

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 FOR THE FOLLOWING ENTITIES INDIVIDUALLY AND COLLECTIVELY

- 1. GOLDGRO PROPRIETARY LIMITED**
Registration No. 1999/027625/07
- 2. SCOIN TRADING PROPRIETARY LIMITED**
Registration Number 2006/028395/07
- 3. TALYA TRADING PROPRIETARY LIMITED**
Registration No. 2004/003715/07
- 4. GOLD FOR LIFE PROPRIETARY LIMITED**
Registration No. 2009/017689/07

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1. INTRODUCTION

In accordance with section 32 (1) (h) of the Constitution of the Republic of South Africa every person has access to information held by others when required for the exercise or protection of any rights. Pursuant thereto the State has passed the Promotion of Access to Information Act No. 2 of 2000 (the Act”) to respect and foster such transparency and provide society with the means to more fully exercise and protect all of their rights, as provided for therein.

The entities inter alia market coins and medallions, support the constitutional right of access to information, and are committed to provide access to their records in accordance with the provisions of the Act, the confidentiality they owe third parties and the principles of South African law.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

This Manual will be updated from time to time, as and when required.

2. CONTACT DETAILS

To make a request or obtain further information, contact

MR ANREAS RITZLMAYR
THE INFORMATION OFFICER
POSTAL ADDRESS: P.O. BOX 785399 SANDTON 2146
STREET ADDRESS: 5TH FLOOR TWIN TOWERS WEST, SANDTON CITY
PHONE NUMBER: +27 011 784 8551

FAX NUMBER: +27 011 784 8524
ELECTRONIC MAIL ADDRESS: info@sagoldcoin.com
WEBSITE ADDRESS: www.sagoldcoin.com

A copy of this manual will also be available at the above website or the above office.

3. GUIDE ON UTILISING RIGHTS TO ACCESS INFORMATION

The Human Rights Commission (“HRC”) has compiled a guide in each official language in an easily comprehensible form and manner, as may be reasonably required by a person who wishes to contemplate any right contemplated in the Act.

This may be accessed at the offices of the HRC at PAIA UNIT

The Research and document department

Private Bag 2700

Houghton

2041

Telephone +27 011 484 8300

Fax +27 011 484 0582/1300

Website: www.sahrc.org.za

Email: PAIA@sahrc.org.za

4. VOLUNTARY DISCLOSURE AND AUTOMATIC AVAILABILITY OF CERTAIN RECORDS.

At this stage there are no such records. Certain records are however freely available on the website at www.sagoldcoin.com

5. RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION.

The requestor may also request all records kept and made available in terms of other legislation applicable to the above entities as it applies to the environment in which the entity operates, in accordance with such legislation, such as:

Information is available in terms of the following legislation to the persons or entities specified in such

Companies Act 61 of 1973

Income Tax Act 58 of 1962

Value Added Tax Act 89 of 1991

Labour Relations Act 66 of 1995

Basic Conditions of Employment Act 75 of 1997

Employment Equity Act 55 of 1998

Skills Development Levies Act 9 of 1999

Unemployment Insurance Act 30 of 1966

Electronic Communications and Transactions Act 25 of 2002.

Telecommunications Act 103 of 1996

Electronic Communications Act 36 of 2005

ICASA Act 13 of 2000

Film and Publications Act 65 of 1996

Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002

The Consumer Protection Act 68 of 2008

6. REQUESTS FOR ACCESS TO RECORDS

A requestor may request information if it is required for the exercise or protection of rights, the procedural aspects are complied with, and there are no legal grounds for refusal thereof.

The entity may withhold a record until the prescribed fee has been paid.

A request must be made in the prescribed form to the entity at its above address, fax number or electronic mail address, for the attention of the Information Officer, and must provide sufficient particularity to identify the record/s requested and identify the requester.

This must also indicate the form of access required, specify the requester's postal address of fax number in the Republic of South Africa, and provide an explanation of why the requested record is required..

If reply in any other manner is required, the manner and particulars must be provided.

Any request on behalf of another person must reasonable proof of capacity.

The form is available at the HRC or the above offices.

7. THE SUBJECTS ON WHICH RECORDS ARE HELD, AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT.

This includes (insofar as private bodies are concerned)

The objects of the Act

Such particulars of every private body as are practicable

The manner and form of a request for access to a private body contemplated in section 50 of the Act

The assistance available from the HRC in terms of the Act.

All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by the Act, including the manner of lodging an internal appeal, and an application with a court against a decision on internal appeal or of the head of a private body.

The provisions of section 50 of the Act requiring a private body to compile a Manual, and how to obtain access to a manual.

The provisions of section 52 providing for voluntary disclosure of records.

The notices regarding fees to be paid in relation to requests for access

The regulations

8. TYPES OF RECORDS

The requester may request access to the following records

PERSONNEL RECORDS

These include

Personal records provided to the entity by their personnel

Records out the entities personnel provided by third parties

Conditions of employment and other personnel-related contractual and quasi-legal records.

Internal evaluation records

Other internal records and correspondence.

CLIENT RELATED RECORDS

These include

Records a client has provided to a third party acting on behalf of the entity.

Records a third party has provided to the entity, and records generated by or within the entity pertaining to the client, including transactional records.

THE ENTITIES PRIVATE RECORDS

These include

Financial records Operational records

Databases

Information Technology

Marketing records

Internal correspondence

Product records

Statutory records

Internal policies and procedures

Product and price lists

RECORDS OF OTHER PARTIES

The include

Contractors, suppliers, clients, customers, related entities, joint venture partners, service providers.

Such parties may possess records which belong to the entities.

9. REFUSAL OF REQUESTS

In accordance with the provisions of the Act, requests may be declined for inter alia, the following grounds

It is prohibited to unreasonably disclose personal information of natural-person third parties to requestors, including deceased persons (subject to exceptions).

A request must be refused if it relates to records containing third party

Information pertaining to Trade secrets

Financial, commercial, scientific or technical information where disclosure would be likely to harm the commercial or financial interests of the third party.

Information supplied in confidence by the third party which could reasonably be expected to put the third party at a disadvantage in contractual or other negotiations, or prejudice the third party in commercial competition.

The disclosure of information where this is likely to expose the third party, the person conducting the research on behalf of the third party, or the subject matter of the research to serious disadvantage.

Disclosure is prohibited if it would constitute a breach of any confidentiality owed to a third party in terms of an agreement

A request for information must be refused if disclosure could reasonably be expected to Endanger the life or safety of an individual

Prejudice or impair the security of a building, structure or system, including but not limited to a computer or communications system, means of transport or any other property

Prejudice methods systems plans or procedures for the protection of an individual in accordance with a witness protection scheme or safety of the public.

A request must be refused if subject to legal privilege unless waived by the party entitled thereto.

Requests may be refused if

They contain trade secrets, financial commercial scientific or technical information the disclosure of which would be likely to put the entities at a disadvantage in contractual or other negotiations, or prejudice them in commercial competition.

They consist of a computer program owned by the entity.

This information must be provided if it pertains to the results of product or environment the disclosure of which would reveal a serious public safety or environmental risk

Disclosure is discretionary if this pertains to the entities.

A record must be disclosed if this would reveal evidence of a substantial contravention of a failure to comply with the law, imminent and serious public safety or environmental risk; and if the public interest in the disclosure clearly outweighs the harm.

10 RIGHTS OF APPEAL

A requestor or third party who is dissatisfied with a refusal to grant access or to grant to any information may within 30 days of notification of the decision, apply to court for relief.