



**MATRIX**  
FUND MANAGERS

**MANUAL IN TERMS OF SECTION 51 OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT**

**ACT No. 2 OF 2000**

**("PAIA")**

**for**

**MATRIX FUND MANAGERS (PTY) LTD**

**("Matrix")**

**(Registration Number: 2007/028504/07)**

**Revised: June 2021**

## **1. INTRODUCTION**

This manual is published in accordance with Section 51 of PAIA and gives effect to the public's constitutional right to have access to information that is required for the exercise or protection of any rights.

Matrix is a private body as defined and is an authorised financial services provider that provides advisory, intermediary, and discretionary financial services to its clients, under license number 44663, issued in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002.

This document serves as the manual as required in terms of PAIA and describes the categories of records held by Matrix and the procedures that need to be followed to request access to such records.

## **2. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL**

### **2.1 COMPANY ADDRESS AND CONTACT DETAILS**

All requests for information in terms of this manual should be directed to:

Information officer: **Robert Coombe**

Deputy Information officer: **Faieka Slemming**

Physical address: **The Terraces, 2nd Floor**

**25 Protea Road**

**Claremont**

**7708**

Postal address: **Postnet Suite 80**

**Private Bag X1005**

**Claremont**

**7735**

Telephone number: **021 673 7800**

Email: [\*\*compliance@matrixfm.co.za\*\*](mailto:compliance@matrixfm.co.za)

## **2.2 PAIA AND THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION (SAHRC) GUIDE**

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights in terms of PAIA and the Protection of Personal Information Act 4 of 2013 (“POPI Act”). If a public body lodges a request, the public body must be acting in the public interest.

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

Requesters are referred to the Guide in terms of Section 10 which has been compiled by SAHRC and contains information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the SAHRC are:

Postal Address:	Private Bag 2700, Houghton, 2041
Telephone Number:	(011) 877 3600
Fax Number:	(011) 403 0625
Website:	<a href="http://www.sahrc.org.za">www.sahrc.org.za</a>

## **2.3 APPLICABLE LEGISLATION**

The following is a list of legislation applicable to available records (list not exhaustive):

- Basic Conditions of Employment Act No. 75 of 1997
- Collective Investment Schemes Control Act No. 45 of 2002
- Companies Act No. 71 of 2008
- Consumer Protection Act No. 68 of 2008
- Electronic Communications Act No. 36 of 2005
- Employment Equity Act No. 55 of 1998
- Financial Advisory and Intermediary Services Act No. 37 of 2002
- Financial Institutions (Protection of Funds) Act No. 28 of 2001
- Financial Intelligence Centre Act No. 38 of 2001
- Financial Markets Act No. 19 of 2012
- Financial Services Board Act No.97 of 1990
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- National Credit Act No. 34 of 2005
- Occupational Health and Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Prevention of Organised Crime Act No. 121 of 1998
- Promotion of Access to Information Act No. 2 of 2002
- Protection of Personal Information Act No. 4 of 2013

- Skills Development Act No. 97 of 1998
- Skills Development Levies Act No. 9 of 1999
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Contributions Act No.4 of 2002
- Value Added Tax Act No. 89 of 1991

## **2.4 RECORDS AVAILABLE**

The following categories of records, available on request, are maintained by Matrix:

### **2.4.1 Investor Records**

Investors include any natural or juristic person who has received products or services from Matrix. Records include those generated by Matrix or provided by the investor to Matrix or a contracted third party, or those provided by a contracted third party to Matrix in respect of the investor.

### **2.4.2 Matrix Staff Records**

Matrix staff includes temporary and contractual staff, and FAIS representatives. Records include those generated by Matrix or provided by Matrix staff to Matrix or a third party, or those provided by a third party to Matrix in respect of Matrix staff, and internal records and correspondence.

### **2.4.3 Matrix Business Records**

Matrix maintains records relating to its private internal affairs, including but not limited to the following:

- Financial records
- Operational records
- Information technology records
- Marketing records
- Internal correspondence
- Records related to products and services
- Statutory records
- Internal policies and procedures
- Records held by third party Matrix officials

## **2.5 PROCESSING OF PERSONAL INFORMATION**

In terms of the POPI, data must be processed for a specified purpose. The purpose for which data is processed by Matrix will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

### **2.5.1 Purpose of processing**

#### **2.5.1.1 Personnel data**

Matrix processes personnel data for business administration purposes. For example, personnel data is processed for payroll purposes. Personnel data is also processed to the extent required by legislation and regulation. For example, Matrix discloses employees' financial information to the Commissioner for the South African Revenue Service, in terms of the Income Tax Act 58 of 1962 and employee's sensitive personal information in terms of the Employment Equity Act 55 of 1998.

#### 2.5.1.2 Client-related data

Matrix processes client-related records as an integral part of its commercial services. For example, Matrix processes client-related records during the client application process and in assessing a client's profile and risk.

#### 2.5.1.3 Third party data

Matrix processes third party records for business administration purposes.

#### 2.5.1.4 Other party data

Matrix processes "other party" records for business administration purposes. For example, personnel data may be processed in order to effect payment to contractors and / or suppliers. In performing these various tasks, Matrix may, amongst others, collect, collate, process, store and disclose personal information.

### 2.5.2 To whom personal information will be supplied

Depending on the nature of the data, Matrix may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data (e.g. the Financial Sector Conduct Authority in terms of the Collective Investments Schemes Control Act 45 of 2002).
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or Matrix in terms of the applicable rules (i.e. the Competition Commission in terms of the Competition Act 89 of 1998).
- South African Revenue Services, or another similar authority
- Third parties with whom Matrix has a contractual relationship for the retention of data (e.g. a third-party archiving service).
- Auditing and accounting service providers (internal and external).
- Anyone making a successful application for access in terms of the PAIA.

### 2.5.3 Security measures

Matrix takes extensive information security measures to ensure the confidentiality, integrity and availability of Personal Information in its possession and also takes appropriate technical and organizational measures designed to ensure that personal data remain confidential and secure against unauthorized or unlawful processing and against accidental loss, destruction or damage.

## **2.6 FORM OF REQUEST**

To facilitate the processing of a request, kindly follow the steps as set out below:

- a) Use the prescribed form (Form C), attached as annexure A to this manual. The prescribed form is also available on the website of the SAHRC at [www.sahrc.org.za](http://www.sahrc.org.za).
- b) Address your request to the Information officer.
- c) Provide sufficient details to enable Matrix to identify:
  - The record(s) requested;
  - The requester (and if an agent is lodging the request, proof of capacity);
  - The form of access required;
  - (i) The postal address or fax number of the requester in the Republic;
  - (ii) If the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
  - The right which the requester is seeking to exercise or protect, with an explanation of the reason the record is required to exercise or protect the right.

## **2.7 PRESCRIBED FEES**

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees before a request will be processed.
- If the preparation of the record 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 requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.
- The fee structure is available on the website of the SAHRC at [www.sahrc.org.za](http://www.sahrc.org.za).

## **2.8 AVAILABILITY OF THE PAIA MANUAL**

Copies of this manual are available for inspections, free of charge, at the offices of Matrix. Copies are also available from the SAHRC and on the Matrix website [www.matrixfundmanagers.co.za](http://www.matrixfundmanagers.co.za).

## **2.9 FORM C AND FEES**

The prescribed Form C is annexed to this manual as Annexure A.

The fees pamphlet is available on request.

**ANNEXURE A  
FORM C**

REQUEST FOR ACCESS TO RECORDS 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 Head:

**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 <i>ONLY</i> if a request for information is made on behalf of another person.
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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.
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- 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
Form in which record is required:	
Mark the appropriate box with an X.	
<p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(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.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>	

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

<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
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**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*
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**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
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**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* (mobile storage device or compact disc)
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'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 of .....21

SIGNATURE OF REQUESTER / PERSON ON  
WHOSE BEHALF REQUEST IS MADE