

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS
TO INFORMATION ACT 20/2000 ("the ACT")**

for

GALLET GROUP EMPLOYEE BENEFITS (PTY) LTD	(Reg. no: 2010/019631/07)
GALLET FUND ADMINISTRATORS (PTY) LTD	(Reg. no: 1967/008174/07)
GALLET ASSET ADMIN (PTY) LTD	(Reg. no: 2009/014708/07)
GALLET PROPERTIES (PTY) LTD	(Reg. no: 2009/008042/07)
GALLET EB SUPPORT SERVICES (PTY) LTD	(Reg. no: 1980/006347/07)
GALLET FINANCIAL PLANNING (PTY) LTD	(Reg. no: 2003/016826/07)
GALLET RISK ADMIN (PTY) LTD	(Reg. no: 1999/013536/07)

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS
TO INFORMATION ACT 20/2000 ("the ACT")**

A. CONTACT DETAILS

1. Information Officer: Mr. C.S Beck
2. Postal Address:
PO Box 359, Saxonwold, 2132
3. Street Address:
50 Oxford Road, Parktown, Johannesburg, 2193
4. Contact number: (011) 544-0600
5. Contact Facsimile No: (011) 486-0741
6. Information Officer's e-mail address: steveb@gallet.co.za

B. SOUTH AFRICAN HUMAN RIGHTS COMMISSION GUIDE

Should you require greater clarity on or assistance with the Act, we refer you to the Guide that has been published by the Human Rights Commission in terms of section 10 of the Act. It includes:

- what the objects of the Act are
- the relevant contact details of each public and private body (where possible)
- the process that needs to be followed in order to request access to records
- assistance available from the "SAHRC" and information officers of public bodies
- how to get access to the manual of a private body
- all the remedies available in law to you
- details on prescribed fees payable in respect of requests for information

This Guide will be made available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.

Address: Private Bag 2700, Houghton, 2041
Telephone: (011) 484-8300
Facsimile: (011) 484-0582
Website: <http://www.sahrc.org.za>

C. TYPE OF RECORDS

(a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to the entity noted in this Manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

(b) Records available without requesting access in terms of the Act

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette.

The identified entity have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.gallet.co.za

(c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the Act:

Records are held on the following subjects:

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records.

(iii) Private body records

The following are considered to include but not be limited to records, which pertain to the private body's own affairs:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers. Alternatively, such other parties may possess records, which can be said to belong to the private body.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

D. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS – SECTION 51(e)

A person who wants access to the records of any of the identified entities must complete the attached prescribed request form.

The completed request form must be sent to the address or fax number provided in clause 1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on <http://www.sahrc.org.za>.

All the pertinent sections must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

NOTE: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- Information for the protection of the privacy of individuals;
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company including but not limited to trade secrets; and
- Research information.

PRESCRIBED FORMS

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:

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. |
| 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 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:
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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 to 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*	<input type="checkbox"/>	Inspection of record	<input type="checkbox"/>		
2.	If record consists of visual images					
	(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)					
	View of images	<input type="checkbox"/>	Copy of the images*	<input type="checkbox"/>		
				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)	<input type="checkbox"/>	Transcription of soundtrack* (written or printed document)	<input type="checkbox"/>		
4.	If record is held on computer or in an electronic or machine-readable form:					
	Printed copy of record*	<input type="checkbox"/>	Printed copy of information derived from the record*	<input type="checkbox"/>		
				Copy in computer readable form* (stiffy or compact disc)		
	<ul style="list-style-type: none"> If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? 			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO					
Postage is payable						

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 Thisday of20

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SIGNATURE OF REQUESTER/PERSON
ON WHO'S BEHALF REQUEST IS MADE