



APPLICABLE TO FLUIDROCK ENTITIES

Owner:	CEO
Type of Policy:	Promotion of Access to Information Act Manual for the FluidRock Group Combined PAIA and POPIA Manual in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and Chapter 5 of the Protection of Personal Information Act 4 of 2013 ("POPIA")
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TABLE OF CONTENT

1. INTRODUCTION AND PURPOSE	2
1.1 Purpose of this Manual	3
1.2 Constitutional and Legislative Framework.....	3
2. SCOPE AND APPLICATION	3
2.1 Application of this Manual	3
2.2 Consolidation	3
3. ENTITIES COVERED BY THIS MANUAL	4
4. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER	5
4.1 Information Officer.....	5
4.2 Deputy Information Officer	5
4.3 Responsibilities	5
5. GUIDE ON HOW TO USE PAIA.....	6
5.1 Information Regulator's Guide.....	6
5.2 How to Obtain the Guide	6
5.3 Availability and Use of the Guide	6
6. FLUIDROCK GROUP STRUCTURE AND FUNCTIONS.....	7
6.1 Group Structure	7
6.2 Principal Business Activities	8
6.3 Regulatory Status.....	8
7. CATEGORIES OF RECORDS HELD BY THE FLUIDROCK GROUP.....	8
7.1 Introduction.....	9
7.2 Records Held by All FluidRock Group Entities (Common Records)	9
8. Retention of Records.....	14
9. RECORDS AUTOMATICALLY AVAILABLE.....	14
9.1 Publicly Available Records.....	14
9.2 Records Available Upon Request Without a PAIA Application	14
10. REQUEST PROCEDURE FOR ACCESS TO RECORDS.....	15
10.1 Who May Request Access.....	15

10.2 Personal Requesters	15
10.3 How to Make a Request	15
10.4 Information to be Provided in the Request.....	16
10.9 Responding to Requests	16
10.10 Extension of Time	17
10.11 Third Party Notification.....	17
11. PRESCRIBED FORMS	17
11.1 Form C: Request for Access to Records	17
11.2 Form D: Outcome of Request.....	18
12. FEES PAYABLE	18
12.1 Request Fee	18
12.2 Access Fees	18
12.3 Prescribed Fees (as at 2026):	18
12.4 Deposit	19
12.5 Payment Methods	19
13. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS.....	19
13.1 Mandatory Grounds for Refusal.....	19
13.7 Severability.....	20
13.8 Public Interest Override	20
14. PROTECTION OF PERSONAL INFORMATION (POPIA)	21
14.1 FluidRock Group as a Responsible Party	21
14.2 Purpose of Processing Personal Information	21
14.3 Categories of Personal Information Processed	21
15. LAWFUL PROCESSING CONDITIONS.....	23
16. DATA SUBJECT RIGHTS	24
16.2 How to Exercise POPIA Rights	24
17. SECURITY SAFEGUARDS.....	25
18. RETENTION AND DISPOSAL	25
18.6 Key retention periods:.....	26
19. CROSS-BORDER TRANSFERS.....	26
20. DATA BREACHES.....	27
21. REMEDIES AVAILABLE TO REQUESTERS.....	27

22. Internal Appeal	27
23. Complaint to the Information Regulator	27
24. Application to Court	28
25. Contact Details for the Information Regulator	28
26. AVAILABILITY OF THIS MANUAL	28
26.1 Where to Obtain this Manual.....	28
26.2 Copies of this Manual.....	29
27. UPDATES AND REVIEW	29
28. Review and Amendment.....	29
29. Publication of Updates	29
30. Contact for Queries.....	29
ANNEXURE A: FORM C – REQUEST FOR ACCESS TO RECORDS	29

1. INTRODUCTION AND PURPOSE

1.1 Purpose of this Manual

- 1.1.1** This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and incorporates the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA") as required by the Information Regulator.

1.2 Constitutional and Legislative Framework

- 1.2.1** The purpose of this manual is to:

- 1.2.1.1** Inform members of the public of the records held by the FluidRock Group entities, including the Cygnet Group entities, and how to request access to such records in terms of PAIA.
- 1.2.1.2** Provide information about the categories of records held by the FluidRock Group, including records processed for governance, statutory, compliance, training, Talent, recruitment, placement, fiduciary, advisory and related professional services purposes.
- 1.2.1.3** Explain how personal information is processed, protected, accessed, corrected or deleted in accordance with POPIA and the FluidRock Group's internal policies, safeguards and lawful business purposes.

2. SCOPE AND APPLICATION

2.1 Application of this Manual

- 2.1.1** This manual applies to all legal entities within the FluidRock Group as listed in Section 3 below.
- 2.1.2** It covers:
- 2.1.2.1** The types of records held by the FluidRock Group entities.
- 2.1.2.2** The procedures for requesting access to records under PAIA.
- 2.1.2.3** The rights of data subjects under POPIA.
- 2.1.2.4** Contact details for the Information Officer and Deputy Information Officer.

2.2 Consolidation

- 2.2.1** This is a consolidated Group PAIA Manual prepared on behalf of all FluidRock Group entities. While each entity is a separate juristic person and "private body" under PAIA, this consolidated manual satisfies the Section 51 obligations for all entities listed in Section 3.

2.2.2 Where entity-specific information is required, such as records held only by certain entities, this is clearly indicated in the relevant sections of this manual.

3. ENTITIES COVERED BY THIS MANUAL

3.1 This PAIA Manual applies to the following legal entities, collectively referred to as the "FluidRock Group" or the "Group":

Entity Name	Registration Number	Status
FluidRock Holdings (Pty) Ltd	2019/569097/07	Parent holding company
FluidRock North (Pty) Ltd	2019/540451/07	BEE Company
FluidRock South (Pty) Ltd	2019/550689/07	BEE Company
FluidRock Governance Group (Pty) Ltd	2016/252913/07	Operating subsidiary
FluidRock Governance Academy (Pty) Ltd	2013/187505/07	Operating subsidiary
FluidRock Statutory (Pty) Ltd	1999/024207/07	Operating subsidiary (FICA Accountable Institution)
FluidRock Advisory (Pty) Ltd	2008/008745/07	Operating subsidiary
FluidRock Co Sec (Pty) Ltd	2016/093836/07	Operating subsidiary
FluidRock Compliance (Pty) Ltd	2019/459310/07	Operating subsidiary

3.2 Cygnet Group Entities (Joint Venture):

3.2.1 FluidRock Holdings (Pty) Ltd holds a 50% shareholding in Cygnet Group (Pty) Ltd. The remaining 50% is held by Richard Hayne. The Cygnet Group comprises the following companies:

Entity Name	Registration Number	Status
Cygnet Group (Pty) Ltd	2025/524201/07	Joint venture holding company
Cygnet Fiduciary (Pty) Ltd	2025/524156/07	Operating subsidiary of Cygnet Group (FICA Accountable Institution)

Cygnnet Corporate Services (Pty) Ltd	2025/483911/07	Operating subsidiary of Cygnnet Group
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3.3 All entities' physical and postal registered addresses are at:

3.3.1 One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196, Republic of South Africa.

4. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

4.1 Information Officer

4.1.1 In terms of Section 51 of PAIA and Section 55 of POPIA, Ronelle Kleyn has been designated as the Information Officer for all FluidRock Group entities, excluding the Cygnnet Group entities, and Richard Hayne has been designated as the Information Officer for the Cygnnet Group entities listed in Section 3.

4.1.2 Name: Ronelle Kleyn, CEO, FluidRock Group

4.1.2.1 Email: ronelle@fluidrockgovernance.com

4.1.2.2 Telephone: 086 111 1010

4.1.2.3 Physical and Postal Address: One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196.

4.1.3 Name: Richard Hayne, CEO, Cygnnet

4.1.3.1 Email: richard@cygnetgroup.co.za

4.1.3.2 Telephone: 086 111 1010

4.1.3.3 Physical and Postal Address: One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196.

4.2 Deputy Information Officer

4.2.1 The following person has been designated as the Deputy Information Officer for all FluidRock Group entities, excluding the Cygnnet Group.

4.2.2 Name: Annamarie van der Merwe, Executive Chair, FluidRock Group

Email: avdm@fluidrockgovernance.com

Telephone: 086 111 1010

Physical Address: One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196.

4.3 Responsibilities

4.3.1 The Information Officer is responsible for:

4.3.1.1 Receiving and processing requests for access to records in terms of PAIA.

- 4.3.1.2** Deciding whether to grant or refuse access to requested records.
- 4.3.1.3** Ensuring compliance with PAIA and POPIA across all relevant FluidRock Group entities.
- 4.3.1.4** Acting as the primary contact point for data subjects exercising their rights under POPIA.
- 4.3.1.5** Liaising with the Information Regulator on PAIA and POPIA matters.
- 4.3.2** The Deputy Information Officer assists the Information Officer and acts in the Information Officer's absence.

5. GUIDE ON HOW TO USE PAIA

5.1 Information Regulator's Guide

- 5.1.1** Section 10 of PAIA requires the Information Regulator to compile a guide to assist persons wishing to exercise their rights under PAIA.
- 5.1.2** The guide is available in all eleven official languages and contains information on:
 - 5.1.2.1** The objects of PAIA.
 - 5.1.2.2** How to make a request for access to records.
 - 5.1.2.3** Remedies available if a request is refused.
 - 5.1.2.4** The functions and contact details of the Information Regulator.

5.2 How to Obtain the Guide

- 5.2.1** The guide is available from the Information Regulator at:
 - 5.2.1.1** Information Regulator (South Africa), JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001.
 - 5.2.1.2** Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017.
 - 5.2.1.3** Telephone: 010 023 5200.
 - 5.2.1.4** Email: inforegulator@justice.gov.za
 - 5.2.1.5** Website: www.justice.gov.za/inforeg
 - 5.2.1.6** PAIA Portal: <https://www.justice.gov.za/forms/paia.html>
- 5.2.2** The guide is also available on the FluidRock Group website at www.fluidrock.co.za.

5.3 Availability and Use of the Guide

- 5.3.1** Members of the public are encouraged to consult the Information Regulator's guide before submitting a PAIA request, so that requests are clear, complete and properly directed.

- 5.3.2** The guide does not replace this manual and should be read together with the request procedure, prescribed forms, fees, grounds for refusal and remedies set out in this manual.
- 5.3.3** Where a requester is uncertain how to proceed, the requester may contact the Information Officer for procedural guidance, provided that the Information Officer is not required to provide legal advice or to create records that do not already exist.

6. FLUIDROCK GROUP STRUCTURE AND FUNCTIONS

6.1 Group Structure

- 6.1.1** The FluidRock Group is a South African professional services group specialising in governance, risk, compliance, statutory services, company secretarial services, fiduciary services, and training.
- 6.1.2** **FluidRock Holdings (Pty) Ltd** is the parent holding company of the Group.
- 6.1.3** **FluidRock South (Pty) Ltd** and **FluidRock North (Pty) Ltd** are two holding entities with no activity or operations.
- 6.1.4** The Group operates through the following business divisions:
- 6.1.4.1** **FluidRock Governance Group (Pty) Ltd:** is the parent holding company of the Governance Group and oversees the strategic direction, governance, and compliance of its subsidiary entities.
- 6.1.4.2** **FluidRock Governance Academy (Pty) Ltd:** Delivers governance, risk, and compliance training and professional development programmes, and houses the Talent division, which provides recruitment, placement, board placement, candidate sourcing, talent matching and related talent advisory services for clients and candidates.
- 6.1.4.3** **FluidRock Statutory (Pty) Ltd:** Provides statutory services including company secretarial and statutory compliance management and is registered as an Accountable Institution under the Financial Intelligence Centre Act 38 of 2001 ("FICA").
- 6.1.4.4** **FluidRock Advisory (Pty) Ltd:** Offers strategic governance advisory, board effectiveness, and corporate governance services.
- 6.1.4.5** **FluidRock Co Sec (Pty) Ltd:** Provides governance, company secretarial, board support and meeting management services.
- 6.1.4.6** **FluidRock Compliance (Pty) Ltd:** Delivers compliance management, regulatory risk assessments, and ethics monitoring services.

6.1.4.7 Cygnet Group (Joint Venture):

6.1.4.7.1 FluidRock Holdings (Pty) Ltd holds a 50% interest in Cygnet Group (Pty) Ltd, a joint venture with Richard Hayne, who holds the remaining 50% shareholding. Cygnet Group owns the entities listed in clauses 6.1.4.7.2 and 6.1.4.7.3.

6.1.4.7.2 Cygnet Fiduciary (Pty) Ltd: Provides fiduciary services, the set up and maintenance of special purpose vehicles and nominee services that include the appointment of directors and trustees on the special purpose vehicles and trusts within a security structure. It is registered as an Accountable Institution under FICA.

6.1.4.7.3 Cygnet Corporate Services (Pty) Ltd: Provides corporate services, business administration and consulting services in relation to the provision of securitisation.

6.2 Principal Business Activities

6.2.1 The FluidRock Group provides the following services to clients:

6.2.1.1 Corporate governance advisory and board support.

6.2.1.2 Company secretarial and corporate administration.

6.2.1.3 Statutory compliance management.

6.2.1.4 Risk management and internal audit.

6.2.1.5 Fiduciary services.

6.2.1.6 Governance, risk, and compliance training.

6.2.1.7 Recruitment, placement, board placement, candidate sourcing, talent matching and related talent advisory services through the Talent division within FluidRock Governance Academy.

6.3 Regulatory Status

6.3.1 Two entities within the FluidRock Group are registered as Accountable Institutions under FICA and are subject to additional regulatory obligations relating to client due diligence, record-keeping, and reporting of suspicious transactions:

6.3.1.1 FluidRock Statutory (Pty) Ltd.

6.3.1.2 Cygnet Fiduciary (Pty) Ltd.

7. CATEGORIES OF RECORDS HELD BY THE FLUIDROCK GROUP

7.1 Introduction

7.1.1 This section describes the categories of records held by the FluidRock Group. Records are held in both electronic and physical formats and are stored securely in accordance with applicable legal and regulatory requirements.

7.1.2 Please note: The inclusion of any category of records in this manual does not imply that a request for access to such records will automatically be granted. All requests for access are subject to the provisions of PAIA, including the grounds for refusal set out in Chapter 4 of PAIA.

7.2 Records Held by All FluidRock Group Entities (Common Records)

7.2.1 The following categories of records are held by all or most FluidRock Group entities:

7.2.2 Corporate Governance and Statutory Records

7.2.2.1 Foundational documents such as Memorandum of Incorporation (MOI) and Shareholders Agreements.

7.2.2.2 CIPC registration certificates and annual returns.

7.2.2.3 Share certificates and registers.

7.2.2.4 Directors' registers and declarations of interest.

7.2.2.5 Minutes of board meetings, matters arising and resolutions.

7.2.2.6 Shareholder agreements and resolutions.

7.2.2.7 Delegation of authority frameworks.

7.2.2.8 Board charters and committee terms of reference.

7.2.3 Financial Records

7.2.3.1 Annual Financial Statements, including audited financial statements and management accounts.

7.2.3.2 Tax returns and assessments, including income tax, VAT, PAYE, UIF and SDL records.

7.2.3.3 General ledgers, journals and subsidiary ledgers.

7.2.3.4 Bank statements and reconciliations.

7.2.3.5 Invoices, receipts and payment records.

7.2.3.6 Asset registers and depreciation schedules.

7.2.3.7 Budgets and financial forecasts.

7.2.3.8 Audit files and reports, both internal and external.

7.2.4 Human Resources and Employment Records

7.2.4.1 Employment contracts and appointment letters.

- 7.2.4.2** Employee personal information, including names, identity numbers, contact details, banking details and tax numbers.
- 7.2.4.3** Payroll records and payslips.
- 7.2.4.4** Leave records, including annual, sick, maternity and family responsibility leave.
- 7.2.4.5** Performance appraisals and development plans.
- 7.2.4.6** Disciplinary and grievance records.
- 7.2.4.7** Training records and skills development plans.
- 7.2.4.8** Employment Equity reports and plans.
- 7.2.4.9** Unemployment Insurance Fund (UIF) and compensation fund records.
- 7.2.4.10** Sick notes.
- 7.2.4.11** Occupational health and safety records.
- 7.2.4.12** Pension and provident fund records.
- 7.2.4.13** Resignations, terminations and exit interviews.

7.2.5 Talent, Recruitment and Placement Records

- 7.2.5.1** Candidate and work-seeker profiles, curriculum vitae, application forms, cover letters, portfolios and supporting application records.
 - 7.2.5.1.1** Identity, contact, qualification, certification, professional membership, employment history and skills information provided by candidates or collected from lawful sources for recruitment and placement purposes.
 - 7.2.5.1.2** Interview notes, screening questionnaires, assessment results, shortlist records, candidate comparison records, placement recommendations and internal decision records, subject always to confidentiality, fairness and applicable access limitations.
 - 7.2.5.1.3** Reference checks, background screening records, qualification verification records, consent records and correspondence with referees, clients, candidates and authorised screening service providers.
 - 7.2.5.1.4** Client role briefs, job specifications, vacancy mandates, placement agreements, fee arrangements, candidate submission records, offer records, acceptance records and placement outcome records.
 - 7.2.5.1.5** Talent pipeline records, candidate consent preferences, opt-in records for future opportunities, communication logs, CRM records, marketing preferences and records used to manage ongoing candidate and client relationships.

7.2.6 Client and Supplier Records

- 7.2.6.1 Client employee contact details.
- 7.2.6.2 Client information for Salesforce CRM.
- 7.2.6.3 Client contracts and service level agreements.
- 7.2.6.4 Client correspondence, including emails, letters and meeting notes.
- 7.2.6.5 Invoices and statements of account.
- 7.2.6.6 Supplier contracts and purchase orders.
- 7.2.6.7 Supplier invoices and payment records.
- 7.2.6.8 Procurement records and tender documentation.

7.2.7 Information Technology and Information Security Records

- 7.2.7.1 IT policies and procedures.
- 7.2.7.2 Information security policies and incident logs.
- 7.2.7.3 User access controls and permissions.
- 7.2.7.4 System backups and disaster recovery plans.
- 7.2.7.5 Software licences and agreements.
- 7.2.7.6 Network and system logs.
- 7.2.7.7 Cybersecurity assessments and penetration test reports.

7.2.8 Compliance and Risk Management Records

- 7.2.8.1 Compliance policies and procedures.
- 7.2.8.2 Compliance universe registers and obligation registers.
- 7.2.8.3 Compliance risk assessments and risk registers.
- 7.2.8.4 Compliance incident registers and breach reports.
- 7.2.8.5 Audit reports and management responses.
- 7.2.8.6 Regulatory correspondence and submissions.
- 7.2.8.7 PAIA requests and responses.
- 7.2.8.8 POPIA records of processing activities (ROPA).
- 7.2.8.9 Data subject access requests and responses.

7.2.9 Intellectual Property and Proprietary Information

- 7.2.9.1 Trademarks, trade names, and branding materials.
- 7.2.9.2 Training materials, course content, and learning methodologies.
- 7.2.9.3 Marketing materials and website content.
- 7.2.9.4 Confidential business strategies and plans.
- 7.2.9.5 Proprietary client frameworks and tools.

7.2.10 Insurance Records

7.2.10.1 Insurance policies, including professional indemnity, public liability, property and motor vehicle policies.

7.2.10.2 Insurance claims and correspondence.

7.2.10.3 Risk assessments for insurance purposes.

7.2.11 *Property and Lease Records*

7.2.11.1 Lease agreements for office premises.

7.2.11.2 Municipal accounts and rates.

7.2.11.3 Property maintenance and facilities management records.

7.2.12 *Correspondence and Communications*

7.2.12.1 General correspondence, including emails, letters and memos.

7.2.12.2 Board and management reports.

7.2.12.3 Internal and external communications.

7.2.12.4 Media releases and public statements, if applicable.

7.3 In addition to the common records listed above, the following entities hold additional categories of records due to their status as Accountable Institutions under the Financial Intelligence Centre Act 38 of 2001:

7.3.1 FluidRock Statutory (Pty) Ltd.

7.3.2 Cygnet Fiduciary (Pty) Ltd.

7.3.3 *FICA Client Due Diligence Records*

7.3.3.1 Client identification and verification documents, including certified copies of identity documents, passports and proof of address.

7.3.3.2 Beneficial ownership information and verification.

7.3.3.3 Source of funds and source of wealth documentation.

7.3.3.4 Corporate client documentation, including registration certificates, memoranda of incorporation, resolutions and shareholder information.

7.3.3.5 Trust deeds, letters of authority and trustees' information.

7.3.3.6 Politically Exposed Persons screening reports.

7.3.3.7 Sanctions screening reports.

7.3.3.8 Know Your Client questionnaires and risk assessments.

7.3.3.9 Client acceptance and ongoing due diligence records.

7.3.4 *FICA Transaction Monitoring and Reporting Records*

7.3.4.1 Transaction monitoring records and alerts.

7.3.4.2 Suspicious Transaction Reports (STRs) and supporting documentation.

7.3.4.3 Terrorist Property Reports (TPRs) and supporting documentation.

7.3.4.4 Cash Threshold Reports (CTRs).

7.3.4.5 Correspondence with the Financial Intelligence Centre (FIC).

7.3.5 FICA Compliance Records

7.3.5.1 FICA Risk Management and Compliance Programme (RMCP).

7.3.5.2 Money Laundering Control Officer (MLCO) appointment and reports.

7.3.5.3 FICA policies and procedures.

7.3.5.4 FICA training records.

7.3.5.5 FICA independent review reports.

7.3.5.6 FICA internal audit reports.

7.3.5.7 Regulatory reporting to the FIC.

7.3.6 Fiduciary and Trust Administration Records (Cygnet Fiduciary)

7.3.6.1 Trust deeds and amendments.

7.3.6.2 Trust property registers and valuations.

7.3.6.3 Trust bank accounts and financial records.

7.3.6.4 Trust beneficiary information.

7.3.6.5 Trust distributions and resolutions.

7.3.6.6 Estate administration records.

7.3.6.7 Letters of executorship and wills.

7.3.6.8 Deceased estate accounts and liquidation and distribution accounts.

7.3.6.9 Master of the High Court correspondence and submissions.

7.3.6.10 Certain records are held only by specific FluidRock Group entities depending on their business activities.

7.3.6.10.1 FluidRock Governance Academy (Pty) Ltd: Training course materials, learner records, assessments, accreditation documentation, SETA registrations, and Talent division records including recruitment mandates, candidate profiles, CVs, work-seeker records, screening and assessment records, interview notes, reference checks, background verification records, shortlist records, candidate submissions, placement agreements, offer and acceptance records, placement outcome records, and related candidate, client and referee correspondence.

7.3.6.10.2 FluidRock Co Sec (Pty) Ltd: Client company secretarial files, statutory registers, annual general meeting documentation and CIPC filings.

7.3.6.10.3 FluidRock Advisory (Pty) Ltd: Advisory project files, consulting reports, client research and deliverables.

7.3.6.10.4 FluidRock Compliance (Pty) Ltd: Compliance assessment reports, regulatory gap analyses and compliance implementation plans.

8. Retention of Records

8.1 Records are retained in accordance with applicable legal and regulatory requirements, including:

8.1.1 Companies Act 71 of 2008 (7 years for accounting records)

8.1.2 Tax Administration Act 28 of 2011 (5 years for tax records)

8.1.3 Financial Intelligence Centre Act 38 of 2001 (5 years for FICA records)

8.1.4 Protection of Personal Information Act 4 of 2013 (retention proportionate to purpose)

8.1.5 Basic Conditions of Employment Act 75 of 1997 (3 years for employment records)

8.2 The FluidRock Group maintains a Records Retention and Disposal Schedule that sets out the retention periods for each category of records.

9. RECORDS AUTOMATICALLY AVAILABLE

9.1 Publicly Available Records

9.1.1 Certain records of the FluidRock Group entities are publicly available and do not require a formal PAIA request. These include:

9.1.1.1 Company registration information: Available from the Companies and Intellectual Property Commission (CIPC) at www.cipc.co.za, including:

9.1.1.2 Registration certificates.

9.1.1.3 Current directors and prescribed officers.

9.1.1.4 Annual returns (CoR forms).

9.1.1.5 Notices of amendments to Memoranda of Incorporation.

9.1.2 This PAIA Manual: Available on the FluidRock Group website www.fluidrock.co.za and at the FluidRock Group offices.

9.1.3 Marketing and informational materials: Brochures, website content, and publicly available training schedules (available at www.fluidrock.co.za).

9.2 Records Available Upon Request Without a PAIA Application

9.2.1 The following records may be provided informally upon request without requiring a formal PAIA application (subject to verification of the requester's identity and legitimate interest):

9.2.1.1 General information about FluidRock Group services

- 9.2.1.2 Training course outlines and schedules (FluidRock Governance Academy)
- 9.2.1.3 Standard terms and conditions of service
- 9.2.1.4 Share register (application i.t.o. Co Act)
- 9.2.1.5 Public statements or media releases (if any)
- 9.2.1.6 Requests for such records may be directed to the Information Officer by email at hello@fluidrockgovernance.com

10. REQUEST PROCEDURE FOR ACCESS TO RECORDS

10.1 Who May Request Access

- 10.1.1 Any person (including a juristic person such as a company or close corporation) may request access to records held by the FluidRock Group if:
 - 10.1.1.1 The record is required for the exercise or protection of any right, and
 - 10.1.1.2 The requester provides sufficient detail to enable the Information Officer to identify the record and the requester.

10.2 Personal Requesters

- 10.2.1 A personal requester is a person seeking access to records containing their own personal information. Personal requesters are entitled to:
 - 10.2.1.1 Request access to any record containing their personal information held by the FluidRock Group.
 - 10.2.1.2 Be informed of the categories of personal information held and how it is processed.
 - 10.2.1.3 Request correction or deletion of inaccurate or outdated personal information.
 - 10.2.1.4 Personal requesters are exempted from paying the request fee (currently R50) but may be required to pay reproduction and access fees.

10.3 How to Make a Request

- 10.3.1 A request for access to a record must be made in writing using the prescribed Form C (attached as Annexure A to this manual and available on the Department of Justice website at www.justice.gov.za/forms/paia.html).
- 10.3.2 The completed Form C must be submitted to the Information Officer by:
 - 10.3.3 Email: ronelle@fluidrockgovernance.com or Richard@cygnetgroup.co.za
or
Hand delivery or post to:

The Information Officer, FluidRock Group, One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196.

10.3.4 or

10.3.5 The Information Officer, Cygnet Group, One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196.

10.4 Information to be Provided in the Request

10.5 The request must include the following information:

10.5.1 Full names and contact details of the requester (including postal address, email, and telephone number).

10.5.2 If the requester is acting on behalf of another person, proof of such authority (power of attorney, resolution, etc.).

10.5.3 Description of the record(s) requested in sufficient detail to enable the Information Officer to identify the record.

10.5.4 The form in which access to the record is requested (e.g., inspection, photocopy, electronic copy, transcription).

10.5.5 The requester's preferred language (if a record is available in multiple languages)

10.6 If the requester wishes to be informed of the decision in a particular manner, specify the manner and particulars required.

10.7 If the request is made on behalf of another person, the nature of the requester's interest in the record and why the record is required

10.8 Proof of payment of the request fee (R50 for non-personal requesters)

10.9 Responding to Requests

10.9.1 The Information Officer will:

10.9.1.1 Acknowledge receipt of the request within a reasonable time.

10.9.1.2 Assess the request to determine whether:

10.9.1.2.1 The requester has complied with the procedural requirements of PAIA.

10.9.1.2.2 The requested record exists and is held by the FluidRock Group.

10.9.1.2.3 The requester has a legitimate interest in the record (if required).

10.9.1.2.4 Any grounds for refusal apply (see Section 12 below).

10.9.1.2.5 Make a decision within 30 days of receipt of the request (or such extended period as permitted by PAIA).

10.9.1.3 Notify the requester in writing of the decision, including:

10.9.1.3.1 Whether access is granted or refused.

10.9.1.4 If access is granted: the form in which access will be provided, the time and place for access, and any access fees payable.

10.9.1.5 If access is refused: the reasons for refusal and the requester's right to lodge an internal appeal or complaint with the Information Regulator.

10.10 Extension of Time

10.10.1 If the Information Officer is unable to make a decision within 30 days due to the complexity of the request, the need to consult third parties, or the volume of records involved, the Information Officer may extend the period by a further 30 days (maximum). The requester must be notified in writing of the extension and the reasons for it.

10.11 Third Party Notification

10.11.1 If the requested record contains information about a third party (such as a client, supplier, or employee), the Information Officer may be required to notify the third party and give them an opportunity to make representations before granting access. This may result in an extension of the response period.

11. PRESCRIBED FORMS

11.1 Form C: Request for Access to Records

11.1.1 All requests for access to records must be made using the prescribed Form C in terms of Section 53 of PAIA.

11.1.2 Form C is attached as Annexure A to this manual.

11.1.3 Form C is also available from:

11.1.3.1 The Department of Justice website: www.justice.gov.za/forms/paia.html

11.1.3.2 The FluidRock Group website: www.fluidrock.co.za

11.1.3.3 The Information Officer (upon request)

11.2 Form D: Outcome of Request

11.2.1 Once a decision has been made, the Information Officer will notify the requester using Form D, which sets out:

11.2.1.1 Whether the request has been granted or refused.

11.2.2 If granted: the access fee payable, the form of access, and arrangements for access.

11.2.3 If refused: the reasons for refusal and the remedies available.

12. FEES PAYABLE

12.1 Request Fee

12.1.1 A non-refundable request fee of R50.00 is payable per request by all requesters except personal requesters (persons requesting their own personal information).

12.1.1.1 The request fee must be paid before the request will be processed.

12.2 Access Fees

12.2.1 If access to a record is granted, the requester may be required to pay an access fee for:

12.2.1.1 Photocopying or printing of records.

12.2.1.2 Electronic reproduction of records.

12.2.1.3 Postage or courier costs (if the requester requests the record to be sent).

12.2.1.4 Time spent by staff in searching for, preparing, and compiling the requested record (charged at the prescribed hourly rate).

12.3 Prescribed Fees (as at 2026):

12.3.1 The following fees are prescribed in terms of PAIA Regulations and are subject to change:

Service	Fee
Request fee (non-personal requesters) per request	R50.00
Photocopy (A4 page)	R1.10 per page
Photocopy (larger than A4)	Actual cost
Printed copy (A4 page)	R0.75 per page
Copy on CD or DVD	R70.00 per disc
Transcription of audio/visual material (per hour)	R60.00
Copy of record sent electronically	R60.00 per request
Postage (actual cost)	As incurred
Search and preparation time (per hour or part thereof, excluding first hour)	R30.00

12.3.2 Note: Personal requesters are exempted from the request fee but may still be required to pay access fees for reproduction and postage.

12.4 Deposit

12.4.1 If the Information Officer estimates that the total access fee will exceed R100.00, the requester may be required to pay a deposit of up to one-third of the estimated fee before the request is processed.

12.5 Payment Methods

12.5.1 Fees may be paid by:

12.5.1.1 Electronic funds transfer (EFT) to the FluidRock Group bank account (details provided upon request).

12.5.1.2 Cash or card payment at the FluidRock Group offices (by prior arrangement).

12.5.1.3 Proof of payment must be provided to the Information Officer.

13. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

13.1 Mandatory Grounds for Refusal

13.1.1 The Information Officer must refuse access to a record if:

13.1.1.1 Protection of privacy of a third party (Section 63): The record contains personal information about an identifiable third party, and disclosure would constitute an unreasonable invasion of that person's privacy, unless:

13.1.1.1.1 The third-party consents to disclosure, or

13.1.1.1.2 The information is already publicly available, or

13.1.1.1.3 The requester is the parent or guardian of the third party (if a minor)

13.1.1.2 Commercial information of a third party (Section 64): The record contains trade secrets, financial, commercial, or technical information of a third party that could harm the commercial interests of that party, unless:

13.1.1.2.1 The third-party consents to disclosure, or

13.1.1.2.2 The information is already publicly available, or

13.1.1.2.3 Disclosure is required in the public interest

13.1.1.3 Certain confidential information of third parties (Section 65): The record was provided in confidence by a third party, and disclosure could:

13.1.1.3.1 Prejudice future supply of similar information, or

13.1.1.3.2 Harm the interests of the third party.

- 13.2 Protection of safety of individuals and property (Section 66):** Disclosure could endanger the life or physical safety of an individual or enable access to secured premises or systems.
- 13.3 Legally privileged records (Section 67):** The record is protected by legal professional privilege (attorney-client privilege, litigation privilege)
- 13.4 Commercial information of the private body (Section 68):** The record contains:
- 13.4.1** Trade secrets of the FluidRock Group.
 - 13.4.2** Financial, commercial, scientific, or technical information that could harm the commercial or financial interests of the Group.
 - 13.4.3** Information that could put the FluidRock Group at a disadvantage in negotiations or commercial competition.
- 13.5 Certain confidential information (Section 69):** The record contains information disclosed in confidence to the FluidRock Group, and disclosure could:
- 13.5.1** Prejudice future supply of similar information, or
 - 13.5.2** Harm the person who provided the information or the subject of the information
 - 13.5.3** Other Grounds for Refusal
- 13.6** Access may also be refused if:
- 13.6.1** The requested record does not exist or cannot be found after a reasonable search.
 - 13.6.2** The request is frivolous, vexatious, or an abuse of the PAIA process.
 - 13.6.3** Granting access would require the creation of a new record (PAIA does not oblige the FluidRock Group to create records).
 - 13.6.4** The request is manifestly unreasonable or would involve an unreasonable diversion of resources.
- 13.7 Severability**
- 13.7.1** If only part of a record may be refused, the Information Officer may grant access to the remainder of the record by redacting or severing the protected portions.
- 13.8 Public Interest Override**
- 13.8.1** Even if a ground for refusal exists, access must be granted if:
 - 13.8.1.1** Disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or
 - 13.8.1.2** Disclosure would reveal an imminent and serious public safety or environmental risk, and
 - 13.8.1.3** The public interest in disclosure outweighs the harm that would result from disclosure.

14. PROTECTION OF PERSONAL INFORMATION (POPIA)

14.1 FluidRock Group as a Responsible Party

14.1.1 Each FluidRock Group entity is a Responsible Party under POPIA. This means that the FluidRock Group determines the purpose of and means for processing personal information.

14.1.2 Personal information is defined as information relating to an identifiable, living, natural person (such as name, identity number, contact details, employment history, financial information) or an identifiable juristic person (such as a company's financial information).

14.2 Purpose of Processing Personal Information

14.2.1 The FluidRock Group processes personal information for the following purposes:

14.2.1.1 Client relationship management: To provide governance, compliance, statutory, fiduciary, training, and advisory services to clients.

14.2.1.2 FICA compliance: To perform client due diligence, verify identity, and comply with anti-money laundering obligations (FluidRock Statutory and Cygnet Fiduciary only)

14.2.1.3 Employment: To manage employment relationships, process payroll, administer benefits, and comply with employment legislation.

14.2.1.4 Talent, recruitment and placement: To source, assess, shortlist, match, introduce and place candidates and board talent with clients; to verify qualifications, experience and references where lawful and appropriate; to manage recruitment mandates, placement processes, talent pipelines, candidate consent preferences, client role requirements and related candidate, client and referee communications.

14.2.1.5 Supplier management: To procure goods and services, process payments, and manage supplier relationships.

14.2.1.6 Compliance and legal obligations: To comply with statutory reporting, tax obligations, regulatory submissions, and legal requirements.

14.2.1.7 Marketing and communications: To communicate with clients, stakeholders, and the public about FluidRock Group services (where consent has been obtained or legitimate interest exists)

14.2.1.8 IT and information security: To protect information systems, monitor network activity, and ensure cybersecurity

14.3 Categories of Personal Information Processed

14.3.1 The FluidRock Group processes the following categories of personal information:

14.3.1.1 Employees:

14.3.1.1.1 Identity and demographic information (full name, identity number, date of birth, nationality, passport number, race, gender, sex, age, disabilities if any)

14.3.1.1.2 Contact information (physical address, email, telephone number)

14.3.1.1.3 Employment information (job title, department, employment history, qualifications, performance records)

14.3.1.1.4 Financial information (bank account details, tax number, salary, remuneration)

14.3.1.1.5 Health information (sick leave records, medical certificates, occupational health assessments), processed only where necessary and with consent or legal obligation

14.3.1.1.6 Biometric information (used for access control)

14.3.1.2 Clients:

14.3.1.2.1 Identity information (full name, identity number, passport number, date of birth, nationality)

14.3.1.2.2 Contact information (physical address, email, telephone number)

14.3.1.3 Financial information (bank account details, source of funds, source of wealth) for FICA clients only

14.3.1.4 Business information (company registration details, directors, shareholders, beneficial owners)

14.3.1.5 Politically Exposed Person (PEP) status and sanctions screening results — for FICA clients only

14.3.1.6 Trust information (trust deeds, beneficiaries, deceased estate documentation), for fiduciary clients only

14.3.2 Candidates, work-seekers and placement participants:

14.3.2.1 Identity and contact information, including full name, identity number, passport number, date of birth, nationality, email address, telephone number and physical address.

14.3.2.2 Professional and employment information, including CVs, employment history, qualifications, certifications, professional memberships, skills, remuneration expectations, availability, preferred roles and career interests.

14.3.2.3 Recruitment process information, including interview notes, screening outcomes, assessment results, shortlist status, placement recommendations, offer information, acceptance records and placement outcome records.

14.3.2.4 Reference, verification and background information, including referee contact details, reference feedback, qualification verification and other checks conducted with consent or where otherwise permitted by law.

- 14.3.2.5** Consent, communication and preference records, including consent to submit a profile to a client, consent to retain details for future opportunities, marketing preferences and related communications.
- 14.3.2.6 Client hiring contacts and referees:**
 - 14.3.2.6.1** Business contact information, role details, recruitment mandate information, vacancy requirements, interview availability, feedback, placement correspondence and related commercial records.
 - 14.3.2.6.2** Referee identity and contact information, relationship to the candidate, reference feedback and supporting correspondence, processed only for recruitment and placement purposes and subject to appropriate confidentiality safeguards.
- 14.3.2.7 Suppliers:**
 - 14.3.2.7.1** Identity information (contact person name, identity number)
 - 14.3.2.7.2** Contact information (business address, email, telephone number)
 - 14.3.2.7.3** Financial information (bank account details, tax number, invoices)
 - 14.3.2.7.4** Business information (company registration, BEE status, tax compliance status)
 - 14.3.2.7.5** Website visitors and marketing contacts:
 - 14.3.2.7.6** Contact information (name, email, telephone number) — collected with consent
- 14.3.2.8 Website usage data** (cookies, IP address, browsing behaviour) — see FluidRock Group Privacy Policy <https://www.fluidrock.co.za/privacy-policy/>

15. LAWFUL PROCESSING CONDITIONS

- 15.1** The FluidRock Group processes personal information only where:
 - 15.1.1** Consent has been obtained from the data subject (e.g., for marketing communications).
 - 15.1.2** Processing is necessary for the performance of a contract with the data subject (e.g., employment contract, client service agreement).
 - 15.1.3** Processing is necessary to comply with a legal obligation (e.g., FICA, tax, employment equity reporting).
 - 15.1.4** Processing is necessary to protect a legitimate interest of the FluidRock Group or a third party (e.g., fraud prevention, legal claims).
- 15.2** The FluidRock Group will not process personal information for purposes other than those for which it was originally collected unless:
 - 15.2.1** Consent is obtained, or
 - 15.2.2** The further processing is compatible with the original purpose, or

15.2.3 Processing is required by law.

16. DATA SUBJECT RIGHTS

16.1 Data subjects (individuals whose personal information is processed by the FluidRock Group) have the following rights under POPIA:

16.1.1 Right to access: Request confirmation of whether personal information is held and request a copy of such information (PAIA request procedure applies).

16.1.2 Right to correction: Request correction or deletion of inaccurate, irrelevant, excessive, or outdated personal information.

16.1.3 Right to object: Object to processing of personal information on reasonable grounds (including direct marketing).

16.1.4 Right to erasure: Request deletion of personal information where retention is no longer necessary or lawful (subject to legal retention obligations).

16.1.5 Right to lodge a complaint: Lodge a complaint with the Information Regulator if rights are infringed.

16.2 How to Exercise POPIA Rights

16.2.1 Data subjects may exercise their rights by submitting a written request to the Information Officer:

16.2.2 Email: ronelle@fluidrockgovernance.com or richard@cygnetgroup.co.za
or

Post/Hand Delivery: The Information Officer, FluidRock Group, One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank, Gauteng, 2196

16.2.3 The request should include:

16.2.3.1 Full name and contact details of the data subject

16.2.3.2 Description of the personal information in question

16.2.3.3 The right being exercised (access, correction, objection, erasure)

16.2.3.4 Proof of identity (certified copy of identity document)

16.2.3.5 The Information Officer will respond within a reasonable time (generally within 30 days).

17. SECURITY SAFEGUARDS

- 17.1** The FluidRock Group implements appropriate technical and organisational measures to protect personal information against unauthorised access, loss, damage, or destruction, including:
- 17.1.1** Access controls and user authentication.
 - 17.1.2** Encryption of sensitive data.
 - 17.1.3** Secure storage (physical and electronic).
 - 17.1.4** Regular backups and disaster recovery arrangements.
 - 17.1.5** Staff training on data protection and confidentiality.
 - 17.1.6** Confidentiality agreements with staff and service providers.
 - 17.1.7** Monitoring and auditing of access to personal information.

18. RETENTION AND DISPOSAL

- 18.1** Personal information is retained only for as long as necessary to fulfil the purpose for which it was collected, or for as long as required or authorised by law.
- 18.2** The FluidRock Group retains records in accordance with applicable South African legislation, including the Financial Intelligence Centre Act (5-year retention for FICA client records), Companies Act (7-year retention for accounting records), Tax Administration Act (5-year retention for tax records), and employment legislation (3-to-5-year retention for employment records post required for use).
- 18.3** Where retention is necessary for lawful purposes related to the FluidRock Group's business functions, including legal compliance, conflict management, employment or placement, legal defence, and regulatory reporting, records may be retained beyond the original collection purpose, subject to appropriate safeguards including restricted access, purpose limitation, and security measures.
- 18.4** Once personal information is no longer required for any lawful purpose, it is securely destroyed or irreversibly anonymised in accordance with the FluidRock Group's Records Retention and Disposal Schedule. Detailed retention periods, disposal methods, and accountability mechanisms are set out in the Records Retention and Disposal Schedule, which is available upon request from the Information Officer.
- 18.5** Data subjects have the right to request erasure of their personal information under POPIA Section 24. However, the FluidRock Group may refuse erasure where retention is required or authorised by law, or where processing is necessary for

pursuing the FluidRock Group's legitimate interests or the establishment, exercise, or defence of legal rights.

18.6 Key retention periods:

18.6.1 FICA records: 5 years after termination of the business relationship (FICA Section 22A)

18.6.2 Employment records: 3 years after termination of employment or required use (BCEA) / 5 years for certain records (EEA)

18.6.3 Talent, recruitment and placement records: retained only for as long as required for the recruitment or placement purpose, related contractual or legal obligations, consented future opportunity matching, dispute management, legitimate business interests, or the establishment, exercise or defence of legal rights; unsuccessful candidate records should not be retained indefinitely and must be reviewed and deleted, anonymised or refreshed with consent in accordance with the Records Retention and Disposal Schedule.

18.6.4 Tax records: 5 years after submission of tax return (Tax Administration Act)

18.6.5 Financial records (Companies Act): 7 years after the end of the financial year

19. CROSS-BORDER TRANSFERS

19.1 Since FluidRock uses Microsoft, Google and other international software; the data centres are located outside of South Africa. Hence, the FluidRock Group **does** transfer personal information outside South Africa.

19.2 Since personal information is routinely transferred to a third country (e.g., use of cloud service providers with offshore servers), the FluidRock Group will ensure that:

19.2.1 The third country has adequate data protection laws, or

19.2.2 The recipient is subject to a binding agreement ensuring POPIA-equivalent protection, or

19.2.3 The data subject has consented to the transfer, or

19.2.4 The transfer is necessary for the performance of a contract or compliance with a legal obligation.

20. DATA BREACHES

20.1 In the event of a data breach involving personal information, the FluidRock Group will:

- 20.1.1** Investigate the breach and assess the risk to data subjects.
- 20.1.2** Notify the Information Regulator as soon as reasonably possible (if the breach poses a risk of harm).
- 20.1.3** Notify affected data subjects where the breach is likely to cause harm.
- 20.1.4** Take steps to remediate the breach and prevent recurrence.
- 20.2** Data subjects who become aware of a suspected data breach should notify the Information Officer immediately at hello@fluidrockgovernance.com.

21. REMEDIES AVAILABLE TO REQUESTERS

22. Internal Appeal

- 22.1** If a request for access is refused (in whole or in part), the requester may lodge an internal appeal with the head of the FluidRock Group entity concerned (if different from the Information Officer).
- 22.2** Note: Because Ronelle Kleyn (CEO) is the Information Officer for all FluidRock Group entities bar the Cygnet Group and Richard is the Information Officer for the Cygnet Group, internal appeals may be directed to the FluidRock Holdings Board or the relevant subsidiary board.
- 22.3** The internal appeal must be lodged within 60 days of being notified of the refusal.

23. Complaint to the Information Regulator

- 23.1** If the requester is dissatisfied with the outcome of an internal appeal, or if no internal appeal mechanism is available, the requester may lodge a complaint with the Information Regulator within 180 days of the decision.
- 23.2** The Information Regulator may:
 - 23.2.1** Investigate the complaint.
 - 23.2.2** Attempt to resolve the matter through mediation.
 - 23.2.3** Issue an enforcement notice requiring the FluidRock Group to grant access.
 - 23.2.4** Refer the matter to court.

24. Application to Court

- 24.1** A requester may apply to the High Court for relief if:
 - 24.1.1** The Information Regulator has not resolved the complaint within a reasonable time, or
 - 24.1.2** The requester is dissatisfied with the Information Regulator's decision.

24.2 The court may:

24.2.1 Order the FluidRock Group to grant access.

24.2.2 Substitute its own decision for that of the Information Officer.

24.2.3 Award costs.

25. Contact Details for the Information Regulator

25.1 Information Regulator (South Africa)

25.2 JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001

25.3 Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

25.4 Telephone: 010 023 5200

Email: complaints.IR@justice.gov.za

Website: www.justice.gov.za/infoereg

25.5 Complaints may be lodged online via the Information Regulator eServices portal at: <https://eservices.inforegulator.org.za>

26. AVAILABILITY OF THIS MANUAL

26.1 Where to Obtain this Manual

26.1.1 This PAIA Manual is available:

26.1.1.1 On the FluidRock Group website: www.fluidrock.co.za

26.1.1.2 At the FluidRock Group offices (physical copy available for inspection free of charge during normal business hours):

26.1.1.3 One Sturdee, First Floor, Building B, One Sturdee Avenue, Rosebank Gauteng, 2196

26.1.1.4 From the Information Officer (upon request — electronic or printed copy may be provided subject to payment of reasonable reproduction fees)

26.1.1.5 On the Information Regulator eServices portal:

26.1.1.6 <https://eservices.inforegulator.org.za>

26.2 Copies of this Manual

26.2.1 A printed or electronic copy of this manual may be requested from the Information Officer at hello@fluidrockgovernance.com.

26.2.2 A reasonable fee may be charged for reproduction and postage (as set out in Section 11 above).

27. UPDATES AND REVIEW**28. Review and Amendment**

- 28.1** This Manual will be reviewed annually (or more frequently if required by changes in legislation, FluidRock Group structure, or business operations) to ensure it remains accurate and compliant with PAIA and POPIA.
- 28.2** Responsibility for review and updates rests with the Information Officer.
- 28.3** Material amendments to this manual will be approved by the FluidRock Holdings Board.

29. Publication of Updates

- 29.1** Updated versions of this manual will be:
 - 29.1.1** Published on the FluidRock Group website.
 - 29.1.2** Submitted to the Information Regulator via the eServices portal.
 - 29.1.3** Made available at the FluidRock Group offices.
- 29.2** The version number and date of last review are indicated on the cover page of this manual.

30. Contact for Queries

- 30.1** Any queries regarding this manual or requests for clarification should be directed to:
- 30.2** The Information Officer
 - Email: hello@fluidrockgovernance.com
 - Telephone: 086 111 1010

ANNEXURE A: FORM C – REQUEST FOR ACCESS TO RECORDS

[Note: The prescribed Form C (PAIA request form) must be attached here. Form C is available from the Department of Justice at www.justice.gov.za/forms/paia.html]

FORM C**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

Particulars of private body

The Head: _____

(Name of private body as it appears in the PAIA Manual)

Particulars of person requesting access to the record

The particulars of the person who requests access to the record must be given below.

The address and/or fax number in the Republic to which the information is to be sent, must be given.

Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number: _____

Postal address: _____

Telephone number: _____ Fax number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person: _____

Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____

Particulars of record

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 folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record:

Reference number, if available: _____

Any further particulars of record: _____

Fees

A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.

You will be notified of the amount required to be paid as the request fee.

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.

If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: _____

Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability: _____

Form in which record is required: _____

Mark the appropriate box with an X.

NOTES:

Compliance with your request in the specified form may depend on the form in which the record is available.

Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

If the record is in written or printed form:

- ☐ copy of record*
- ☐ inspection of record

If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

- ☐ view the images
- ☐ copy of the images*
- ☐ transcription of the images*

If record consists of recorded words or information which can be reproduced in sound:

- ☐ listen to the soundtrack (audio cassette)
- ☐ transcription of soundtrack* (written or printed document)

If record is held on computer or in an electronic or machine-readable form:

- ☐ printed copy of record*
- ☐ printed copy of information derived from the record*
- ☐ copy in computer readable form* (CD, USB, etc.)

**If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?*

Postage is payable.

☐

YES

☐ NO

Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

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.

Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20____

Signature of requester / person on whose behalf request is made

END OF FORM C

END OF FLUIDROCK GROUP PAIA MANUAL

Document Control

Field	Detail
Manual Owner	Ronelle Kleyn, Chief Executive Officer, FluidRock Group
Approved by	FluidRock Holdings Board
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Contact for Queries	Hello@fluidrockgovernance.com / 086 111 1010

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