



**DIGIWEALTH**  
GLOBAL WEALTH FOR ALL

Name	Promotion of Access to Information Manual (PAIA) Manual
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Policy Owner	Windall Bekker
Responsible	Management



## POLICY STATEMENT

- Any reference to the “organisation” shall be interpreted as Digiwealth Pty Ltd (DW).
- The organisation’s Governing Body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the policy’s requirements and undertake to comply with the stated processes and procedures.
- Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) \*

## POLICY ADOPTION

By signing this document, I authorise Digiwealth Pty Ltd (“DW”) approval and adoption of the processes and procedures outlined herein.

Name & Surname	Windall Bekker
Capacity	Key Individual
Signature	<i>Windall Bekker</i>
Date	31 May 2025



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## 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
- 1.8 “Republic” Republic of South Africa
- 1.9 “FAIS” Financial Advisory and Intermediary Services Act No. 37 of 2002
- 1.10 “FIC” Financial Intelligence Centre Act No. 38 of 2001
- 1.11 “FSCA” Financial Sector Conduct Authority

## 2 PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to –

- 2.1 check the categories of records held by a body 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 body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 2.3 know the description of the records of the body which are available in accordance with any other legislation.
- 2.4 access all 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 body 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 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 body 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 body 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**

3.1. Chief Information Officer Name: Windall Bekker (CEO) Tel: +27 72 191 0492 Email: windall@digwealth.co.za Fax number: 011 123 4568

3.2. Access to information general contacts Email: info@digwealth.co.za

3.4. Address: 13 Belvedere Street, Durbanville, 7551, South Africa Email: info@digwealth.co.za , Website: www.digwealth.co.za C : +27 82 759 2318



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

- 4.1. 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.
- 4.2. The Guide is available in English
- 4.3. The aforesaid Guide contains the description of –
  - 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 and section 56 of POPIA.
  - 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;
    - 4.3.3.2. access to a record of a private body contemplated in section 50.
  - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.
  - 4.3.5. the assistance available from 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.
    - 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 and 51 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 and 52 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 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92.

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.

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

Category of Records	Types of the Record	Available on Website	Available upon Request
POPIA Privacy Policy	Privacy policy document	Yes	
FSCA Compliance Policies	Conflict of Interest Policy, Complaints Policy	Yes	
Company License	Copy of FSCA license	Yes	
Annual Financial Statements	Latest audited financial statements	No	Yes
Disclosure Documents	Client disclosure letters	No	Yes
Competence Records	Representative qualifications	No	Yes



## 6 DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
FSCA License	Financial Advisory and Intermediary Services Act 37 of 2002
Risk Management Programme	Financial Intelligence Centre Act 38 of 2001
CIPC Records	Companies Act 71 of 2008
Complaints Policy	FAIS legislation
Conflict of Interest Policy	FAIS legislation
Treating Customers Fairly (TCF) Policy	FAIS legislation
POPIA Privacy Statement	Protection of Personal Information Act 4 of 2013

## 7 DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DIGIWEALTH PTY LTD

Subjects on Which the Body Holds Records	Categories of Records
Companies Act Records	Documents of incorporation; Records relating to the appointment of directors/auditor/secretary/public officer
Financial Records	Annual Financial Statements; Tax Returns; Accounting Records; Banking Records; Bank Statements; Electronic banking records; Budgets
Personnel Documents and Records	Employment contracts; Disciplinary records; Salary records; Disciplinary code; Training records; Training Manuals
Marketing Records	Advertising materials; Product brochures; Client communication templates
Client Records	Investment portfolios; Advisory agreements; Transaction histories; KYC documents
Risk and Compliance Policies and Procedures	Risk registers; FSCA compliance reports; FICA verification records; AML policies



## 8 PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

- To provide financial advisory and intermediary services, including wealth management, investment advice, and portfolio administration.
- To verify and confirm client identities for compliance with FICA and FAIS.
- For risk assessment (Conservative, moderate or aggressive)
- To handle client queries, claims, and account changes.
- For operational, audit, and record-keeping purposes.
- In compliance with regulatory requirements from the FSCA, FIC, or other authorities.
- To improve services through data analysis and marketing (with consent).

### 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
Customers/Clients	Full name & surname, address (physical/postal), contact numbers, email, ID/passport number, date of birth, gender, nationality, race, marital status, employment details, income/salary, bank details, financial history, investment preferences, tax number, FICA/KYC documents, criminal background checks.
Service Providers	Company name, registration/VAT number, address, contact details, bank details, trade references, contracts.
Employees	Full name & surname, ID number, address, qualifications, gender, race, nationality, contact details, employment history, salary/bank details, performance reviews, disciplinary records.



### 8.3 The Recipients to Whom the Personal Information May Be Supplied

Category of Personal Information	Recipients or Categories of Recipients to Whom the Personal Information May Be Supplied
Client (Individual)	Name, ID number, contact details, financial/banking information, FICA docs: FSCA, FIC, Product providers (e.g., investment platforms), Auditors, Legal advisors.
Client (Legal Entity)	Entity name, registration/tax info, contact details, banking/financial info, FICA docs: FSCA, FIC, Banks, Credit bureaus.

### 8.4 Planned Transborder Flows of Personal Information

Personal information may be transferred or processed outside the Republic of South Africa for cloud-based services or international investment platforms (e.g., to servers in the EU or USA). Transfers occur only with adequate safeguards, such as standard contractual clauses or binding corporate rules, and where necessary for service delivery. Recipients include international custodians or cloud providers (e.g., AWS in Ireland). Data is encrypted during transmission and storage.

### 8.5 General Description of Information Security Measures to Be Implemented by the Responsible Party to Ensure the Confidentiality, Integrity and Availability of the Information

- All devices (laptops, servers) are password-protected with multi-factor authentication.
- Secure, locked offices and access-controlled filing cabinets.
- Anti-virus, firewall, and intrusion detection systems on all networks.
- Incident response plan for breaches, including notification to the Information Regulator within required timelines.



## 9 AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available –

9.1.1 on [www.digiwealth.co.za](http://www.digiwealth.co.za).

9.1.2 at the head office of Digiwealth Pty Ltd for public inspection during normal business hours (08:00–17:00, Monday to Friday);

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee.

9.1.4 to the Information Regulator upon request.

9.2 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 Digiwealth Pty Ltd will update this manual on a regular basis to reflect any changes in the company's structure, records, or applicable legislation.

Issued by:

Windall Bekker

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