Access to Information Manual (POPIA & PAIA)

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Version 1.5

A2X MARKETS

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1. Introduction

The Promotion of Access to Information Act, 2 of 2000 ("PAIA" or "the Act") was enacted on 3 February 2000 coming into effect 9 March 2001 and the Protection of Personal Information Act, 4 of 2013 (POPIA) was enacted in November 2013 and came into effect 1 July 2020. The Information Regulator is now responsible for regulating both the flow and protection of information in terms of PAIA and POPIA respectively. The purpose of PAIA being to exercise the rights contained in Section 32(2) of the Constitution, which provides that any person has a right to gain access to any information held by a private or public body and POPIA to protect the constitutional right to privacy. If a record is requested from a private body, the requester must prove that the record is required for the exercise or protection of a right. The Information Regulator is mandated with overseeing compliance with both PAIA and POPIA.

2. Purpose

Despite being classified as a small business, with an exemption from complying with the PAIA Manual requirement, A2X is committed to protecting the right to privacy while advocating transparency in all its business activities. The purpose of this policy is to set out the records and information held by A2X and the procedure to acquire such records and information from A2X. The latest version of this policy must always be consulted and can be found on www.a2x.co.za.

3. Contact Details

A2X Markets (Pty) Ltd, is a licenced stock exchange in terms of the Financial Markets Act.

Physical Address:

1st floor, 155 West Street, Sandton, Johannesburg, 2031.

Postal Address:

PO Box 781763, Sandton, 2196

Contact Number: (011) 088-5006

Email Address: info@a2x.co.za

Website Address: www.a2x.co.za

Information Officer: Kevin Brady – CEO, Kevin.Brady@a2x.co.za

Designated Information Officer: Palesa Manana, palesa.manana@a2x.co.za

4. A Guide on How to Use PAIA

The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the Act 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 the South African Human Rights Commission (SAHRC), which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:
Postal Address: Private Bag 2700, Houghton, 2041
Telephone Number: 011 877 3600
Fax Number: 011 403 0625
Website Address: www.sahrc.org.za
Email Address: PAIA@sahrc.org.za

5. Applicable Legislation

A2X is primarily regulated by the Financial Markets Act, 19 of 2012. As a business and an exchange, there is a host of legislation and related regulations that A2X is required to comply with i.e.:

- Basic Conditions of Employment Act, 75 of 1997;
- Companies Act, 71 of 2008;
- Electronic Communications and Transactions Act, 25 of 2002;
- Employment Equity Act, 55 of 1998;
- Financial Markets Act, 19 of 2012;
- Income Tax Act, 58 of 1962;
- Labour Relations Act, 66 of 1995;
- Occupational Health and Safety Act, 85 of 1993;

- Promotion of Access to Information Act, 2 of 2000;
- Unemployment Insurance Act, 63 of 2001;
- Value Added Tax Act, 89 of 1991.

6. Schedule of Information Held by A2X

The table below highlights the types, nature and availability of information collected and held by A2X.

Type of Information	Nature of Information	Freely Available	On Request
Issuers	Application Forms		x
	Approval Letters		x
	Company Announcements	x	
Members	Application Forms		x
	Financial Information		x
	Policies and Procedures		x
	Directors Details		x
	Employee Details		x
	Technology & Systems		x
Settlement Agents	Application Forms		x
	Approval Letters		x
Post Trade	SWIFT Data		x
	MeCRAS Data including Broker Client Data		x
	Capital Adequacy Calculations		x
	Daily Trades and Allocations		x
	Broker Transactional Data		x
	Capital Exposure Requirements		x
	Clearing and Settlement transactions		x
	RisCura Data		x
Legal and Regulation	A2X Rules	x	
	A2X Directives	x	
	A2X Listings Requirements	x	
	Contracts / Agreements		x

	Legal Opinions		x
	Licence Applications		x
	Regulatory Reports		x
	A2X Internal Policies	x	
	Board and Sub Committee Meeting Records		x
	Board and Shareholder Resolutions Register		x
	Compliance and Risk Management Reports		x
	A2X Insurance Policies		x
	Complaints Register		x
	Conflicts of Interest Register		x
	Fit and Proper Register		x
	Staff Trading Approvals		x
Human Resources	Employee Personal Details		x
	Recruitment Files		x
Proprietary	Audit and Financial		x
	Shareholding Register and Share Certificates		x
	Invoices		x
	Income Tax Returns and Certificates		x
	CIPC		x
Marketing	Newsletters	x	
	Market Statistics	x	
	Press Releases	x	
	Corporate Identity and Brand (CI guides)		x
	Logo's, Templates and Branding		x
	Social Media Accounts		x
	Advertising and Campaigns		x
	A2X Brochures	x	
Information Technology	Public Market Data Prices	x	
	Private Trade Data		x
	News Data (A2X News service)	x	
	A2X Website	x	
	Clearing Data		x

	Surveillance Data		x
	Internal Staff Data (e.g. emails)		x
	Vendor Details		x

7. Information Request Procedure

A request for access to information held by A2X must be submitted in writing, using the Information Access Request Form in Annexure A addressed to the Deputy Information Officer and must include sufficient details to enable A2X to identify:

- The record being requested;
- The name and contact details of the requester (and if on behalf of another, proof of capacity and authority to act on behalf thereof);
- The form of access required;
- 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;

Upon receipt of the completed Information Access Request form and proof of payment of the prescribed fees, A2X will consider the request and provide a response within 21 working days. Should the request be denied, reasons will be provided and the requester will have the right to challenge the decision of A2X through the appropriate Magistrates Court.

8. Information Request Fees

All fees applicable are as prescribed and amended. Please refer to the SAHRC website https://www.sahrc.org.za/ for the latest fees.

The current fees are:

- The “request fee” payable by a requester, other than a personal requester, is R50.
- The “fees for reproduction” referred to in section 52(3) and “access fees” payable by a requester referred to in section 54(7), unless exempted under section 54(8) of the Act, are as follows:
  - for every photocopy of an A4-size page or part thereof R1 - R10;

- for every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form R0 - R75;
- for a copy in a computer-readable form on:
  (i) stiffy disc;
  (ii) compact disc R70;
- (i) for a transcription of visual images, for an A4-size page or part thereof R40;
  (ii) for a copy of visual images R60;
- (i) for transcription of an audio record, for an A4-size page or part thereof R20;
  (ii) for a copy of an audio record R30
- To search for the record for disclosure, R30 for each hour or part of an hour reasonably required for such search
- The actual postal fee is payable when a copy of a record must be posted to a requester

9. Exemption from Paying Access Fees

The following are the persons exempted from paying access fees:

i. A single person whose annual income does not exceed R14,712.00; or
ii. Married persons or a person and his/her life partner whose annual income does not exceed R27,192.00

10. Annexure A

Information Access Request Form

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 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 *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* 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
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 for 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*		inspection of record		
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*
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		
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* (stiffy or compact disc)
'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 ……20…….

_____

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE