

ABSOLUTE CAPITAL (PTY) LTD

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000 (“ACT”)

1 COMPANY DETAILS

1.1	Full name:	Absolute Capital (Pty) Ltd
1.2	Registration number:	2015/074289/07
1.3	Physical Address:	SG101A, South Wing, Great Westerford, 240 Main Road, Newlands, Western Cape, 7700
1.4	Postal Address:	P.O. Box 44856, Claremont, Cape Town, Western Cape, 7735
1.5	Telephone:	021 659 7070
1.6	Information Officer:	Janine Rabe
1.7	Email:	janine@absolutecapital.co.za
1.8	Website	www.absolutecapital.co.za

2 PRIMARY BUSINESS

Provision of funding for developers or other selected borrowers.

3 DIRECTORS

Gerald John Porter

Rhys Meredith

Jason Robert Voigt

Dean Charles Burscough

4 GUIDE IN TERMS OF SECTION 10 OF THE ACT

4.1 The section 10 Guide on how to use the Promotion of Access to Information Act No 2 of 2000 (“the Act”) is available from the South African Human Rights Commission and the Information Regulator and is available on their websites at <https://www.justice.gov.za/inforeg/contact.html> and <https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

4.2 Enquiries can be directed to:

The Information Regulator

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: <https://www.justice.gov.za/infoereg/index.html>

Email: infoereg@justice.gov.za

5 RECORDS AVAILABLE IN TERMS OF LEGISLATION OTHER THAN THE ACT.

Documents are held in accordance with statutory provisions that include those in the following Acts. This list is not exhaustive.

- 5.1 Companies Act 71 of 2008;
- 5.2 Deeds Registries Act 47 of 1937;
- 5.3 Financial Intelligence Centre Act 38 of 2001;
- 5.4 Income Tax Act 58 of 1962;
- 5.5 Insolvency Act 24 of 1936; and
- 5.6 Value-Added Tax Act 89 of 1991.

6 CATEGORIES OF RECORDS HELD BY THE COMPANY

The Company's web page which is accessible to anyone who has access to the Internet, contains information relating to the business operations of the Company.

- 6.1 Other records held by the Company include -
 - 6.1.1 statutory company information;
 - 6.1.2 financial records;
 - 6.1.3 records required by law to verify identity of clients;
 - 6.1.4 records relating to fixed and movable property;
 - 6.1.5 commercial contracts;
 - 6.1.6 insurance contracts;
 - 6.1.7 debt collection records; and

6.1.8 records and information required for the exercise or protection of any rights will be made available subject to the provisions of the Act.

6.2 Access to records may be refused on grounds specified in the Act.

7 PROCESSING OF PERSONAL INFORMATION

7.1 The Company is a responsible party in accordance with the Protection of Personal Information Act 4 of 2013 and accordingly processes the following personal information -

Data Subjects	Information Categories	Purpose of processing	Recipients of supply of personal information
Clients	<ul style="list-style-type: none"> • Financial information • Tax information • Identity/Registration numbers • Contact information • Property details 	Provision of services	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Directors • Banks • External service providers
Service Providers	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information 	Provision of services	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Directors • External service providers
Shareholders	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information • Company structures 	Compliance	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Directors • Banks
Directors	<ul style="list-style-type: none"> • Financial information • Tax information • Identity numbers • Contact information 	Compliance	<ul style="list-style-type: none"> • Accountants/Auditors • Attorneys • Banks • CIPC

7.2 There are no planned trans-border flows of information at this stage.

7.3 General information security measures relating to the personal information includes (but is not limited to) -

- 7.3.1 server is backed-up weekly and backups are kept for 30 days;
- 7.3.2 email access requires 2-factor authentication;
- 7.3.3 external access to the server is locked down;
- 7.3.4 business continuity plans and disaster recovery testing plans are in place;
- 7.3.5 antivirus software is updated regularly;
- 7.3.6 remote monitoring of access activity; and
- 7.3.7 employees are under an obligation to keep information confidential.

8 FORM OF REQUEST

- 8.1 The requester must use the prescribed form to make the request for access to a record. Request forms can be obtained on the South African Human Rights Commission (SAHRC) website <https://www.sahrc.org.za/> or the Information Regulator's website <https://www.justice.gov.za/inforeg/index.html>.
- 8.2 The request must be made to the contact person at the address, fax number or electronic mail address given in paragraph 1 of this manual.

9 PRESCRIBED FEES

- 9.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 9.2 Every other requester must pay the required request fee of R50.00. The fee structure can be obtained on the South African Human Rights Commission (SAHRC) web site <https://www.sahrc.org.za/> or the Information Regulator's website <https://www.justice.gov.za/inforeg/index.html>.

10 AVAILABILITY OF THE MANUAL

- 10.1 This manual is available for inspection at the offices of the Company at no cost during normal business hours.
- 10.2 This manual is available on the website of the Company.
- 10.3 Copies of this manual may be obtained, subject to the prescribed fees, from the offices of the Company.