

ACCESS TO INFORMATION MANUAL

As required by Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PROATIA") and to address requirements of Protection of Personal Information Act 4 of 2013 ("POPI").

SAHL INVESTMENT HOLDINGS (PROPRIETARY) LIMITED
("the Holding Company")
And
SA HOME LOANS (PROPRIETARY) LIMITED
("the Company")

Including all Special Purpose Vehicles managed by the Company
SAHL Life Assurance Company Limited;
and SAHL Insurance Company Limited.



SA Home Loans

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1. INTRODUCTION

The Company is a specialist mortgage provider. The Company has a non bank approach to doing business, which is flexible, approachable and service orientated. The Company, together with the Holding Company and other entities in the group, offers a range of different product options such as rate protection, home owners cover and bond protection cover.

The object of PROATIA is to give you access to the records of the Company under certain circumstances. PROATIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and / or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

PROATIA seeks to promote a society in which you have access to information to enable you to exercise and protect your rights, and to promote a culture of transparency and accountability. Section 51 of PROATIA requires all private bodies to compile a manual containing various information including:

- the company details
- a description of the records of the company
- means by which a record may be accessed.

The company is a private body and therefore this manual has been compiled in terms of and in order to comply with Section 51 of PROATIA.

2. COMPANY DETAILS

In terms of Section 51 (1) (a) The Holding Company's details are as follows –

Registration Number	1998/004570/07
Postal Address	PO BOX 3918, Durban, 4000
Telephone Number	031-560 5300
Facsimile Number	0866794935.
General contact Email address for the company	Admin@sahomeloans.com
Email address for heads of the Company	JackeyS@sahomeloans.com
Website	www.sahomeloans.com

The Company's details are as follows -

Registration Number	2006/035436/07
Postal Address	PO BOX 3918, Durban, 4000
Telephone Number	031-560 5300
Facsimile Number	0866 763 961
General contact Email address for the company	Admin@sahomeloans.com
Email address for heads of the Company	JackeyS@sahomeloans.com
Website	www.sahomeloans.com

3. HUMAN RIGHTS COMMISSION'S 'PROATIA' GUIDE

In Terms of Section 10 of PROATIA, the South African Human Rights Commission ("SAHRC") is required to compile a guide, in each official language, containing information for any person who wishes to exercise any right contemplated in PROATIA. Please direct any queries to:

The South African Human Rights Commission:

PROATIA Unit

The Research and Documentation Department

Postal address: Private Bag 2700

Houghton

2041

Telephone: +27 11 484-8300

Fax: +27 11 484-0582

Website: www.sahrc.org.za

E-mail: paia@sahrc.org.za

4. RECORDS OF THE COMPANY

A description of the records held by the company, as required by section 51(1)(e) of PROATIA, is set out in the Description of Records Table which is attached to this manual as Annexure A.

5. REQUEST FOR ACCESS TO A RECORD

In order to comply with our obligations in terms of PROATIA the Company has authorised and designated to deal with all matters relating to PROATIA. In order to request access to a record please complete the Request for Access Form which is available at www.sahrc.org.za and submit it to the Company at its physical address, its fax number or general contact email address provided above.

Form of request:

- The requester must use the prescribed form to make the request for access to a record. This must be made to the head of the private body. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
- The requester must provide sufficient detail on the request form to enable the head of the private body 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 [s 53(2)(a) and (b) and (c)].
- 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 [s 53(2)(d)].
- 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 head of the private body [s 53(2)(f)].

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.

6. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Records of the Company's and other legal entities in which the Company has a direct controlling interest or an indirect controlling interest through its subsidiaries) may be kept by or on behalf of the Company in accordance with the following legislation (some of which legislation may not be applicable to the Company), as well as with other legislation that may apply to the Company and/or its subsidiaries from time to time.

In terms of Section 51 (1)(c) the Company may hold information in accordance with the following legislation:

1. Administration of Estates Act, No. 66 of 1965
2. Alienation of Land Act No. 68 of 1961
3. Arbitration Act No. 42 of 1965
4. Banks Act No. 94 of 1990
5. Basic Conditions of Employment No. 75 of 1997
6. Companies Act No. 61 of 1973
7. Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
8. National Credit Act No. 34 of 2005
9. Currency and Exchanges Act No. 9 of 1933
10. The Custody and Administration of Securities Act No. 85 of 1992
11. Debt Collectors Act No. 114 of 1998
12. Employment Equity Act No. 55 of 1998
13. Financial Services Board Act No. 97 of 1990
14. Financial Advisory and Intermediary Services Act 37 of 2002
15. Financial Relations Act No. 65 of 1976
16. Harmful Business Practices Act No. 23 of 1999
17. The Home Loan and Mortgage Disclosure Act No. 63 of 2000
18. Income Tax Act No. 95 of 1967
19. Insolvency Act No. 24 of 1936
20. Insurance Act No. 27 of 1943
21. Labour Relations Act No. 66 of 1995
22. Long Term Insurance Act No. 52 of 1998
23. Medical Schemes Act No. 131 of 1998
24. Occupational Health & Safety Act No. 85 of 1993
25. Pension Funds Act No. 24 of 1956
26. Post Office Act No. 44 of 1958
27. SA Reserve Bank Act No. 90 of 1989
28. Short Term Insurance Act No. 53 of 1998
29. Skills Development Levies Act No. 9 of 1999
30. Skills Development Act No. 97 of 1998
31. Stamp duties Act no. 77 of 1968
32. Stock Exchange Control Act No. 1 of 1985
33. Unemployment Contributions Act No. 4 of 2002
34. Unemployment Insurance Act No. 63 of 2001
35. Usury Act No. 73 of 1968
36. Value Added Tax Act No. 89 of 1991

7. OTHER INFORMATION AS MAY BE PRESCRIBED

The Minister of Justice and Constitutional Development has not made any regulations in terms of section 51(f) of the Act.

8. DECISION REGARDING REQUEST

PROATIA provides for numerous grounds upon which the company may refuse to grant you access to a record of the company. These grounds for refusal are to protect –

- the privacy of another person
- commercial information of another company
- confidential information of another person
- the safety of individuals and property
- records privileged from production in legal proceedings
- research information

You will be notified in writing whether your request has been approved or denied within 30 calendar days after receipt by the company of the completed Request for Access Form. Should any record of the company requested by you not be found or not exist, the company will, by way of affidavit, notify you that it is not possible to give access to that particular record.

9. REMEDIES AVAILABLE IF REQUEST FOR INFORMATION IS REFUSED

9.1 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.

9.2 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.

10. ACCESS TO RECORDS

If your request for access to records of the company is approved, access will be provided in the form as the company reasonable determines, unless you have requested access in a specific form.

11. FEES

Section 52(3) states that fees payable for access to records are to be prescribed. The prescribed fees are as set out in the Fee Schedule, which is available on the SAHRC website: www.sahrc.org.za

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:

The fee that the requester must pay to a private body is R50. The requester may lodge an application to the court against the tender or payment of the request fee [s 54(3)(b)].

If the request is granted then a further access fee must be paid for the search, reproduction, and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

PLEASE TAKE NOTE: Any person including a department of state and a person acting on behalf of another person **request access to a record**.

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose of Processing

The Company uses the Personal Information under its care in the following ways:

- Administration of financial services to clients
- Rendering services according to instructions given by clients
- Staff administration
- Keeping of accounts and records
- Complying with tax laws

12.2 Categories of Data Subjects and their Personal Information

The Company may possess records relating to suppliers, shareholders, contractors service providers, staff and clients:

Entity Type	Personal Information Processed
Clients: Natural Persons	Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence
Clients – Juristic Persons / Entities	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
Clients – Foreign Persons / Entities	Names; contact details; physical and postal addresses; date of birth; Passport number, Tax related information; nationality; gender; confidential correspondence
Intermediary / Advisor	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; 7behavior7d signatories, beneficiaries, ultimate beneficial owners
Contracted Service Providers	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; 7behavior7d signatories, beneficiaries, ultimate beneficial owners
Employees / Directors	Gender, Pregnancy; Marital Status; Colour, Age, Language, Education information; Financial Information; Employment History; ID number; Physical and Postal address; Contact details; Opinions, Criminal behavior; Well-being

12.3 Actual or Planned Transborder Flows of Personal Information

The Company has actual and planned Transborder Flow of Personal Information which may occur if we may need to transfer personal information to another country for storage purposes or for the purpose of rendering insurance services. Our rating agencies may transfer personal information cross-border for purposes relating to funding and funding transactions. We will ensure that anyone to whom we pass personal information is subject to a law, binding corporate rules or binding agreement which provides an "adequate level of protection and the third party agrees to treat your information with the same level of protection as we are obliged. Any transfer of personal information cross border shall be with clients consent however should it not be reasonably practicable to obtain your consent we shall transfer your information should it be for clients benefit and that client would be likely to give consent should it have been reasonably practicable to obtain such consent.

General Description of Information Security Measures

The Company employs up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control;
- Secure setup of hardware and software making up the IT infrastructure;
- Outsourced Service Providers who process Personal Information on behalf of the Company are contracted to implement security controls.

13 AVAILABILITY OF THE MANUAL

The manual is available for inspection, on reasonable prior notice, at the office of the company free of charge. Copies of the manual of the Company are also available from the SAHRC.

14 APPROVAL

SIGNED ON BEHALF OF THE COMPANY ON THIS 11TH DAY OF JANUARY 2018.

**ANNEXURE A
DESCRIPTION OF RECORDS TABLE**

In terms of Section 14 and Section 51(1) (d) the following are records pertaining to the Company’s own affairs and those of its divisions, subsidiary and associated companies. The personnel records stated refers to any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business the Company. This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers.

CATEGORIES OF RECORDS FOR EACH SUBJECT	FORM HELD	AVAILABILITY
1. COMPANY SECRETARIAL RECORDS		
Company Incorporation	Electronic and physical	Not automatically available
Names of Directors	Electronic and physical	Automatically available
Salaries of Directors	Electronic and physical	Not automatically available
2. FINANCIAL RECORDS OF SAHL		
Financial statements	Electronic and physical	Not automatically available
Documents relating to taxation of the company	Physical	Not automatically available
Financial Agreements	Physical	Not automatically available
Banking Details	Electronic and physical	Not automatically available
3. INSURANCE OF SAHL		
Insurance Policies held by the Company	Physical	Not automatically available
Register of all immovable property owned by the company	Physical	Not automatically available
4. EMPLOYEES		
List of Employees	Electronic and physical	Not automatically available
Personal information of employees	Electronic and physical	Not automatically available
Employee contracts of employment	Electronic and physical	Not automatically available
Salaries of Employees	Electronic and physical	Not automatically available
Leave records	Physical	Not automatically available
5. COMPANY POLICIES AND DIRECTIVES		
Internal relating to employees and the company	Electronic and physical	Not automatically available
External relating to clients and other third parties	Electronic and physical	Not automatically available
6. AGREEMENTS OR CONTRACTS		
Standard Agreements	Physical	Not automatically available
Contracts concluded with customers	Physical	Not automatically available
Third party contracts (such as Service Level Agreements etc.)	Physical	Not automatically available
Office management contracts	Physical	Not automatically available
Supplier contracts	Physical	Not automatically available

7. REGULATORY		
Licenses or Authorities	Physical	Not automatically available
8. CUSTOMER INFORMATION		
Customer Details	Electronic and physical	Not automatically available
Contact details of individuals within customers	Electronic and physical	Not automatically available
Communications with customers	Electronic and physical	Not automatically available
9. PUBLISHED INFORMATION		
External Newsletters and Circulars	Electronic and physical	Not automatically available
Internal Newsletters and Circulars	Electronic and physical	Not automatically available
Information on the company published by third parties	Electronic and/or physical	Not automatically available
12.SYSTEMS, SOLUTIONS, INFORMATION TECHNOLOGY		
Intellectual property pertaining to solutions and products developed.	Electronic	Not available
Usage of solutions and products	Electronic and physical	Not automatically available
13. REFERENCE MATERIALS		
Newsletters and journals articles	Electronic and physical	Not automatically available
Magazines	Physical	Not automatically available
Newspaper articles	Physical	Not automatically available
Books	Electronic and Physical	Not automatically available

Please be aware that the Company is very concerned about protecting the confidential information of its customers. Please motivate any request for customer information very carefully, having regard to Sections 63 to 67 of the Act.

ANNEXURE B

REQUEST FOR ACCESS FORM <i>In terms of Section 51 (1) (e) OF The Promotion of Access to Information Act)</i>			
NAME OF THE COMPANY TO WHOM THE REQUEST IS MADE			
[Insert full name of company]			
PARTICULARS OF PERSON REQUESTING ACCESS TO INFORMATION			

Surname		First names	
Identity number		E-mail address	
Telephone no.		Facsimile no.	
Postal address			

PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (IF APPLICABLE)			
Surname		First names	
Identity number		E-mail address	
Telephone no		Facsimile no.	
Postal address			

PARTICULARS OF RECORDS REQUESTED	
REFERENCE (if applicable):	

FORM OF ACCESS TO RECORD

NOTES:
) 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 shaded box with an X.)

1. If the record is in written or printed form:
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copy of record		inspection of record	
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2. If the record consists of visual images: (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):
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view the images		copy of the images		transcription of the images	
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3. If the record consists of recorded words or information which can be reproduced in sound:

listen to the soundtrack		transcription of soundtrack (written or printed)	
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4. If record is held on computer or in an electronic or machine-readable form:

printed copy of information		derived from the record		copy in computer readable form (stiffy or compact disc)	
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If you requested a copy or transcription of a record (above), do you wish the copy or transactions to be posted to you?	YES:	NO:
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 above state your disability and indicate in which form the record is required.		
Disability:		
Form in which record is required:		
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED		
EXPLANATION OF WHY RECORD IS REQUIRED FOR EXERCISE OR PROTECTION OF ABOVEMENTIONED RIGHT		
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.		
SIGNATURE		
Signed at:	Date:	
Signature of the Requester:		

ANNEXURE C

LIST OF ENTITIES

Information relating to the following entities may be accessed in terms of this Manual

Name of Entity	Registration Number
SAHL Investment Holdings (Proprietary) Limited	1998/004 570/07
SA Home Loans (Proprietary) Limited	2006/035 436/07
Alpha Housing Warehouse (RF) Proprietary Limited	2012/215 104/07
Alpha Housing Warehouse Security SPV (RF) Proprietary Limited	2013/029 953/07
Amber House Fund 1 (RF) Limited	2006/024 381/06
Amber House Fund 1 Security SPV (RF) Proprietary Limited	2006/024 201/07
Amber House Fund 2 (RF) Limited	2012/065 316/06
Amber House Fund 2 Security SPV (RF) Proprietary Limited	2012/065 313/07
Amber House Fund 3 (RF) Limited	2013/020 920/06
Amber House Fund 3 Security SPV (RF) Proprietary Limited	2013/020 863/07
Amber House Fund 4 (RF) Proprietary Limited	2013/148 286/07
Amber House Fund 4 Security SPV (RF) Proprietary Limited	2013/148 295/07
Amber House Fund 5 (RF) Limited	2017/052 607/06
Amber House Fund 5 Security SPV (RF) Proprietary Limited	2017/052 626/07
Milkwood Home Loans (RF) Limited	2014/082 840/06
Milkwood Home Loans Security SPV (RF) Proprietary Limited	2014/077 685/07
Blue Banner Securitisation Vehicle RC1 Proprietary Limited	2001/003 182/07
Calibre Mortgage Fund (RF) Proprietary Limited	2013/065 862/07
Calibre Mortgage Fund Security SPV (RF) Proprietary Limited	2013/077 170/07
Main Street 65 Proprietary Limited	2001/004 041/07
SAHL Insurance Company Limited	2006/008 359/06
SAHL Life Assurance Company Limited	2004/014 380/06
SAHL Office Park Proprietary Limited	2012/026 326/07
South African Housing Development Fund Proprietary Limited	2015/157 170/07
South African Mortgage Fund 1 (RF) Proprietary Limited	2015/160 456/07
South African Mortgage Fund 1 Security SPV (RF) Proprietary Limited	2015/160 428/07
South African Mortgage Fund (RF) Proprietary Limited	2015/157 196/07
South African Mortgage Fund Security SPV (RF) Proprietary Limited	2015/160 470/07
The Interest Rate Cap Company Proprietary Limited	2008/000 816/07
The RCS Home Loans Warehouse Proprietary Limited	2005/029 295/07
The South African Home Loans Hedge Company Proprietary Limited	2005/013 298/07
The Thekwini Fund 1 Proprietary Limited	2000/014 666/07
The Thekwini Fund 10 (RF) Limited	2012/030 394/06
The Thekwini Fund 10 Security SPV (RF) Proprietary Limited	2012/041 042/07
The Thekwini Fund 11 (RF) Limited	2013/020 930/06
The Thekwini Fund 11 Security SPV (RF) Proprietary Limited	2013/020 866/07
The Thekwini Fund 12 (RF) Limited	2014/106 401/06
The Thekwini Fund 12 Security SPV (RF) Proprietary Limited	2014/087 601/07

The Thekwini Fund 13 (RF) Limited	2014/064 933/06
The Thekwini Fund 13 Security SPV (RF) Proprietary Limited	2014/086 344/07
The Thekwini Fund 14 Proprietary Limited	2015/327 767/06
The Thekwini Fund 14 Security SPV (RF) Proprietary Limited	2015/327 312/07
The Thekwini Fund 3 Proprietary Limited	2003/004 691/07
The Thekwini Fund 8 (RF) Limited	2007/033 225/06
The Thekwini Fund 8 Security SPV (RF) Proprietary Limited	2007/033 428/07
The Thekwini Fund 9 (RF) Limited	2011/001 385/06
The Thekwini Fund 9 Security SPV (RF) Proprietary Limited	2011/001 358/07
The Thekwini Warehousing Conduit (RF) Limited	2005/007 604/06
The Thekwini Warehousing Conduit Security SPV (RF) Proprietary Limited	2005/006 599/07
The Thekwini Fund 15 (RF) Ltd	2017/052 656/06
The Thekwini Fund 15 Security SPV (RF) Proprietary Limited	2017/052 676/07

The following contact details relate to all entities:

Postal Address	P O Box 3918, Durban, 4000
Physical Address	2 Milkwood Crescent, Milkwood Park, La Lucia Ridge, Durban, 4051
Telephone Number	031-560 5300
Facsimile Number	0866794935
General contact Email address for the Company	admin@sahomeloans.com
E-mail address for heads of the Company	JackeyS@sahomeloans.com