

PERSPECTIVE INVESTMENT MANAGEMENT (PTY) LTD

Registration number 2015 / 211710 / 07

Manual prepared in terms of section 51
of the Promotion of Access to
Information Act, No. 2 of 2000

JUNE 2021

Perspective

Investment Management

CONTENTS

1	Introduction	3
2	Purpose	3
3	Available Information	4
4	Contact Details	5
5	Types of Records	6
	a) Records available in terms of any other legislation	6
	b) Records available without requesting access in terms of the Act	6
	c) Records available on request	6
6	Procedures to follow to access information	9
7	Availability of the Manual	9

Perspective

Investment Management

1. INTRODUCTION

The Protection of Personal Information Act, 4 of 2013 (“POPIA”) provides for protection principles that Perspective Investment Management (Pty) Ltd (hereafter “**Perspective**”) must comply with to protect the Personal Information of all Data Subjects. Should a person require access to Personal Information, then access is allowed in terms of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”).

PAIA gives effect to section 32 of the Constitution, that provides for access to Personal Information if a person wants to exercise a right or to protect a right, subject to the procedural requirements laid down by PAIA.

Section 10 of POPIA provides that Perspective must implement a Manual that must comply with Sections 14 and 51 of PAIA that should be made available to persons who want to access the Personal Information held by Perspective.

This POPIA and PAIA Manual is available for inspection by contacting Perspective and the Information Regulator at the contact details provided below.

2. PURPOSE

2.1 This purpose of the Manual is to:

- provide details on records and information of Perspective that are available and accessible once the requirements for access have been met; and
- sets out the procedures to be followed by a person that wants access to Personal Information that is subject to protection and non-disclosure in terms of POPIA, if such person wants to exercise or to protect a right.

2.2 The Manual is available for inspection at Perspective’s offices at no cost as well as on the website www.perspectiveim.co.za.

Perspective

Investment Management

3. AVAILABLE INFORMATION

Currently no notice has been published in terms of section 52(2) of POPIA on the categories of records that will automatically be available without following the required processes as provided for in terms of this Manual.

Please note that the inclusion of any subject or category of records in this Manual does not mean that information or records falling within those subjects and /or categories will automatically be made available. Certain grounds of refusal may apply to a request for such record

Perspective

Investment Management

4. CONTACT DETAILS

Company Name	PERSPECTIVE INVESTMENT MANAGEMENT (PTY) LTD		
Registration no	2015/ 211710 / 07	FSCA Licence no	47672
CEO	DANIEL J MALAN	Key Individual	DANIEL J MALAN
Structure	Perspective does not form part of a group of companies and employs approximately 5 people. The Head Office is located in Cape Town and there are no branch offices.		
Functions	Perspective provides investment management services to CIS Funds for South African clients and is an authorized Financial Services Provider for Category I (Advice and Intermediary Services all product categories) and Category II (Discretionary financial services.) in terms of the Financial Advisory and Intermediary Services Act of 2002.		
Postal address	UNIT 22, VICTORIA JUNCTION, PRESTWICH STREET, CAPE TOWN, 8001		
Business/ Street Address	UNIT 22, VICTORIA JUNCTION, PRESTWICH STREET, CAPE TOWN, 8001		
Phone Number	+27 (0) 79 022 4442	Website	www.perspectiveim.co.za
Information Officer	BERYL E TRUTER	Email address	beryl@perspectiveim.co.za
Deputy Information Officer/s	n/a	Email address	n/a
Information Regulator	JD House Stiemens Street Braamfontein, Johannesburg, 2001 Website: www.justice.gov.za Email: POPIAComplaints.IR@justice.gov.za and PAIAComplaints.IR@justice.gov.za		

5. TYPES OF RECORDS

a) **Records available in terms of any other legislation**

All records kept and made available in terms of legislation applicable to Perspective and the financial services industry in general, as it applies to the specific environment in which Perspective operates, are available with said legislation.

b) **Records available without requesting access in terms of the Act**

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette.

Perspective have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.perspectiveim.co.za.

c) **Records available on request**

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available upon request for the purposes of the Act:

Records are held on the following subjects:

- (i) personnel records;
- (ii) client-related records;
- (iii) private body records, and
- (iv) records in the possession of or pertaining to other parties

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of Perspective and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Perspective. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- any personal records provided to Perspective by their personnel;
- any records a third party has provided to Perspective about any of their personnel;
- conditions of employment and other personnel-related contractual and quasi-legal records;
- internal evaluation records; and
- other internal records and correspondence.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from Perspective. Client related information includes the following:

- any records a client has provided to the third party acting for or on behalf of Perspective;
- any records a third party has provided to Perspective; and
- records generated by or within Perspective pertaining to the client, including transactional records.

(iii) Perspective records

These records relate to the own affairs of Perspective and are considered to include, but not limited to:

- financial records;
- operational records;
- databases;
- information technology
- marketing records
- internal correspondence
- records relating to products and services
- statutory records
- internal policies and procedures
- securities and equities; and
- records held by officials of Perspective.

(iv) Other parties

Perspective may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.

The following records fall under this category:

- personnel, client or Perspective records which are held by another party as opposed to being held by Perspective; and
- records held by Perspective pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about contractors / suppliers.

6. PROCEDURES TO FOLLOW TO ACCESS INFORMATION

A person who wants access to the records of Perspective must complete the necessary request form.

The request form can be obtained from the Information Officer. If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the email address provided on page 4.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalized. A copy of the fee structure applicable is available on request from the Information Officer.

All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

Note: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- a) information for the protection of the privacy of individuals;
- b) information for the protection of commercial information and confidential information of third parties;
- c) information privileged from production in legal proceedings;
- d) commercial information of Perspective; and
- e) research information.

7. AVAILABILITY OF THE MANUAL

Copies of this manual are available for inspection, free of charge, at the offices of Perspective. Copies are also available on our website (www.perspectiveim.co.za)