



# ACCESS-TO-INFORMATION MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 (as amended).

Date of review: 1 July 2025  
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see money differently

**NEDBANK**

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## 1 Abbreviations

Abbreviation	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act, 2 of 2002 (as amended)
POPIA	Protection of Personal Information Act, 4 of 2013

## 2 Purpose of the PAIA manual

- 2.1 PAIA requires all public and private bodies in South Africa to have a manual to explain to the public how they can get access to records that a body holds.
- 2.2 This manual will help you do the following:
- 2.2.1 View the categories of available records that a body holds without having to submit a formal PAIA request.
  - 2.2.2 Request access to the records that a body holds.
  - 2.2.3 Obtain the contact details of the IO and the DIO, who will help you gain access to the records that you want.
- 2.3 The manual will also give you information about the following:
- 2.3.1 The description of the available records that Nedbank holds, in line with other legislation.
  - 2.3.2 The description of the data subject categories and the related information or categories of information.
  - 2.3.3 Whether and why a body will process personal information, including sending or processing personal information outside of South Africa.
  - 2.3.4 The categories of data subjects and the information or categories of information relating to the personal information.
  - 2.3.5 The recipients or categories of recipients to whom the personal information may be given.
  - 2.3.6 Whether a body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information that will be processed.
  - 2.3.7 The PAIA guide and how to access it.

## 3 Nedbank contact details

### 3.1 Information Officer:

#### **Nomonde Hlongwa**

Physical address: Nedbank 135 Rivonia Campus  
135 Rivonia Road  
Sandown  
Sandton  
2196  
Postal address: PO Box 653640  
Benmore Gardens  
2196  
Email: [paia@nedbank.co.za](mailto:paia@nedbank.co.za)  
Website: [nedbank.co.za](http://nedbank.co.za)

### 3.2 Deputy Information Officer:

#### **Neelesh Mooljee**

Physical address: Nedbank 135 Rivonia Campus  
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Email: [paia@nedbank.co.za](mailto:paia@nedbank.co.za)  
Website: [nedbank.co.za](http://nedbank.co.za)

**3.3 General contact for access to information:**  
Email: [paia@nedbank.co.za](mailto:paia@nedbank.co.za)

**3.4 National or head office:**  
Postal address: PO Box 1144, Johannesburg, 2000  
Physical address: Nedbank 135 Rivonia Campus, 135 Rivonia Road, Sandown, Sandton  
Telephone: +27 800 555 111  
Website: [nedbank.co.za](http://nedbank.co.za)

## **4 How to use PAIA and access the PAIA guide**

- 4.1 In terms of section 10(1) of PAIA, the Information Regulator has updated and made available a revised guide on how to use PAIA to anyone who wants to exercise a right as set out in PAIA and POPIA.
- 4.2 The guide is easy to understand and available in all the official South African languages, including braille.
- 4.3 The guide includes the following:
  - 4.3.1 Descriptions of the aims of PAIA and POPIA.
  - 4.3.2 The postal and street addresses, contact numbers and, if available, email addresses of –
    - 4.3.2.1 the IO of every public body; and
    - 4.3.2.2 the DIO of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>.
  - 4.3.3 Request forms with instructions on how to request access to records of –
    - 4.3.3.1 a public body as set out in section 11<sup>3</sup> of PAIA; and
    - 4.3.3.2 a private body as set out in section 50<sup>4</sup> of PAIA.
  - 4.3.4 A description of the help available from the IO of a public body in terms of PAIA and POPIA.
  - 4.3.5 A description of the help available from the Information Regulator in terms of PAIA and POPIA.
  - 4.3.6 A description of remedies in law available regarding an act or failure to act in respect of a right or duty that PAIA and POPIA confers or imposes, including how to lodge –
    - 4.3.6.1 an internal appeal;
    - 4.3.6.2 a complaint with the Information Regulator; and
    - 4.3.6.3 a court application against a decision of the IO of a public body, a decision about an internal appeal or a decision of the Information Regulator or the head of a private body.
  - 4.3.7 The provisions of sections 14<sup>5</sup> and 51<sup>6</sup> of PAIA, which require a public or private body to compile a manual and to describe how to access the PAIA guide.

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<sup>1</sup> Section 17(1) of PAIA. For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate the number of persons as DIOs that are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA. Each public and private body must make provision, in the manner prescribed in section 17 of PAIA, with the necessary changes, for the designation of the number of persons, if any, as DIOs that are necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA. A requester must be given access to a record of a public body if:

- a) the record is required to exercise or protect rights;
- b) the person complies with all the procedural requirements of PAIA relating to a request for access to the record; and
- c) the record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA. A requester must be given access to any record of a private body if:

- a) the record is required to exercise or protect rights;
- b) the person complies with the procedural requirements in PAIA relating to a request for access to the record; and
- c) the record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA. The IO of a public body must, in at least three official languages, make available a manual with the information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA. The head of a private body must make available a manual with the description of the information listed in paragraph 4 above.

- 4.3.8 The provisions of sections 15<sup>7</sup> and 52<sup>8</sup> of PAIA providing for the voluntary disclosure of categories of records by a public or private body.
- 4.3.9 The notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> of PAIA about the fees that must be paid for access requests.
- 4.3.10 The regulations made in terms of section 92<sup>11</sup> of PAIA.
- 4.4 You can inspect or make copies of the guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.
- 4.5 You can also get the guide:
- 4.5.1 on request from the IO; or
- 4.5.2 from the Information Regulator's website at [inforegulator.org.za](http://inforegulator.org.za).
- 4.6 A copy of the guide is also available in English and Afrikaans for public inspection during normal office hours.
- 4.7 This PAIA manual and associated forms may also be used to request information for Nedgroup Mogale ESD (Pty) Ltd.

## 5 General information about disclosure following a request for access to records

- 5.1 We must or may refuse the following requests for records:
- 5.1.1 Records for the purpose of criminal or civil proceedings (subject to section 7 of PAIA).
- 5.1.2 Rights of access to records of private bodies (section 50), particularly where the rights being exercised do not correlate to the records being requested.
- 5.1.3 Records that will affect the mandatory protection of privacy of a third party who is natural person, including a deceased natural person (subject to section 63 of PAIA).
- 5.1.4 Records that will affect the mandatory protection of commercial information of a third party (subject to section 64 of PAIA).
- 5.1.5 Records that are protected in terms of a duty of confidence owed to a third party (particularly banker-client confidentiality) in terms of an agreement (subject to section 65 of PAIA).
- 5.1.6 Records that would threaten the protection of the safety of individuals and property (subject to section 66 of PAIA).
- 5.1.7 Records that are protected and privileged against production in legal proceedings (subject to section 67 of PAIA).
- 5.1.8 Records that are commercial information of a private body, including trade secrets and financial, commercial, scientific or technical information of the private body that would be likely to cause harm to the commercial or financial interests of the body if the information were disclosed (subject to section 68 of PAIA).
- 5.2 Subject to section 70 of PAIA, we must disclose records if disclosure is in the public interest. In other words, if disclosure of the records would reveal evidence of –
- 5.2.1 a substantial contravention of or failure to comply with the law; or
- 5.2.2 an imminent and serious public safety or environmental risk; and if
- 5.2.3 the public interest of disclosing the records outweighs the harm that may reasonably be expected to be caused by the disclosure.

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<sup>7</sup> Section 15(1) of PAIA. The IO of a public body must make available, in the prescribed manner, a description of the categories of records of the public body that are available without having to request access.

<sup>8</sup> Section 52(1) of PAIA. The head of a private body may, voluntarily, make available in the prescribed manner a description of the categories of records of the private body that are available without a person having to request access.

<sup>9</sup> Section 22(1) of PAIA. The IO of a public body to whom a request for access is made must, by notice, ask the requester to pay the prescribed fee (if any) before processing the request.

<sup>10</sup> Section 54(1) of PAIA. The head of a private body to whom a request for access is made must, by notice, ask the requester to pay the prescribed fee (if any) before processing the request.

<sup>11</sup> Section 92(1) of PAIA. The Minister of Justice and Correctional Services may, by notice in the Gazette, make regulations regarding the following:

- (a) Matters that are required or permitted by PAIA.
- (b) Matters relating to the fees as set out in sections 22 and 54.
- (c) Notices required by PAIA.
- (d) Uniform criteria to be applied by the IO of a public body when deciding which categories of records must be made available in terms of section 15.
- (e) Administrative or procedural matters necessary to give effect to the provisions of PAIA.

## 6 Nedbank categories of records available without a request

Record category	Record type	Available at nedbank.co.za	Available on request
Human resources	Statutory and other employee records	X	X
	External-candidate profiles and positions applied for	X	
Company secretarial	Own portfolio or shareholdings, tax statements for share transactions (IT3), frequently asked questions (FAQs) and rules of the share scheme		X
	Own portfolio or shareholdings (transactions, dividends), tax statements for share transactions (IT3), FAQs and rules of the share scheme		X
	Annual financial statements (audited), Stock Exchange News Service (SENS) announcements and share prices	X	
Market conduct; financial advisory and intermediary services (FAIS)	Debarments and date-of-first-appointment (DOFA) documents		X
	Account statement for a specific period	X	X
	Account statement for a specific period (Corporate Saver)	X	X
	Copies of legal agreements (Corporate Saver)		X
	Profile setup (Corporate Saver)		X
	Confirmation of balances	X	X
	Transaction listing		X
	Needs analysis and disclosures		X
	Available balance on account		X
	Historic client receipts		X
Home loans	Call recordings		X
	Account statement for a specific period	X	X
	Settlement letter	X	X
	Quotation	X	X
	Reconciliation		X
	Decline letter		X
Personal loans and unsecured lending	Approval letter	X	X
	Account statement for a specific period	X	X
	Application form for a personal loan, an overdraft or a student loan		X
	FAIS acknowledgement for a personal loan, an overdraft or a student loan		X
	Settlement letter for a personal loan or unsecured lending		X
	Account closure letter for a personal loan or unsecured lending		X
	Welcome letter for a personal loan or unsecured lending		X
	Statement	X	X

Record category	Record type	Available at nedbank.co.za	Available on request
Motor Finance Corporation (MFC)	Settlement quote	X	X
	Confirmation of client details changes		X
	Tax certificate	X	X
	Copy of registration papers	X	X
	Cross-border letter	X	X
	Transaction history	X	X
	Banking details update	X	X
	Addendum		X
	Amortisation		X
	Repayment schedule		X
	Balloon quote		X
	Balloon manual quote		X
	Capital interest statement		X
	Interest rate letter		X
	Settlement letter		X
	Change-of-owner settlement letter		X
	Authorisation letter for police clearance		X
	Relocation letter		X
	Copy of the National Administration Traffic Information System (NaTIS) document		X
	Contract addendum relating to value-added product services		X
	Cost of credit/Additional credit		X
	Vehicle finance contract		X
	Invoice		X
	Remittance		X
	Proof of payment		X
	Copy of a NaTIS document		X
Business banking	Original NaTIS document		X
	Own-entity product statement	X	
	Copy of facility letters, suretyships, title deeds, mortgage bond documents, etc		X
	Original securities		X
	NedFleet	X	
	Replacement cards		X

## 7 Nedbank records available in line with other legislation

Applicable legislation	Category of record
Banks Act, 94 of 1990 (guidance notes and directives)	<ul style="list-style-type: none"> <li>South African Reserve Bank (SARB) outsourcing list</li> <li>Materiality risk assessments</li> <li>Letters or notifications to SARB</li> </ul>
Basic Conditions of Employment Act,	<ul style="list-style-type: none"> <li>Employee details</li> </ul>

75 of 1997	<ul style="list-style-type: none"> <li>• Labour relations reports</li> <li>• Information regarding dismissals for dishonesty-related behaviour</li> <li>• Information on disability, trade union membership, race and religion</li> <li>• Employee next of kin or emergency contact details</li> <li>• Conflict-of-interest declarations</li> <li>• Education information</li> <li>• Health and safety records</li> <li>• Pension and provident fund records</li> <li>• Leave records</li> <li>• Internal evaluations and performance records</li> <li>• Disciplinary records</li> <li>• Training records</li> <li>• Background checks</li> </ul>
Broad-based Black Economic Empowerment Act, 53 of 2003	<ul style="list-style-type: none"> <li>• Skills development section on the Financial Services Council report (no unique identifiers)</li> <li>• BBBEE status (MTN ZF)</li> <li>• BBBEE status of suppliers</li> <li>• Supplier employee information</li> <li>• Contractor and supplier agreements</li> <li>• List of suppliers, products, services and distributors</li> </ul>
Code of Banking Practice	<ul style="list-style-type: none"> <li>• Code of Banking Practice</li> <li>• Terms and conditions</li> </ul>
Companies Act, 71 of 2008	<ul style="list-style-type: none"> <li>• Memorandum of incorporation</li> <li>• Award letter</li> <li>• Annual financial statements</li> <li>• Share register (MTN ZF)</li> <li>• CIPC company registration document</li> <li>• CoR 14.3 registration certificate</li> <li>• COR123.1</li> <li>• Business application form</li> <li>• Certificate of incorporation</li> <li>• Dealer application</li> <li>• The details of all share trades by employees, directors and officers of the organisation</li> <li>• Own-organisational title deeds</li> <li>• Register of disclosures in terms of section 140(1A) of the Companies Act, 71 of 2008</li> <li>• Regulated-company (as defined in Chapter 5, Parts B and C, of the Companies Act, 71 of 2008) register of disclosures</li> <li>• Company rules</li> <li>• Records of directors</li> <li>• Copies of reports presented at annual general meetings</li> <li>• Notices and minutes of shareholder meetings</li> <li>• Resolutions and their supporting documents</li> <li>• Copies of written communications generally sent to securityholders</li> <li>• Minutes of meetings of directors, directors' committees, audit committees, shareholders</li> <li>• Securities registers</li> <li>• Record of company secretaries and auditors</li> </ul>
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	<ul style="list-style-type: none"> <li>• Record of the earnings and other prescribed particulars of all employees</li> <li>• Auction-related records</li> </ul>

	<ul style="list-style-type: none"> <li>• Promotional-competition-related records</li> </ul>
Consumer Protection Act, 68 of 2008	<ul style="list-style-type: none"> <li>• Promotion and marketing material</li> <li>• Terms and conditions</li> <li>• Direct marketing consent</li> <li>• Complaints process document</li> </ul>
Copyright Act, 98 of 1978 (as amended by Act 2 of 2002)	Software licences
Disaster Management Act, 57 of 2002	<ul style="list-style-type: none"> <li>• Covid-19 registers</li> <li>• Business continuity management plans</li> <li>• Business impact assessment</li> </ul>
Electronic Communications and Transactions Act, 25 of 2002	<ul style="list-style-type: none"> <li>• Digital signatures</li> <li>• Transactional record</li> <li>• Electronic terms and conditions</li> <li>• Records of third parties to whom information is disclosed</li> </ul>
Employment Equity Act, 55 of 1998	Employment equity plans and targets
Employment Services Act, 4 of 2014	<ul style="list-style-type: none"> <li>• Employment work permits</li> <li>• Job advertisements</li> </ul>
Exchange Control Amnesty and Amendment Taxation Laws Act, 12 of 2003	<ul style="list-style-type: none"> <li>• Reports on foreign spend greater than R10 million to the South African Revenue Service (quarterly)</li> <li>• Cross-border transfer-of-funds applications and transactions</li> </ul>
Financial Advisory and Intermediary Services (FAIS) Act, 37 of 2002	<ul style="list-style-type: none"> <li>• Learning history reports</li> <li>• Registers of representatives, key individuals, qualifications completed by intermediaries and competences.</li> <li>• Records evidencing representatives' compliance with section 13(1)–(2) of FAIS</li> <li>• Continued professional development (CPD) programme and activity records</li> <li>• Records of financial and system procedures</li> <li>• Records evidencing supervision actions undertaken, including evidence regarding the rendering of services under supervision, the method followed and frequency thereof during the period under supervision.</li> <li>• Records evidencing the deployment of adequate technological resources to maintain client records and data integrity.</li> <li>• Records relating to conclusions regarding compliance with independent requirements, and the substance of relevant discussions that support those conclusions.</li> <li>• Records relating to giving advice, call recordings and product agreements.</li> <li>• Records relating to debarments of FAIS representatives and key individuals.</li> <li>• Records relating to business continuity plans.</li> <li>• Records relating to competency requirements (copies of Grade 12, FSCA-recognised qualifications, class of business training, CPD and product-specific training).</li> <li>• Signed supervision agreements</li> <li>• Representative letters of authority</li> <li>• Key-individual authorisation letters</li> <li>• Compliance reports</li> </ul>

	<ul style="list-style-type: none"> <li>• FSP licence and addendum with conditions</li> <li>• Complaints management (contact details of the compliance officer)</li> </ul>
Financial Intelligence Centre Act (FICA), 38 of 2001	<ul style="list-style-type: none"> <li>• Identification and verification records</li> <li>• Client due-diligence records</li> <li>• Applications for credit or credit agreements</li> </ul>
• Foreign Account Tax Compliance Act • Common Reporting Standard	<ul style="list-style-type: none"> <li>• IRS W-8BEN-E; IRS W-8BEN; IRS W-9; IRS W-8ECI</li> <li>• Self-certification forms</li> </ul>
Income Tax Act, 58 of 1962	<ul style="list-style-type: none"> <li>• IT3</li> <li>• IRP5</li> <li>• IT3a</li> <li>• Monthly IRP5 files</li> <li>• Unemployment Insurance Fund (UIF) files</li> <li>• PAYE information</li> <li>• SDL information</li> <li>• VAT records</li> <li>• Ledgers</li> <li>• Cash books</li> <li>• Journals</li> <li>• Cheque books</li> <li>• Bank statements</li> <li>• Deposit slips</li> <li>• Paid cheques</li> <li>• Invoices</li> <li>• Stock lists</li> <li>• Other books of accounts</li> <li>• Electronic representations of information</li> </ul>
Labour Relations Act, 66 of 1995	<ul style="list-style-type: none"> <li>• Disciplinary records, including outcomes</li> <li>• Labour relations reports</li> <li>• Arbitration awards</li> <li>• Records of strike action and protests</li> </ul>
Long-term Insurance Act, 52 of 1998	<ul style="list-style-type: none"> <li>• Retrenchment claim documents (retrenchment letter, retrenchment claim form, copy of the identity document, etc)</li> <li>• Disability claim documents (disability claim form, medical report, copy of the identity document, etc)</li> <li>• Death claim documents (death certificate, claim form, etc)</li> </ul>
Lotteries Act, 57 of 1997	Personal information and LOTTO transactions of clients
National Credit Act, 34 of 2005	<ul style="list-style-type: none"> <li>• Loan or credit agreements</li> <li>• Applications for credit</li> <li>• Occupation information</li> <li>• Credit bureau demographic, financial and consumer credit information (credit bureau information)</li> <li>• Credit refusal letter</li> <li>• Pre-agreement statement and quote transactions and transactional history</li> <li>• Bank details, contact details and location information</li> <li>• Documentation in support of steps taken after default by consumer</li> </ul>
National Payment System Act, 78 of 1998	<ul style="list-style-type: none"> <li>• Records obtained by so-called 'system participants' during the course of the operation and administration of the settlement system.</li> </ul>

	<ul style="list-style-type: none"> <li>Records of payment instructions generated and/or obtained by it during the course of the operation and administration of the payment clearing house (PCH).</li> <li>Records obtained during the course of operation and administration of a payment or SARB settlement system.</li> </ul>
Occupational Health and Safety Act, 85 of 1993	<ul style="list-style-type: none"> <li>Occupational health and safety (OHS) reports including the following: <ul style="list-style-type: none"> <li>Learning history report</li> <li>OHS agreement</li> <li>OHS appointment letters</li> <li>Data centre procedure documents</li> <li>Incident reports</li> <li>Personal information for workmen's compensation</li> <li>Personal information of visitors to our premises and branches</li> <li>CCTV footage</li> </ul> </li> </ul>
Prevention and Combating of Corrupt Activities Act, 12 of 2004	<ul style="list-style-type: none"> <li>Corrupt or fraudulent employee, client or merchant activities</li> <li>Reports on corrupt and fraudulent activities to law enforcement agencies</li> <li>Supplier Code of Ethics</li> <li>Business case</li> <li>Scorecards</li> <li>Tender awards</li> </ul>
Promotion of Access to Information Act, 2 of 2000	The PAIA manual
Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000	Grievance logged and outcome
Protection of Personal Information Act, 4 of 2013	<ul style="list-style-type: none"> <li>POPIA operating contract</li> <li>Data transfer agreement</li> <li>Privacy Notice</li> </ul>
Regulation of Interception of Communications and Provision of Communication-related Information Act, 70 of 2002	<ul style="list-style-type: none"> <li>Mobile policy</li> <li>Employee ID and proof of address</li> <li>SIM card number</li> <li>IME number</li> <li>Cellphone number</li> </ul>
Short-term Insurance Act, 53 of 1998	<ul style="list-style-type: none"> <li>Original NaTIS documents</li> <li>Settlement letters</li> <li>Agreements of loss</li> <li>Proof of payment</li> <li>Rejection letters</li> </ul>
Skills Development Act, 97 of 1998	<ul style="list-style-type: none"> <li>Sector Education and Training Authority (SETA) reports (no unique identifiers)</li> <li>Learning history reports</li> <li>Skills development levies</li> <li>Certificates of completion</li> </ul>
UK Bribery Act	<ul style="list-style-type: none"> <li>Personal information of directors</li> <li>Financial statements</li> <li>Tax returns</li> <li>Other documents relating to tax or invoices</li> <li>Accounting records</li> </ul>

	<ul style="list-style-type: none"> <li>• Auditor reports</li> <li>• Banking records</li> <li>• Bank statements</li> <li>• Electronic banking records</li> <li>• Asset registers</li> <li>• Financial agreements</li> </ul>
Value-added Tax Act, 89 of 1991	<ul style="list-style-type: none"> <li>• Invoices</li> <li>• Tax invoices</li> <li>• Credit notes</li> <li>• Debit notes</li> <li>• Bank statements</li> <li>• Deposit slips</li> <li>• Stock lists</li> <li>• Paid cheques relating thereto (no longer relevant since 30 December 2020)</li> </ul>

## 8 Subjects on which a body holds records and categories of records that Nedbank holds for each subject

Subjects on which a body holds records	Categories of records
Strategy, plans and proposals	Annual reports, strategic plans and annual performance plans
Human resources	<ul style="list-style-type: none"> <li>• HR policies and procedures</li> <li>• Employee records</li> <li>• Advertised posts</li> <li>• Updates to employee records</li> <li>• Onboarding and offboarding of employees</li> <li>• Internal- and external-candidate records</li> <li>• Psychometric assessment information</li> <li>• Leave records</li> <li>• Tax</li> <li>• Additional earnings</li> <li>• Additional deductions</li> <li>• Third-party deductions (retirement funds, etc)</li> <li>• Performance management</li> <li>• Bursary information</li> <li>• Educational assistance</li> <li>• Labour relations information</li> <li>• Training records</li> </ul>
Shareholders	<ul style="list-style-type: none"> <li>• Share registers</li> <li>• Cash and script holdings</li> <li>• Tax reporting</li> <li>• Shareholder statements</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>• Supplier profile</li> <li>• Supplier invoices</li> </ul>
Occupational health and safety	<ul style="list-style-type: none"> <li>• OHS policies, procedures and guidelines</li> </ul>

## 9 Processing of personal information

### 9.1 Purpose of processing personal information

We process personal information to do the following:

- 9.1.1 Recruit new employees and, if the candidate is successful, to fulfil the employee–employer relationship, including in respect of tax obligations, employment equity reporting and skills development requirements.
- 9.1.2 Pay grants for medical bills.
- 9.1.3 Pay grants to employees for their children's primary and secondary education.
- 9.1.4 Pay bursary claims to employees for their own tertiary education.
- 9.1.5 Enable employees to acquire recognised qualifications (eg FAIS and OHS qualifications).
- 9.1.6 Facilitate travel for business purposes.
- 9.1.7 Fulfil a contractual obligation to a shareholder (internal and external trust schemes) or fulfil a contractual obligation to a third party (external share scheme).
- 9.1.8 Enable suppliers to provide goods or services to us and receive payment for these good or services and collect information for BBBEE reporting and accreditation purposes.
- 9.1.9 Fulfil statutory obligations in terms of the Companies Act, 71 of 2008 (directors' information).
- 9.1.10 Do creditworthiness assessments.
- 9.1.11 Prevent fraud and for authentication purposes.
- 9.1.12 Comply with anti-money-laundering regulations.
- 9.1.13 Track clients for money collection purposes.
- 9.1.14 Market our products and services (if we have consent).
- 9.1.15 Assess applications and onboard new clients or service providers or suppliers.
- 9.1.16 Compile offer letters or expressions of interest (EOIs).
- 9.1.17 Use risk models to produce risk ratings or client risk profiles.
- 9.1.18 Issue quotes (eg for vehicle and asset finance applications).
- 9.1.19 Open transactional accounts or provide other products or services (eg on Ariba).

- 9.1.20 Validate client details, information or documents (eg signature card) to provide a service and consider credit applications, as well as for know-your-customer (KYC) and fraud prevention purposes.
- 9.1.21 Do social and environment screenings (SEMS).
- 9.1.22 Do due-diligence assessments (eg in terms of FICA).
- 9.1.23 Prepare fulfilment documentation [eg for debtor management, offer letters, master agreements, extract of minutes, cession of debtors, fax indemnities and extracts, banking of money letters, account verification letters, contract letters, supplier forms, cessions of insurance (if applicable)].
- 9.1.24 Load and release payments or set facility limits.
- 9.1.25 Issue property guarantees.
- 9.1.26 Do periodic collateral valuations.
- 9.1.27 Do yearly or periodic reviews or due-diligence assessments of clients and service providers or suppliers.
- 9.1.28 Produce invoices, reconciliations, statements and remittances.
- 9.1.29 Do routine client record maintenance (eg updating debit order details and sending monthly statements).
- 9.1.30 Manage excesses and arrears.
- 9.1.31 Negotiate and conclude settlement agreements.
- 9.1.32 Give instructions to bank panel third parties for credit- and credit-risk-related activities (eg attorney instructions for collection actions).
- 9.1.33 Archive or destroy personal information in accordance with clients' requests or regulatory requirements.
- 9.1.34 Do statutory reporting (eg for FICA and the Prevention and Combating of corrupt Activities Act, 12 of 2004).
- 9.1.35 Engage in general correspondence.

## 9.2 Data subject categories and related information or categories of information

Data subject categories	Personal information that may be processed
Shareholders	Names, addresses, identity numbers, registration numbers, employment status, BBBEE information and banking details, income tax numbers, email addresses, telephone and cellphone numbers, physical addresses, postal addresses, disability, veteran status, and gender.
Service providers	Names, registration numbers, VAT numbers, addresses, and banking details.
Employees	Names, surnames, addresses and contact details, qualifications and professional registrations, CVs, tax information, marital status, gender, disability status, citizenship, race, banking details, identity numbers, next of kin, beneficiaries and benefit selections, training records, leave, and Covid-19 information.
Pensioners	Names, surnames, identity numbers, accounting information and medical aid details.
Suppliers	Names, addresses, company registration numbers, tax numbers, PAYE numbers, banking details, and contact details.
Clients	Names, surnames, addresses, registration or identity numbers, employment status, and banking details.

## 9.3 Recipients or categories of recipients to whom personal information may be given

Category of personal information	Recipients or categories of recipients to whom personal information may be given
Identity numbers, fingerprints and names for criminal checks.	South African Police Service
Qualifications for qualification verifications	South African Qualifications Authority
Credit and payment history for credit information	Credit bureaus
Shareholders contact details only	
Tracing shareholders	Tracing agent
Shareholder information	Ince (to run virtual shareholder meetings)
BBBEE (shareholders and suppliers)	BBBEE assessment or verification agency
Employee names, identity numbers and demographics.	SETA (for programmes)
Employee names and identity numbers	FAIS and OHS training providers

Category of personal information	Recipients or categories of recipients to whom personal information may be given
<ul style="list-style-type: none"> <li>Suppliers</li> <li>Credit checks</li> <li>Media screening</li> <li>Sanctions checks</li> </ul>	<ul style="list-style-type: none"> <li>Experian</li> <li>Dow Jones</li> <li>World check</li> </ul>
Identity number, names, psychometric test scores and reports, employee numbers, contact details, employment dates, performance history, industrial relations information, union membership fees, statutory requirements (including tax) and salary information.	<ul style="list-style-type: none"> <li>Old Mutual (retirement fund)</li> <li>Medscheme (medical aid)</li> <li>Safrican (funeral fund)</li> <li>Alexander Forbes (Defined-benefit Pension Fund – closed scheme)</li> <li>Department of Employment and Labour (UIF)</li> <li>South African Revenue Service (PAYE, SDL, UIF)</li> <li>Commission for Conciliation, Mediation and Arbitration (labour relations)</li> <li>Psychometric-assessment suppliers</li> <li>Reference checks for former employees</li> <li>South African Society of Bank Officials (Sasbo union)</li> <li>YES office and implementation partners</li> <li>Holsboer resorts and timeshare</li> </ul>
Identity numbers, names and facial biometrics.	Department of Home Affairs
Corporate Saver agent information	<ul style="list-style-type: none"> <li>Legal Practitioners Fidelity Fund</li> <li>Legal Practice Council</li> <li>Office of the Master of the High Court</li> <li>FSCA</li> <li>Estate Agencies Affairs Board</li> </ul>
Client information	SARB
Identity numbers, names and surnames, physical and email addresses, payslips, medical records, and contact numbers.	<ul style="list-style-type: none"> <li>Corporate Industrial and Risk consultants</li> <li>Compensation Commissioner</li> <li>Department of Employment and Labour</li> <li>Department of Health</li> <li>ER24 and medical facilities</li> <li>Compliance Safety (Pty) Ltd (Comsaf)</li> </ul>
Identity numbers and names for criminal checks	South African Police Service
Qualification verifications	South African Qualifications Authority
Credit and payment history for credit information	Credit bureaus
Names, identity numbers, and qualifications.	<ul style="list-style-type: none"> <li>Compliance Institute Southern Africa</li> <li>Khulisane Academy</li> </ul>

#### 9.4 Planned transborder flows of personal information

- 9.4.1 Sub-Saharan Africa: Receive shareholders' information from African countries and confirm payments in terms of dividends and proceeds. The information is not moved offshore, and payments are made from a South African scheme to a participant in another country.
- 9.4.2 Procurement: Cloud-based solution, with the necessary contracts in place.
- 9.4.3 Employee services.

#### 9.5 General description of information security measures that the responsible party must implement to ensure the confidentiality, integrity and availability of the information.

- 9.5.1 We subscribe to and are a member of the Information Security Forum (ISF) Standard of Good Practice and we align all our security principles to this standard through:
- 9.5.1.1 employee awareness and change management;
- 9.5.1.2 regular system patching; and
- 9.5.1.3 secure system development lifecycle management.

### 10 Availability of the manual

- 10.1 A copy of the manual is available:

- 9.1.1.1 at our website nedbank.co.za;
  - 9.1.1.2 at our head office for public inspection during normal business hours;
  - 9.1.1.3 to any person on request and payment of the fee in 10.2; and
  - 9.1.1.4 to the Information Regulator.
- 9.1.2 A fee for a copy of this manual, as set out in Annexure B of the regulations, is payable for each A4-size photocopy made.

## **11 Updating the manual**

The Information Officer, mandated by the Chief Executive Officer of Nedbank, will update this manual regularly.

**Issued by:**

**Nomondo Hlongwa**  
**Group Chief Compliance Officer**

## **Request procedure**

To get access to a record referred to in section 6.1 of PAIA, you must complete the required form and email it to [paia@nedbank.co.za](mailto:paia@nedbank.co.za). Once we have received your request, our IO will give you the details of the fee payable and how to pay it.

Please complete all the fields in the request form, and make sure that you include the following information:

- The details of the record that you want.
- A copy of your valid South African identity document or card. If a request is being made on your behalf, we will require copies of both individuals.
- A copy of the power of attorney (if applicable).
- A description, in as much detail as possible, of the right you want to exercise or protect.
- Why the record is required to exercise or protect the rights of the requestor.
- The details of how we must give you the information (if your request is granted).
- Your contact details.

## **Timelines**

We will process your request within 30 business days (which excludes weekends and public holidays), unless your request involves considerations that will need more time.

If an extension is necessary, we will notify you and tell you why we need an extension.

## **Grounds for refusal of access to records**

The main grounds on which we may refuse access to records relate to:

- the privacy of a third party who is a natural person;
- the commercial information of a third party;
- confidential information of a third party;
- the safety of individuals and property;
- legally privileged records; and
- our commercial information, including –
  - trade secrets;
  - financial, commercial, scientific or technical information, if disclosure would likely harm our financial or commercial interests;
  - information that, if disclosed, could put us at a disadvantage in negotiations or commercial competition;
  - computer programs and related information technology software that we own and that are protected by copyright; and
  - research information that we or a third party has compiled, if disclosure would expose the third party, researcher or subject matter of the research and therefore disadvantage us.

Requests submitted in terms of POPIA may be refused on the same grounds.

## **Remedies for refusal**

If you are not satisfied with the outcome of your request, you can lodge an internal appeal by submitting the relevant supporting documents and reasons for dispute to [paia@nedbank.co.za](mailto:paia@nedbank.co.za). You can also lodge a complaint with the Information Regulator or apply to a court of competent jurisdiction to take the matter further. Should you wish to lodge a complaint with the Information Regulator, you can contact the Information Regulator at [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za) or visit their website at [inforegulator.org.za](http://inforegulator.org.za).

## Request form

(Page 1 of 4)

### Promotion of Access to Information Act: Form 2

#### Request for access to records

[Regulation 7]

**Note:**

- 1 The requester must attach proof of their identity to this form.
- 2 If the request is made on someone else's behalf, the necessary authorisation must be attached to this form.

To: The Information Officer

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(Address)

Email: \_\_\_\_\_

Mark your capacity below with an **X**.

<input type="checkbox"/>	I want access to records in my own name.	<input type="checkbox"/>	I want access to records on behalf of someone else.
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<b>Personal information</b>	
Full names	
Identity number	
Capacity in which the request is made (when made on someone else's behalf)	
Postal address	
Physical address	
Email	
Contact numbers	Work: Cellphone:
Full names of the person on whose behalf the request is made (if applicable)	
Identity number	
Postal address	
Street address	
Email	
Contact numbers	Work: Cellphone:
<b>Particulars of record requested</b>	
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 not enough, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Description of the record or the relevant part of the record	
Reference number (if available)	
Any other details of the record	

<b>Type of record</b> (Mark the applicable box with an X.)	
The record is in written or printed form.	
The record comprises virtual images (including photographs, slides, video recordings, computer-generated images, sketches, etc).	
The record consists of recorded words or information that can be reproduced in sound.	
The record is held on a computer or in an electronic, or machine-readable form.	
<b>Form of access</b> (Mark the applicable box with an X.)	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form).	
Written or printed transcription of virtual images (including photographs, slides, video recordings, computer-generated images, sketches, etc).	
Transcription of soundtrack (written or printed document).	
Copy of the record on flash drive (including virtual images and soundtracks).	
Copy of the record on a compact disc drive (including virtual images and soundtracks).	
Copy of the record saved on a cloud storage server.	
<b>Manner of access</b> (Mark the applicable box with an X.)	
Personal inspection of the record at a registered address of the public or private body (including listening to recorded words and accessing information that can be reproduced in sound or information held on a computer or in an electronic or machine-readable format).	
Postal services to a postal address.	
Postal services to a street address.	
Courier services to a street address.	
A fax of the information in written or printed format (including transcriptions).	
An email of the information (including soundtracks if possible).	
Cloud share or file transfer.	
Preferred language (If the record is not available in the language you prefer, access may be granted in the language in which the record is available.)	

<b>Particulars of the right to be exercised or protected</b> (If the provided space is not enough, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Which right will be exercised or protected?	
Why is record required to exercise or protect this right?	

<b>Fees</b> a) A request fee must be paid before the request will be considered. b) We will notify you of the amount of the access fee. c) The fee amount will depends on the form in which access is required and the reasonable time required to search for and prepare the record. d) If you qualify for a fee exemption, please give the reason below.	
Reason	

We will notify you in writing whether your request has been approved or not. If your request was approved, we will tell you if a fee is payable. Please indicate your preferred manner of correspondence:

Postal address	Fax	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

Signature of requester or the person on whose behalf the request is made.

**For official use only**

Reference number:	
Request received by: (Rank, name and surname of the Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of the Information Officer

## Form 1

### Objection to the processing of personal information in terms of section 11(3) of the Protection of Personal Information Act, 4 of 2013

#### Regulations relating to the Protection of Personal Information, 2018 [Regulation 2(1)]

**Note:**

Affidavits or other documentary evidence in support of the objection must be attached to this form. If the provided space is not enough, please continue on a separate page and attach it to this form. All additional pages must be signed.

**Reference number:**

A	Details of the data subject
Names and surname of the data subject	
Unique identifier or identity number	
Residential, postal or business address	
Contact numbers	
Email	
B	Details of the responsible party
Names and surname or registered name of the responsible party	Nedbank Group
Residential, postal or business address	Nedbank 135 Rivonia Campus, 135 Rivonia Road, Sandown, Sandton
Contact number	+27 11 294 7130
Fax number or email address	paia@nedbank.co.za
C	Reasons for the objection (Please give detailed reasons for your objection.)

Signed at ..... on .....  
Place ..... Date .....

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**Signature of data subject or designated person**

## Form 2

### Request for correction or deletion of personal information or destruction or deletion of a record of personal information in terms of section 24(1) of the Protection of Personal Information Act, 4 of 2013

#### Regulations Relating to the Protection of Personal Information, 2018 [Regulation 3(2)]

##### Notes:

- 1 Affidavits or other documentary evidence in support of the request must be attached to this form.
- 2 If the provided space is not enough, please continue on a separate page and attach it to this form. All additional pages must be signed.
- 3 Reference number:

Mark the appropriate box with an X.

Request for:

Correction or deletion of the personal information about the data subject that is in possession or under the control of the responsible party.

Destruction or deletion of a record of personal information about the data subject that is in possession or under the control of the responsible party who is no longer authorised to have the record of information.

A	Details of the data subject
Names and surname or registered name of the data subject	
Unique identifier or identity number	
Residential, postal or business address	
Contact numbers	
Email	
B	Details of the responsible party
Names and surname or registered name of responsible party	Nedbank Group
Residential, postal or business address	135 Rivonia Road, Sandown, Sandton
Contact numbers	+27 11 294 7130
Fax number or email address	paia@nedbank.co.za
C	Information that must be corrected, deleted or destroyed

D

**Detailed reasons for your request**

Signed at ..... on .....

Place

Date

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**Signature of data subject or designated person**

## Fees payable

	Fees in respect of private bodies	Fee
1	The request fee that a requester must pay	R140
2	A photocopied or printed black and white copy of an A4-size page	R2 per page or part of the page
3	A copy in a computer-readable form saved on: <ul style="list-style-type: none"> <li>• a flash drive (to be provided by the requester); or</li> <li>• a compact disc</li> </ul>	R40 R40 (provided by the requester) R60 (if provided to the requester)
4	A transcription of visual images on an A4-size page	The service will be outsourced and the fee will depend on the service provider's quotation.
5	A copy of visual images	
6	Transcription of an audio record	R24 per A4-size page
7	Copy of an audio record on: <ul style="list-style-type: none"> <li>• a flash drive (to be provided by the requester); or</li> <li>• a compact disc</li> </ul>	R40 R40 (provided by the requester) R60 (if provided to the requester)
8	To search for and prepare the record for disclosure	R145 per hour or part of an hour, (excluding the first hour), reasonably required to search for and prepare the record.  Must not exceed a total cost of R435.
9	Deposit (if the search exceeds six hours)	One-third of the amount per request calculated in terms of items 2 to 7.
10	Postage, email or any other electronic transfer	Actual expense (if any).