

WORLDWIDE ADVISORY SERVICES (PTY) LTD

PROMOTION OF ACCESS TO INFORMATION (PAIA)

MANUAL



Worldwide
Advisory Services

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1. Definitions

Act means the Promotion of Access to Information Act 2 of 2000 (PAIA).

Data Subject means the person to whom personal information relates.

Head of the FSP means, of, or in relation to, a private body:-

- a) In the case of a natural person, that natural person or any person duly authorised by that natural person;
- b) In the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- c) In the case of a juristic person:
 - i) The CEO or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - ii) The person who is acting as such or any person duly authorised by such acting person.

Information Officer means, of, or in relation to a:-

- a) Public body – an Information Officer or Deputy Information Officer as contemplated in terms of section 1 or 17 of PAIA; or
- b) Private body – the head of the private body as contemplated in section 1 of PAIA.

Information Regulator means the Information Regulator established in terms of section 39 of the PoPIA.

Person means a natural person or a juristic person.

Personal Information means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to:-

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

PoPIA means the Protection of Personal Information Act 4 of 2013.

Private Body means:-

- a) a natural person who carries or has carried on any trade, business, or profession, but only in such capacity.
- b) a partnership which carries or has carried on any trade, business, or profession; or
- c) any former or existing juristic person but excludes a public body.

Processing means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including:-

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure, or destruction of information.

Public Body means:-

- a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- b) any other functionary or institution when:
 - i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - ii) exercising a public power or performing a public function in terms of any legislation.

Requester means, in relation to:-

- a) a Public Body:
 - i) any person (other than a public body contemplated in paragraph (a) or (b) (i) of the definition of 'public body', or an official thereof) making a request for access to a record of that public body; or
 - ii) a person acting on behalf of the person referred to in subparagraph (i).
- b) a Private Body:
 - i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
 - ii) a person acting on behalf of the person contemplated in subparagraph (i).

2. Introduction

Worldwide Advisory Services (Pty) Ltd, with **Registration No. 2001/030080/07**, is an authorised Financial Services Provider with **FSP No. 12964** ("the FSP"). The FSP is a private body as defined in the Act.

This manual is published in terms of section 51 of the Act and provides an outline of the records and personal information which the FSP holds and processes, as well as an explanation of how requests for access to such records may be submitted.

In addition, this manual explains how data subjects may exercise their rights of access to, objection to, or correction or deletion of personal information in terms of sections 23 and 24 of the PoPIA.

The objective of the Act is to give effect to the constitutional right of access to information held by public and private bodies where that information is required for the exercise or protection of any rights, whilst recognising the need to protect privacy, confidentiality and legitimate commercial interests.

Accordingly, this PAIA Manual aims to foster a culture of transparency and compliance within the FSP, while balancing the right of access to information with the lawful protection of personal information and confidential records.

Availability and Purpose of this PAIA Manual

This PAIA Manual is published on the FSP's website. A copy may also be requested from the Information Officer or Deputy Information Officer and may be inspected during normal business hours at the FSP's principal place of business.

The primary purpose of this PAIA Manual is to facilitate requests for access to records held by the FSP in accordance with PAIA and the prescribed procedures and fees.

In addition, this PAIA Manual describes the records held by the FSP, sets out the grounds upon which access to records may be refused, and explains how data subjects may exercise their rights under POPIA.

3. Information of the Deputy Information Officer of the FSP (section 1(1)(b))

The Information Officer may appoint, where it is deemed necessary, a Deputy Information Officer(s), as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render the FSP as accessible as reasonable possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013.

Requests for access to records may be submitted to the Information Officer or Deputy Information Officer, using the contact details set out below.

Information Officer (registered with the Information Regulator via the eServices portal):

Name: Tyrone Waterston

Telephone: 011 884 8343

E-mail: tyrone@wwas.co.za

Physical Address: 266 Bryanston Dr, Bryanston, Sandton, 2191

Postal Address: PO Box 651250, Benmore 2010, South Africa

Deputy Information Officer (registered with the Information Regulator via the eServices portal):

Full Name: Byron Bosch

Telephone: 011 884 8343

E-Mail: byron@wwas.co.za

Physical Address: As above.

Postal Address: As above.

4. Guide referred to in section 10 of the Act

The Information Regulator publishes a Guide on how to use the Act ("PAIA Guide"), which is available in all official languages. The PAIA Guide is binding guidance and assists requesters in exercising their rights.

Any person may request a copy of the PAIA Guide from the Information Regulator or from the FSP's Information Officer using the prescribed PAIA Form 01.

The Information Regulator's contact details are as follows:

The office of the Information Regulator (South Africa): Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Telephone: 010 023 5200.

E-mail: enquiries@infoeregulator.org.za.

Website: <https://infoeregulator.org.za>.

Note: A Braille version of the PAIA Guide (and other accessible formats) may be obtained directly from the Information Regulator upon request.

5. Latest notice in terms of section 52(2) (if any)

In terms of section 52 of the Act, certain records are automatically available without the need to submit a formal request, including:

- Records available via the Companies and Intellectual Property Commission;
- Public disclosures made on the FSP's website; and
- Other records required by law to be publicly accessible.

No additional categories of records have been submitted to the Information Regulator for automatic availability in terms of section 52(2). The FSP has not submitted a notice to the Information Regulator in terms of section 52(2) of the Act. Records that are publicly available in terms of other legislation or through statutory regulators (such as CIPC) are accessible independently of the Act, subject to applicable conditions.

6. Access to records held by the FSP

In terms of section 50 of the Act, a requester must be given access to a record of the FSP if the following requirements are met:

- the record is required for the exercise or protection of any rights (section 50(1)(a));
- the requester complies with the procedural requirements relating to a request for access (section 50(1)(b)); and
- access to the record is not refused on any of the grounds set out in Chapter 4 of the Act (section 50(1)(c)).

As mentioned above, records held by the FSP may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of the FSP and in this regard, the Act distinguishes between two types of requesters:

- **Personal requester:** A Personal Requester is a Requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, the FSP will provide the requested information, or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by the FSP.
- **Other requester:** This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. In considering such a request, the FSP will adhere to the provisions of the Act. Section 71 requires that the Deputy Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that s/he may make a written or oral representation to the Deputy Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information. However, the FSP is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by the FSP.

7. Records available in terms of Applicable Legislation

The FSP complies with, and maintains records in terms of, the following legislation (among others), as may be applicable from time to time. Each category of record listed below may be subject to one or more grounds for refusal of access as set out in Chapter 4 of the Act.

Note: The legislation listed below applies only to the extent that WWAS generates or holds records under the relevant statute from time to time.

Item No.	Legislative Reference	Records
1	Basic Conditions of Employment Act No. 75 of 1997	Employee personal records; employment contracts and amendments; remuneration, working hours and leave records; payroll records; termination and exit documentation; conditions of employment records.
2	Broad-Based Black Economic Empowerment Act No. 53 of 2003	BBBEE verification certificates and scorecards; supporting compliance documentation; supplier and service-provider BBBEE information.
3	Companies Act No. 71 of 2008	Memorandum of Incorporation; statutory registers (directors, shareholders and beneficial ownership where applicable); minutes and resolutions; annual financial statements; company secretarial records.
4	Compensation for Occupational Injuries and Diseases Act No. 130 of 1993	Workplace accident and incident records; employee injury and disease records; compensation claims and correspondence; employer returns and assessments.
5	Competition Act No. 89 of 1998	Competition-law compliance policies and frameworks; internal risk assessments; legal opinions; training records; correspondence with regulators.
6	Constitution of the Republic of South Africa, 1996	Governance and policy frameworks reflecting constitutional compliance; records supporting access to information, equality and privacy obligations.
7	Consumer Protection Act No. 68 of 2008	Client complaints records; marketing and advertising materials; disclosure documentation; client communications and engagement records.
8	Copyright Act No. 98 of 1978	Copyright ownership and subsistence records; licensing and assignment agreements; intellectual property registers; content development records.
9	Electronic Communications and Transactions Act No. 25 of 2002	Electronic communications (emails and system messages); electronic contracts and agreements; data-message records; transaction logs; authentication records.

Item No.	Legislative Reference	Records
10	Employment Equity Act No. 55 of 1998	Employment equity plans; workforce demographic data; EEA submissions and reports; transformation and diversity documentation.
11	Financial Advisory and Intermediary Services Act No. 37 of 2002	FSP licence and registration records; Key Individual and Representative records; compliance and monitoring reports; client onboarding documentation; disclosure records; record of advice.
12	Financial Intelligence Centre Act No. 38 of 2001	KYC and verification documentation; Risk Management and Compliance Programme; training records; monitoring and reporting records; correspondence with the FIC.
13	Financial Institutions (Protection of Funds) Act No. 28 of 2001	Records relating to safeguarding of client funds; trust and control records (where applicable); internal compliance documentation.
14	Financial Sector Regulation Act No. 9 of 2017	Regulatory engagement records; conduct-of-business compliance documentation; correspondence with financial-sector regulators.
15	Financial Services Ombud Schemes Act No. 37 of 2004	Ombud complaint records; determinations and outcomes; correspondence; internal complaints-handling documentation.
16	Income Tax Act No. 58 of 1962	PAYE, VAT and income tax compliance records; financial statements and supporting schedules; correspondence with SARS; assessment and audit records.
17	Insurance Laws Amendment Act No. 27 of 2008	Regulatory impact assessments; advisory-related compliance documentation; correspondence with regulators (where applicable).
18	Intellectual Property Laws Amendment Act No. 38 of 1997	Intellectual property protection records; ownership and licensing documentation; internal IP compliance records.
19	Labour Relations Act No. 66 of 1995	Disciplinary and grievance records; retrenchment and restructuring documentation; CCMA and labour-court dispute records; consultation records.
20	Long-term Insurance Act No. 52 of 1998 <i>(where applicable)</i>	Advisory engagement records; Licensing and compliance documentation; Client-related record
21	Occupational Health and Safety Act No. 85 of 1993	Health and safety policies; risk assessments; incident and accident registers; training and committee records.

Item No.	Legislative Reference	Records
22	Prevention of Organised Crime Act No. 121 of 1998	Risk assessments; monitoring documentation; internal compliance records.
23	Promotion of Access to Information Act No. 2 of 2000	PAIA Manual; PAIA request and response records; PAIA procedures and logs; training and awareness records.
24	Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004	Risk monitoring records; compliance and reporting documentation; incident records.
25	Protection of Personal Information Act No. 4 of 2013	Privacy policies and notices; records of processing activities; operator agreements; data subject request records; security-incident and breach notifications; regulatory correspondence.
26	Regulation of Interception of Communications and Provision of Communication-Related Information Act No. 70 of 2002	Communication-monitoring compliance records (where applicable); internal policy and procedural documentation.
27	Short-Term Insurance Act No. 53 of 1998 (where applicable)	Advisory engagement records; Regulatory correspondence; Compliance documentation; Client-related records
28	Skills Development Act No. 97 of 1998	Skills development plans; training records; SETA submissions; correspondence.
29	Skills Development Levies Act No. 9 of 1999	SDL payment records; payroll and levy submissions; compliance correspondence.
30	Unemployment Contributions Act No. 4 of 2002	UIF contribution records; payroll submissions; regulatory correspondence.
31	Unemployment Insurance Act No. 63 of 2001	UIF declarations; employee benefit records; correspondence with authorities.
32	Value Added Tax Act No. 89 of 1991	VAT registration records; VAT returns and reconciliations; supporting transactional documentation; correspondence with SARS.

* Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requester access on a basis other than as set out in the Act, we shall update the list accordingly.

If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the requester is required to indicate what legislative right the request is based on, and to allow the Deputy Information Officer the opportunity of considering the request in light thereof.

8. Subjects and categories of records held by the FSP

Please note that all requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.:

1. FSP records	• Advertisements; • Compliance and Risk Documents; • Compliance Reports; • Complaints Management Framework; • Conflict of Interest Policy; • Contractual Agreements; • Disaster Recovery Plan; • Documents of registration; • FICA Manual and RMCP; • Financial Recovery Plan; • Governance Structures; • Human Resources; • Intermediary Agreements; • Key Individual Agreements; • Licence Certificates; • Management Records; • Operational Records; • Professional Indemnity Schedule; • Remuneration Policy; • Strategy; • Technology.
2. Financial records	• Accounting Records; • Assets Inventory; • Banking Records; • Bank Statements; • Electronic banking records; • Financial Statements; • Invoices; • Rental Agreements; • Tax Returns.
3. Tax records	• Documents issued to employees for income tax purposes; • PAYE Records; • SARS Records; • All other statutory compliances: ○ VAT; ○ Skills Development Levies; ○ UIF; ○ Workmen's Compensation/COIDA.
4. Personnel documents and records	• Any personal records provided to the FSP for their personnel; • Any records a third party has provided to the FSP about any of their personnel;

	• Conditions of employment and other personnel-related contractual and quasi-legal records; • Disciplinary records; • Employment contracts; • Incentive register; • Leave records; • Medical aid records; • Other internal records & correspondence; • Pension fund records; • Salary records; • Standard letters and notices; • Training manuals; • Training records.
5. Customer records	• Application forms for financial products; • Correspondences; • FICA KYC documents; • Intermediary disclosure; • Needs analysis; • Other compliance documents; • Policy documents; • PoPIA Notice and consent form; • Quotes; • Record of advice; • Renewal documents; • Risk profile; • Service Level Agreement.
6. Companies Act records (where the FSP is a Pty)	• Annual returns to the CIPC; • Documents of Incorporation; • Memorandum of Incorporation; • Minutes of meetings; • Records relating to the appointment of Directors/auditor/secretary/public officer and other officers; • Resolutions; • Share Register & other statutory registers.
7. Procurement department	• Standard terms and conditions for supply of services and products; • Product Provider Agreements; • Lists of Suppliers, Products, Services, & Distribution; • Policies and Procedures.

9. How to make a request for access to information

Use the prescribed Form 2 as per Annexure A, to make a request for access to a record. The form must be submitted to the Information Officer or Deputy Information Officer. The requester will be notified of any applicable fees (including any request fee, access fee and/or deposit) in accordance with the Act and the

Act's Regulations, and no fees are payable unless and until such notice is provided.. Sufficient information must be provided to enable the Deputy Information Officer to adequately identify:–

- The record(s) requested;
- The identity of the requester;
- Which form of access is required, if the request is granted;
- Specify the physical address, or email address of the requester in the Republic;
- Identify the right that the requester is seeking to exercise or protect;
- Provide an explanation of why the requested record is required for the exercise or protection of that right.

A requester must submit the request using PAIA Form 02, and the FSP will notify the requester in writing of its decision using PAIA Form 03, within the time periods prescribed by the Act.

If in addition to a written reply, the requester wishes to be informed of the decision on the request, in any other manner, to state that manner and the necessary particulars to be informed of in that manner.

If the request is made on behalf of another person, submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Deputy Information Officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

The FSP will process a request within 30 days, unless the requestor has stated special reasons which would satisfy the Deputy Information Officer that circumstances dictate that the time period not be complied with.

10. Refusal of access to records

A Private Body, such as the FSP, is entitled to refuse a request for information in the following instances:

- Mandatory protection of the privacy of a third party, who is a natural person, a deceased person (section 63), or a juristic person, as included in PoPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
- Mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with PoPIA;
- Mandatory protection of the commercial information of a third party (section 64) if the record contains:
 - Trade secrets of the third party;
 - Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - Information disclosed in confidence by a third party to the FSP, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- Mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
- Mandatory protection of the safety of individuals and the protection of property (section 66);
- Mandatory protection of records which would be regarded as privileged in legal proceedings (section 67).

- A computer program which is owned by the FSP, and which is protected by copyright;
- The research information (section 69) of the FSP or a third party, if its disclosure would disclose the identity of the FSP, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

If a requested record cannot be found or if the record does not exist, the Deputy Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record.

Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Deputy Information Officer refuses access to such record.

11. Decision

The FSP will, within 30 days of receipt of a request, decide whether to grant or decline a request and give notice with reasons, if required, to that effect. The 30-day period within which the FSP has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information held at another office of the FSP (other than the head office) and the information cannot reasonably be obtained within the original 30-day period. The Deputy Information Officer will notify the requester in writing should an extension be necessary.

12. Remedies available when the FSP refuses a request

Internal remedies

The FSP does not have an internal appeal procedure. The decision made by the Deputy Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Deputy Information Officer.

External remedies

In terms of section 77A of the Act, a requester or third party who is dissatisfied with a decision of the Information Officer / Deputy Information Officer may lodge a complaint with the Information Regulator within 180 days of the decision, in the prescribed manner and form for appropriate relief.

A requester may also apply to a court of competent jurisdiction within 180 days for appropriate relief in terms of section 78 of Act.

For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which is presided over by a designated Magistrate.

13. Prescribed fees (section 51(1)(f))

The Act, read with section 54 thereof and the Regulations relating to the Act, provides for fees to be paid in respect of requests for access to records.

13.1 Types of fees

The Act provides for the following categories of fees:

- **Request Fee**

A request fee is payable by a requester **other than a personal requester**, before a request for access to records will be processed. Personal requesters are not required to pay a request fee.

- **Access Fee**

An access fee is payable **only if access to the requested record is granted**. The access fee is intended to cover the reasonable costs incurred by the FSP in searching for, preparing, reproducing and providing the record in the form requested.

13.2 Payment of request and access fees

Upon receipt of a request for access to records, the Deputy Information Officer will notify the requester (other than a personal requester) of the applicable request fee, if any, payable before the request is further processed, as contemplated in section 54(1) of the Act.

If the preparation of the record for disclosure requires more than the period prescribed in the Act's Regulations, the Deputy Information Officer may, by written notice, require the requester to pay a deposit equal to one-third of the estimated access fee, prior to further processing of the request.

The FSP is entitled to withhold access to a record until all applicable fees have been paid.

13.3 Deposits

Where a deposit has been paid and the request for access is ultimately refused, the FSP will refund the deposit to the requester, as required by the Act.

13.4 Reproduction fees and automatically available records

Where categories of records are made automatically available without the need for a formal PAIA request in terms of section 52 of the Act, the FSP may levy only a reasonable reproduction fee for providing copies of such records, as prescribed.

13.5 Applicable tariffs

The fees payable in respect of requests for access to records are those **prescribed from time to time in the Regulations relating to the Act**. Requesters will be informed of the applicable fees prior to any payment being required.

13.6 Collection of fees

All applicable fees must be paid in the manner and within the time period communicated by the Deputy Information Officer. Proof of payment may be required before access to records is granted. Fees are subject to change in accordance with the Act and applicable Regulations.

14. Records available without a request to access in terms of the Act

Records of a public nature, typically those disclosed on the FSP's website and in its various annual reports, may be accessed without the need to submit a formal application.

Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Deputy Information Officer.

15. Processing of Personal Information

The FSP uses the Personal Information under its care in the following ways:

- Rendering service according to client's instructions;
- Staff administration;
- Keeping of accounts and records;
- Complying with tax laws.

16. Categories of data subjects and their Personal Information

The FSP may possess records relating to suppliers, shareholders, contractors, service providers, staff and clients:

Entity Type	Personal Information Processed
Clients – Juristic Persons/Entities	Names of Contact Persons; Name of Legal Entity; Physical, Postal Address and Contact Details; Financial Information; Registration Number; Founding Documents; Tax Related Information; Authorised Signatories, Beneficiaries, Ultimate Beneficial Owners.
Clients – Natural Persons	Names, Contact Details, Postal Address, Street Address, E-Mail Address Date, of Birth, ID Number, Tax Related Information, Nationality, Gender, Confidential Correspondence, Ethnic Group, Employment History, Marital Status, Language, Financial Information.
Service Suppliers/Product Providers	Names of Contact Persons; Name of Legal Entity, Physical, Postal Address and Contact Details, Registration Number, Founding Document, Tax Related Information, Authorised Signatories, Beneficiaries, Ultimate Beneficial Owners, Agreements, Financial Information.
Employees	Gender, Pregnancy; Marital Status; Race, Age, Language, Education Information; Financial Information; Employment History; ID number; Physical and Postal Address; Contact details; Opinions, Criminal behaviour; Medical History, Next of Kin.

17. Categories of recipients for processing the Personal Information

The FSP may supply the Personal Information to service suppliers and product providers who render the following services:

- Capturing and organising of data;
- Storing of data;
- Sending of emails and other correspondence to clients on its behalf;
- Conducting due diligence checks;
- Provision of financial products and services;
- Organisation or person that the FSP uses to collect payments and recover debts or to provide a service on its behalf;

- Any payment system the FSP utilises;
- Audit, Accounting and Compliance Services;
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the FSP has a duty to share information;
- Third parties to whom payments are made on behalf of employees;
- Financial institutions from whom payments are received on behalf of data subjects;
- Any other operator not specified;
- Employees, Contractors, Representatives, Key Individual's, and temporary staff.

18. Rights of the Data Subject

A Data Subject has the right to:

- Access their Personal Information that the FSP has on record;
- Object to the processing of their Personal Information;
- Request the FSP to correct, delete, or destroy their Personal Information;
- Lodge a complaint with the Information Regulator;
- Institute civil proceedings regarding interference with the protection of personal information, as provided for in section 99 of POPIA.

19. Actual or planned transborder flows of Personal Information

Personal Information may be transmitted transborder to the FSP's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The FSP will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure the said data and Personal Information.

20. General description of information security measures

The FSP employs up-to-date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care.

Measures include: Firewalls - Virus protection software and update protocols - Logical and physical access control - Secure setup of hardware and software making up the IT infrastructure - Outsourced Service Providers who process Personal Information on behalf of the FSP are contracted to implement security controls.

The FSP undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The FSP may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

Access control of persons

The FSP shall implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where the data are processed.

Data media control

The FSP undertakes to implement suitable measures to prevent the unauthorised manipulation of media, including reading, copying, alteration, or removal of the data media used by the FSP and containing personal data of clients.

Data memory control

The FSP undertakes to implement suitable measures to prevent unauthorised input into data memory and the unauthorised reading, alteration, or deletion of stored data.

Access control to data

The FSP represents that the person(s) entitled to use the FSP's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

Transmission Control

The FSP shall be obliged to enable the verification and tracing of the locations/destinations to which the Personal Information is transferred by utilisation of The FSP's data communication equipment/devices.

Transport Control

The FSP shall implement suitable measures to prevent Personal Information from being read, copied, altered, or deleted by unauthorised persons during the transmission thereof or during the transport of the data media.

Organisation Control

The FSP shall maintain its internal organisation in a manner that meets the requirements of this manual.

21. Other information as may be prescribed

The Regulations relating to the Promotion of Access to Information Act, 2021 (Government Notice R757 of 27 August 2021) prescribe additional procedural requirements, prescribed forms and complaint processes applicable to requests made in terms of the Act.

22. Availability of this manual

The manual is available on the FSP's website (www.wwas.co.za), at the FSP's principal place of business for public inspection during normal business hours and may be provided to any person upon request (subject to a reasonable reproduction charge, where applicable). The manual will be made available to the Information Regulator upon request.

Annexure A

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>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 page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Signed at this day of20.....

.....
Signature of data subject/designated person

Annexure B

FORM 1

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN
TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2017
[Regulation 2(1)]**

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

A	DETAILS OF DATA SUBJECT	
Name and surname of data subject:		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural):		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

Name of public or private body/(if the responsible party is not a natural person):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of 20

.....
Signature of data subject (applicant)