

# CUBISOL INVESTMENTS 2 (PTY) LTD

## MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000 (“ACT”)

### 1 COMPANY DETAILS

1.1	Full name:	Cubisol Investments 2 (Pty) Ltd
1.2	Registration number:	2011/144321/07
1.3	Physical Address:	SG101A, South Wing, Great Westerford, 240 Main Road, Newlands, Western Cape, 7700
1.4	Postal Address:	P.O. Box 33856, Claremont, Cape Town, Western Cape, 7735
1.5	Telephone:	021 659 7070
1.6	Information Officer:	Andre von Bulow
1.7	Email:	<a href="mailto:andre@prosmith.co.za">andre@prosmith.co.za</a>
1.8	Website	<a href="http://www.cubisol.co.za">www.cubisol.co.za</a>

### 2 PRIMARY BUSINESS

Investment in immovable property

### 3 DIRECTORS

Andre Paul Forest von Bulow

Gerald John Porter

### 4 GUIDE IN TERMS OF SECTION 10 OF THE ACT

4.1 The section 10 Guide on how to use the Promotion of Access to Information Act No 2 of 2000 (“the Act”) is available from the South African Human Rights Commission and is available on their website at <https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

4.2 Enquiries can be directed to:

The South African Human Rights Commission: PAIA Unit, Private Bag 2700, Houghton, 2041

Tel: +27-11-484-8300 Website: <https://www.sahrc.org.za/>

Fax: +27-11-484-0582 Email: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

## **5 RECORDS AVAILABLE IN TERMS OF LEGISLATION OTHER THAN THE ACT.**

Documents are held in accordance with statutory provisions that include those in the following Acts. This list is not exhaustive.

- 5.1 Companies Act 71 of 2008;
- 5.2 Financial Intelligence Centre Act 38 of 2001;
- 5.3 Income Tax Act 58 of 1962;
- 5.4 Insolvency Act 24 of 1936;
- 5.5 Occupational Health and Safety Act 85 of 1993;;
- 5.6 Pension Funds Act 24 of 1956;
- 5.7 Skills Development Act 97 of 1998; and
- 5.8 Value-Added Tax Act 89 of 1991.

## **6 CATEGORIES OF RECORDS HELD BY THE COMPANY**

The Company's web page which is accessible to anyone who has access to the Internet, contains information relating to the business operations of the Company.

- 6.1 Other records held by the Company include -
  - 6.1.1 statutory company information;
  - 6.1.2 financial records;
  - 6.1.3 records required by law to verify identity of clients;
  - 6.1.4 records relating to fixed and movable property;
  - 6.1.5 commercial contracts;
  - 6.1.6 insurance contracts;
  - 6.1.7 debt collection records;
  - 6.1.8 records relating to prospective investments; and
  - 6.1.9 records and information required for the exercise or protection of any rights will be made available subject to the provisions of the Act.

6.2 Access to records may be refused on grounds specified in the Act.

## 7 PROCESSING OF PERSONAL INFORMATION

7.1 The Company is a responsible party in accordance with the Protection of Personal Information Act 4 of 2013 and accordingly processes the following personal information -

<b>Data Subjects</b>	<b>Information Categories</b>	<b>Purpose of processing</b>	<b>Recipients of supply of personal information</b>
<b>Clients</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Tax information</li> <li>• Identity numbers</li> <li>• Contact information</li> <li>• Property details</li> </ul>	Provision of services	<ul style="list-style-type: none"> <li>• Accountants/Auditors</li> <li>• Attorneys</li> <li>• Directors</li> <li>• Banks</li> <li>• External service providers</li> </ul>
<b>Service Providers</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Tax information</li> <li>• Identity numbers</li> <li>• Contact information</li> </ul>	Provision of services	<ul style="list-style-type: none"> <li>• Accountants/Auditors</li> <li>• Attorneys</li> <li>• Directors</li> <li>• Banks</li> <li>• External service providers</li> </ul>
<b>Shareholders</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Tax information</li> <li>• Identity numbers</li> <li>• Contact information</li> <li>• Company structures</li> </ul>	Compliance	<ul style="list-style-type: none"> <li>• Accountants/Auditors</li> <li>• Attorneys</li> <li>• Directors</li> <li>• Banks</li> </ul>
<b>Directors</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Tax information</li> <li>• Identity numbers</li> <li>• Contact information</li> </ul>	Compliance	<ul style="list-style-type: none"> <li>• Accountants/Auditors</li> <li>• Attorneys</li> <li>• Banks</li> <li>• CIPC</li> </ul>

7.2 There are no planned trans-border flows of information at this stage.

7.3 General information security measures relating to the personal information includes (but is not limited to) -

- 7.3.1 server is backed-up weekly and backups are kept for 30 days;
- 7.3.2 are stored in a secure access-controlled data centre;
- 7.3.3 email access requires 2-factor authentication;
- 7.3.4 external access to the server is locked down;
- 7.3.5 business continuity plans and disaster recovery testing plans are in place;
- 7.3.6 antivirus software is updated regularly;
- 7.3.7 remote monitoring of access activity; and
- 7.3.8 employees are under an obligation to keep information confidential.

## **8 FORM OF REQUEST**

- 8.1 The requester must use the prescribed form to make the request for access to a record. Request forms can be obtained on the South African Human Rights Commission (SAHRC) web site <https://www.sahrc.org.za/>.
- 8.2 The request must be made to the contact person at the address, fax number or electronic mail address given in paragraph 1 of this manual.

## **9 PRESCRIBED FEES**

- 9.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 9.2 Every other requester must pay the required request fee of R50.00. The fee structure can be obtained on the South African Human Rights Commission (SAHRC) web site <https://www.sahrc.org.za/>.

## **10 AVAILABILITY OF THE MANUAL**

- 10.1 This manual is available for inspection at the offices of the Company at no cost during normal business hours.
- 10.2 This manual is available on the website of the Company.
- 10.3 Copies of this manual may be obtained, subject to the prescribed fees, from the offices of the Company.