

BlackRock®

PAIA MANUAL

LAST UPDATED: 16/12/2022

1. Introduction

- 1.1 As part of its operations and services, BlackRock Investment Management (UK) Limited – Cape Town Branch (later as “BlackRock South Africa”) holds certain records (information and documents), including Personal Information (PI). The Promotion of Access to Information Act No 2 of 2000 (“PAIA”) and the Protection of Personal Information Act No 4 of 2013 (“POPI”) provide for certain records to be accessed where certain circumstances are met and in accordance with certain procedures and at prescribed fees, giving effect to the right of access to information in terms of the Constitution of the Republic of South Africa.
- 1.2 This PAIA and POPI Manual (“the Manual”) (which includes all annexures and amendments thereto as made available by BlackRock South Africa from time to time) has been prepared in accordance with section 51 of PAIA as read with POPI. It provides an overview of the records (information and documents) held by BlackRock South Africa and details of how such records may be accessed, including in relation to giving effect to the rights granted under POPI terms of which a data subject may access its PI, object to processing and request the correction of any of its PI held by BlackRock South Africa.
- 1.3 BlackRock South Africa may amend this manual from time to time. It is available and accessible at <https://www.blackrock.com/za> or on request to BlackRock South Africa’ designated Information Officer (being the person appointed by BlackRock South Africa to act in this capacity).
- 1.4 BlackRock South Africa has appointed an Information Officer in accordance with POPI. In addition to its obligations prescribed under POPI, the designated Information Officer is also responsible for assessing any requests to BlackRock South Africa for access to information in terms of PAIA as well as to oversee any other obligations which BlackRock South Africa may have under PAIA.

2. BlackRock South Africa Details

Name	BlackRock Investment Management (UK) Limited – Cape Town Branch
Postal and Physical Address	BlackRock Dock Road Junction Corner of Dock and Stanley Road Cape Town 8001 - CT2
Information Officer	Khoabane Phoofolo Telephone: +27 21 403 6441 E-mail: groupblackrocksouthafricacompliance@blackrock.com

3. Guide on How to Use PAIA

The South African Information Regulator (“InfoReg”) has issued a guide on how to use the Act (as prescribed by section 10 of PAIA) and is available on the InfoReg website (<https://info regulator.org.za/>).

See contact details below:

Name	The Information Regulator (South Africa)
Postal and Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001. P.O Box 31533, Braamfontein, Johannesburg, 2017
PAIA Complaints	E-mail: PAIACompliance@info regulator.org.za
POPI Complaints	E-mail: POPIACompliance@info regulator.org.za

4. Records Available by BlackRock South Africa

4.1. Records which are freely available

4.1.1. The following records are available on the BlackRock South Africa website:

Type of Record	URL
Fund registrations and listings	https://www.blackrock.com/za/individual/products/product-list
Terms & Conditions	https://www.blackrock.com/za/individual/compliance/terms-and-conditions
Privacy statements	https://www.blackrock.com/corporate/compliance/privacy-policy
Cookie statement	https://www.blackrock.com/corporate/compliance/privacy-policy#cookie-notice

4.1.2. The following records are freely available upon request:

- Conflicts of interest statements
- Financial Advisory and Intermediary Services statement
- Complaints handling statements

4.2. Records held by BlackRock South Africa in terms of other legislation

4.2.1. BlackRock South Africa retains a number of records in accordance with legislation which applies to it, including but not limited to:

- Companies Act 71 of 2008
- Financial Advisory and Intermediary Services Act of 2002 (FAIS)
- Companies Act of 2008
- Companies Regulations of 2011
- Companies and Intellectual Property Commission Republic of South Africa
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No.4 of 2013

4.3. Records held by BlackRock South Africa (section 51(1)(e) of PAIA)

The records held by BlackRock South Africa include but are not necessarily limited to:

4.3.1. Constitutional Documents

a) Certificate of Incorporation

b) Financial Services Board License

4.3.2. Strategic Documents, Plans, Proposals

a) Strategic Business Plan

b) Annual Performance Report

4.3.3. Finance, Tax, Banking

a) Management accounts

b) Financial statements

c) Tax returns

d) Auditors' reports

e) Bank records and statements

4.3.4. Regulatory Approvals, Licenses

a) Key Individual approvals and registrations

4.3.5. Business Activity

a) Marketing materials

b) Presentations

c) Client communications / correspondence

d) Client agreements

e) Internal communications, announcements and meeting notes

5. Process for Requests for Information

5.1. Any requests for access to records of BlackRock South Africa are subject to PAIA and, in respect of PI, POPI.

5.2. In terms of PAIA, a request for access is to be made on the prescribed form accessible at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf> with a copy being set out in Annexure A to this Manual. The request is to be made to the Information Officer addressed to the contact details set out above.

5.3 The requester must provide sufficient detail on the form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the requester and state the necessary particulars to be so informed.

5.4. The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

5.5. In circumstances where the request for access is being made on behalf of another person, the requestor is obliged to prove the capacity in which the request is being made, with any submissions in support thereof being subject to the satisfaction of BlackRock South Africa.

5.6. The Information Officer will decide on whether or not to grant the request as soon as is reasonably possible (but in any event within thirty days of the request having been submitted) and notify the requester accordingly.

5.7. The Information Officer may decide to extend the period of thirty days for another period of not more than thirty days if:

- the request is for a large number of records;
- the search for the records is to be conducted at premises not situated in the same town or city as the head office of BlackRock South Africa;
- consultation among divisions or departments; as the case may be, of BlackRock South Africa is required;
- the requester consents to such an extension in writing; or
- the parties agree in any other manner to such an extension.

Should BlackRock South Africa require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.

5.8. If the Information Officer fails to respond (or extend the period within which the respond) within thirty days after a request has been received, it will, in terms of PAIA, be deemed to have refused the request.

5.9 Where access is granted:

5.9.1 the Information Officer will advise the requester of:

- the access fee to be paid for the information prior to BlackRock South Africa being able to process the request and grant the access;
- the format in which access will be given;
- the fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or the format in which access is to be granted; and

5.9.2 access to the record requested will be given as soon as reasonably possible.

5.10 The following access and reproduction fees apply:

5.10.1. request fee payable by a requester, other than a personal requester (being a requester who seeks access to a record containing PI about that requester) is R50,00.

5.10.2. The Information Officer can request a deposit from the requester, but only if they believe that the information or records requested will take more than six (6) hours to search, but the deposit amount cannot be more than one-third of the prescribed fee.

5.10.3. Access and Reproduction fees respectively:

For every photocopy of an A4 size page or part thereof	R1,10
For every printed copy of an A4 size page or part thereof	R0,75
For a copy of a compact disc	R70,00
For a transcript of visual images for an A4 size page or part thereof	R40,00
For a copy of visual images	R60,00
For a transcript of an audio record, for an A4 size page or part thereof	R20,00
For a copy of an audio record	R30,00

5.11 If the request for access is refused, the Information Officer shall advise the requester in writing of the refusal, including adequate reasons for the refusal and that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request

6. Refusal of Access

6.1 BlackRock South Africa may refuse to grant access on certain grounds, including the following

- that the record constitutes privileged information for the purposes of legal proceedings or is subject to professional privilege;
- to protect the commercial information or the confidential information of a third party or BlackRock South Africa;
- that it is necessary to protect the safety of individuals or property;
- that it is necessary to protect the research information of a third party or BlackRock South Africa; or
- that granting access would result in the unreasonable disclosure of personal information about a third party.

7. Protection of Personal Information

The BlackRock Client and Vendor Privacy Notice, Recruitment Privacy Notice and Cookie Notice can be found at: <https://www.blackrock.com/corporate/compliance/privacy-policy>

8. Updating of the Manual

The Information Officer, Khoabane Phoofolo, will update this manual at least annually.

9. Annexures

Annexure A – Request for Access to Record:

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

 (Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (<i>when made on behalf of another person</i>)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (<i>if applicable</i>):			
Identity Number			

Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	

Reference number, if available	
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Any further particulars of record	

TYPE OF RECORD
(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned	

right:	
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FEEES	
a) <i>A request fee must be paid before the request will be considered.</i> b) <i>You will be notified of the amount of the access fee to be paid.</i> c) <i>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.</i> d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Annexure B - Internal Appeal Form Template:

INTERNAL APPEAL FORM

FORM 4

[Regulation 9]

Reference Number:

PARTICULARS OF PUBLIC BODY				
Name of Public Body				
Name and Surname of Information Officer:				
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
Is the internal appeal lodged on behalf of another person?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: <i>(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)</i>				
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED <i>(If lodged by a third party)</i>				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				

DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED

(mark the appropriate box with an "X")

Refusal of request for access	
Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	

GROUNDS FOR APPEAL

(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)

State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Appellant/Third party

FOR OFFICIAL USE
OFFICIAL RECORD OF INTERNAL APPEAL

Appeal received by: <i>(state rank, name and surname of Information Officer)</i>			
Date received:			
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:	Yes	<input type="checkbox"/>	
	No	<input type="checkbox"/>	
OUTCOME OF APPEAL			
Refusal of request for access. Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Fees (Sec 22). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Extension (Sec 26(1)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Access (Sec 29(3)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Request for access granted. Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	

Signed at _____ this _____ day of _____ 20 _____

Relevant Authority