

**SABRIC**

# INFORMATION MANUAL

Information Manual

Registration Number: 2002/017376/08

Promotion of Access To Information Act 2 of 2000

Protection of Personal Information Act 4 of 2013

Reviewed 6 December 2025





## Contents

	<b>0</b>
<b>Contents</b>	<b>1</b>
<b>1. FOREWORD</b>	<b>2</b>
<b>2. INTRODUCTION</b>	<b>2</b>
<b>3. SCOPE OF THE MANUAL</b>	<b>2</b>
<b>4. PURPOSE OF THE MANUAL</b>	<b>2</b>
<b>5. AVAILABILITY OF THE MANUAL</b>	<b>3</b>
<b>6. INFORMATION OFFICER &amp; DEPUTY INFORMATION OFFICER</b>	<b>3</b>
<b>7. AVAILABILITY OF GUIDES TO PAIA AND POPIA</b>	<b>4</b>
<b>9. LEGISLATIVE RECORDS</b>	<b>4</b>
<b>10. TYPES OF RECORDS HELD AT SABRIC AND RECIPIENTS WITH WHOM IT IS SHARED</b>	<b>5</b>
<b>11. HOW WE PROCESS AND PROTECT PERSONAL INFORMATION</b>	<b>7</b>
<b>12. REQUEST PROCEDURE</b>	<b>8</b>
<b>13. SUBMISSION OF REQUEST FORM</b>	<b>8</b>
<b>14. PAYMENT OF FEES</b>	<b>8</b>
<b>15. GROUNDS FOR REFUSAL OF REQUESTS</b>	<b>9</b>
<b>16. REMEDIES SHOULD SABRIC DECLINE A REQUEST</b>	<b>10</b>
<b>17. UPDATING OF MANUAL</b>	<b>10</b>
<b>18. FORMS</b>	<b>10</b>
Follow Us.....	12
Contact US.....	12

## 1. FOREWORD

MANUAL OF SABRIC NPC

Registration Number: 2002/017376/08

SABRIC NPC (SABRIC) conducts its operations in compliance with all legal and regulatory requirements. This Information manual is intended to ensure that SABRIC complies with Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and Sections 11, 23 and 24 of the Protection of Personal Information Act 4 of 2013 (POPIA).

## 2. INTRODUCTION

SABRIC is a Non-Profit company with the object to protect the financial and payment system and the interest of the general public through collaborative programs that aim to combat illicit activity effecting banks, the payment system and its users: Programs include:

- Data processing and analysis,
- Collaboration with partners and members,
- Advocacy and Policy Development,
- Community Engagement,
- Training, technical assistance and coordination,
- Setting standards and guidelines,
- International cooperation,
- Promoting, innovation, technology, and new ways of working and
- Setting standards, best practise and guidelines in a non-profit manner and with an altruistic intent.

PAIA gives effect to the Constitutional right to Access to Information held by private bodies and the State. POPIA gives effect to the Constitutional right to privacy. This document serves as the company's information manual and provides reference to the records held by the company and the process to request access to such records or to request correction, deletion or destruction, or object to the processing of personal information.

## 3. SCOPE OF THE MANUAL

The scope of the manual is limited to the records and information in the possession of SABRIC and the publication or release of any of SABRIC's records and information in the public domain. Reference to SABRIC in this manual relates only to the non-profit company registered in terms of the Companies Act of 2008.

## 4. PURPOSE OF THE MANUAL

The purpose of this manual is to:

- Check the categories of records that SABRIC holds that are available without a formal request for access,
- Document the requirements as prescribed in both PAIA and POPIA (collectively referred to as the “Act”) on how to request information or records from SABRIC,
- Document the requirements as prescribed in POPIA on how to request correction, deletion or destruction, or objection to processing of personal information held at SABRIC,
- Provide the process and forms for submitting requests; and
- Stipulate the grounds on which a request may be refused.

## 5. AVAILABILITY OF THE MANUAL

A copy of this manual is available to the public for inspection on the Company’s website at [www.sabric.co.za](http://www.sabric.co.za) or on request from the designated contact persons referred to in this manual.

## 6. INFORMATION OFFICER & DEPUTY INFORMATION OFFICER

The Act prescribes the appointment of an Information Officer, who is responsible to assess and respond to requests for access to information, deal with requests made to the organisation in terms of POPIA as well as to oversee its required functions.

The Information Officer may appoint, where it is deemed necessary, a Deputy Information Officer.

**SABRIC Information Officer:** Andre Wentzel  
**Contact Number:** 011 847 3000

**SABRIC Deputy Information Officer:** Prisha Naicker  
**Contact Number:** 011 847 3000

The responsibility for administration of, and compliance with the relevant legislation has been delegated to the Deputy Information Officer. Requests pursuant to the provisions of the Act should be directed as follows:

<b>Contact person</b>	Prisha Naicker
<b>Postal Address</b>	PO Box 3682, Halfway House, Midrand, 1685
<b>Physical Address</b>	300 Janadel Avenue Block B Siemens Park Halfway House
<b>Phone number</b>	011 847 3000
<b>Email</b>	<a href="mailto:governance@sabric.co.za">governance@sabric.co.za</a>
<b>Website</b>	<a href="http://www.sabric.co.za">www.sabric.co.za</a>

All requests for access to information in terms of the Act must be made using the appropriate form. We will assist any person who wishes to make a request or a complaint, to reduce that request or complaint to writing in order to comply with the processes and documentation provided for below.

## 7. AVAILABILITY OF GUIDES TO PAIA AND POPIA

The South African Human Rights Commission (SAHRC) has compiled a guide contemplated in Section 10 of PAIA, which contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA. Copies of PAIA and POPIA, the relevant regulations and guides to these acts, can be obtained from the SAHRC or the information regulator and queries should be directed to:

SAHRC	Information Regulator
<b>South African Human Rights Commission PAIA Unit</b>	The Information Regulator (South Africa)
<b>Private Bag 2700 Houghton Johannesburg 2041</b>	Braampark, Forum 3 33 Hoofd Street Braamfontein Johannesburg 2001
<b>Telephone number: (011) 877 3600 Fax number: (011) 484 7146/7 Website: <a href="http://www.sahrc.org.za">www.sahrc.org.za</a> Email: <a href="mailto:info@sahrc.org.za">info@sahrc.org.za</a> or <a href="mailto:PAIAComplaints@inforegulator.org.za">PAIAComplaints@inforegulator.org.za</a></b>	Telephone number: 010 023 5200 <a href="mailto:enquiries@inforregulator.org.za">enquiries@inforregulator.org.za</a> <a href="https://www.justice.gov.za/inforeg/index.html">https://www.justice.gov.za/inforeg/index.html</a>

## 8. RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS IN TERMS OF THE ACT

- 8.1 Annual Report
- 8.2 SABRIC Annual Crime Stats
- 8.3 Awareness Material
- 8.4 Press Releases

## 9. LEGISLATIVE RECORDS

Records are held in accordance with the following legislation:

Basic Conditions of Employment Act, 1997  
Broad Base Black Economic Empowerment Act, 2003 Companies Act 1973




Companies Act 2008 (Act No. 71 of 2008)  
Compensation for Occupational Injuries and Diseases Act, 1993 Constitution of the Republic of South Africa, 1996  
Criminal Procedure Act, 1977  
Electronic Communications Act, 2005  
Electronic Communications and Transactions Act, 2002 Employment Equity Act, 1998  
Finance Act, 2007  
Income Tax Act, 1962  
Justices of the Peace and Commissioners of Oaths Act, 1963  
Labour Relations Act, 1995  
Non-Profit Organizations Act, 1997  
Occupational Health and Safety Act, 1993 Pension Funds Act, 1956 (Act No. 24 of 1956)  
Promotion of Access to Information Act, 2000  
Promotion of Access to Information Act 4 of 2013  
Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 Skills Development Act, 1998  
Skills Development Levies Act, 1999 South African Revenue Service Act, 1997  
Unemployment Insurance Act, 2001  
Unemployment Insurance Contributions Act, 2002 Value-Added Tax Act, 1991

## **10. TYPES OF RECORDS HELD AT SABRIC AND RECIPIENTS WITH WHOM IT IS SHARED**

The following records are held at SABRIC and are classified and grouped according to records relating to the listed subjects and categories. It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter.

### **10.1 Employee Records**

- 10.1.1 Personal records provided by employees,
- 10.1.2 Records provided by a third party relating to employees,
- 10.1.3 Conditions of employment and other personnel-related contractual and quasi legal records,
- 10.1.4 Internal evaluation records and other internal records,
- 10.1.5 Correspondence relating to employees,
- 10.1.6 Training schedules and material,
- 10.1.7 Biometric information,
- 10.1.8 Health information (pandemic related),
- 10.1.9 Medical and disability information,
- 10.1.10 Information required for processing travel arrangements,
- 10.1.11 Background checks,
- 10.1.12 Bank account details and
- 10.1.13 Criminal checks



“Employees” refers to any person who works for or provides services to or on behalf of SABRIC and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of SABRIC. This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers.

## 10.2 Private Body Records

- 10.2.1 Financial records,
- 10.2.2 Operational records,
- 10.2.3 Databases,
- 10.2.4 Information Technology,
- 10.2.6 Internal correspondence,
- 10.2.8 Statutory records and
- 10.2.9 Internal Policies and Procedures.


These records include, but are not limited to, the records which pertain to SABRIC’s own affairs.

## 10.3 Third Party Records

Records provided by Third Parties include without limitation:

- 10.3.1 Financial records,
- 10.3.2 Correspondence,
- 10.3.3 Agreements and contractual records,
- 10.3.4 Records provided by the third party,
- 10.3.5 Records third parties have provided about another third party,
- 10.3.6 Personnel, customer, or private body records which are held by another party, as opposed to the records held by SABRIC itself,
- 10.3.7 Identity information,
- 10.3.8 Race, ethnic and social origin
- 10.3.9 Business details,
- 10.3.10 Beneficial ownership records,
- 10.3.11 Contact details,
- 10.3.12 Physical address,
- 10.3.13 Employment details,
- 10.3.14 Social identity,
- 10.3.15 Vehicle registration numbers,
- 10.3.16 Surveillance records,
- 10.3.17 Photographs,
- 10.3.18 Location information,
- 10.3.19 Online identifiers,
- 10.3.20 Criminal behaviour and related information,
- 10.3.21 Health information (pandemic related) and
- 10.3.22 Physical access records.

“Third parties” refer to members, collaborative partners, stakeholders, contractors, suppliers, service providers and any other Third Party whose information we have processed lawfully.



Note that the accessibility of the records may be subject to the grounds of refusal set out in this manual. Amongst others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before SABRIC will consider access.

#### **10.4 Recipients or categories of recipients with whom PI is shared**

SABRIC will only share the personal information of data subjects where legally justified to do so and for the purpose of executing its mandate set out in paragraph 2 or in compliance with legislation or regulations.

Recipients of personal information may be Employees in the normal course of business, members, collaborative partners, stakeholders, contractors, suppliers, or vendors when there are lawful grounds to share such information. SABRIC may share information with SARS, medical aids, credit bureaus and other necessary parties that our HR department deals with in the normal course of managing employee related matters.

SABRIC may also share the personal information of data subjects with law enforcement agencies, such as the National Prosecuting Authority or South African Police Service, for prevention, detection or investigation and prosecution of crime.

### **11. HOW WE PROCESS AND PROTECT PERSONAL INFORMATION**

#### **11.1 Purpose**


We process the personal information of various categories of people for various purposes as set out in our Privacy Notices. A copy of our Third-Party Privacy Notice can be obtained on our website [www.sabric.co.za](http://www.sabric.co.za) or from the contact persons listed in this manual. Should you be an employee or director of SABRIC, our Employee and Directors Privacy Notice can be sourced from our HR department.

#### **11.2 Security Safeguards**

SABRIC takes and maintains appropriate, reasonable technical and organisational measures to secure personal information. Information is safeguarded in accordance with our policies, standards and practices which are aligned to industry accepted best practices. These measures are regularly reviewed, and we continuously improve our safeguards.

#### **11.3 Cross-Border Flows**

SABRIC will only transfer personal information when the situation requires cross- border processing and in accordance with POPIA. Should it be



necessary, we will ensure that the information flows to a jurisdiction that is subject to a law or binding agreement that provides the same or better protection for the processing of personal information under POPIA, and that the Recipient agrees to protect the information in the same manner as what we are obliged to, under POPIA.

## 12. REQUEST PROCEDURE

To facilitate a timely response to requests, all requestors should take note of the following:


- The applicable Request Form must be completed. Refer to point 17 below to select the relevant form. It must be noted that the request must be in terms of the correct and relevant section of the applicable Act to enable processing of the request.
- Proof of identity is required to authenticate the identity of the requestor. Therefore, in addition to the access form, requestors will be required to supply a copy of their identification document.
- SABRIC reserves the right to verify the identity of the requestor and will provide additional information regarding this process to the requestor, on receipt of any request.
- SABRIC reserves the right to transfer requests for records to relevant organisations where these organisations were the primary holders or generators of the information requested.
- If the identity of the requestor cannot be verified, the request cannot be processed by SABRIC.
- Complete the form in BLOCK LETTERS and answer every question.
- If a question does not apply state N/A in response to that question
- If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
- If there is insufficient space on a printed form, additional information may be provided on an attachment.
- When the use of an attachment is required, precede each answer with the applicable title.

## 13. SUBMISSION OF REQUEST FORM

The completed Request Form together with a copy of the identity document must be submitted by way of email to [governance@sabric.co.za](mailto:governance@sabric.co.za) or to be delivered to SABRIC's physical address and must be addressed to the contact person as indicated above.

## 14. PAYMENT OF FEES

In terms of Section 54(2) & (7) of PAIA and Regulation 11(3), Private Bodies are entitled to levy a prescribed request fee to a requestor before the Private Body



may process the request for information or records. Fees levied are published by the Minister and are displayed below. Levies published by the Minister are subject to change and can be viewed on <https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

All requests complying with the requirements set out above will be processed and considered expeditiously. If the request for access is granted, then SABRIC will advise the Requester in accordance with Form 3 - Outcome of request and of fees payable, on the following :

- the prescribed fee for accessing the information or documentation, if applicable,
- payable deposit fee and balance outstanding,
- the right to lodge an appeal against the access fee to be paid or the form of access to be granted and
- should a fee be payable, the contact person will advise you accordingly and provide payment details. Payment must be made by way of a direct deposit and proof of payment must be supplied. The access fee must be paid prior to access being given to the requested record.

It is important to note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application to access a record is subject to certain limitations if the requested record falls within a certain category as specified with Part 3 and Chapter 4 of PAIA.

SABRIC will within 30 days of receipt of the request decide whether to grant or decline the request and give notice with reasons to that effect. The 30-day period within which SABRIC must decide whether to grant or to refuse the request, may be extended for a further period of not more than thirty days, if the request is for a large volume of information and the information cannot be reasonably obtained within the original 30-day period. SABRIC will notify the requestor in writing should an extension be sought.

## 15. GROUNDS FOR REFUSAL OF REQUESTS

If the request for access is refused, then SABRIC will advise the Requester about the reasons for refusal of access and may advise the Requester to lodge an application with the court against the refusal of the request.

Chapter 4 of PAIA provides the following grounds for refusing requests for Information:

- protection of the privacy of a Third Party who is a natural person.
- protection of commercial information of a Third Party
- protection of certain confidential information of a Third Party
- protection of safety of individuals and protection of property

- protection of records privileged from production in legal proceedings.
- commercial information of the Private Body
- Protection of research information of a third party and of the Private Body.

SABRIC will give the Requester a written notice of the decision within 30 days after a decision is made on their request to access information. In case of a request being refused, the notification will include the reasons for the refusal.

SABRIC may extend the 30-day notice period for a further period not exceeding 30 days after receiving the request, due to the nature of the request and the amount of time required to gather the requested information.

The Requester will however be given notice of the extension prior to the expiry of the 30-day period and provided with reasons for the extension.

## 16. REMEDIES SHOULD SABRIC DECLINE A REQUEST

### 16.1 Internal Remedies

SABRIC does not have an internal appeal process should a request for access to information or any other lawful request in compliance with this manual, be denied. The decision made by the Information Officer is final.

### 16.2 External Remedies

A requester that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a Court for relief. Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a Court for relief.

## 17. UPDATING OF MANUAL

SABRIC will review the manual annually or sooner should there be changes to legislation and update the manual when necessary.

## 18. FORMS

### 18.1 Request for access to record

The following form can be submitted through the following link:

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>



InfoRegSA-PAIA-Form 02-Reg7.pdf

### The requestor must:

1. Complete all necessary spaces.
2. Sign the access request form electronically or physically if the request is to be hand delivered to our offices.
3. Sign additional folios completed.

### Send with this application

- 1 Any additional folios completed.
- 2 Copy of Identity Document

### Outcome of request and of fees payable

The following form will be used by SABRIC to respond to you:

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>



Form-3-PAIA.pdf

### 18.3 Objection to the processing of personal information in terms of section 11(3) of POPIA

The following link can be used to submit the forms.

<https://forms.office.com/r/18KvecsDxE>



FORM-1-OBJECTION- TO-THE-PROCESSING

### 18.4 Request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of section 24(1) of the protection of personal information act, 2013 (act no. 4 of 2013)

The following link can be used to make a request.

<https://forms.office.com/r/wApk691Rhw>



WWW.SABRIC.CO.ZA

# Thank you

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## Contact US

(+27) 11 847 300

Siemens, Halfway House,  
300 Janadel Ave,  
Halfway Gardens,  
Midrand,  
1685

## Follow Us

YouTube: SabricZA  
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