

EVERYDAY WEALTH (PROPRIETARY) LIMITED

t/a Everyday Advisors – An authorised Discovery franchise practice

Registration No. 2021/703245/07

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended), read together with section 51 of the Protection of Personal Information Act 4 of 2013

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1** "CEO" – Chief Executive Officer
- 1.2** "Company / Everyday Advisors" – Everyday Wealth Proprietary Limited (Registration No. 2021/703245/07), trading as Everyday Advisors, an authorised Discovery franchise practice and juristic representative of Discovery Life Limited (FSP 18147)
- 1.3** "DIO" – Deputy Information Officer
- 1.4** "FAIS" – Financial Advisory and Intermediary Services Act 37 of 2002
- 1.5** "FICA" – Financial Intelligence Centre Act 38 of 2001
- 1.6** "FSCA" – Financial Sector Conduct Authority
- 1.7** "FSP" – Financial Services Provider
- 1.8** "IO" – Information Officer
- 1.9** "Minister" – Minister of Justice and Correctional Services
- 1.10** "PAIA" – Promotion of Access to Information Act No. 2 of 2000 (as amended)
- 1.11** "POPIA" – Protection of Personal Information Act No. 4 of 2013
- 1.12** "Regulator" – The Information Regulator (South Africa)
- 1.13** "Republic" – Republic of South Africa

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual is useful to members of the public in order to:

- 2.1** check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- 2.2** have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- 2.3** know the description of the records of the Company which are available in accordance with any other legislation;
- 2.4** access the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5** know the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 2.6** know if the Company processes personal information, the purpose of that processing, and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7** know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8** know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9** know if the Company has planned to transfer or process personal information outside the Republic of South Africa, and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10** know whether the Company 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 INFORMATION OF THE COMPANY

3.1 Information Officer

Name: Daniel Saul Fisher

Telephone: 011 075 8507

Email: daniel.fisher@dfc.discovery.co.za

3.2 Deputy Information Officer

Name: Saul Shain

Telephone: +27 (0)83 607 0808

Email: saul.shain@dfc.discovery.co.za

3.3 General access-to-information enquiries

Email: everyday@dfc.discovery.co.za

3.4 Registered / Head Office

Company: Everyday Wealth Proprietary Limited t/a Everyday Advisors

Registration number: 2021/703245/07

Physical address: Wierda Office Park, 107 Johan Avenue, 1st Floor, Sandton, 2128

Postal address: Wierda Office Park, 107 Johan Avenue, 1st Floor, Sandton, 2128

Telephone: 011 075 8386

Email: everyday@dfc.discovery.co.za

Website: www.everydayadvisors.co.za

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

The Regulator has, in terms of section 10(1) of PAIA, 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.

The Guide is available in each of the official languages and in braille. The Guide contains a description of:

4.1 the objects of PAIA and POPIA;

4.2 the postal and street address, phone and fax number and, if available, electronic mail address of –

4.2.1 the Information Officer of every public body; and

4.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56(a) of POPIA²;

4.3 the manner and form of a request for – access to a record of a public body contemplated in section 11³; and access to a record of a private body contemplated in section 50⁴;

¹Section 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 records.

²Section 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 number of deputy information officers, if any, as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³Section 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.

⁴Section 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

- 4.4** the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 4.5** the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.6** 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 –
 - 4.6.1** an internal appeal;
 - 4.6.2** a complaint to the Regulator; and
 - 4.6.3** 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 by the head of a private body;
- 4.7** the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.8** the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.9** the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.10** the regulations made in terms of section 92¹¹.

Members of the public may inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

The Guide can also be obtained:

- 4.11** upon request to the Information Officer;
- 4.12** from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.13** A copy of the Guide is also available in the two official languages listed below, for public inspection during normal office hours: English and Afrikaans.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

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.

⁵Section 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.

⁶Section 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.

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

⁸Section 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.

⁹Section 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.

¹⁰Section 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.

¹¹Section 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; (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."

In terms of section 52(1) of PAIA¹², the Company voluntarily makes the following categories of records available without a person having to submit a formal request for access:

Category of records	Types of the record	Available on website	Available upon request
Company information	PAIA Manual	X	X
Privacy / data protection information	Privacy Statement (POPIA)	X	X
Regulatory disclosure	FSP licence and representative details		X

Note: this list should be reviewed and expanded by the Company to reflect every category of record it voluntarily discloses.

6. DESCRIPTION OF RECORDS OF THE COMPANY AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of records	Applicable legislation
Memorandum of Incorporation and statutory registers	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy Statement and related data protection records	Protection of Personal Information Act 4 of 2013
Client due diligence / know-your-client records	Financial Intelligence Centre Act 38 of 2001
Financial advice, disclosure and compliance records	Financial Advisory and Intermediary Services Act 37 of 2002 and the Financial Sector Regulation Act 9 of 2017
Tax and financial records	Income Tax Act 58 of 1962 and the Tax Administration Act 28 of 2011
Employment records	Labour Relations Act 66 of 1995, Employment Equity Act 55 of 1998 and the Basic Conditions of Employment Act 75 of 1997
Occupational health and safety records	Occupational Health and Safety Act 85 of 1993

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subjects on which the Company holds records	Categories of records
Strategic documents, plans and proposals	Annual reports, strategic plan, annual performance plan
Governance	Memorandum of Incorporation, shareholder and director records, board and management minutes
Human resources	HR policies and procedures, advertised posts, employee records
Client / customer administration	Needs analyses, financial plans, product applications, policy schedules, claims records
Compliance and risk	FICA / know-your-client records, anti-money laundering records, FAIS compliance records, complaints register

¹²Section 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.

Subjects on which the Company holds records	Categories of records
Finance and accounting	Invoices, financial statements, banking and payment records
Marketing and communication	Client communication and marketing preference records
Information technology and security	IT security policies, access logs, data breach register

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing personal information

The Company processes personal information (including special personal information) for the following purposes:

- conducting a needs analysis and providing financial advice relating to insurance, investments, life cover, banking, Vitality, medical aid and gap cover, and estate planning;
- assessing affordability, risk profile and financial needs;
- preparing, submitting and processing applications for products with Discovery or other product providers;
- intermediating and servicing products, including assisting with premium collection, claims and policy changes;
- communicating about financial plans, products and any changes affecting the client;
- complying with legal and regulatory obligations, including FICA, FAIS and anti-money laundering requirements;
- resolving queries or complaints; and
- improving the services provided to clients.

8.2 Categories of data subjects and the information or categories of information relating thereto

Category of data subjects	Personal information that may be processed
Customers / clients	Biographic and demographic information: full name, ID/passport number, date of birth, marital status, dependants and beneficiaries' details Contact information: physical and postal address, cell phone number, email address Financial information: income, assets, liabilities, financial goals, risk profile, bank account details, tax information Product and policy information: policies, investments and products held, premiums, contributions, claims history Special personal information: health information relevant to underwriting or claims, where applicable Credit information: credit history and credit score, where relevant to affordability assessments Communications and preferences: records of meetings, calls, emails and marketing preferences
Service providers	Name, registration number, VAT number, address, contact details and banking details
Employees	Name, address, identity number, qualifications, gender, race, banking and payroll details, tax number, and performance or disciplinary records

8.3 Recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or categories of recipients
Identity number and names, for criminal checks	South African Police Service
Qualifications, for qualification verification	South African Qualifications Authority
Credit and payment history, for affordability and identity verification	Credit bureaus and consumer data verification bureaus
Product, policy and underwriting information	Companies within the Discovery Group, and other product providers or insurers with whom products are placed
Compliance and regulatory information	The Financial Sector Conduct Authority, where there is a legal or regulatory duty to report
Records required for assurance and advisory purposes	The Company's compliance officer, auditors and professional advisers

8.4 Planned transborder flows of personal information

The Company may transfer personal information outside the Republic of South Africa, for example where it communicates via an email or platform hosted outside South Africa, uses cloud or IT service providers based outside South Africa, or where a product provider (such as Discovery) processes personal information outside South Africa as part of administering a product. The Company will take reasonable steps to ensure that any party it shares personal information with outside South Africa protects that information to the same standard the Company is required to apply.

8.5 General description of information security measures

The Company has put reasonable technical and organisational security measures in place, appropriate to the sensitivity of the personal information it holds, to protect personal information against loss, unauthorised access and misuse. No method of transmission over the internet or electronic storage is completely secure, and while the Company takes reasonable steps to protect personal information, it cannot guarantee absolute security.

9. AVAILABILITY OF THE MANUAL

A copy of this Manual is available:

- 9.1 on the Company's website, www.everydayadvisors.co.za;
- 9.2 at the head office of the Company, for public inspection during normal business hours;
- 9.3 to any person upon request and upon payment of a reasonable prescribed fee; and
- 9.4 to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of the Company will review and, where necessary, update this Manual at least annually and whenever there is a material change to the information it contains.

Date of last review: 24 August 2024

Issued by

Daniel Fisher
Director