The Hospitality and General
Provident Fund

**PAIA Manual of**

**The Hospitality and General Provident Fund**

**Registration No. 12/8/28359**

**Prepared in terms of Section 51 of the**
**Promotion of Access to Information Act 2 of 2000 (as amended)**

**DATE OF COMPILATION: 27 JUNE 2025**

**DATE OF REVISION: 27 JUNE 2028**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 **Fund** means The Hospitality and General Provident Fund, registration number 12/8/28359;

1.2 **Guide** means the Guide on How to use PAIA promulgated in terms of section 10(1) of PAIA and updated by the Regulator;

1.3 **Head** means the Fund’s principal officer;

1.4 **Information Officer** means the Fund’s information officer appointed in terms of POPIA who is the Head of the Fund;

1.5 **Manual/PAIA Manual** means this manual for access to information as required by section 51 of PAIA;

1.6 **Minister** means the Minister of Justice and Correctional Services;

1.7 **PAIA** means the Promotion of Access to Information Act, 2000 and the regulations promulgated in terms of that Act;

1.8 **POPIA** means the Protection of Personal Information Act, 2013 and the regulations promulgated in terms of that Act;

1.9 **Regulator** means the Information Regulator; and

1.10 **South Africa** means the Republic of South Africa.

## 2. PURPOSE OF THIS MANUAL

This PAIA Manual is useful for the public to:

2.1 check the categories of records held by the Fund which are available without a person having to submit a formal PAIA request;

2.2 understand how to request access to a record of the Fund, by providing a description of the subjects on which the Fund holds records and the categories of records held on each subject;

2.3 know the description of the Fund's records which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer who will assist the public with the records they wish to access;

2.5 know the description of the Guide and how to obtain access to it;

2.6 know if the Fund will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the recipients or categories of recipients to whom the personal information may be supplied;

2.8 know if the Fund transfers or processes personal information outside South Africa; and

2.9 know whether the Fund has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 3. KEY CONTACT DETAILS FOR ACCESS TO THE FUND'S INFORMATION

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|---|---|
| | **Fund Details** |
| **Name of fund** | The Hospitality and General Provident Fund |
| **Registration number of fund** | 12/8/28359 |
| **Street address** | 3 Anderson Street, Ferreiras Dorp, Johannesburg, 2001 |
| **Postal address** | PO Box 64422, Marshalltown, 2107 |
| **Telephone number** | (011) 838 3751 |
| **E-mail address** | info@hgpf.co.za |
| **Fund's website** | https://www.hgpf.co.za |
| **Details of the Head of the Fund (Information Officer)** | |
| **Name** | Leslie Primo (the Fund's principal officer) |
| **Email** | po@hgpf.co.za |
| **Telephone number** | 011 838 2052 |

## 4. ACCESS TO THE GUIDE ON HOW TO USE PAIA

4.1 In terms of section 10(1) of PAIA the Regulator has revised, updated and made available the 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 Guide describes:

4.3.1 the objects of PAIA and POPIA;

4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of:

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17 (1) of PAIA[1] and section 56 of POPIA;[2]

4.3.3 the manner and form of a request for:

4.3.3.1 access to a record of a public body contemplated in section 11[3]; and

4.3.3.2 access to a record of a private body contemplated in section 50;[4]

4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available form the Regulator in terms of PAIA and POPIA;

4.3.6 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:

4.3.6.1 an internal appeal;

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private body if-*
*a) that record is required for the exercise or protection of any rights;*
*b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
*c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

4.3.6.2 a complaint to the Regulator; and

4.3.6.3 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;

4.3.7 the provisions of sections 14[5] and 51[6] of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15[7] and 52[8] of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22[9] and 54[10] of PAIA regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92[11] of PAIA.

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[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

[8] *Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

[9] *Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[10] *Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[11] *Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding –*

*(a) any matter which is required or permitted by this Act to be prescribed;*

*(b) any matter relating to the fees contemplated in sections 22 and 54;*

*(c) any notice required by this Act;*

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:

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available in English and Afrikaans for public inspection during normal office hours at the Fund's head office.

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

| **Category of records** | **Types of the record** | **Available on the Fund's website** | **Available upon request** |
|---|---|---|---|
| Certificate of registration | Hard copy/electronic | | √ |
| The Fund's Rules and approved Rule Amendments | Hard copy/electronic | | √ |
| The Fund's annual financial statements | Hard copy/electronic | | √ |
| The Fund's statutory valuation reports | Hard copy/electronic | | √ |
| The Fund's investment policy statement | Hard copy/electronic | | √ |
| The Fund's Privacy Policy | Electronic | | √ |
| Policy documents relating to fidelity cover and risk cover (death, disability benefits and funeral cover) | Hard copy/electronic | | √ |

*(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and*

*(e) any administrative or procedural matter necessary to give effect to the provisions of this Act."*

## 6. DESCRIPTION OF THE FUND'S RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

| No. | Category of Record | Ref | Act |
|---|---|---|---|
| 1. | Accounting and tax records and source documents | 95 of 1967 | Income Tax Act |
| 2. | Tax records (applications, directives, IT88 notifications, certificates) and source documents | 28 of 2011 | Tax Administration Act |
| 3. | Tax records and source documents | 89 of 1991 | Value Added Tax Act |
| 4. | Electronic communication | 25 of 2002 | Electronic Communications and Transactions Act |
| 5. | Source documents | 38 of 2001 | Financial Intelligence Centre Act |
| 6. | PAIA Manual | 2 of 2000 | Promotion of Access to Information Act |
| 7. | Privacy policy and other records required for compliance with POPIA | 4 of 2013 | Protection of Personal Information Act |
| 8. | Court orders and payment records | 70 of 1979 | Divorce Act |
| 9. | Court orders and payment records | 99 of 1998 | Maintenance Act |
| 10. | Statutory records including member, pensioner, beneficiary and dependant records, contribution, benefit and payment records and statements, withholding and deduction requests and instructions, board meeting packs and minutes, board resolutions and registers, valuations, investment records, section 14 applications and approvals and records, accounting records, investment and other mandates, service provider contracts, PFA complaints, housing loan records, investment policy statements, surplus apportionment records | 24 of 1956 | Pension Funds Act |
| 11. | Statutory licences and records | 9 of 2017 | Financial Sector Regulation Act |

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|---|---|---|---|
| 12. | Source documents | 37 of 2002 | Financial Advisory and Intermediary Services Act |
| 13. | Policies and records relating to insured benefits | 52 of 1998 | Long-term Insurance Act |
| 14. | Policies and records relating to insured benefits | 18 of 2017 | Insurance Act |
| 15. | Statutory licences and records | 28 of 2001 | Financial Institutions (Protection of Funds) Act |

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH THE FUND HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE FUND

| **Subjects on which the Fund holds records** | **Categories of records** |
|---|---|
| The creation, existence, operation, and administration of the Fund | Fund rules, rule amendments, licences and other authorisations, statutory and other reports, advice and records, records of decisions of the principal officer and the board of the Fund, minute books and agendas, board resolutions and registers, service provider contracts, board correspondence, communication with regulators |
| Fund assets and financial position | Asset and financial records, accounting records (cashbooks, bank reconciliations, general ledgers, trial balances, audit and working papers, bank statements, EFT files including ACB whilst still applied, deposit slips), insurance policy and review documents, investment mandates, investment strategy documents |

| | |
|---|---|
| Fund membership and benefits | Identity records of members, dependents, beneficiaries and participating employers, membership records, contribution records, investment choice records, flexible benefit member option forms, claim forms, payment instructions, benefit records and statements, payment confirmations, tax records, withholding and deduction requests and instructions, beneficiary nomination forms, declaration of qualifying partner, death certificates, death benefit distribution resolutions, insured benefit statements and records, pensioner records (pension increase letters, certificates of existence, option forms, outsourcing contracts, beneficiary details), court orders, regulatory reports and records, section 14 applications and approvals and records, other member and pensioner communications, complaints including PFA and FSCA complaints, housing loan forms and records of payment and settled claims and approvals, funeral benefit claim forms and correspondence, surplus apportionment exercise documents |
| Participating employers | Identity records, financial records, bank account records, employee records and contact information, regulatory reports and records |
| Suppliers and service providers | Identity records, tax records, contracts, licences and other authorisations, bank account records, contact information, B-BBEE scorecard records, insurance records, employee and agent records, advice, reports and valuations, as applicable, communication records, regulatory reports and records |
| Board and sub-committee members | Recruitment records, identity records, tax records, contracts, contact information, meeting minutes, regulatory reports and records |
| Regulatory records | Returns, reports and communication with regulators |

# 8. PROCESSING OF PERSONAL INFORMATION

## 8.1 Purpose of Processing Personal Information

8.1.1 The Fund's administrator processes personal information in relation to the Fund's active, paid-up, deferred, non-contributory and former members and members' beneficiaries, dependants and nominees (**Member Information**) to register members of the Fund, receive and allocate member contributions and transfers from other retirement funds, make transfers to other retirement funds, invest and manage funds and allocate returns, issue benefit statements, prepare annual financial statements, for annual audits, statutory actuarial valuations and calculating actuarial projections, to verify identity, contact and bank details, to receive and process claims and deductions and pay benefits (including the distribution of death benefits), to provide annuity quotations for members on retirement, to resolve questions and complaints, to ensure the security of our business and systems including information processed using the infrastructure, to comply with the law including the Pension Funds Act 1956, tax laws, any applicable collective agreement and the requirements of the Pension Funds Adjudicator (**PFA**), Financial Sector Conduct Authority (**FSCA**), South African Revenue Service (**SARS**) and other regulators (**Applicable Laws**), to keep records including backups of the administrator's IT systems, to communicate with and manage the Fund's contracts and relationships with the Fund's service providers, other suppliers and stakeholders and to securely and properly manage the Fund.

8.1.2 The Fund's administrator processes personal information relating to participating employers in relation to registering members of the Fund, receiving, reconciling and allocating contributions, managing the Fund and reporting to the PFA, FSCA, SARS and any other regulators.

8.1.3 The Fund's administrator uses the personal information which it has been provided through its website, email or other means of electronic communication for the purposes for which the personal information was provided and to communicate with the person who provided it.

8.1.4 The Fund's secretariat and/or the administrator processes personal information relating to the members of the board in relation to the selection and appointment of board members, their registration with the FSCA, their management of the Fund including arranging, attending and recording board meetings and their decisions, in communication with the FSCA and other regulators and in compliance with the law including Applicable Laws.

8.1.5 The Fund's secretariat and/or the administrator processes personal information relating to the Fund's principal officer in relation to the selection, appointment, conclusion and management of the Fund's contract with the principal officer, registration of the principal officer with the FSCA and in managing the Fund.

8.1.6 The Fund's secretariat and/or the administrator processes personal information relating to the Fund's potential and actual suppliers of goods and services in relation to the selection and appointment of suppliers, concluding and managing contracts with them, compliance with laws including the Applicable Laws and the management of the Fund.

8.1.7 The Fund's administrator and/or secretariat also processes personal information as necessary to open accounts and receive and process payments through banks to comply with money laundering and terrorist financing laws including the Financial Intelligence Centre Act, 2001, to receive and make payments, pay refunds and communicate with you and the bank in relation to such payments or refunds.

8.1.8 The Fund processes information about enquiries it receives for the purposes of responding to that enquiry.

8.1.9 The Fund processes information in communications to communicate with various persons, to comply with the law including Applicable Laws and to keep records.

8.1.10 The Fund and/or the Fund's administrator processes personal information to investigate, assess, establish, exercise or defend legal claims in any forum, for audits, for asset valuations including statutory valuations, to prepare annual financial statements, to obtain expert advice, to identify, mitigate and manage risks and to obtain, maintain and claim under insurance cover to manage the Fund, to identify, manage and protect the Fund against risk and deal with any disputes or claims by or against the Fund including legal proceedings in any forum, when required to do so by law and as necessary to cooperate with any regulator or law enforcement agency and when necessary to protect life or other vital interests of any person.

8.2 **Description of the categories of data subjects and of the information or categories of information relating thereto**

| Categories of Data Subjects | Personal Information that may be processed |
|---|---|
| Members including active members, paid-up members, deferred retirees, former members, beneficiaries, dependants and pensioners | name, date of birth, age, gender, address, contact information, registration numbers or identity or passport numbers, employee numbers, employment information, tax number, bank details, normal retirement date, Fund joining date, salary information, financial information, previous membership to other funds, health information, information about marital status and dependants including children, medical aid membership information, trade union membership and information contained in court orders that are relevant to the Fund |
| Participating employers | name and registration numbers, contact information (including phone numbers, email and other addresses) and identity/passport numbers of relevant individuals and bank account and other financial information |
| Potential and actual suppliers and service providers | names, identity/passport numbers/registration number, contact information (including phone numbers, email and other addresses), tax and VAT numbers, B-BBEE verification certificates and other relevant licences, authorisations and accreditation and bank account and other financial information |

| | |
|---|---|
| Potential and actual members of the board | name, contact information, education, employment information, race, gender, credit and criminal record checks and information relating to conflicts of interest |

8.3 **The recipients or categories of recipients to whom personal information may be supplied**

| **Category of personal information** | **Third party recipients or categories of recipients to whom the personal information may be supplied** |
|---|---|
| Any and all of the personal information listed in paragraph 8.2, as applicable | The Fund's administrator and its sub-operators or service providers who need to process that personal information to provide services to the Fund, members, dependants, beneficiaries, former spouses and/or the representatives of these individuals |
| Benefit statements and benefit values | When required by law, participating employers |
| Fund's bank details, communications and records of decisions relating to financial affairs and assets | Those of the Fund's service providers who hold, invest, manage, value and report on its assets such as banks, asset and investment managers, valuators, actuaries, underwriters and regulators |
| Personal information relating to board decisions (including sub-committee decisions) | The members of the board/sub-committee of the board |
| All personal information which the Fund is required to provide by law such as information required to identify and verify the identity of a person, Member Information, benefit statements, nomination forms and other beneficiary or dependant information, tax and financial information of the Fund and current and former members, pensioners, dependants and beneficiaries | Law enforcement agencies, the PFA, FSCA, SARS and other regulators including tribunals and the courts |

8.4 **Transborder flows of personal information**

The Fund may send personal information offshore as follows:

8.4.1 to asset and investment managers and similar service providers outside South Africa as necessary to facilitate offshore investments;

8.4.2 where someone requires the Fund to use an online platform for communication and that online platform transfers personal information offshore, the personal information in that publication or communication may be available in foreign countries where that platform operates or stores data and may be available through the internet around the world.

8.5 **General description information security measures to be implemented by the Fund to ensure the confidentiality, integrity, and availability of the information**

The Fund takes appropriate and reasonable technical and organisational steps to protect personal information against unauthorised access or disclosure by ensuring that the Fund's administrator's infrastructure (and the Fund's other operators' infrastructure on which personal information is processed) is protected by physical and electronic access control, encryption, appropriate firewalls and malware and virus protection.

## 9. AVAILABILITY OF MANUAL

9.1 A copy of this Manual is available:

9.1.1 to members on the Fund's website at https://www.hgpf.co.za;
9.1.2 at the Fund's registered office as set out in paragraph 3;
9.1.3 upon request and payment of a reasonable prescribed fee;
9.1.4 to the Information Regulator upon request.

## 10. UPDATING OF THE MANUAL

The Head of the Fund will regularly update this Manual.

Issued by:

**Leslie Primo – Information Officer**

**Fund's principal officer**

**Date: 27 June 2025**