



FRONTIER
ACCOUNTING AND SECRETARIAL SERVICES

Frontier Accounting and Secretarial Services (Pty) Ltd (2009/015299/07)

FRONTIER ACCOUNTING AND SECRETARIAL SERVICES PROPRIETARY LIMITED

REGISTRATION NUMBER 2009/015299/07

MANUAL

in terms of

Section 51 of

the Promotion of Access to Information Act 2/2000

(the "ACT")

And to address the requirements of the Protection of Personal Information Act, 2013



Contents

SUBJECT	Page
Introduction	3
1. Company Contact details [Section 51(1) (a)]	3
2. The South African Human Rights Commission Guide to the Act [Section 51(1) (b)]	4
3. Applicable Legislation [Section 51(1)(c)]	4
4. Schedule of Records Kept in terms of Legislation [Section 51(1)(d)]	5
5. Availability of the Manual	6
6. Access to Records Held by The Company	6
7. Grounds for refusal of Access to Records	7
8. Remedies available	7
9. Prescribed Fees	7
10. Protection of Personal Information Act, 4 of 2003 (“POPI”)	8
11. Introduction to POPI	8
12. Key Principles	8
13. Personal Information Collected	9
14. How Personal Information is used	10
15. Disclosure of Personal Information	10
16. Safeguarding Debenture Holder and Shareholder Information	10
17. Access and Correction of Personal Information	11
18. Other Information	12
FEES IN RESPECT OF PRIVATE BODIES	13
FORM C	15

Introduction.

Frontier Accounting and Secretarial Services (Pty) Limited (“Frontier”) is a wholly owned subsidiary of Nova PropGrow Group Holdings Limited (“Nova Group”) and was specifically created in 2011 to perform the functions of a Secretarial Services Provider for the Nova Group.

These functions are –

- the providing of Administrative/Accounting and Secretarial functions to the Nova Group and its Debenture Holders and Shareholders; and
- the providing of Property Administrative related services on behalf of the Nova Group, pertaining to the Management and Administration of the various properties owned by the Nova Group, in support of its in-house Property Management Company, Centroprop.

1. Company Contact Details [Section 51 (1) (a)]

Persons designated /duly authorised persons

Directors:

D Haese (Managing Director)
MJ Osterloh (Property Director)
M Henwood (Financial Director)
CJ van Rooyen (HR Director)

Head of the Organisation for the Purposes of the Act

Dominique Haese (Managing Director) is the CEO of the company and has delegated the responsibility of Information Officer to Corrie van Rooyen, who for the purposes of this brochure will be called the information officer. Danie van der Merwe has been appointed as Deputy Information Officer.

Postal and street address of Information Officer

Postal Address: Private Bag 27067 Monument Park 0105	Physical Address: 105 Club Avenue Waterkloof Heights 0181
--	---

Contact numbers for Information Officer:

Tel: +27 12 425 5000

Fax: 086 508 4317

Electronic mail address of the

Information officer: corrie@frontieram.co.za

Deputy Information Officer: danie@frontieram.co.za

Website: <http://www.frontieram.co.za>

2. **The South African Human Rights Commission(SAHRC) Guide to the Act in Terms of Section 10(1)[Section 51(1)(b)]**

The Promotion of Access to Information Act ("the Act") grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest

Requests in terms of the Act shall be made in accordance with the prescribed procedures at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

The Act requires the South African Human Rights Commission ("SAHRC") to compile a guide in terms of section 10(1) of the Act. This guide is to help people understand the provisions of the Act, its objects and how to make use of the provisions in the Act.

The Guide was compiled by the Commission specifically to assist the requester to access records and exercise his/her right to information. An update of this Guide will be published within 2 years from the publication of this copy.

The Guide is available from the SAHRC. The contact details of the SAHRC are as follows:

Private Bag 2700
Houghton
2041

Tel: +27 011 484 8300
Fax: +27011 484 0582

Website: www.sahrc.org.za
E-mail: PAIA@sahrc.org.za

[Section 51 (1) (c)]

3. Applicable Legislation

Ser	Ref	Act
1	No57 of 1997	Basic Conditions of Employment Act
2	No 71 of 2008	Companies Act
3	No 55 of 1998	Employment Equity Act
4	No 58 of 1962	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 85 of 1993	Occupational Health and Safety Act
7	No 2 of 2000	Public Access to Information Act
8	No 9 of 1999	Skills Development Levy Act
9	No 30 of 1966	Unemployment Insurance Act
10	No 89 of 1991	Value Added Tax Act
11	No 38 of 2001	Financial Intelligence Centre Act
12	No 4 of 2013	Protection of Personal Information Act

13	No 25 of 2002	Electronic Communication and Transaction Act
14	No 130 of 1993	Compensation for Occupational Injuries and Diseases Act
15	No 24 of 1936	Insolvency Act
16	No 8 of 2011	Sectional Titles Schemes Management Act
17	No 28 of 2011	Tax Administration Act
18	No 40 of 1949	Transfer Duty Act
19	NO 26 of 2007	Securities Transfer Tax Administration Act

4. Schedule of Records kept by Frontier in terms of Legislation [Section 51 (1) (d)]

Frontier maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of the Act.

Records	Subject
Public Affairs	Media Releases Correspondence with external parties Communiqués to Share Creditors and Debenture Creditors
Financial	Annual financial statements Tax returns Accounting records Banking records <ul style="list-style-type: none"> - Bank statements - Electronic banking records Asset register Rental agreements Invoices Income Tax records <ul style="list-style-type: none"> - PAYE records - IRP5/IT3 documents issued to employees - Records of payments made to SARS on behalf of employees All other statutory compliances iro <ul style="list-style-type: none"> - VAT - Skills development Levies - UIF - Workmen's Compensation
Personnel records	Employment contracts Employment Equity Plan (currently exempt) Medical Aid records Disciplinary records SETA records Salary records Leave records Training records
Companies Act records	Documents of incorporation Memoranda of incorporation

5. **Availability of this Manual**

A copy of this Manual is available by sending a request for a copy to the Information Officer by e mail. The Manual is also available on the Frontier website www.frontieram.co.za. It may also be obtained from the South African Human Rights Commission ("SAHRC") at the addresses set out above. This Manual will be updated annually.

6. **Access To Records Held By The Company**

6.1 Records held by the Company may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of the Company and in this regard, the Act distinguishes between two types of requesters:

6.1.1 **Personal Requester.** A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, the Company will provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by the Company.

6.1.2 **Other Requester.** This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, the Company is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by the Company.

6.2 **Request Procedure**

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requester must complete the prescribed form enclosed herewith and submit same to the information officer at the postal or physical address, fax number or electronic mail address stated herein. This form is also available on the website of SAHRC www.sahrc.org.za. The prescribed form must be completed with enough particularity to at least enable the information officer to identify:

- The record or records requested;
- The identity of the requester;
- What form of access is required; and
- The postal address or fax number of the requester.

A requester must state that he or she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must also provide an explanation of why the requested record is required for the exercise or protection of that right.

The Company will process a request within 30 days, unless the requestor has stated special reasons which would satisfy the information officer that circumstances dictate that the this time period not be complied with.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required. If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the information officer.

The Company will, within 30 days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The 30 day period within which the Company has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company (other than the head office) and the information cannot reasonably be obtained within the original 30 day period. The information officer will notify the requester in writing should an extension be necessary

7. Grounds for Refusal of Access to Records.

Please note that there are various grounds upon which your request for access to a record of a Private Body must and/or may be refused. These grounds for refusal are as stated and described in part 4 of the section 10 Guide in terms of the Promotion to Access to Information Act.

8. Remedies Available. If Request for Information Is Refused.

8.1 Internal Remedies. The Company does not have internal appeal procedures. As such, the decision made by the information officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the information officer.

8.2 External Remedies. A requestor that is dissatisfied with the information officer's refusal to disclose information, may, within 30 days of notification of the decision, apply to a court for relief. Likewise, a third party dissatisfied with the information officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a court for relief. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

9. **Prescribed Fees** (See attached Annexure)

The head of the private body to whom the request is made will notify you in writing to pay the prescribed request fee, if any, before processing the request. If you require access to records of your personal information, you do not have to pay a request fee (s 22(1)).

The fee structure is also available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.

Please note the following:

- A requester is required to pay the prescribed fees (R50,00) before a request will be processed.
- If the preparation of the record/s requested requires more than the prescribed hours (six), a deposit shall be paid of not more than one third of the access fee which would be payable if the request were granted.
- A requester may lodge an application with a court against the payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.

10. **Protection of Personal Information Act, 4 of 2013** (“POPI”)

11. **Introduction to POPI**

Frontier is a company functioning within the property domain and is obligated to comply with The Protection of Personal Information Act 4 of 2013.

Frontier confirms its commitment to protecting Nova’s Debenture Holders’ and Shareholders’ privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

POPI requires Frontier to inform Nova’s Debenture Holders and Shareholders as to how their Personal Information is used, disclosed and destroyed.

Frontier is the secretarial services provider for the Nova Group and as such is responsible for the protection of the personal information of the Debenture Holders and Shareholders of the Frontier Group as well as the employees of the Nova Group.

This Policy sets out how Frontier, on behalf of Nova, deals with Personal Information in addition to what purpose said information is used for. This Policy is made available on our company website www.frontieram.co.za and by request from our offices by email at admin@frontieram.co.za

12. **Key principles.** The Board of Frontier and all staff members of Frontier are committed to the following principles:

- To be transparent with regards to the standard operating procedures governing the collection, maintenance and processing of personal information;
- To comply with all applicable regulatory requirements regarding the collection and processing of personal information;
- To collect personal information only by lawful and fair means and to process personal information in a manner compatible with the purpose for which it was collected;
- Where required by regulatory provisions, to inform individuals when personal information is collected about them;
- To treat sensitive personal information that is collected or processed with the highest of care as prescribed by regulation;
- Where required by regulatory provisions or guidelines, to obtain individuals' consent to process their personal information;
- To strive to keep personal information accurate, complete and up to date and reliable for their intended use. To develop adequate security safeguards against risks such as loss, unauthorized access, destruction, use, amendment or disclosure of personal information. To provide individuals with the opportunity to access the personal information relating to them and, where applicable, to comply with requests to correct, amend or delete personal information.

13. **Personal Information Collected**

Section 9 of POPI states that *"Personal Information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive."*

Frontier, on behalf of Nova, collects, processes and maintains Debenture Holders' and Shareholders' Personal Information with the aim of maintaining the Debenture Holder and Shareholder register and to effectively communicate with them. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the Debenture Holders and Shareholders what information they are required to provide us with and the reasons why the information is required.

The following personal information of Debenture Holders and Shareholders are maintained and processed:

- Debenture/Share number
- Title
- Initials
- Name and Surname
- Marital Status

- ID/Registration No
- Home Telephone No
- Work Telephone No
- Cell No
- Email Address
- Postal Address
- Physical Address
- Bank Detail
- Language Preference
- Income Tax No

14. **How Personal Information is Used**

Debenture Holders' and Shareholders' Personal Information will only be used for the purpose for which it was collected and agreed upon. This may include:

- Dissemination of information by means of communiques and letters
- Maintaining Debenture Holder and Shareholder registers.
- Payment of returns;
- Repayment of investments;
- Confirming, verifying and updating Debenture Holder and Shareholder details;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, Personal Information may only be processed if certain conditions are met which are listed below along with supporting information for Frontier processing of Personal Information:

- Debenture Holder and Shareholder consents to the processing — consent is obtained from Debenture Holder and Shareholder when personal information is requested;
- The processing is necessary — when communiques and letters are to be dispatched and when payments are to be effected; and
- Processing complies with an obligation imposed by law on the Frontier Group;

15. **Disclosure of Personal Information**

We may only disclose Debenture Holders', Shareholders' and Employee's Personal Information to any third party when we have the written authorization from the respective Debenture Holder, Shareholder or Employee.

We may also disclose information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

16. Safeguarding Debenture Holder and Shareholder Information

It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your Personal Information is secure.

The following procedures are in place in order to protect your Personal Information:

- The **Frontier Information Officer** is Corrie van Rooyen whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI. He is assisted by Danie van der Merwe who will function as the Group's Deputy Information Officer;
- **This Policy** has been implemented and training on this policy and the POPI Act will take place during the latter half of 2018.
- Each new employee will be required to sign an **employment contract** containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- Every employee currently employed within Frontier will be required to sign an addendum to their **employment contract** containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- Every employee currently performing the duties of an operator dealing with personal information as defined, will be required to sign an addendum to their employment contract containing clauses regulating the use and security of Debenture Holder and Shareholder personal information.
- Our archived personal information is stored on site.
- Frontier will introduce an electronic document management system whereby our hard copy files are to be captured electronically for back up purposes. All files will be archived at the Frontier disaster recovery site which will be available both electronically and in hard copy form;
- All electronic files or data are backed up by the Deputy Information Officer who is also responsible for system security which protects third party access and physical threats. An external IT service provider, Warp Development, is responsible for Electronic Information Security as per SLA;
- A **Security Incident Management Register** will be kept to log any security incidents and to report on and manage said incidents. This register will be maintained by the Deputy

Information Officer, Danie van der Merwe.

- **Consent** to process client information is obtained from clients (or a person who has been given authorisation from the client to provide the client's Personal Information) during the process of obtaining of information process.

17. **Access and Correction of Personal Information**

Debenture Holders and Shareholders have the right to access the Personal Information we hold about them. They also have the right to ask us to update, correct or delete their Personal Information on reasonable grounds. The necessary forms, based on forms prescribed in the Regulations, can be accessed here.

Form 1: [OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION](#)

Form 2: [REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION](#)

Once a Debenture Holder, Shareholder or employee objects to the processing of their Personal Information, Frontier may no longer process said Personal Information. We will take all reasonable steps to confirm our clients' identity before providing details of their Personal Information or making changes to their Personal Information.

(Signed)

Dominique Haese

Managing Director

FRONTIER ACCOUNTING AND SECRETARIAL SERVICES PROPRIETARY LIMITED

FEES IN RESPECT OF PRIVATE BODIES

- The head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request. A personal requester does not pay such a fee [s 22(1)].
- The fee that the requester must pay to a private body is R50. The requester may lodge an internal appeal or an application to the court against the tender or payment of the request fee [s 22(3)(b)].
- The head of the private body will then make a decision on the request and notify the requester in the required form
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 22(6)]

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

2. The fees for reproduction referred to in regulation 11(1) are as follows:

(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	R7,50
(ii) compact disc	R70,00
(d) For a transcription of visual images,	
for an A4-size page or part thereof	R40,00
(ii) For a copy of visual images	R60,00
(e) For a transcription of an audio record	
(i) for an A4-size page or part thereof	R20,00
(ii) for a copy of an audio record	R30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

(1)(a) For every photocopy of an A4-size page or part thereof	R1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0,75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	R7,50
(ii) compact disc	R70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	R40,00
(ii) For a copy of visual images	R60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	R20,00
(ii) For a copy of an audio record	R30,00
(f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	

(2) For purposes of section 54(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) One third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.

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

(a) 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.
(b) 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.

1 Description of record or relevant part of the record:
.....
.....
.....
.....
.....

2 Reference number, if available:
.....
.....
.....
.....
.....

3 Any further particulars of record:
.....
.....
.....
.....

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

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

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 this includes 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 which 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* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.				YES
				NO

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 the 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..... this..... day of20.....

.....

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE