

PAIA MANUAL

Manual prepared in terms of section 51 of the Promotion of Access to Information Act, No 2 of 2000 (the "ACT"), for the following entity **Sinayo Wealth (Pty) Ltd**

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A. Introduction to entity

- Sinayo Wealth (Pty) Ltd
 - o Registration # 2015/417494/04
 - o FSP # 46834

B. Particulars in terms of the section 51 manual

This manual has been compiled in accordance with the Promotion of Access to Information Act 2 of 2000 ('the Act') and applies to all the identified entities.

1. Contact details

Sinayo Wealth (Pty) Ltd will deal with all requests relating to any of the entity. All requests for information in terms of this manual should be directed to:

Persons designated/duly authorised

Directors: Mrs B Ngonyama (CEO)

Mrs K Shongwe

Mr J Pretorius

Chief Information Officer – Amanda Baloyi

155 West Street 4TH Floor WeWork Building

Sandton

Johannesburg

South Africa

Telephone: +27 11 783 6599

E mail - info@sinayowealth.com

2. The section 10 Guide on how to use the Act

2.1 The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

2.2 Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

2.3 Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. This Guide will be made available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.

The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041

Telephone Number: +27-11-877 3600

Fax Number: +27-11-403 0625

Website: www.sahrc.org.za

Should you require greater clarity on or assistance with the Act, we refer you to the Guide that has been published by the South African Human Rights Commission ('SAHRC') in terms of section 10 of the Act. It includes:

- a) what the objects of this Act are;
- b) the relevant contact details of each public and private body (where possible);
- c) the process that needs to be followed in order to request access to records;
- d) assistance available from the SAHRC and information officers of public bodies;
- e) how to get access to the manual of a private body;
- f) all the remedies available in law to you; and
- g) details on prescribed fees payable in respect of requests for information.

This Guide will be made available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. Please direct any queries to:

3. Types of Records

a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this manual and the Financial Services Industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

b) Records available without requesting access in terms of the Act

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the Gazette. The identified entities have not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.sinayowealth.com

c) Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in the Act, available for the purposes of the Act:

Records are held on the following subjects:

- i. Personnel records;

- ii. Client-related records;
- iii. Private body records; and
- iv. Records in the possession of or pertaining to other parties.

Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the private body by their personnel;
- Any records a third party has provided to the private body about any of their personnel; • Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

Client-related records

A client includes any natural or juristic entity, who receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client, including transactional records.

Private body records

The following are considered to include but not be limited to records, which pertain to the private body's own affairs:

- Financial records;
- Operational records;

- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.
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Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers. Alternatively, such other parties may possess records, which can be said to belong to the private body.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors /suppliers.

4. Applicable Legislation

No	Ref	Act
1	No 61 of 1973	Companies Act
2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 95 of 1967	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act

- 7 No 37 of 2002 Financial Advisory and Intermediary Services Act
- 8 No 75 of 1997 Basic Conditions of Employment Act
- 9 No 69 of 1984 Close Corporations Act
- 10 No 25 of 2002 Electronic Communications and Transactions Act
- 11 No 2 of 2000 Promotion of Access of Information Act
- 12 No 30 of 1996 Unemployment Insurance Act

5. Requesting procedures (Section 51 (1) e)

A person who wants access to the records of any of the identified entities must complete the necessary request form.

The request form can be accessed on www.sinayowealth.com or www.sahrc.org.za. If a person needs assistance to obtain the form or on any other matter, please contact the Chief Information Officer on 011 783 6599

The completed request form must be sent to the address or e mailed to info@sinayowealth.com in paragraph 1 and marked for the attention of the Chief Information Officer. The Chief Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.sinayowealth.com

All the pertinent sections must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

NOTE: Access to certain records may be or must be denied on the grounds set out in the Act.

Mandatory grounds for refusal include but are not limited to:

- a) Information for the protection of the privacy of individuals;
- b) Information for the protection of commercial information and confidential information of third parties;
- c) Information privileged from production in legal proceedings;

d) Commercial information of the company; and

e) Research information.

6. Prescribed Fees

The following applies to requests (other than personal requests):

- 6.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- 6.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 6.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 6.4 Records may be withheld until the fees have been paid.
- 6.5 The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at www.sahrc.org.za.

7. Availability of the manual

Copies of this manual are available for inspection, free of charge, at the offices of Sinayo Wealth (Pty) Ltd. Copies are also available from the South African Human Rights Commission and on our website www.sinayowealth.com