

PROMOTION OF ACCESS TO INFORMATION MANUAL

(Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended)

1 TABLE OF CONTENTS

2	Introduction	2
3	Company Details.....	2
4	Description Of Business Operations.....	3
5	Guide On How To Use Paia And How To Obtain Access To The Guide.....	3
6	Records Automatically Available (Section 52(2))	4
7	Records Held By The Company	4
8	Purpose Of Processing Personal Information (POPIA Compliance)	6
9	Information Security Measures	7
10	Procedure To Request Access To Records.....	7
11	Refusal Of Access	8
12	Prescribed Fees.....	8
13	Remedies Available To Requesters.....	9
14	Review And Manual Availability	9
15	Annexure A: Legislative Framework Reference Table.....	10
16	List of Acronyms and Abbreviations.....	11

2 INTRODUCTION

This Manual is compiled in terms of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”), and the Protection of Personal Information Act, 4 of 2013 (“POPIA”). It is intended to promote transparency and accountability by enabling requesters to access information held by Stepp Atlas Gardens (Pty) Ltd (“the Company”), provided such access is lawful and required for the exercise or protection of any rights.

PAIA gives effect to the constitutional right of access to information. POPIA complements this by ensuring personal information is processed lawfully and securely. This Manual outline:

- The types of records held by the Company
- The categories of data processed
- Procedures for accessing information
- Grounds for refusal
- Fees payable

3 COMPANY DETAILS

The table below must be completed by the Company for publication and regulatory compliance.

Registered Name	Stepp Atlas Gardens (Pty) Ltd
Legal Form	(Pty) Ltd
Registration Number	2003/027438/07
FSP Number	15583
VAT Number	4140209919
Physical Address	17 Sycamore Crescent, Atlas Gardens Contermanskloof Road Contermanskloof 7441
Postal Address	Same as Physical Address
Head of Business	Vernon George Solomon

Information Officer	Wade Solomon
Designation	Internal Compliance Officer
Telephone Number	+27 21 556 0027
Email Address (PAIA Contact)	wade@stepp.co.za
Website	www.steppatlasgardensgroup.co.za

4 DESCRIPTION OF BUSINESS OPERATIONS

Stepp Atlas Gardens is an authorised Financial Services Provider (FSP) licensed by the Financial Sector Conduct Authority (FSCA) in terms of the Financial Advisory and Intermediary Services Act, 2002 (FAIS). The Company operates in the short-term insurance sector, providing regulated advice and intermediary services to individual and commercial policyholders.

Business activities include:

- ▶ Distribution and servicing of short-term insurance products, including motor, property, and commercial cover
- ▶ Conducting client onboarding, policy maintenance, renewals, and suitability reviews
- ▶ Assisting clients with claims submissions, documentation, and claims-related queries
- ▶ Liaising with insurers to ensure efficient and fair claims processing
- ▶ Facilitating and supporting third-party claim interactions, including claims from non-policyholders who may have suffered loss or damage due to an insured event (e.g. damage to another vehicle in a motor accident)

Stepp Atlas Gardens operates nationally and may render services through in-house staff or appointed representatives, in full compliance with its FSCA licence conditions and the General Code of Conduct. The Company is committed to Treating Customers Fairly (TCF) and ensuring that claims, both from clients and affected third parties, are handled transparently and equitably.

5 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

In terms of Section 10 of the Promotion of Access to Information Act, the Information Regulator is required to publish a Guide to assist individuals in understanding how to exercise their rights to access information.

This Guide:

- ▶ Describes the purpose and objectives of PAIA and POPIA
- ▶ Explains how to submit a request for access to records
- ▶ Lists remedies available when access is denied
- ▶ Provides the contact details of the Information Officers and the Regulator
- ▶ Includes relevant timeframes, procedures, and prescribed forms

The Guide is made available in **all official South African languages** and in **braille**.

You may obtain a copy of the Guide:

- ▶ On the website of the Information Regulator: <https://www.inforegulator.org.za>
- ▶ By contacting the Information Regulator directly:
 - ▶ **Email:** PAIAComplaints@inforegulator.org.za
 - ▶ **Telephone:** +27 (10) 023 5200
 - ▶ **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- ▶ By requesting a copy from the Company’s Information Officer

6 RECORDS AUTOMATICALLY AVAILABLE (SECTION 52(2))

These records may be accessed without submitting a formal PAIA request:

Type of Record	Available Via
Company brochures	Stepp Atlas Gardens Website or upon request
FSP Licence Certificate	Upon request
POPIA privacy notice	Stepp Atlas Gardens Website or within the onboarding material
Conflict of interest management policy	On request from the Information Officer
PAIA Manual	Stepp Atlas Gardens Website or available at the office

7 RECORDS HELD BY THE COMPANY

5.1. Corporate Records

- ▶ Memorandum of Incorporation
- ▶ Shareholder and director registers
- ▶ FSCA licence documents
- ▶ CIPC registration documents
- ▶ Board and management meeting minutes

5.2. Client Records

- ▶ Know Your Client (KYC) documents
- ▶ Application forms and mandates
- ▶ Advice records and disclosures
- ▶ Correspondence and complaints
- ▶ Transaction records and instructions

5.3. Financial Records

- ▶ Annual financial statements
- ▶ Tax records and filings
- ▶ Invoices and remittance advice
- ▶ Budget and management accounts

5.4. HR & Employee Records

- ▶ Employment contracts
- ▶ Payroll and UIF records
- ▶ Leave and disciplinary records
- ▶ Employee performance records

5.5. Operational Policies

- ▶ POPIA compliance policies
- ▶ Risk management framework
- ▶ Internal controls and audit findings

- ▶ Cybersecurity and IT usage policies

8 PURPOSE OF PROCESSING PERSONAL INFORMATION (POPIA COMPLIANCE)

In terms of POPIA, personal information is processed for the following purposes:

- ▶ Fulfilling legal obligations (e.g. FAIS, FICA, SARS)
- ▶ Client onboarding and financial servicing
- ▶ Employment and HR administration
- ▶ Managing contractual obligations
- ▶ Regulatory reporting and compliance
- ▶ Marketing (with consent)

6.1. Categories of Data Subjects

- ▶ Individual and juristic clients
- ▶ Representatives and signatories
- ▶ Employees and applicants
- ▶ Service providers and intermediaries

6.2. Types of Personal Information Processed

Natural Persons	Juristic Persons
Name, ID number, address	Business name and registration number
Contact details	Contact persons and role-specific emails
Financial and employment data	VAT number and tax-related documents
Medical or biometric data	Authorised signatory records

6.3. Special Information (if applicable)

- ▶ Medical underwriting disclosures

- ▶ Criminal history (for FICA purposes)
- ▶ Politically Exposed Persons (PEP/PIP) status

6.4. Trans-Border Information Flows

Personal data may be shared with foreign third parties only if:

- ▶ The jurisdiction provides equivalent legal protection; or
- ▶ The data subject consents; or
- ▶ The sharing is contractually necessary

9 INFORMATION SECURITY MEASURES

The Company implements the following measures to secure personal information:

- ▶ Access-controlled internal systems
- ▶ Password-protected user authentication
- ▶ Antivirus and malware prevention tools
- ▶ Secure data storage (physical and electronic)
- ▶ POPIA awareness training for all staff
- ▶ Confidentiality undertakings by third parties
- ▶ Secure destruction of outdated records

10 PROCEDURE TO REQUEST ACCESS TO RECORDS

Any person seeking access to records must:

- 1 Complete **Form 2**. [Download Form 2 – Request for Access to Record \(PDF\)](#)
- 2 Clearly describe the record sought and the right being exercised
- 3 Provide proof of identity (or authority if acting on behalf of another)
- 4 Pay the prescribed **R140.00 request fee** (unless exempted)

Submit requests to:

Email: admin@stepp.co.za

Physical Address: 17 Sycamore Crescent, Atlas Gardens, Contermanskloof Road, Contermanskloof, 7441

The Information Officer will respond within **30 calendar days**. If additional time is required (e.g. consultation with third parties), the requester will be notified.

Access will only be granted if:

- ▶ The request complies with PAIA
- ▶ The record is necessary to exercise or protect a right
- ▶ No grounds for lawful refusal apply

11 REFUSAL OF ACCESS

Stepp Atlas Gardens may lawfully refuse access to a record if:

- ▶ It contains personal information of third parties
- ▶ It reveals trade secrets or commercial information
- ▶ It is legally privileged
- ▶ Disclosure would contravene statutory obligations
- ▶ It compromises security, research, or regulatory investigations

Where access is refused:

- ▶ Written reasons will be provided
- ▶ The requester will be advised of the right to lodge a complaint or court application

12 PRESCRIBED FEES

Fee Type	Amount (ZAR)
Request Fee (non-personal records)	R140.00
Copy per A4 Page	R2.00
Flash Drive / CD (provided)	R60.00
Labour (beyond the first hour)	R145.00 per hour

Fee Type	Amount (ZAR)
Deposit for large requests	One-third of the estimated total fee
Postage / Courier	Actual cost

No fees apply for access to your own personal information unless copies are requested.

13 REMEDIES AVAILABLE TO REQUESTERS

If access is refused or not responded to:

- ▶ Submit **Complaint (Form 5)** to the Information Regulator:
- ▶ **Email:** PAIAComplaints@inforegulator.org.za
- ▶ **Website:** <https://www.inforegulator.org.za>
- ▶ Alternatively, apply to a Magistrate’s or High Court within **180 days** of refusal or deemed refusal.
- ▶ **The Information Regulator** may recommend corrective action before court escalation.

14 REVIEW AND MANUAL AVAILABILITY

This Manual:

- ▶ Is reviewed annually or upon legal or business changes
- ▶ Is available free of charge on request (electronic or hard copy)
- ▶ May be downloaded from the Company’s website, if applicable

Approval Date	01 June 2025
Next Review Date	30 March 2026
Approved by	Wade Solomon (Information Officer)
Version	2

15 ANNEXURE A: LEGISLATIVE FRAMEWORK REFERENCE TABLE

This annexure summarises the key legislative provisions in terms of the Promotion of Access to Information Act, 2 of 2000 (PAIA) and the Protection of Personal Information Act, 4 of 2013 (POPIA) that support and inform the contents of this Manual. Each reference relates directly to the sections of the Manual and provides the legal authority for the Company's obligations and procedures.

No.	Section of the Act	Legislative Summary	Applies To
1	Section 17(1) of PAIA	Public bodies must appoint Deputy Information Officers as necessary to ensure the accessibility of records.	Public Bodies
2	Section 56(a) of POPIA	Public and private bodies must designate Deputy Information Officers to carry out responsibilities under Section 55(1) of POPIA.	All Bodies
3	Section 11(1) of PAIA	A requester must be granted access to a record of a public body if procedural requirements are met and no refusal grounds apply.	Public Bodies
4	Section 50(1) of PAIA	A requester must be granted access to a private body's record if: (a) the record is needed to exercise a right; (b) procedures are followed; and (c) no grounds for refusal apply.	Private Bodies
5	Section 14(1) of PAIA	Public bodies must publish their PAIA Manual in at least three official languages and make it available to the public.	Public Bodies
6	Section 51(1) of PAIA	Private bodies must compile and publish a PAIA Manual, including required categories of information.	Private Bodies
7	Section 15(1) of PAIA	Public bodies must publish a list of records that are automatically available without a PAIA request.	Public Bodies
8	Section 52(1) of PAIA	Private bodies may voluntarily publish a list of records available without a formal request.	Private Bodies
9	Section 22(1) of PAIA	Information Officers of public bodies must notify the requester to pay any prescribed request fee before processing.	Public Bodies

No.	Section of the Act	Legislative Summary	Applies To
10	Section 54(1) of PAIA	The head of a private body must notify the requester to pay the prescribed access fee (if any) before continuing with the request.	Private Bodies
11	Section 92(1) of PAIA	The Minister may make regulations regarding: (a) procedural matters, (b) fees (under sections 22 and 54), (c) notices, and (d) access criteria for records.	All Bodies

16 LIST OF ACRONYMS AND ABBREVIATIONS

No.	Acronym	Meaning
1	CEO	Chief Executive Officer

No.	Acronym	Meaning
2	CIPC	Companies and Intellectual Property Commission
3	DIO	Deputy Information Officer
4	FICA	Financial Intelligence Centre Act No. 38 of 2001
5	FSCA	Financial Sector Conduct Authority
6	FSP	Financial Services Provider
7	HR	Human Resources
8	ICT	Information and Communications Technology
9	IO	Information Officer
10	KYC	Know Your Client (or Know Your Customer)
11	Minister	Minister of Justice and Correctional Services
12	PA	Prudential Authority
13	PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
14	POPIA	Protection of Personal Information Act No. 4 of 2013
15	Regulator	Information Regulator
16	Republic	Republic of South Africa
17	RMCP	Risk Management and Compliance Programme
18	SARS	South African Revenue Service
19	TCF	Treating Customers Fairly
20	UIF	Unemployment Insurance Fund