

1. Purpose of this PAIA Manual

This Manual explains how you may request access to records held by us in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA).

It also provides information about:

- The categories of records we hold
- Records that may be available without a formal PAIA request
- Records we hold in accordance with other legislation
- How to submit a request for access to a record
- How we process personal information in terms of the Protection of Personal Information Act 4 of 2013 (POPIA)
- How to contact us about an access to information request

2. Contact details for access to information

Organisation

Wealth Way Plus (Pty) Ltd

Information Officer

Werner Hattingh

Email: werner@wealthway.co.za

Phone: +27 78 436 3702

General access to information enquiries

Email: support@wealthway.co.za

Website: wealthway.co.za

Physical and postal address

20 Kroton Street

Constantia Kloof

Roodepoort

1709

3. Guide on how to use PAIA

The Information Regulator has published a Guide to assist people who wish to exercise their rights under PAIA and POPIA.

The Guide explains, among other things:

- How to make a request for access to a record

- The assistance available from an Information Officer
- The fees that may apply
- The remedies available where access is refused
- How to access personal information under POPIA

The Guide is available from the Information Regulator at www.inforegulator.org.za.

A copy of the Guide in at least two official languages is also available for public inspection at our principal place of business during normal business hours.

A request for access to a record must be submitted using the prescribed Form 2: Request for Access to Record to the contact details provided in section 2. Form 2 is available from the Information Regulator's website.

4. Records available without a formal PAIA request

Certain information is made publicly available without the need to submit a formal PAIA request.

This includes:

- Our PAIA Manual
- Our Privacy Statement

These documents are available through our website.

Other records held by us are not automatically available merely because they are described in this Manual. Requests for access to those records will be considered in accordance with PAIA.

5. Records available in accordance with other legislation

Certain records are created and retained by us in accordance with applicable legislation, including:

Record category	Applicable legislation
Company and statutory records	Companies Act 71 of 2008
Financial services and client records	Financial Advisory and Intermediary Services Act 37 of 2002 and applicable subordinate requirements
Client identification, verification, transaction and reporting records	Financial Intelligence Centre Act 38 of 2001
Personal information and privacy records	Protection of Personal Information Act 4 of 2013
PAIA and access-to-information records	Promotion of Access to Information Act 2 of 2000

Record category	Applicable legislation
Employment and remuneration records	Basic Conditions of Employment Act 75 of 1997
Tax and financial records	Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962 and Value-Added Tax Act 89 of 1991, where applicable

The inclusion of a record category in this section does not mean that the record is automatically available to the public. Access remains subject to the applicable legislation and, where relevant, the requirements and grounds for refusal under PAIA.

6. Subjects and categories of records

We hold records relating to the following areas of our business:

Subject	Categories of records
Corporate and governance	Company and statutory records; governance policies, standards and processes; agreements and business records
Clients and financial services	Client identification and contact information; financial needs analyses; records of advice; applications and instructions; product and servicing records; client correspondence; complaints and supporting records
Compliance and regulatory	Regulatory registrations and appointments; FAIS and FIC records; Fit and Proper records; supervision records; training and CPD records; privacy and information governance records; compliance monitoring and incident records
Employees and Representatives	Employment and appointment records; contracts; payroll and leave records; qualifications and training records; onboarding and offboarding records
Finance and taxation	Accounting records; invoices; banking records; financial statements; tax and statutory financial records
Service providers and other third parties	Agreements; contact information; invoices and payment records; due diligence and supporting records
Marketing and communications	Marketing material; communication records; direct marketing preferences, consents and opt-out records

The inclusion of a category of records in this Manual does not mean that access will automatically be granted. Requests for access are considered in accordance with PAIA and any applicable grounds for refusal.

7. Processing of personal information

7.1 Why we process personal information

We process personal information where necessary to:

- Provide financial services and understand our clients' needs, circumstances and objectives
- Prepare financial needs analyses, advice and recommendations
- Process applications, instructions and servicing requests
- Manage our relationships with clients and prospective clients
- Meet legal, regulatory and compliance obligations
- Manage complaints, enquiries and requests
- Prevent fraud and manage business and information security risks
- Manage our employees, Representatives and service providers
- Operate and administer our business

7.2 Categories of people and personal information

Category	Personal information we may process
Clients and prospective clients	Identification and contact information; financial information; employment and occupational information; financial needs, objectives and circumstances; beneficiary and dependant information; health or medical information where required; application, product, servicing and communication records
Employees and Representatives	Identification and contact information; employment and appointment records; payroll and banking information; qualifications, training and compliance records
Service providers and contractors	Identification and contact information; company or registration information; agreements; banking and payment information; supporting business records
Beneficiaries, dependants and other related persons	Identification, contact and relationship information where required for a financial service, product, legal or regulatory purpose

7.3 Who we may share personal information with

Where necessary and permitted, personal information may be shared with:

- Product providers, insurers and financial institutions
- Authorised service providers and operators

- Compliance, verification and regulatory service providers
- Professional advisers, auditors and other specialists
- Regulators, law enforcement bodies and other public authorities
- Other persons where authorised by the individual or permitted by law

7.4 Personal information processed outside South Africa

Some personal information may be processed or stored outside South Africa where we use a product provider, service provider or information system operating in another country.

This may include personal information relating to clients, prospective clients, employees, Representatives and service providers, depending on the service or system being used.

Where this occurs, we take reasonable steps to ensure that the transfer or processing is permitted under POPIA and that appropriate safeguards apply.

7.5 Security of personal information

We take reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised destruction, unlawful access or unlawful processing.

Personal information is maintained electronically within approved systems and storage environments, with access limited according to business responsibilities and authorised access.

We maintain processes for responding to information security incidents and review our information protection controls as our systems, operations and regulatory requirements change.

8. Availability of this Manual

This Manual is available:

- On our website
- At our principal place of business for public inspection during normal business hours
- To any person on request
- To the Information Regulator on request

A copy of the Manual may be provided subject to any applicable fee permitted under PAIA.

9. Updating of this Manual

We will update this Manual on a regular basis and where necessary to ensure that the information it contains remains current and accurate.

The current version of this Manual will be made available in accordance with section 8.