Promotion of Access to Information Manual

INSTIT (Pty) Ltd

September 2025

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INSTIT (PTY) LTD

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT

1 Preamble

Section 51 of the Promotion of Access to Information Act No.2 of 2000, ("the Act"), as amended by the Protection of Personal Information Act no. 4 of 2013 ("POPIA") requires that Instit (Pty) Ltd ("Instit"), as a private body must compile a manual giving information to the public regarding the procedure to be followed in requesting information from Instit for the purpose of exercising or protecting rights in accordance with data protection constraints.

2 Scope and Overview

Instit is a private company duly incorporated in the Republic of South Africa, with registration number 2011/01126/07, and a subsidiary of Apex Group Ltd.

Instit is a financial services provider, registered with the FSCA, FSP 45527. It specialises in the management of collective investment schemes.

2.1 This manual documents the categories of information held by Instit and aims to assist potential requestors in requesting access to information from Instit as contemplated under the Act.

2.2 The following words or expressions bear the following meanings in this manual:

The Act	means the Promotion of Access to Information Act No.2 of 2000, together with the regulations and rules published in terms of this Act.
Information Regulator	The Office of the Information Regulator has been created to monitor and enforce compliance in relation to both POPIA and PAIA and will take over the SAHRC's responsibilities in terms of PAIA in 2021.
Manual	means this manual together with its annexures, as amended from time to time, made available at the offices of Apex Investment Consulting SA Pty Ltd.
Personal information	As defined in Section 1 of POPIA (Protection of Personal Information Act 4

	of 2013, as amended from time to time including the regulations promulgated in terms of POPIA) available at Section 1 Definitions - POPIA ;
Processing	means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including— (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; or (c) merging, linking, as well as restriction, degradation, erasure or destruction of information
Data Subject	means the person (natural or juristic) to whom personal information relates
Responsible Party	means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;
Operator	means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;
Requestor	Means the person requesting access to the records.

3 Company details

Instit (Pty) Ltd

Registration Number: 2011/01126/07

Registered Address: Catnia Building, Bella Rosa Street, Bella Rosa Village, Bellville, Western Cape

Street Address: Catnia Building, Bella Rosa Street, Bella Rosa Village, Bellville, Western Cape

Telephone: +27 (0) 21 007 1500

Website: https://www.bcis.co.za/boutique-collective-investments/instit

	Information Officer
Name:	Gregory Abrahams
Direct telephone number:	072 193 0013
E-mail address:	gregory.abrahams@fundrock.com
Physical address:	Catnia Building, Bella Rosa Street, Bella Rosa Village, Bellville
Website:	https://www.bcis.co.za/boutique-collective-investments/instit

4 The Official Guide

4.1 The Information Regulator has, in terms of section 10(1) the Act, as amended, updated and made available the revised Guide on how to use the Act ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the Act and POPIA.

4.2 The Guide can also be obtained from the website of the Information Regulator (https://inforegulator.org.za)

4.3 Any queries should be directed to:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: https://inforegulator.org.za

Email: enquiries@inforegulator.org.za

5 Availability of Manual

5.1 This manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Instit.

5.2 Copies of the manual may be made, subject to the prescribed fees.

5.3 The manual is also posted on Instit's website at https://www.bcis.co.za/boutique-collective-investments/instit

5.4 A copy of the manual is available to the Information Regulator upon request.

6 Categories of Records Held by Instit

The categories of records held by Instit are listed in the table that follows, according to the respective divisions. A category of record in this Manual does not imply that a request for access to such a record would be granted. All requests for access will be evaluated on a case-by-case basis by the Information Officer. Information that is obtainable via our website is automatically available and thus there is no need to formally request this in terms of this Manual.

DIVISION	CATEGORY
Company Secretarial and Legal	Statutory company records Minutes and related meeting information Records of executive, board and shareholder decisions, and related documentation Trademark information General agreement documentation Securities and equities Terms of reference for board and board committees Shareholder information Legally privileged material

DIVISION	CATEGORY
	Internal legal opinions Legal policies and procedures
Compliance	Compliance policies and procedures Regulatory licences Regulatory and industry body reports Compliance reports Complaints register Gifts register Training register Conflict of Interest register Fit and proper documentation of Representatives, Key Individuals, and Managers of Collective Investments Schemes
Executive Office	Business continuity plan Strategic plans Research information belonging to Instit, whether conducted itself or commissioned from a third party
Finance	Invoices Finance-related policies and procedures Audit records Annual financial statements Asset register Rental agreements Bank statements

DIVISION	CATEGORY
	Management accounts Tax, VAT and PAYE records Payroll Procurement records Service provider information Professional indemnity insurance Going concern assessment
Human Resources	Employee records Employment contracts Employment-related policies and procedures Health and safety records Employment equity records Training/learning and development records Job applicant information Reports to industry body
Information Technology	Information technology policies and procedures Disaster recovery plan and tests System security tests
Marketing	Market information Media releases Internal publications and newsletters Client communication by e-mail or SMS

DIVISION	CATEGORY
	Advertising and promotional material (including marketing brochures)
Operational	Records provided by clients Records provided by third parties regarding clients Records provided by clients' financial advisors Clients' transactional records Correspondence with clients Service agreements entered into with third parties
Risk	Risk register Risk Tolerance Framework Fraud Risk Register Internal audit plan and reports

7 The Purpose of Processing Personal Information

7.1 We may collect, transfer, share and otherwise process your personal information for, or relating to, the purposes of:

7.2 Fulfilling and provision of our services, products, or offerings you have requested, and

7.3 notifying you about important changes to these services, products, or offerings;

7.4 managing your account or our relationship and complying with your instructions or requests;

7.5 providing your personal information to our partners responsible for the management of the various portfolios;

7.6 detecting and preventing fraud, money laundering and terrorist financing risk in the interest of security and crime prevention;

7.7 assessing and dealing with complaints;

7.8 operational, marketing, auditing, legal and record keeping requirements;

7.9 verifying your identity;

7.10 verifying the identifies of beneficial owners of entities; and

7.11 carrying out marketing activities;

7.12 Instit only processes personal information on any of the following legal basis;

7.13 Consent;

7.14 for the conclusion and performance of a contract;

7.15 to comply with a legal obligation;

7.16 to protect a legitimate interest of a data subject;

7.17 for the proper performance of a public law duty; and/or

7.18 for the pursuance of a legitimate interest of BCI or 3rd party.

7.19 Instit will collect, use, and share your personal information in accordance with its Privacy Policy. This policy is available on our website or upon request.

8 Categories of Data Subjects and Personal Information processed by the Company

Categories of data subjects and personal information processed by the Company include the following:

Categories of Data Subject	Personal Information Processed
Clients / Prospective Clients: Natural Persons	Names; contact details; physical and postal addresses; dates of birth; identification numbers; financial information; nationality; confidential correspondence.
Clients / Prospective Clients: Juristic Persons	Names and positions, of contact persons; name of legal entity; physical / postal addresses and contact details; financial information; registration number; founding documents and related information; authorised signatories; information of connected parties and Ultimate Beneficial Owners, special personal information; images; voiceprints.
Contracted Service Providers / Vendors	Names of contact persons; name of legal entity; physical and postal address and contact details; financial

	information; registration number; founding documents; authorised signatories; BEE Certificates.
Employees / Potential Employees / Contracted staff members	Gender; marital status; title; race; age; language; identity number; physical and postal addresses and contact details; financial information; fingerprints; disability status; pregnancy status; shareholder scheme information; CVs; proof of qualifications; educational information, employment history, medical history, criminal history, opinions.
Apex Group Companies: Juristic Persons	Name of legal entity; physical / postal addresses and contact details; statutory information; financial information.

9 Records available in terms of other legislation

Records are kept in accordance with such other legislation as is applicable to Instit which includes, but is not limited to, the following:

9.1 Income Tax Act 58 of 1962

9.2 Financial Advisory and Intermediary Services Act 37 of 2002

9.3 Financial Intelligence Centre Act, 38 of 2001

9.4 Value Added Tax Act 89 of 1991

9.5 Occupational Health and Safety Act 85 of 1993

9.6 Labour Relations Act 66 of 1995

9.7 Basic Conditions of Employment Act 75 of 1997

9.8 Broad-Based Black Economic Empowerment Act 53 of 2003

9.9 Employment Equity Act 55 of 1998

9.10 Prevention of Organised Crime Act 121 of 1998

9.11 Protection of Constitutional Democracy against Terrorism and Related Activities Act No. 33 of 2004

9.12 Protection of Personal Information Act no. 4 of 2013

9.13 Medical Schemes Act 131 of 1998

9.14 Skills Development Levies Act 9 of 1999

9.15 Unemployment Insurance Act 63 of 2001

9.16 Unemployment Insurance Contributions Act 4 of 2002

9.17 Companies Act 71 of 2008

10 Information automatically available

10.1 The following categories of records are automatically available for inspection, or photocopying without having to be requested in terms of the Act:

10.1.1 Newsletters

10.1.2 Booklets

10.1.3 Pamphlets / Brochures

10.1.4 Reports of a public nature

10.1.5 Other information intended for public viewing.

10.2 The only fee payable for access to the records listed in this clause 10 is a prescribed fee for reproduction.

11 Recipients or categories of recipients to whom personal information is supplied

Instit ' business and the services you request of us require transfers to many third parties and/or operators in accordance with the purposes listed above and as mentioned in our Privacy Notice and Data Protection Notice. A non-exhaustive list of potential transfers includes:

11.1 Collecting and sending documents for external audits of client entities;

11.2 Collecting and sending documents for external audits of Apex Group entities;

11.3 Publications onto the public record, such as companies registries or beneficial ownership registers;

11.4 Any person with legal or regulatory power that may require such disclosure on legal grounds;

11.5 Service providers engaged by us to help us run our business and in order to effectively perform our Services

11.6 To 3rd parties as agreed with a client or as required or expressly permitted by applicable law;

12 Sharing of AML Information with banks, custodians, brokers, advisors, auditors or portfolio managers

Brokers, Banks, Custodians, Advisors, Auditors and Portfolio Managers may require information on you for their own due diligence to comply with regulations, we share the information you provide to us with them for this purpose.

13 Transborder flow of Personal Information

13.1 As a result of contracting with Instit your personal information will be processed in South Africa in accordance with POPIA. In addition, as an entity which offers goods and services into the European Union or elsewhere, where we process personal information of residents in the Union subject to the GDPR. Your personal information may be processed by any of the Apex Group offices, inside and outside the European Union or South Africa. There are agreements in place between the Apex offices to protect your data to GDPR / POPIA compliant standards. Should you require further information please contact the Information Officer.

13.2 Additionally your data may be entered into our accounting and/or billing systems, and our document management systems and your data may be processed by our sub-processors/sub-operators including our retail investment technology and third party service providers or outsourcing technology companies, including cloud services providers, in such cases, where data is processed outside of the European Union, the appropriate safeguards are in place. It may also be provided externally to banks, regulators, auditors, advisors (including, but not limited to, legal advisors), supervisory or governmental bodies as well as those appointed as directors and shareholders. At your request we will transfer your personal data to a new service provider.

14 Information security measures to protect Personal Information

14.1 Instit is committed to developing appropriate safeguards to ensure that personal information is kept secure and confidential at all times, and is protected against reasonably anticipated threats to its security or integrity, and against unlawful and unauthorised access or use.

14.2 Reasonable technical and organisational measures are implemented for the protection of personal information in the possession of the Company.

14.3 The Company continuously implements and monitors technical and organisational security measures to protect personal information against unauthorised access as well as accident or wilful manipulation, loss or destruction.

15 Request Procedures

Any and all records shall only be made available subject to the provisions of the Act.

15.1 Form Of Request

15.1.1 When making a request to access a record, the requester must use the prescribed form (refer to Annexure B), addressed to the head of the body.

15.1.2 The requester must provide sufficient detail on the request form to allow for the identification of the record and the requester. The requester should also indicate which form of access is required and specify a postal address or fax number in the Republic.

15.1.3 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.

15.1.4 If a request is being made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request.

15.2 Fees

15.2.1 A requester who seeks access to a record containing personal information about the requester is not required to pay the request fee.

15.2.2 Where fees are payable these are detailed in the request form.

15.2.3 If the request is granted, a further fee will be payable for the search, preparation and reproduction of the record.

15.2.4 The requester may lodge an application to the court against the tender or payment of the request fee or may lodge a complaint with the Information Regulator.

15.3 Decision

15.3.1 The Company will, within 30 days of receipt of a request, decide whether to grant or decline a request, providing reasons to that effect.

15.3.2 The 30 day period within which the Company has to decide whether to grant or refuse a request may be extended for a further period of not more than 30 days if reasonably required under the circumstances.

15.3.3 If the request for access is refused the requester may lodge an application to court or alternatively, lodge a complaint with the Information Regulator.

15.4 Grounds for Refusal

15.4.1 Instit has the right to refuse a request for information based on any of the following grounds:

(a) Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;

(b) Mandatory protection of the commercial information of a third party, if the record contains:

(i) Trade secrets of that third party;

(ii) Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and

(iii) Information disclosed in confidence by a third party, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.

(c) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;

(d) Mandatory protection of the safety of individuals and the protection of property;

(e) Mandatory protection of records which would be regarded as privileged in legal proceedings;

(f) The information relates to the commercial activities of Instit , which may include:

(i) Trade secrets of Apex Investment Consulting SA ;

(ii) Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Apex Investment Consulting SA ;

(iii) Information which, if disclosed, could put Apex Investment Consulting SA at a disadvantage in negotiations or commercial competition;

(iv) A computer program which is owned by Apex Investment Consulting SA and which is protected by copyright.

(g) The research information of Instit or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage;

15.4.2 A request for information that is clearly frivolous or vexatious, or which would involve an unreasonable diversion of resources will be refused.

16 Prescribed fees and forms in respect of Private Bodies

The prescribed fees and form for requests to private bodies, are attached to this manual, marked "Annexure A" and "Annexure B" respectively and are available on the website of the Information Regulator https://inforegulator.org.za/.

Annexure B – 'FORM 2 – Request for Access to Records' (also available at InfoRegSA-PAIA-Form02-Reg7.pdf)

Manual Update

We will update this Manual from time to time, without prior notice. Any amendments will be posted on this page with an updated revision date.

ANNEXURE A: FEE SCHEDULE

GENERAL: VALUE-ADDED TAX

Public and private bodies registered under the Value-Added Tax Act, 1991 (Act 89 of 1991), as vendors may add value-added tax to all fees prescribed in this Annexure.

PART I

FEES IN RESPECT OF GUIDE

The fee for a copy of the guide as contemplated in regulations 2(3)(b) and 3(4)(c) is R0,60 for every photocopy of an A4-sized page or part thereof.

PART II

FEES IN RESPECT OF PUBLIC BODIES

Not applicable to Apex Fund Service

PART III

FEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

2. The fees for reproduction referred to in regulation 11(1) are as follows—

	R
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c) For a copy in a computer-readable form on—	
(i) stiffy disc	7,50
(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

4. The access fees payable by a requester referred to in regulation 11(3) are as follows—

	R
(1)(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c) For a copy in a computer-readable form on—	
(i) stiffy disc	7,50

(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	

(2) For purposes of section 54(2) of the Act, the following applies—

(a) Six hours as the hours to be exceeded before a deposit is payable; and

(b) one third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.

ANNEXURE B:

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 *(when made on behalf of another person)*	
Postal Address	

Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		(h)	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		(h)	
	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	
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 *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
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 *(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 *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "X")*	
Personal inspection of record at registered address of public/private body *(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)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *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.*	
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:	

FEES	
a) *A request fee must be paid before the request will be considered.* b) *You will be notified of the amount of the access fee to be paid.* 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	

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	Electronic communication *(Please specify)*

Signed at _____ this __ day of _____ 20 ___

_____

Signature of Requester / person on whose behalf request is made

---

FOR OFFICIAL USE

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

_____

Signature of Information Officer

.....

SIGNATURE OF REQUESTER/PERSON ON WHOSE BEHALF REQUEST IS MADE