

PROMOTION OF ACCESS TO INFORMATION ACT No 2 of 2000 (PAIA)

MANUAL for the Interneuron Group of Companies

Hereinafter collectively referred to as “Interneuron”

1. Introduction

This Manual is prepared in terms of the Promotion of Access to Information Act No 2 of 2000, and more specifically in terms of Section 51 of the Act.

2. Background

Interneuron's main business is that of asset management and related activities such as real estate investments and venture capital projects.

3. Contact details and General Information

- 3.1 Interneuron (Pty) Ltd
Reg No : 2001/020856/07
Approved and regulated by the Financial Services Board,
South Africa (Licence number 772)

- 3.2 Interneuron Nominees (Pty) Ltd
Reg No : 1990/005275/07

- 3.3 Interneuron Capital Ltd
Reg No : 1995/012106/06

- 3.4 Interneuron Property (Pty) Ltd
Reg No : 2002/020537/07
Registered with the Estate Agency Affairs Board, South
Africa

- 3.5 Underwritten Capital (Pty) Ltd
Reg No : 1996/002823/07

- 3.6 Roggebaai Properties (Pty) Ltd
Reg No : 2003/019971/07
- 3.7 Kovacs Investments 724 (Pty) Ltd
Reg No : 2005/009943/07
- 3.8 Hout Bay Harvest Centre (Pty) Ltd
Reg No : 1956/001346/07
- 3.9 Hout Bay Rocks (Pty) Ltd
Reg No : 2007/021/795/07
- 3.10 PPWT Properties (Pty) Ltd
Reg No : 2004/026193/07
- 3.11 Interneuron Housing Estate Noordhoek (Pty) Ltd
Reg No : 2007/011797/07
- 3.12 Interneuron Housing Estate Benoni (Pty) Ltd
Reg No : 2008/026024/07
- 3.13 Cedar Falls Properties 154 (Pty) Ltd
Reg No : 2007/016504/07

Postal Address:

PO Box 26638
Hout Bay
7872
South Africa

Street Address:

31 Harbour Road
Hout Bay
7806

Tel : 021-7905171

Fax : 021-7900220

Website : www.interneuron.co.za

Managing Director : Willi Jonker
willi@interneuron.co.za

Information Officer : Marthie Horn
marthie@interneuron.co.za

4. Section 10 Guide by the South African Human Rights Commission: How to use the Act

In terms of section 10 of PAIA, the South African Human Rights Commission (“HRC”) has compiled simple and easily comprehensible guidelines on how to use the PAIA-Act.

This guide is available in electronic format in all 11 languages on the website of the HRC at www.sahrc.org.za.

Queries can also be addressed to:

The South African Human Rights Commission
PAIA Unit
The Research and Documentation Department
Private Bag X2700
Houghton
2041
Tel : 011-484 8300
Fax : 011-4840582
Website : www.sahrc.org.za

5. Voluntary Disclosures in terms of Section 52 of the Act

No Notice has been published in terms of Section 52 of the Act to voluntarily disclose certain records that are automatically available.

However, any information automatically available is published on the Interneuron website @ www.interneuron.co.za.

6. Description of Categories and Subjects of Records held by Interneuron that may be requested

Accessibility of records listed herein below may be subject to the grounds of refusal as set out hereinafter. Every request for a record will therefore be reviewed on its merits.

6.1 Categories and Subjects of records held:

FINANCIAL
Monthly and Annual Financial statements
Debt and credit transactions
Bank statements
Budgets
VAT, Income Tax, PAYE, RSC levies and other taxes
Assets and Liabilities
Invoices
Statements
Lease Agreements

HUMAN RESOURCES

Employment and recruitment
Staff records
Training
Payroll records
Employment Equity
Skills development
Unemployment Insurance
Workman's Compensation

COMPANY LAW

Directors
Shareholders
Company formation documents
Minute Books
Company registers

COMPANY ACTIVITIES

Client records, correspondence and agreements
Broker records, correspondence and agreements
Licences
Fee schedules
Products
Corporate Finance Activities
Marketing material
Proposals
Trading instructions
Other Agreements

6.2 Records are kept in terms of the following legislation:

1. Collective Investment Schemes Control Act No.45 of 2002
2. Financial Advisory and Intermediary Services Act No. 37 of 2002
3. Financial Intelligence Centre Act No. 38 of 2001
4. Financial Services Board Act No. 97 of 1990
5. Pension Funds Act 24 of 1956
6. Companies Act No. 71 of 2008
7. Consumer Protection Act No.68 of 2009
8. Income Tax Act No. 95 of 1967
9. Value Added Tax Act No. 89 of 1991
10. Basic Conditions of Employment No. 75 of 1997
11. Labour Relations Act No. 66 of 1995
12. Occupational Health & Safety Act No. 85 of 1993
13. Skills Development Levies Act No. 9 of 1999
14. Skills Development Act No. 97 of 1998
15. Unemployment Contributions Act No. 4 of 2002
16. Unemployment Insurance Act No. 63 of 2001 Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
17. Employment Equity Act No. 55 of 1998

7. Procedure to obtain a record from Interneuron

- 7.1 The requester must use the prescribed form, attached hereto as **Annexure A**, to make the request for access to a record.
- 7.2 The request must be made to the Information Officer at the address, fax number or electronic mail address as stipulated in clause 3 above.
- 7.3 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 also indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed.
- 7.4 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 7.5 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 Managing Director of the Interneuron group.

8. Fees

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- 8.1 The Information Officer will 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.
- 8.2 The fee that the requester must pay to a private body is R50 or such amount as amended from time to time. The requester may lodge an application to the court against the tender or payment of the request fee.
- 8.3 After the Information Officer has made a decision on the request, the requester must be notified in the required form.
- 8.4 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.

8.5 Refer **Annexure B** attached hereto for an indication of the fees as published from time to time.

9. Other Information as may be prescribed

The Minister of Justice and Constitutional Development has not published any regulations in this regard.

10. Availability of this Manual

This Manual will be made available for inspection:

- At Interneuron's premises free of charge;
- On our website @ www.interneuron.co.za;
- From the South African Human Rights Commission; or
- Applicable controlling bodies.

This manual has not been published in the Government Gazette.

11. Updating this Manual

Interneuron will update this Manual on an annual basis or at such intervals as may be required by law.

December 2011

ANNEXURE A

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)

A. Particulars of private body

The Information Officer
By Fax : 021-790 0220

By post :
Po Box 26638
HOUT BAY
7872

By e-mail : marthie@interneuron.co.za

B. Particulars of person requesting access to the record

a) The particulars of the person who requests access to the record must be given below.

b) The address and/or fax number in the Republic to which the information is to be sent must be given.

c) 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

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:

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 to the record, if any, will be determined partly by the form in which access is requested.

Mark the appropriate statement with an **X**.

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

copy of record* or
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* or
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) or
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 or

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 _____ on this ____ day of _____ 20____.

SIGNATURE OF REQUESTER / PERSON
ON WHOSE BEHALF REQUEST IS MADE

ANNEXURE B

PRESCRIBED FEES

Part III of Regulation 187 published in the Government Gazette on the 15 February 2002:

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: **R**
 - (a) For every photocopy of an A4-size page or part thereof 1,10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form 0,75
 - (c) For a copy in a computer-readable form on -
 - (i) stiffy disc 7,50
 - (ii) compact disc 70,00
 - (d) (i) For a transcription of visual images, for an A4-size page or part thereof 40,00
(ii) For a copy of visual images 60,00
 - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof 20,00
(ii) For a copy of an audio record 30,00
3. The request fee payable by a requester, other than a personal requester, referred to in Regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in Regulation 11(3) are as follows: **R**
 - (1) (a) For every photocopy of an A4-size page or part thereof 1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form 0,75
(c) For a copy in a computer-readable form on -
 - (i) stiffy disc 7,50
 - (ii) compact disc 70,00
 - (d) (i) For a transcription of visual images, for an A4-size page or part thereof 40,00
(ii) For a copy of visual images 60,00
 - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof 20,00
(ii) For a copy of an audio record 30,00
 - (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.