

**MANUAL PREPARED IN TERMS  
OF SECTION 51 OF THE  
PROMOTION OF ACCESS TO  
INFORMATION ACT, NO 2 OF 2000**

FEBRUARY 2025

## CONTENTS

<b>A</b>	<b>INTRODUCTION TO ENTITIES</b>	<b>1</b>
<b>B</b>	<b>PARTICULARS IN TERMS OF THE SECTION 51 MANUAL</b>	<b>1</b>
1.	CONTACT DETAILS	1
2.	GUIDE ON HOW TO USE PAIA	2
3.	DISCLOSURES REQUIRED IN TERMS OF SECTION 51(1)(C) OF PAIA INsofar AS THE POPIA IS CONCERNED	2
	(A) CATEGORIES OF DATA SUBJECTS:	2
	(B) PURPOSE OF PROCESSING:	3
	(C) RECIPIENTS OF PERSONAL INFORMATION	3
	(D) TRANSBORDER FLOWS OF PERSONAL INFORMATION	3
	(E) STORAGE AND DESTRUCTION OF PERSONAL INFORMATION	3
	(F) GENERAL DESCRIPTION OF SECURITY MEASURES	3
4.	TYPES OF RECORDS	5
	(A) RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION	5
	(B) RECORDS AVAILABLE WITHOUT REQUESTING ACCESS IN TERMS OF PAIA	5
	(C) RECORDS AVAILABLE ON REQUEST	5
5.	REQUESTING PROCEDURES	7
6.	AVAILABILITY OF THE MANUAL	7

**This manual applies to the following entities, all of whom are subsidiaries of Allan Gray Group Proprietary Limited as well as the below listed retirement funds:**

Subsidiaries of Allan Gray Group Proprietary Limited:

- Allan Gray Africa Equity Fund Limited
- Allan Gray Africa Bond Fund Limited
- Allan Gray Africa ex-SA Equity Fund Limited
- Allan Gray (Botswana) (Proprietary) Limited
- Allan Gray Bermuda Limited
- Allan Gray E2 Ventures GP Proprietary Limited
- Allan Gray Foreign Equity Fund Limited
- Allan Gray Foreign Fixed Interest Fund Limited
- Allan Gray Foreign Money Market Fund Limited
- Allan Gray Foreign Stable Fund Limited
- Allan Gray Frontier Markets Equity Fund Limited
- Allan Gray International Proprietary Limited
- Allan Gray Investment Services Proprietary Limited
- Allan Gray Life Limited
- Allan Gray Namibia (Proprietary) Limited
- Allan Gray Namibia Unit Trust Management Limited
- Allan Gray Nominees (RF) Proprietary Limited
- Allan Gray Proprietary Limited
- Allan Gray South Africa Proprietary Limited
- Allan Gray Unit Trust Management (RF) Proprietary Limited
- Black Entrepreneurship and Empowerment Proprietary Limited

Retirement Funds:

- Allan Gray Pension Preservation Fund
- Allan Gray Provident Preservation Fund
- Allan Gray Retirement Annuity Fund
- Allan Gray Umbrella Pension Fund
- Allan Gray Umbrella Provident Fund

## **A. INTRODUCTION TO ENTITIES**

Allan Gray Unit Trust Management (RF) Proprietary Limited, Allan Gray Life Limited (including the Guernsey branch), Allan Gray South Africa Proprietary Limited and Allan Gray Investment Services Proprietary Limited are wholly owned subsidiaries of Allan Gray Proprietary Limited. Allan Gray Nominees (RF) Proprietary Limited is wholly owned by Allan Gray Investment Services Proprietary Limited. Allan Gray E2 Ventures GP Propriety Limited, Allan Gray International Proprietary Limited, Allan Gray Namibia (Proprietary) Limited, Allan Gray Namibia Unit Trust Management Limited, Allan Gray (Botswana) (Proprietary) Limited, Allan Gray Proprietary Limited, and Allan Gray Bermuda Limited are the subsidiary companies of the holding company, Allan Gray Group Proprietary Limited.

Allan Gray Proprietary Limited, Allan Gray South Africa Proprietary Limited, Allan Gray International Proprietary Limited, and Allan Gray Life Limited are registered by the Financial Sector Conduct Authority ('Authority') as authorised Financial Services Providers. Allan Gray Investment Services Proprietary Limited is registered by the Authority as an authorised administrative Financial Services Provider and Allan Gray Nominees (RF) Proprietary Limited as its Nominee Company. Allan Gray Unit Trust Management (RF) Proprietary Limited is registered with the Authority as a collective investment scheme management company. Allan Gray Life Limited is an insurer licensed by the Prudential Authority to conduct investment-linked life insurance business as defined in the Insurance Act 18 of 2017.

Allan Gray Proprietary Limited is the sponsor of the Allan Gray Pension Preservation Fund, Allan Gray Provident Preservation Fund, Allan Gray Retirement Annuity Fund, Allan Gray Umbrella Provident Fund and Allan Gray Umbrella Pension Funds. Allan Gray Investment Services Proprietary Limited is the duly appointed administrator for the funds.

Allan Gray Bermuda Limited is the holder of the founder shares in Allan Gray Foreign Equity Fund Limited, Allan Gray Foreign Fixed Interest Fund Limited, Allan Gray Foreign Money Market Fund Limited, Allan Gray Foreign Stable Fund Limited, Allan Gray Africa Equity Fund Limited, Allan Gray Africa Bond Fund Limited, Allan Gray Africa ex-SA Equity Fund Limited and Allan Gray Frontier Markets Equity Fund Limited, which latter eight entities are Bermuda Exempted Mutual Fund Companies.

The Chairman of Allan Gray Group Proprietary Limited has tasked the Group Legal and Compliance Departments to attend to all matters relating to the Promotion of Access to Information Act ("PAIA") and the applicable entity noted above will be referred to as "Allan Gray" herein.

## **B. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL**

This manual has been compiled in accordance with PAIA and applies to all the identified entities.

### **1. Contact details**

Allan Gray Proprietary Limited will deal with all requests relating to any of the entities. All requests for information in terms of this manual should be directed to:

Data Protection Information Officer

Allan Gray Proprietary Limited	I Silo Square
PO Box 51318	V&A Waterfront
CAPE TOWN	CAPE TOWN
8002	8001

Telephone: +27 86 000 0654

E-mail: [protect@allangray.co.za](mailto:protect@allangray.co.za)

## 2. Guide on how to use PAIA

The Information Regulator ("IR") has, in terms of section 10(1) of PAIA, updated and made available a revised Guide on how to use PAIA ("Guide") in an easily comprehensible form and manner, accessible by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act 2 of 2013 ("POPIA").

Should you require to exercise any right contemplated in PAIA and POPIA, we refer you to the Guide. It includes:

- (a) what the objects of PAIA and POPIA are;
- (b) the relevant contact details of each public and private body (where possible);
- (c) the process that needs to be followed to request access to records;
- (d) assistance available from the IR and Information Officers in terms of both PAIA and POPIA;
- (e) how to get access to the manual of a private body;
- (f) all the remedies available in law to you; and
- (g) details on prescribed fees payable in respect of requests for information.

This Guide is available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

Please direct any queries to:

Information Regulator

Postal address: JD House  
27 Stiemens Street  
Braamfontein  
JOHANNESBURG 2001

Website: [www.inforegulator.org.za](http://www.inforegulator.org.za)

E-mail: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

## 3. Disclosures required in terms of Section 51(1)(c) of PAIA insofar as POPIA is concerned

Allan Gray will only collect, process and store personal information, with consent, and for legitimate purposes. This includes the following:

### (a) Categories of data subjects:

Categories of Data Subjects	Personal Information that may be processed
Clients	Name and surname, nationality, address, contact details, registration numbers or identity numbers and date of birth, email address and bank details
Service Providers	Names, registration number, tax information, address, and bank details
Employees	Name, identity numbers, tax information, contact details, address, qualifications, gender and race

**(b) Purpose of processing:**

**(i) Procurement of consent**

This is where a data subject has consented to the processing of the personal information provided as part of onboarding or any subsequent instructions relating to the data subject's investment(s). Allan Gray is also required by law to collect certain personal information of its clients, the data subjects.

**(ii) Fulfilment of our contract with our clients**

This is where the processing of personal information is necessary for us to provide investment management and other services and benefits as agreed between us and our clients.

**(iii) Compliance with legal obligations**

This is where we need to process personal information to comply with any binding legal obligations imposed on us by the relevant governmental or regulatory authority.

**(iv) Legitimate interests**

Verification for the purposes of preventing and mitigating financial crimes, fraud or money laundering; Adhering to local and international best practice guidelines to safeguard our client's investments; or Performing the relevant IT due diligence testing to detect malicious data and cyber threats.

**(c) Recipients of personal information**

Allan Gray shares personal information with third party service providers in compliance with its contractual and legal obligations.

**(d) Transborder flows of personal information**

Allan Gray may transfer your personal information to a foreign country, where necessary, if you have offshore investments. Allan Gray will ensure that anyone to whom it passes personal information to, is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection and the third party agrees to treat that personal information with the same level of protection as Allan Gray is obliged to under POPIA.

Any transfer of personal information cross border shall be with the data subject's consent and / or where it is necessary for the performance of a contract between Allan Gray and the data subject.

**(e) Storage and destruction of personal information**

We will retain personal information for the duration of the relationship between Allan Gray and the data subject in question. After such relationship ceases, , we will keep personal information in accordance with retention requirements imposed by any law and for prudent record-keeping purposes. Personal information may be retained for longer than such periods, should it be the subject of any litigation or for other legal reasons. We may also keep personal information for research or statistical purposes with the necessary security controls in place.

**(f) General description of security measures**

Allan Gray continuously implements appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of personal information processed. These measures are designed to prevent-

- loss of, damage to or unauthorised destruction of personal information; and
- unlawful access to or processing of personal information.

The measures taken by Allan Gray include, but are not limited to-

**(i) Identity and Access management**

Formal standards and procedures are defined and implemented covering all aspects of access management to

minimise the risks associated with unauthorised or inappropriate access to applications and data

(ii) Threat and Vulnerability management

Defined and documented processes to manage, monitor and respond to potential electronic threats and vulnerabilities are adopted and implemented.

Defined, documented and implemented incident management process that support the resolution and response to information security incidents are implemented.

(iii) Patch management

Defined and documented process to implement and maintain preventive, detective and corrective measures to protect technology systems and data from malicious software are developed.

The effectiveness of these measures shall be regularly assessed and adjusted as necessary to align with evolving threats and regulatory requirements.

## 4 Types of Records

### (a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this manual and the financial services industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

### (b) Records available without requesting access in terms of PAIA

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of PAIA. The Minister must publish any description so submitted by notice in the Gazette.

The identified entities have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at [www.allangray.co.za](http://www.allangray.co.za).

### (c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in PAIA, available upon request for the purposes of PAIA:

Records are held on the following subjects:

- Personnel records;
- Client-related records;
- Private body records; and
- Records in the possession of or pertaining to other parties.

#### (i) Personnel records

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



Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

(ii) Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records.

(iii) Private body records

A private body's records relate to the body's own affairs and are considered to include, but not limit to:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

(iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

## 5. Requesting procedures

A person, having provided adequate proof of identity, may request:

- (a) any Allan Gray entity to confirm, free of charge, whether or not that private body holds personal information about them.
- (b) the record or a description of the personal information about the data subject held by the Allan Gray entity, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.
- (c) Any record held by an Allan Gray entity that is required for the exercise or protection of the requestor's rights.

A person may request any Allan Gray entity to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

A person who wants access to the records of any of the identified private bodies must complete the necessary request form.

The request form can be accessed on [www.allangray.co.za](http://www.allangray.co.za) or [www.inforegulator.org.za](http://www.inforegulator.org.za). If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the email address provided in paragraph 1.

The completed request form must be sent to the address or email address provided in paragraph 1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on <https://www.allangray.co.za/globalassets/legal/fee-re-private-bodies.pdf>.

All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

**NOTE:** Access to certain records may be or must be refused on the grounds set out in the applicable sections of Chapter 4 of Part 2 and Chapter 4 of Part 3 of PAIA. . If a request for access to personal information is made and part of that information may or must be refused in terms of PAIA, every other part must be disclosed.

Mandatory grounds for refusal include, but are not limited to:

- Information for the protection of the privacy of individuals;
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information.

## 6. Availability of the manual

Copies of this manual are available for inspection, free of charge, at the offices of Allan Gray Proprietary Limited. Copies are also available on our website ([www.allangray.co.za](http://www.allangray.co.za)).

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8001  
South Africa

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F 0860 000 655 or +27 (0)21 415 2492

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