof of full payment is received. Please use the reference number in all future correspondence.

TO:

Reference number: \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information 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) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	<input type="checkbox"/>
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**OR**

**2. You requested:**

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form )	<input type="checkbox"/>
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	<input type="checkbox"/>
Transcription of soundtrack (written or printed document)	<input type="checkbox"/>
Copy of information on flash drive (including virtual images and soundtracks)	<input type="checkbox"/>
Copy of information on compact disc drive(including virtual images and soundtracks)	<input type="checkbox"/>
Copy of record saved on cloud storage server	<input type="checkbox"/>

**3. TO BE SUBMITTED:**

Postal services to postal address	<input type="checkbox"/>
Postal services to street address	<input type="checkbox"/>
Courier service to street address	<input type="checkbox"/>
Facsimile of information in written or printed format (including transcriptions)	<input type="checkbox"/>
E-mail of information (including soundtracks if possible)	<input type="checkbox"/>
Cloud share/file transfer	<input type="checkbox"/>
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)	

Kindly note that your request has been:

- Approved  
 Denied, for the following reasons:

**4. Fees payable with regards to your request:**

ITEM	COST PER A4-SIZE PAGE OR PART THEREOF/ITEM	NUMBER OF PAGES/ITEMS	TOTAL
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

5. **Deposit payable (if search exceeds six hours):** Yes No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank:

Name of account holder:

Type of account:

Account number:

Branch Code:

Submit proof of payment to:

Reference Nr:

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

X  
\_\_\_\_\_

***Information officer***