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**PROMOTION OF ACCESS TO
INFORMATION
("PAIA") MANUAL**

Bloomberg L.P. South Africa (the "Company")

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 "Information Officer" means the Company's information officer set out in this Manual, as amended from time to time;

1.2 "Manual" means this PAIA manual;

1.3 "Minister" Minister of Justice and Correctional Services;

1.4 "PAIA" Promotion of Access to Information Act No. 2 of 2000
(as Amended);

1.5 "POPIA" Protection of Personal Information Act No.4 of 2013; and

1.6 "Regulator" Information Regulator.

2. INTRODUCTION

2.1 PAIA gives effect to the constitutional right of access to information held by any public or private body that is required for the exercise or protection of any rights.

2.2 PAIA sets out the procedures attached to such request.

2.3 Section 9 of PAIA however, recognises that such right to access to information is subject to certain justifiable limitations, for instance limitations aimed at:

- the reasonable protection of privacy;
- commercial confidentiality; and
- effective, efficient and good governance.

2.4 Section 51 of PAIA obliges private bodies to compile a manual, which would assist a person to obtain access to information held by the private body and which stipulates the minimum requirements which the manual has to comply with.

2.5 The purpose of this Manual is therefore to inform a person or requestor on how to obtain access to any record held by the Company which may be required for the exercise or protection of any rights, thereby giving effect to Section 50 of PAIA.

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3. CONTACT DETAILS

Name of Company: Bloomberg L.P. - South Africa

Telephone: +27-11-286-1900

Email: privacy@bloomberg.com

Address: 11 Alice Lane, Precinct Building A, 7th Floor,
Johannesburg 2196

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

4.2 The Guide is available in each of the official languages and in braille.

4.3 The aforesaid Guide contains the description of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
 - the Information Officer of every public body, and
 - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- The manner and form of a request for:
 - access to a record of a public body contemplated in section 11; and
 - access to a record of a private body contemplated in section 50;
- The assistance available from the information officer of a public body in terms of PAIA and POPIA;
- The assistance available from the Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
 - an internal appeal;
 - a complaint to the Regulator; and

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- an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained:

- upon request to the Information Officer; OR
- from the website of the Regulator
(info regulator.org.za)

5. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Records that are automatically available to the public and/ or a requester are all records available for view by the public on the Company's website but excluding all records which may be housed under any password protected part of said website, which are available to authorised Company users only.

6. DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1 Where applicable to its operations, the Company also retains records and documents in terms of the legislation, including those listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreements or otherwise, records that are required to be made available under these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the relevant act; the below mentioned legislation, applicable internal policies and procedures including the provisions of this Manual, should such interested parties be entitled to such information. A request to access must be done in accordance with prescriptions of PAIA.

Category of Records	Applicable Legislation
PAIA Manual	<ul style="list-style-type: none"> Promotion of Access to Information Act 2 of 2000
Financial records	<ul style="list-style-type: none"> Tax Administration Act 28 of 2011 Value Added Tax Act 89 of 1991
Personnel records	<ul style="list-style-type: none"> Labour Relations Act 66 of 1995 Protection of Personal Information Act 4 of 2014 Basic Conditions of Employment Act 75 of 1997 Employment Equity Act 55 of 1998 Compensation for Occupational Injuries and Diseases Act 130 of 1993 Occupational Health and Safety Act
Purchasing records	<ul style="list-style-type: none"> Value Added Tax Act 89 of 1991 Tax Administration Act 28 of 201
Records regarding premises	<ul style="list-style-type: none"> The Companies Act 71 of 2008

7. DESCRIPTION OF THE SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY

Subjects on which the body holds records	Examples of categories of records
Account and Tax Records	<ul style="list-style-type: none"> Audit reports Financial statements Tax registrations
Personnel Records	<ul style="list-style-type: none"> Employee records Candidate records HR records
Purchasing Records	<ul style="list-style-type: none"> Vendor agreements Purchasing orders
Records regarding premises	<ul style="list-style-type: none"> Accident reports Safety reports

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Subjects on which the body holds records	Examples of categories of records
Company Insurance Coverage	<ul style="list-style-type: none"> • Insurance claims • Insurance policies

8. DESCRIPTION OF PROCESSING OF PERSONAL INFORMATION

The Company processes personal information that is necessary to enable us to provide our various products and services. Below are the categories of personal information we collect and who we share personal information with.

Subject	Category
Data subject categories and their personal information	<ul style="list-style-type: none"> • Employees: record of employee life cycle • General public: general enquiries and viewing the company website; name, e-mail address • Media: records of media interactions • Service providers: record of service provider life cycle
Recipients of personal information	<ul style="list-style-type: none"> • Employee pension funds • Law enforcement • Medical aid schemes • Purchasers on the sale or other substantial transfer of the Company • Operators (service providers) • Statutory authorities
Expected transnational transfer of personal information	<ul style="list-style-type: none"> • Transfer of personal information to the Company's group companies
Security measures to protect personal information	<p>We use reasonable security methods to protect data that is provided to us and resides on our servers. Our security measures include:</p> <ul style="list-style-type: none"> • Physical security measures • Access control measures • Internal security measures • Cyber security measures • Anti-virus measures • Installing security firewalls • Password control

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	<ul style="list-style-type: none">• Training programmes on information security• Information security audits• IT-related company policies
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For more information on how we process personal information, please see our privacy policy available at <https://www.bloomberg.com/notices/>.

9. THE REQUEST PROCEDURE

9.1 The requester must comply with all the procedural requirements as set out in PAIA. The requester must complete the prescribed form enclosed herewith Appendix 1 and submit the form to the Information Officer by sending an email to privacy@bloomberg.com.

9.2 The Company will inform the requester within 30 days after receipt of the request of its decision to grant the request. In some cases the 30 day period may be extended by a further 30 days, if the request is complex.

10. AVAILABILITY OF THE MANUAL

The Manual is available for inspection at the Johannesburg and Cape Town offices of Bloomberg South Africa, free of charge.

11. PRESCRIBED FEES IN RESPECT OF PRIVATE BODIES

11.1 The following fees have been prescribed in the PAIA regulations and must be paid by a requester before the Company may decide whether or not to make any records requested available to the requester.

11.2 The fee for a copy of the Manual as contemplated in regulation 9(2)(c) of PAIA is R1,50 for every photocopy of an A4-size page or part thereof.

11.3 The fees for reproduction referred to in regulation 8(1) of regulations Relating to the Promotion of Access to Information Act, 2021 (issued under the Act on 27 August 2021) are as follows:

Item	Access of Information Charges for reproductions	Fee (CR)
1	The request fee payable by every requester	R140.00
2	Photocopy of an A4-size page or part thereof	R2.00

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3	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R2.00
4	For a copy in a computer-readable form on: Flash Drive (to be provided by the requester) Compact Disk: If provided by requester: If provided to the requester:	R40.00 R40.00 R60.00
5	Transcription of visual images: A4-size page or part thereof	Service to be outsourced. Will depend on quotation from Service provider.
6	A copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
7	Transcription of an audio Record, per A4-size page	R24.00
8	Copy of an audio record on: Flash Drive (to be provided by the requester): Compact Disk If provided by requester: If provided to the requester:	R40.00 R40.00 R60.00
9	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation, To not exceed a total cost of:	R145.00 R435.00
10	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms 2 to 8.
11	Postage, e-mail or any other electronic transfer	Actual expense, if any.

11.4 The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R145.00.

11.5 Please make contact with the Information Officer to obtain the relevant banking details where the above fees are to be paid into.

12. UPDATING OF THE MANUAL

This Manual may be amended and updated from time to time and such changes will be published in accordance with PAIA and POPIA.