

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL



Prepared in terms of section 51 of the Promotion of Access to Information Act of 2000 (as amended) (PAIA) and The Protection of Personal Information Act, 4 of 2013 (POPIA)

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FOREWORD BY THE CEO

Private Wealth Management (Pty) Ltd (“PWM”) has prepared this PAIA Manual in compliance with the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”), as amended. This manual is intended to facilitate public access to information held by PWM and to promote transparency and accountability within the organisation.

PWM recognises the importance of empowering individuals to understand and exercise their rights under PAIA. By providing access to information, we aim to support a society where individuals are informed and able to protect their rights effectively.

In fostering a culture of openness, PWM acknowledges that transparency must be balanced with other legal and ethical considerations. These limitations are recognised within PAIA and the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”), and include:

- The reasonable protection of personal privacy;
- Commercial confidentiality; and
- The promotion of effective, efficient, and good governance.

PAIA acknowledges that the right of access to information is not absolute and must be weighed against other rights enshrined in the Constitution. Accordingly, PWM may be required to grant access to records, even where grounds for refusal exist, if such disclosure would reveal evidence of a substantial contravention of the law and if the public interest in disclosure clearly outweighs any potential harm.

This PAIA Manual complies with Section 10 of PAIA and reflects PWM’s commitment to upholding constitutional values. We further recognise the role of the Information Regulator, established under POPIA, in overseeing compliance with PAIA and its regulations by both public and private bodies.



Pieter Bester

Chief Executive Officer

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | |
|------------------|--|
| 1.1. “CEO” | Chief Executive Officer; |
| 1.2. “DIO” | Deputy Information Officer; |
| 1.3. “IO” | Information Officer; |
| 1.4. “Minister” | Minister of Justice and Correctional Services; |
| 1.5. “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.6. “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7. “Regulator” | Information Regulator; and |
| 1.8. “Republic” | Republic of South Africa |

2. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT (PAIA)

The Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”), was enacted on 3 February 2000 to give effect to the constitutional right of access to information, as provided for in Section 32 of the Bill of Rights in the Constitution of the Republic of South Africa, 1996 (“the Constitution”). This right entitles every person to access:

- Information held by the State; and
- Information held by another person, where such information is required for the exercise or protection of any rights.

In terms of Section 51 of PAIA, Private Wealth Management (Pty) Ltd (“PWM”) is required to compile and maintain an Information Manual (“PAIA Manual”). This manual outlines the procedures to be followed when requesting access to information from PWM.

Where a valid request is made in terms of PAIA, PWM is obliged to release the requested information, subject to applicable legislative and regulatory requirements. However, the Act also provides specific grounds on which access to information may be refused.

This PAIA Manual sets out the process to be followed when submitting a request for information and ensures that PWM complies with its obligations under the Act.

3. PRIVATE WEALTH MANAGEMENT (PTY) LTD (PWM)

In this PAIA Manual any reference to PWM refers to Private Wealth Management (Pty) Ltd with registration number 2019/470597/07. PWM is an authorised Financial Services Provider in terms of Financial Advisory and Intermediary Services Act (“FAIS”).

This PAIA Manual is available in one of the official languages and can be viewed at our premises: The Estuaries, Block F, Ground Floor, Oxbow Crescent, Century Ave, Century City, 7441, as well as on its website: www.privatewealth.co.za.

4. PURPOSE OF THE PAIA MANUAL

This PAIA manual is intended to assist members of the public in understanding how to access information held by Private Wealth Management (Pty) Ltd (“PWM”) in terms of the Promotion of Access To Information Act (PAIA). Specifically, this manual enables individuals to:

- Identify categories of records held by PWM that are available without the need to submit a formal PAIA request.
- Understand the process for submitting a request for access to records, including a description of the subjects on which PWM holds records and the categories of records under each subject.
- Access information about records available in accordance with other legislation.
- Obtain contact details of PWM's Information Officer and Deputy Information Officer, who are responsible for assisting the public with access to records.
- Access the PAIA Guide published by the Information Regulator, which provides guidance on how to exercise rights under PAIA and how to obtain the guide.
- Understand PWM's processing of personal information, including:
 - The purpose for which personal information is processed;
 - The categories of data subjects and the types of personal information processed;
 - The recipients or categories of recipients to whom personal information may be disclosed;
 - Whether personal information may be transferred or processed outside the Republic of South Africa;
 - The security measures in place to ensure the confidentiality, integrity, and availability of personal information

This manual reflects PWM'S commitment to transparency, accountability, and compliance with both PAIA and the Protection of Personal Information Act (POPIA).

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PWM WEALTH MANAGEMENT (PTY) LTD

Information Officer

In terms of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”), every public and private body is required to appoint an Information Officer. The Information Officer is responsible for assessing requests for access to information and ensuring compliance with the provisions of PAIA.

At Private Wealth Management (Pty) Ltd (“PWM”), the Chief Executive Officer has been designated as the Information Officer in accordance with Section 51 of PAIA. This designation also aligns with the requirements of the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”), which refers to the same role.

All requests for information in terms of this manual should be directed to:

Name	Old Mutual Chief Privacy Officer
Access to information general contacts	paia@oldmutual.com
Postal Address	Old Mutual PO BOX 66 Cape Town 8000
Physical Address	Old Mutual Mutualpark Jan Smuts Drive Pinelands 7405

The Information Officer is responsible for overseeing PWM's compliance with both PAIA and POPIA, including the duties outlined in Section 55 of POPIA. These responsibilities are carried out following registration with the Information Regulator.

Deputy Information Officer

The Information Officer may appoint, where it is deemed necessary, a Deputy Information Officer, 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 to render PWM as accessible as reasonably 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.

PWM has opted to appoint the Chief Operating Officer as the Deputy Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.

Contact details of the Deputy Information Officer

Name:	Dirk Wolfaardt
Tel:	021 555 9300
Email:	pwm@privatewealth.co.za

National or Head Office

Physical Address:	The Estuaries, Block F, Ground Floor, Oxbow Crescent, Century Ave, Century City, 7441
Postal Address:	Same as Physical

Telephone:	021 555 9300
Fax number:	Not Applicable
Email:	pwm@privatewealth.co.za
Website:	www.privatewealth.co.za

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

- 6.1 The Regulator has, in terms of section 10(1) of the Act, 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.
- 6.2 The Guide is available in each of the official languages:
<https://info regulator.org.za/paia-guidelines/>
- 6.3 The aforesaid Guide contains the description of-
- 6.3.1 the objects of PAIA and POPIA;
 - 6.3.2 the postal and street address, phone and fax number and, if available, email address of:
 - 6.3.2.1 the Information Officer of every public body, and
 - 6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 6.3.3 the manner and form of a request for:
 - 6.3.3.1 access to a record of a public body contemplated in section 11; and
 - 6.3.3.2 access to a record of a private body contemplated in section 50;
 - 6.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
 - 6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 6.3.6 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:
 - 6.3.6.1 an internal appeal;
 - 6.3.6.2 a complaint to the Regulator; and
 - 6.3.6.3 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;
 - 6.3.7 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;
 - 6.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 6.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

- 6.3.10 the regulations made in terms of section 92.
- 6.4 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 Regulator, during normal working hours.
- 6.5 The Guide can also be obtained-
- 6.5.1 upon request to the Information Officer;
- 6.5.2 from the website of the Regulator (www.justice.gov.za/inforeg/).
- 6.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
- 6.6.1 English and Afrikaans

7. CATEGORIES OF RECORDS OF PRIVATE WEALTH MANAGEMENT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of Section 52 of PAIA, the following categories of PWMWM records are available without a person having to request access:

1. Annual financial reports
2. Interim audited report
3. Product information
4. Advertising pamphlets and brochures
5. Newsletters

8. DESCRIPTION OF THE RECORDS OF PRIVATE WEALTH MANAGEMENT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Memorandum of incorporation Shareholder Records Secretarial Records Audit Records Banking Records Directors Details	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
The following information about Employees: Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details)	Employment Equity Act 55 of 1998 Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Income Tax Act, 58 of 1962

<p>Family Records (i.e. next of kin name and surname, contact number)</p> <p>Medical Details</p> <p>Professional History (Occupation, Qualifications)</p> <p>Demographic details (Age, Income, Gender, Location)</p> <p>Financial Records (Salary, Banking Details, SARS related information)</p> <p>Behavioural data (Criminal checks, performance, disciplinary)</p>	
<p>Identity of prospective or existing client and occupation</p> <p>Ownership and Control Structure of the Client/Entity Information regarding the business relationship (nature and purpose of business)</p> <p>The source of income/ funds/wealth that the client expects to use during the business relationship</p> <p>The anticipated level and nature of the activity that is to be undertaken during the business relationship\</p> <p>The nature and extent of the activity/business activity that the client may be involved in.</p>	<p>Financial Intelligence Centre Act 38 of 2001</p> <p>Prevention of Organised Crime Act, 121 of 1998</p>
<p>Record statistics and information regarding the occurrence and causes of accidents and occupational diseases.</p> <p>Employee identification details and documents. Employee to submit to medical examination.</p> <p>A register or other record of wages, time worked, payment for piece work and overtime and all other prescribed particulars.</p> <p>Any document that is seen as evidence: e.g., sworn statement, etc.</p>	<p>Compensation for Occupational Injuries Diseases Act 130 of 1993</p>

<p>Clients' identification details and document</p> <p>Demographic records Demographic details (Age, Income, Gender, Location)</p> <p>Financial records</p> <p>Records of premature cancellations of transactions or financial products by clients</p> <p>Records of complaints received together with an indication whether or not any such complaints have been resolved</p> <p>Full and proper accounting records</p> <p>Records of all funds received and payments made and of all assets, liabilities and financial transactions.</p>	<p>Financial Advisory and Intermediary Services Act 37 of 2002</p>
<p>Address of the Employer, and its branches</p> <p>Names, identification numbers and monthly remuneration of employees and the address at which the employee is employed</p> <p>Employee Identification details and documents Financial Records (Salary, Banking Details, SARS details) Amount of benefits for purposes of section 13(3)</p> <p>Benefits the applicant is entitled to</p>	<p>Unemployment Insurance Act 63 of 2001</p>

9. DESCRIPTION OF THE SUBJECTS ON WHICH PRIVATE WEALTH MANAGEMENT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

CATEGORIES OF RECORDS HELD	
Long-term insurance products	Administration of Retirement Annuities and Pension Funds
Savings products	Trust services
Unit trust products	Money transfer services
Investment and risk products to groups and schemes	Actuarial and consulting services to the group retirement industry

Short-term Insurance products	Health Care products
Linked Investment services	Lending products
Managed care services to the healthcare industry	Administration of medical schemes

COMPANY RECORDS

Finance and supporting documentation	Marketing
Client care	Information Technology
Advice records	Human Resources
Product provider information	All records kept in terms of the Company Laws of South Africa

SUBJECTS ON WHICH RECORDS ARE HELD

Financial planner	Event Delegate	Premium Payer
Banking Institutions	External Juristic	Prospect
Beneficiary	Product Provider	Shareholder
Board Member	Individual Acting On Behalf Of	Co-Signatory
Candidate	Individual Captured by CCTV Images	Customer
Child	Offender/Suspected Offender	Director
Complainant/Enquirer	PWM Private Staff	Donor
Consultant	PWM Employee	Intermediary
Employer	Policyholder	Investor
Life Covered	Next of Kin	Vendor
Member	Subsidiary Company	Witness

THE FOLLOWING RECORDS ARE HELD IN RESPECT OF THE ABOVE MENTIONED DATA SUBJECTS

Confidential	Research
Personal	Operational
Commercial	Business
Financial	Internal Group/Company Divisions

Group/Company Incorporation	Group/Company Structure
Group/Company Financial	Policyholder
Group/Company Departments	Shareholder
Strategy	External Companies
Contractor	Directors
Investor	Employee
Subsidiary Companies	Banking Institutions
Consultant	Official/Legal
Information Technology	Policy Documents
Client	Product and Services
	Contracts

10. PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of processing Personal Information

PURPOSE OF THE PROCESSING	
Application for Employment	Legal Proceedings
Claim Checks	Market Research and Statistical Analysis
Claims Management	Marketing
Compliance Assessment	Operations
Compliance with Legislation	Personal Information Maintenance
Credit Reference Checking	Provision of Products and Services
Debt Tracing and Recovery	Record Keeping
Employment Management and Administration	Social Responsibility
Fraud, Crime and Money Laundering Detection	Underwriting
Identify Verification	
Application for Employment	Legal Proceedings

Claim Checks	Market Research and Statistical Analysis
Claims Management	Marketing
Compliance Assessment	Operations
Compliance with Legislation	Personal Information Maintenance
Credit Reference Checking	Provision of Products and Services
Debt Tracing and Recovery	Record Keeping
Employment Management and Administration	Social Responsibility
Fraud, Crime and Money Laundering Detection	Underwriting
Identify Verification	

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

CATEGORIES OF DATA SUBJECTS	
Shareholders	Clients
Board Members/Directors	Banking Institutions
Employees	External companies/Contractors
Consultants	Suppliers and Service Providers
Offenders and suspected offenders	Policyholders
Investors	Pension Fund Members and Beneficiaries
Complainants, enquirers	Individuals captured by CCTV images
Employers and employees of other organisations	Individuals who have indicated interest in our products and/or services
Witnesses	Prospective employees/candidates
Subsidiary Companies	Co-Signatories and Individuals Acting on Behalf Of
Financial planners	Next of Kin
Lives Covered	Prospective Employee Referees
Sponsors	Premium Payers

CATEGORY AND TYPE OF PERSONAL INFORMATION PROCESSED	
Personal Information Category	Personal Information Type
Identifier	Name Address Information/Details Contact Number Email Address Identifying Number Location Information/Data Online identifier Other Particular Assignment to Data Subject Symbol
Physiological/Physical/Mental	Age Date of Birth Gender Pregnancy Status
Economic	Education Information Employment Information Financial Information
Cultural/Social	Colour Correspondence Sent Culture Language Marital Status Nationality Origin Personal Opinions, Views or Preferences of the Data Subject Social Origin Views/opinions of another individual about the Data Subject

DOCUMENT CONTROL SHEET

KEY INFORMATION

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2	Portia Nhlangulela	17 February 2026	<ul style="list-style-type: none"> - New cover page. - Update CEO details. - Updated Information Officer details. - Updated Deputy Information Officer email address. - Added link to PAIA Guide. - Amend records under section 8 & 9.

APPROVAL: This document requires the following signed approvals.

Name/Title	Role	Date	Version
Barend Thompson	Head of Operations	21 February 2026	2

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Distribution Group	Medium of Distribution	Date of Issue	Version
PWM Customers	Save on PWM website	29 July 2022	1
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