

Access to Information Manual

Classification

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1 PURPOSE AND OVERVIEW

- 1.1 The Promotion of Access to Information Act, 2 of 2000 (PAIA) requires Standard Bank to compile and publish a manual that contains information on the records it holds.
- 1.2 PAIA gives effect to everyone's constitutional right to access information held by private bodies which is required for the exercise of the requester's rights.
- 1.3 Standard Bank, (we, us, the Bank) has implemented the Access to Information Manual (Manual) which is compiled to comply with both PAIA and the Protection of Personal Information Act 4 of 2013 (POPIA). The Manual provides an outline of the types of records held by the Bank as well as the procedure to access these records.
- 1.4 Publication of the Manual does not give rise to any rights to access information except in terms of PAIA.

2 APPLICABILITY

- 2.1 This Manual is applicable to Standard Bank of South Africa Limited and all its subsidiaries including special purpose vehicle companies as well as Standard Bank Group (SBG) subsidiaries incorporated in South Africa.
- 2.2 SBG's simplified legal structured entities highlights the major subsidiaries and businesses and can be viewed on its [website](#).

3 PURPOSE OF THE MANUAL

This Manual is useful for the public to-

- 3.1 check the categories of records held by the Bank which are available without a person having to submit a formal PAIA request
- 3.2 have a sufficient understanding of how to request access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject,

- 3.3 know the description of the records of the body which are available in accordance with any other legislation,
- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access,
- 3.5 know the description of the guide on how to use PAIA, as updated by the Information Regulator, South Africa (Regulator) and how to obtain access to it,
- 3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto,
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto,
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied,
- 3.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied, and
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4 AVAILABILITY OF THE MANUAL

- 4.1 A copy of the Manual is also available-
 - 4.1.1 on the Standard Bank [website](#)
 - 4.1.2 At the below offices for public inspection during normal business hours:
 - 4.1.2.1 5 Simmonds Street, Marshalltown
 - 4.1.2.2 30 Baker Street, Rosebank

- 4.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 4.1.4 to the Information Officer upon request
- 4.2 A fee for a copy of the Manual shall be payable.

5 OUR CONTACT DETAILS

Organisation name	Standard Bank of South Africa Limited
Website	www.standardbank.co.za
Registration number	1962/000738/06
Postal address	P.O. Box 1155, Johannesburg, 2000
Physical address	Standard Bank Centre, 5 Simmonds Street, Johannesburg, 2001
Phone number	+27 (11) 636 0453
Information officer	Kenny Fihla
Deputy information officer	Vivian Reddy
Information office email	infoofficer@standardbank.co.za
Privacy Statement	Click here for the latest copy of this statement.

6 CATEGORIES OF DATA SUBJECTS AND OF THE INFORMATION OR CATEGORIES OF INFORMATION COLLECTED AND PROCESSED

- 6.1 The Bank's data subjects are categorised as employees, customers and third parties and these include former, current and potential employees, customers and third parties as defined in the various authoritative instruments. Tabulated below is the personal information we may process. The list is not exhaustive

6.2

Categories	Personal information
Employee	Names, identity numbers address, qualifications, gender, health/medical, race, religion, children, spouse and family, beneficiaries, medical, criminal, financial, employment history, trade union membership, opinions and views, credit, curriculum vitae, biometric
Customer	name, surname, contact details, registration numbers/identity numbers, proof of income, proof of address, employment status and financial details, rewards membership information, employment information, biometric
Third parties	Names, identity numbers, registration number, vat numbers, address, Demographic, information of other parties, and financial information including bank details, biometric

7 RECIPIENTS WITH WHOM PERSONAL INFORMATION MAY BE SHARED

Information will be shared for various reasons, some of which are stipulated in our Privacy Statement as well as to persons duly appointed by yourself or another person, such as a court with jurisdiction. This will be done where legally permitted and when required. Personal information may be shared as follows:

- 7.1 Internally within Standard Bank,
- 7.2 With board members and committees established by the board,
- 7.3 With external organisations such as credit bureaus as well as relevant authorities, regulatory or industry bodies to meet due diligence and regulatory requirements, or
- 7.4 With third parties or counterparties in accordance with appropriate agreements entered with those parties.

8 CATEGORIES OF RECORDS HELD BY STANDARD BANK

8.1 Standard Bank holds the below records

Categories of records	Records
Company	Business Process Records Financial records Insurance records Tax records
Employee	Recruitment Employee records Policies and procedures
Customer	Customer details Customer complaints Products and services
Third parties	Contractor, client, or supplier agreements Preferential procurement policies, standards, and documents

9 CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

9.1 We make some records available without following the PAIA process. The below list is not exhaustive

Categories of records	Records
Company	Annual Financial Statements Products and services
Employee	Recruitment Policies and procedures
Customer	Bank Statements Customers

9.2 The following records are currently available on BizPortal

Certain records relating to the administration of all companies are available from BizPortal, via BizProfile, a search tool for all companies registered on the Companies and Intellectual Property Commission (CIPC). The below information for Standard Bank can be accessed from BizPortal

- 9.2.1 Company registration
- 9.2.2 Directors' names
- 9.2.3 Tax registration
- 9.2.4 B-BEE certificates
- 9.2.5 Compensation Fund (CF) registration
- 9.2.6 Unemployment Insurance Fund (UIF) Registration
- 9.2.7 Records relating to appointment of directors, auditor, secretary, public officer, or other officers

10 RECORDS WHICH ARE AVAILABLE IN COMPLIANCE WITH OTHER LEGISLATION

In compliance with other legislation, Standard Bank allows access to records as prescribed in the applicable legislation and different to the PAIA process. The below listed are some of the laws and is not exhaustive.

- 10.1 Financial Advisory and Intermediary Services Act
- 10.2 Securities Services Act 36 of 2004
- 10.3 Companies Act 71 of 2008
- 10.4 Banks Act 94 of 1990
- 10.5 Collective Investment Schemes Control Act 45 of 2002
- 10.6 Home Loan and Mortgage Disclosure Act 63 of 2002
- 10.7 Basic Conditions of Employment Act 75 of 1997
- 10.8 Cybercrimes Act 19 of 2020
- 10.9 Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002
- 10.10 Basic Conditions of Employment Act 75 of 1997
- 10.11 Employment Equity Act 55 of 1998
- 10.12 Labour Relations Act 66 of 1995
- 10.13 Occupational Health and Safety Act 85 of 1993

10.14	Promotion of Administrative Justice Act 3 OF 2000
10.15	Employment Equity Act 55 of 1998
10.16	Insurance Act 18 of 2017
10.17	Long-Term Insurance Act 52 of 1998
10.18	Short-Term Insurance Act 53 of 1998
10.19	Financial Sector Regulations Act 09 of 2017
10.20	Banks Act 94 of 1990
10.21	Basic Conditions of Employment Act 75 of 1997
10.22	Basic Conditions of Employment Act 75 of 1997
10.23	Collective Investment Schemes Control Act 45 of 2002
10.24	Companies Act 71 of 2008
10.25	Cybercrimes Act 19 of 2020
10.26	Employment Equity Act 55 of 1998
10.27	Employment Equity Act 55 of 1998
10.28	Financial Advisory and Intermediary Services Act
10.29	Financial Sector Regulations Act 09 of 2017
10.30	Home Loan and Mortgage Disclosure Act 63 of 2002
10.31	Insurance Act 18 of 2017
10.32	Labour Relations Act 66 of 1995
10.33	Long-Term Insurance Act 52 of 1998
10.34	Occupational Health and Safety Act 85 of 1993
10.35	Promotion of Administrative Justice Act 3 OF 2000
10.36	Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002
10.37	Securities Services Act 36 of 2004
10.38	Short-Term Insurance Act 53 of 1998

11 PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

- 11.1 Due to the integrated nature of the Standard Bank Group's business and to provide you with efficient access to our products and services, we may process your personal information in South Africa or in countries where we have a presence and where our products or services are provided or where our third-party service providers operate.

- 11.2 We will only process and transfer personal information to countries that we are satisfied will provide adequate data protection, and we ensure our third-party service providers comply with the minimum data protection standards of the Standard Bank Group.

12 INFORMATION SECURITY MEASURES

- 12.1 The Bank has implemented information security measures to ensure the protection of all information in its possession in line with its [Privacy Statement](#).
- 12.2 The security of your personal information is important to us, and we take reasonable steps to keep your personal information safe and to prevent loss, destruction of and damage or unlawful access to your personal information by unauthorised parties. We require the same level of security to be implemented by our service providers and other third parties.
- 12.3 However, please do not share or send us any personal information through unauthorised channels, as these are not secured and carry the risk of interception and unauthorised access.

13 REQUEST FOR ACCESS TO INFORMATION

- 13.1 Please submit the completed form (together with the relevant request fee which we explain below) to our information office's email address or our physical address, using the details we provide.

- 13.2 We will evaluate and consider all requests we receive in a proper manner, timeously.

13.3 THE PROCESS

- 13.3.1 To request access to a record, please complete the Request for Access Form. Please ensure that the completed form

- 13.3.1.1 has enough information for the information officer to identify you, the requested records, and how you want to receive it,

- 13.3.1.2 specifies your address, (email or postal address),

- 13.3.1.3 describes the right that you seek to exercise or protect,

- 13.3.1.4 explains why you need the requested record to exercise or protect that right,
- 13.3.1.5 provides any other manner you would like to be informed of our decision in addition to written form, and
- 13.3.1.6 provides, to the satisfaction of Standard Bank or as required by law, proof of the capacity in which you are making the request if you are making it on behalf of someone else.

13.3.2 We may refuse your request:

- 13.3.2.1 if you do not use the correct form
- 13.3.2.2 if you do not comply with the process set out in this manual
- 13.3.2.3 if you do not provide sufficient information on the form, or
- 13.3.2.4 if you delay in providing any additional information, we require from you.

13.4 **THE COST**

13.4.1 Request fees

- 13.4.1.1 The requester must complete the prescribed form and deposit the request fee of R140.00.
- 13.4.1.2 The account details are available upon request.
- 13.4.1.3 Please attach proof of payment to the request form.

13.4.2 Access fees

- 13.4.2.1 Should access to the records be granted, an access fee may be payable for
 - the time it takes us to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure,
 - the costs of making the record, or transcribing the record,
 - a postal fee (if applicable), and

- the reasonable time we need to search for the record and prepare the record for you.

13.4.2.2 Prescribed fees for access

Item Description	Amount
The request fee payable by every requester	R140.00
Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
Printed copy of A4-size page	R2.00 per page or part thereof.
For a copy in a computer-readable form on:	
• Flash drive (to be provided by requester)	R40.00
• Compact disc	
- If provided by requester	R40.00
- If provided to the requester	R60.00
Transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
Transcription of an audio record, per A4-size page	R24.00
Copy of an audio record on:	R40.00
• Flash drive (to be provided by requester)	
• Compact disc	
- If provided by requester	R40.00
- If provided to the requester	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
To not exceed a total cost of	R435.00
Deposit: If search exceeds 6 hours	One third of amount per request
Postage, e-mail or any other electronic transfer	Actual expense, (if any)

13.4.2.3 You may be requested to pay a deposit for the access fee depending on the time and effort to retrieve records as well as manner of access.

13.4.2.4 Access will not be granted without payment of the access fee.

14 GROUNDS FOR US TO REFUSE ACCESS TO AN INFORMATION RECORD

- 14.1 We may refuse you access to certain information in terms of PAIA to protect:
- 14.2 someone else's privacy,
- 14.3 another organisation's commercial information,
- 14.4 someone else's confidential information,
- 14.5 research information,
- 14.6 the safety of individuals and property, or
- 14.7 records privileged from production in legal proceedings.

Some of these grounds are explained in further detail below.

15 OUR DECISION TO GIVE YOU ACCESS

We will notify you in writing if your request has been approved or denied, within 30 calendar days, after assessing your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give you access to that record and the reasons for such refusal.

16 FURTHER GUIDANCE FROM THE INFORMATION REGULATOR SOUTH AFRICA

- 16.1 The Information Regulator South Africa (Regulator) has made available the *Guide on how to use the Promotion of Access to Information Act 2 of 2000* (Guide) on their website. This Guide will moreover assist a data subject to access their personal information in terms of section 23 of POPIA.
- 16.2 The Guide is available in each of the official languages on request, using the Request for PAIA Guide Form which can be
 - 16.2.1 emailed to infoofficer@standardbank.co.za
 - 16.2.2 submitted to any of the Standard Bank offices listed in paragraph 4.1.2
- 16.3 A copy of the Guide is also available in all the official languages, at
 - 16.3.1 from the website of the Regulator (<https://infoeregulator.org.za>) or

- 16.3.2 from the Standard Bank [website](#)
- 16.4 The Guide contains the description of
 - 16.4.1 the objects of PAIA and POPIA,
 - 16.4.2 the postal and street address, phone, and fax number and, if available, electronic mail address of-
 - 16.4.2.1 the Information Officer of every **public body**, and
 - 16.4.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA
 - 16.4.3 the manner and form of a request for access to a record
 - 16.4.4 the assistance available from the Information Officer
 - 16.4.5 the assistance available from the Regulator
 - 16.4.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 16.4.6.1 an internal appeal
 - 16.4.6.2 a complaint to the Regulator and
 - 16.4.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body
 - 16.4.7 the provisions of section 51 requiring the compilation of a manual, and how to obtain access to a manual
 - 16.4.8 the provisions of section 52 providing for the voluntary disclosure of categories of records
 - 16.4.9 the notices regarding fees to be paid in relation to requests for access
 - 16.4.10 the regulations made in terms of section 92

16.5 Members of the public can inspect or make copies of the Guide from the offices listed in paragraph 4.1.2, including the office of the Regulator, during normal working hours.

16.6 The Regulator can be contacted as per below

Information Regulator website	https://inforegulator.org.za/
Postal address	P.O Box 3153, Braamfontein, Johannesburg, 2017
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Phone number	010 023 5200
Ask a general enquiry by email	enquiries@inforegulator.org.za
Lodge a complaint by email: All complaints relating to access to information	PAIAComplaints@inforegulator.org.za
Lodge a complaint by email: All complaints relating to your personal information.	POPIAComplaints@inforegulator.org.za

17 REMEDIES AVAILABLE

17.1 Internal Complaints Remedies available

Standard Bank complaints process	Complaints process
Complaints Resolution Centre	Tel: 0860 101 101 Email: complaint.resolutioncentre@standardbank.co.za
Fraud line	South Africa: 0800 222 050 International: +27 10 249 0100
Phishing Reports	phishing@standardbank.co.za
Insurance related Complaints	South Africa 0860 123 999 Email: assurancedivisionadmin@standardbank.co.za

17.2 External Complaints Remedies

If the requester or third party is aggrieved by the decision of the Information Officer, he or she may

17.2.1 lodge a written complaint with the Regulator

17.2.1.1 by email at PAIAComplaints@inforegulator.org.za or

17.2.1.2 to address P.O Box 3153, Braamfontein, Johannesburg, 2017

17.2.2 by way of an application and within 180 days, apply to a court for appropriate relief in terms of section 82 of PAIA.