

Conflict of Interest Policy

June 2025

1. Introduction

The Promotion of Access to Information Act 2 of 2000 (“PAIA”) gives effect to section 32 of the Constitution, which provides that everyone has the right to access to information held by the State, as well as to information held by another person (or private body) when such privately held information is required to exercise or protect a right. Any such requests must comply with the procedural requirements laid down in PAIA.

The Protection of Personal Information Act 4 of 2013 (“POPIA”) requires that when processing personal information, a responsible party should give effect to the constitutional right to privacy by safeguarding personal information, subject to justifiable limitations aimed at balancing the right to privacy against other rights, particularly the right of access to information.

A “responsible party” is the person who, alone or in conjunction with others, determines the purpose and means of processing personal information. “Processing information” refers to any operation or activity (or set of operations) making use of personal information. A “data subject” is the person to whom the personal information relates, and an “operator” processes personal information for a responsible party in terms of a contract or mandate, but without coming under the direct authority of that party.

In terms of PAIA, “personal information” refers to information relating to an identifiable person – including but not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national origin, ethnic origin, social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the data subject;
- Information relating to the education, medical, criminal or employment history of the data subject, or information relating to a financial transaction in which the data subject has been involved;
- Any identifying number, symbol or other particular assigned to the data subject;
- The address, fingerprints or blood type of the data subject;
- The personal opinions, views or preferences of the data subject, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;
- Correspondence sent by the data subject that is implicitly or explicitly of a private or confidential nature, or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the data subject;
- The views or opinions of another individual about a proposal for a grant, an award or a prize to be made to the data subject, excluding the name of the other individual where it appears with the views or opinions of that individual; and
- The name of the data subject where it appears with other personal information relating to the data subject or where the disclosure of the name itself would reveal information about the data subject.

It excludes information about an individual who has been dead for more than 20 years.

2. Scope

This manual applies to Sygnia Limited and all its subsidiary companies (referred to herein as “Sygnia”). Access to the records of any subsidiary company of Sygnia Limited may be requested from the Information Officer at the contact details specified in this manual.



Sygnia Limited
Registration No. 2007/025416/06

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info@sygnia.co.za | www.sygnia.co.za

3. Information Officer

The Information Officer appointed in terms of PAIA is the same as the Information Officer referred to in POPIA. The Information Officer may appoint Deputy Informant.

4. Contact Details

Information Officer: Magda Wierzycka

Deputy Information Officer: Victor Ndlhovu

Physical address: 7th Floor, The Foundry, Cardiff Street, Green Point, Cape Town, 8001

Telephone number: 021 446 4940

Website: www.sygnia.co.za

Email: InformationOfficer@sygnia.co.za

5. The PAIA Guide

In terms of Section 10 of PAIA, the South African Human Rights Commission compiled a guide outlining the information and steps required by a person wishing to exercise any right contemplated under PAIA. The guide is available in all official languages.

6. Access to Personal Information

POPIA provides that a data subject may, upon proof of identity, request the responsible party to confirm, free of charge, all the information it holds about the data subject and may request access to such information about the identity of third parties who have or have had access to such information.

7. Whose Information Do We Keep?

Sygnia holds information and records on the following categories of data subjects:

- Employees and directors;
- Clients and their authorised representatives or agents;
- Service providers;
- Subscribers to webinars and events;
- Website users.

8. Recipients of Personal Information

Depending on the nature of the personal information, Sygnia may share information or records with the following categories of recipients:

- Subsidiary companies within the Sygnia Group, including employees;
- Third party suppliers;
- Regulatory and government authorities or ombudsmen or other authorities, including tax authorities, where Sygnia has a duty to share information;
- Industry bodies;
- Pension fund administrators;
- Claimants or beneficiaries.

9. Purpose of Categories and Records

Sygnia uses personal information in its possession in the following ways:

- Provide financial services and products;
- Promote Sygnia's services and products;

- Staff administration;
- Keep accounts and records;

The purpose for which personal information is processed by Sygnia will depend on the nature of the personal information and the particular data subject. The purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

“Processing information” may include:

- Collecting, receiving, recording, organising, collating, storing, updating, modifying, retrieving, altering, consulting or use;
- Disseminating by means of transmission, distribution or making available in any other form;
- Merging or linking;
- Blocking, degrading, erasing or destroying information.

10. Records Kept in Terms of Legislation

Sygnia keeps records and information in terms of the following legislation:

- Basic Conditions of Employment Act 75 of 1997;
- Broad-based Black Economic Empowerment Act 53 of 2003;
- Collective Investment Schemes Control Act 45 of 2002;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- 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;
- Financial Institutions (Protection of Funds) Act 28 of 2001;
- Financial Markets Act 19 of 2012;
- Income Tax Act 58 of 1962;
- Inspection of Financial Institutions Act 80 of 1998;
- Insurance Act 18 of 2017;
- Labour Relations Act 66 of 1995;
- Long-Term Insurance Act 52 of 1998;
- Medical Schemes Act 131 of 1998;
- Occupational Health and Safety Act 85 of 1993;
- Pension Funds Act 24 of 1956;
- Prevention of Organised Crime Act 121 of 1998;
- Prevention and Combatting of Corrupt Activities Act 12 of 2004;
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004;
- Protection of Personal Information Act 4 of 2013;
- Skills Development Act 97 of 1998;
- Trademarks Act 194 of 1993;
- Unemployment Insurance Act 63 of 2001;
- Value Added Tax Act 89 of 1991.

11. Publicly Available Records

The following records are publicly available on Sygnia's website and do not require a request for access:

- The Group's annual financial statements;
- The Group's annual integrated reports;
- The Group's interim reports;
- Marketing material.

12. Records Available on Request

The information held by Sygnia is divided into various information categories to give a broad indication of the information subjects and categories.

Please note that recording the category of record in the Manual does not guarantee that a request for access to such records will be granted. All requests will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

"Employees" refers to all employees employed by Sygnia and includes temporary, permanent and contracted employees and agents.

Category	Record	Data subject
Regulatory and Administrative	Permits, licenses or authorities Company	Company
	Public corporate records Company	Company
	Minutes of Board or Committee meetings Company	Company
	Internal correspondence (emails/memos)	Employees
	Insurance policies held by Sygnia Company	Company
	External correspondence (emails/memos)	Stakeholders
Human Resources	Employment applications	Employees
	Employment contracts	Employees
	Personal information of employees	Employees
	Medical aid records	Employees
	Employment equity plan	Company
	Pension fund records	Employees
	Disciplinary records	Employees
	Salary records	Employees
	Employee benefit records	Employees
	PAYE records	Employees
	SETA records	Employees
	Leave records	Employees
	Training records	Employees
Financial	Financial statements	Company
	Financial and tax records	Company
	Management accounts and reports	Company
	Asset register	Company
	Budgets	Company
	Cash books and ledgers	Company
	Banking records and statements	Company
Client	Client database	Client
	Client agreements	Client
	Client correspondence	Client
	Client instructions	Client
Third Party	Rental agreements	Third Party
	Non-disclosure agreements	Third Party
	Letters of intent	Third Party
	Supplier contracts	Third Party
	Outsourcing agreements	Third Party

13. Cross-border Transfers of Information

It may be necessary to share the personal information of data subjects with third parties in other countries or on data servers hosted outside South Africa. Such sharing will be done in compliance with POPIA and on the understanding that:

- The third party is subject to a law, binding corporate rules or binding agreement that provides an adequate level of data protection similar to South Africa's;
- The data subject consents to the transfer;
- The transfer is necessary for the performance of a contract between the data subject and Sygnia or for the implementation of pre-contractual measures;
- The transfer is necessary for the conclusion of a contract between the data subject, Sygnia and a third party;
- The transfer is for the benefit of the data subject and it is not reasonably practicable to obtain the consent of the data subject – or if it were, the data subject would likely give it.

14. Information Security

Sygnia employs up-to-date technology to ensure the confidentiality, integrity and availability of the personal information in its possession. Measures include:

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control;
- Secure setup of the hardware and software that makes up the IT infrastructure;
- Outsourced service providers who may process personal information on behalf of the company are contracted to implement the necessary security controls.

15. PAIA Procedure

Any person (known as the “requester”) can make a request under PAIA. When a request for access is received, the Information Officer will notify the requester of receipt and of the prescribed fee (if any) prior to processing the request.

The Information Officer will notify the requester in writing within thirty (30) days whether the request will be granted.

Requesters pay a fee when requesting access to records other than their personal information, as administration costs may be associated with the retrieval of certain types of information records. The fees for requesting and/or accessing records are set out in Annexure A.

Any request for information must be submitted in terms of Form C (attached as Annexure B). Form C must be completed in full and must be submitted with any other information required to consider the request.

Proof of identity must be submitted with Form C. If the request is made on behalf of another person, proof of the capacity in which the person is making the request must be provided (known as the “authorised person”).

If a person is unable to complete the prescribed form because of illiteracy or disability, they may make the request orally. Information will not be provided unless the requester provides clear and sufficient details of the right the requester is seeking to protect and an explanation of why the requested information is necessary for the exercise or protection of that right.

16. Right of Access

The Information Officer may only provide access to a record held by the Company if:

- The record is required for the exercise or protection of any right; and
- The requester has complied with the procedural requirements to request access to that record; and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

17. Grounds for Refusal

Sygnia employs up-to-date technology to ensure the confidentiality, integrity and availability of the personal information in its possession. Measures include:

- Protection of privacy of a third party who is a natural person, where disclosure would require the unreasonable disclosure of personal information about the third party (including a deceased individual);
- Protection of commercial information of a third party;
- Protection of certain confidential information of a third party;
- Protection of the safety of individuals and protection of property;
- Protection of information in legal proceedings;
- Protection of commercial information of a private body;
- Protection of research information

If a request for access is denied, Sygnia will advise the requester of the reason for refusal of access.

18. Records That Cannot Be Found or Do Not Exist

If all reasonable steps are taken to find a requested record but it cannot be found or does not exist, the requester will be notified by way of affidavit or affirmation.

19. Availability of The Manual

This manual is available from Sygnia's offices and in electronic format at www.sygnia.co.za.

Annexure A

1. Access fees for reproduction

1.1 For every photocopy of an A4-size page or part thereof	R1.10
1.2 For every photocopy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
1.3 For a copy in a computer-readable form on memory stick	R7.50
1.4 For a copy in a computer-readable form on compact disc	R70.00
1.5 For a transcription of visual images for an A4-size page or part thereof	R40.00
1.6 For a copy of visual images	R60.00
1.7 For a transcription of an audio record for an A4-size page or part thereof	R20.00
1.8 For a copy of an audio record	R30.00

2. Access fee for time spent

2.1 The time reasonably required to search for the record for disclosure and preparation	R30.00/hr or part thereof
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3. Request fee

3.1 For a request for access to a record by a person other than a personal requester	R50.00
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4. Deposit

One third of the access fee is payable as a deposit by the requester

5. Postal fee

5.1 When a copy of a record must be posted to the requester	R9.75
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6. Appeal fee

6.1 For lodging an internal appeal against the refusal of a request for access to a record	R50.00
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7. VAT

As a private body registered under the Value Added Tax Act, 1991, Sygnia will add VAT to the abovementioned fees

Annexure B

Form C

Request for access to record of private body (Section 53(1) of the Promotion of Access to Information Act, 2000) (Act No. 2 of 2000) [Regulation 10]

A. Particulars of private body

The Information Officer
Sygnia 7th Floor, The Foundry
Cardiff Street
Green Point
8001
Email: InformationOfficer@sygnia.co.za

B. Particulars of person requesting access to the record

- The particulars of the person who requests access to the record must be given below.
- The address and/or fax number in the Republic to which the information is to be sent must be given.
- Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____

Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf
of another person: _____

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____

D. Particulars of record

- 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 folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record: _____

Reference number, if available: _____

Any further particulars of record: _____

Annexure B

E. Fees

- a. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- b. You will be notified of the amount required to be paid as the request fee.
- 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 for exemption from payment of fees: _____

F. Form of access to record

Disability: _____

Form in which record is required: _____

Mark the appropriate box with an X.

Notes:

- a. Compliance with your request in the specified form may depend on the form in which the record is available.
- b. Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- c. The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:

- ☐ Copy of record*
- ☐ Inspection of record

2. If record consists of visual images (photographs, slides, video recordings, computer-generated images, sketches, etc.)

- ☐ View the images
- ☐ Copy of the images"
- ☐ Transcription of the images

3. if record consists of recorded words or information that can be reproduced in sound:

- ☐ Listen to the soundtrack (audio cassette)
- ☐ Transcription of soundtrack* (written or printed document)

4. If record is held on computer or in an electronic or machine-readable form:

- ☐ Printed copy of record*
- ☐ Printed copy of information derived from the record"
- ☐ Copy in computer readable form* (flash drive or compact disc)

Annexure B

If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?
(Postage will be payable)

- ☐ Printed copy of record*
- ☐ Printed copy of information derived from the record"

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all additional folios.

- 1. Indicate which right is to be exercised or protected:
- 2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at: _____ on this _____ day of _____ year _____

Signature of requester/person on whose behalf the request has been made.