

PAIA MANUAL

Authorised Financial Services Provider regulated by the Financial Sector
Conduct Authority,

FSP NO. 52295

Prepared in terms of section 51 of the Promotion of Access to Information
Act 2 of 2000 (as amended)

DATE OF COMPILATION: 16/02/2023

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LIST OF ACRONYMS AND ABBREVIATIONS

“CEO”	Chief Executive Officer
“DIO”	Deputy Information Officer;
“IO”	Information Officer;
“Minister”	Minister of Justice and Correctional Services;
“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended.
“POPIA”	Protection of Personal Information Act No.4 of 2013;
“Regulator”	Information Regulator; and
“Republic”	Republic of South Africa

PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- 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
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CREDITSMART
FINANCIAL SERVICES (PTY) LTD:



Chief Information Officer

Name: Jakobus Lodewikus Olivier
Cell: +27 72 513 2721
Email: wikus@creditsmart.co.za

Deputy Information Officer

Name: Ulrike Viljoen
Tel: +27 61 475 7001
Email: ulrike@creditsmart.co.za

Access to information general contacts

Email: wikus@creditsmart.co.za

National or Head Office

Postal Address:

Postnet Suite 51, Private Bag x25723, Waterkloof Ridge, Pretoria, 0181

Physical Address: 78 Kalkoen Street, Fountain Square, Monument Park
Pretoria, 0181

Telephone: 072 513 2721

Email: wikus@creditsmart.co.za

Website: www.creditsmart.co.za

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 aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
- the Information Officer of every public body, and

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

- 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;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;

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-

- an internal appeal;
- a complaint to the Regulator; and
- 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;

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;

The provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.

The notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and the regulations made in terms of section 9211.

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.

The Guide can also be obtained-

- upon request to the Information Officer;
- from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- English and Afrikaans

CATEGORIES OF RECORDS OF CREDITSMART FINANCIAL SERVICES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.

Category of records	Types of the Record	Available upon request
POPI	Privacy Policy	X
FSCA Compliance	Conflict of Interest Policy	X
FSCA Compliance	Complaints Policy	X
PERSONAL	ID, Names, Bank accounts	X
LEGISLATIVE	Disclosure letter	X
	Copy of license	X
	Annual Financial Statements	X
	Tax Returns	X
	Accounting records	X
	Competence records	X
	PI Certificate	X

DESCRIPTION OF THE RECORDS OF CREDITSMART FINANCIAL SERVICES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

NB: Please specify all the records which are created and available in accordance with any of the South African 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 licence	No 37 of 2002 Financial Advisory and Intermediary Services Act
Risk Management and Compliance Programme	No 38 of 2001 Financial Intelligence Centre Act
CIPC records	Companies Act 71 of 2008
Complaints Policy	FAIS legislation
Conflict of Interest policy	FAIS legislation
TCF policy	FAIS legislation
POPI Privacy statement	POPIA

DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CREDITSMART FINANCIAL SERVICES (PTY) LTD

Subjects on which the body holds records	Categories of records
COMPANIES ACT RECORDS	<ul style="list-style-type: none"> • Documents of incorporation • Records relating to the appointment of directors/ auditor/ secretary/ public officer and other officers.
FINANCIAL RECORDS	<ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Bank Statements • Electronic banking records • Budgets
INCOME TAX RECORDS	<ul style="list-style-type: none"> • PAYE Records • Documents issued to employees for income tax purposes.

	<ul style="list-style-type: none"> Records of payments made to SARS on behalf of employees.
PERSONNEL DOCUMENTS AND RECORDS	<ul style="list-style-type: none"> Employment contracts Disciplinary records Salary records Disciplinary code Training records Training Manuals
MARKETING	<ul style="list-style-type: none"> Advertising Product Brochures
RISK AND COMPLIANCE	<ul style="list-style-type: none"> Policies and procedures Risk registers. FSCA requirements FICA requirements

PROCESSING OF PERSONAL INFORMATION

1. Purpose of Processing Personal Information (Receive information directly from clients)

- To assist the client in their request for short term and/or long-term insurance policies and to assist in any queries or changes regarding those policies or products.
- To confirm and verify client identities.
- For insurance underwriting.
- To assist in claim handling.
- To conduct credit reference searches or verification.
- For operational purposes required to assist you with the solutions you require.
- For audit and record-keeping purposes.
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

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, postal, numbers, gender, nationality, race, marital status, education, children under 18 information, identity numbers, drivers licence, DOB, Passport number, employment status, salary and bank details. Business details and information. Medical information. Insurance history and claims.

	Signature, background checks and criminal history.
Service Providers	Company names, registration number, vat numbers, address, trade secrets and bank details. Business address and numbers.
Employees	Full name & surname, Id number, drivers' licence, address, qualifications, gender and race, nationality. Marital status and education, contact details. Bank details, tax number, employment history, background checks, criminal history.

3. The recipients or categories of 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
Full names and surname	FICA screening
Client (Individual) Name, surname, identity number or passport number, date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, income tax number, financial information, banking information including account numbers, FICA documentation, employment status.	Product providers Masthead (Pty) Ltd Financial Intelligence Centre Financial Sector Conduct Authority
Client (Legal entity) Entity name, registration number, tax-related information, contact details for representatives, banking information including account numbers, financial information, FICA documentation.	

4. Planned transborder flows of personal information.

The FSP does not plan to have any clients outside the borders of South Africa. The cloud and email host servers may store data in Austria, Finland, France, Ireland, Nederland- *OneDrive and Microsoft Data storage is encrypted.*

5. General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.

- Laptop Password protected.
- Locked office and/or locked cabinets in office when unoccupied
- Safekeeping of hard drives
- Password protected systems where client information is stored.
- Anti-virus program
- Data storage is encrypted.

AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

1. On www.creditsmart.co.za
2. head office of Credit Smart Financial Services (Pty) Ltd for public inspection during normal business hours;
3. to any person upon request and upon the payment of a reasonable prescribed fee; and
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.

UPDATING OF THE MANUAL

The head of Credit Smart Financial Services (Pty) Ltd will on a regular basis update this manual.

Issued by

A handwritten signature in blue ink, appearing to read "Jakobus", written over a horizontal line.

*Jakobus Lodewikus Olivier
Director and Key Individual*