

ADVICEWORX (PTY) LTD

PROMOTION OF ACCESS TO INFORMATION MANUAL

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1. Introduction

This manual has been prepared in accordance with the requirements of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("the Act"). This manual contains information required to request access to the records held by Adviceworx (Pty) Ltd ("Adviceworx").

2. Requests for information

All requests for information in terms of this manual should be directed to the Information Officer at the address in paragraph 3 and in accordance with the process set out paragraph 13 below:

3. Information Officer contact details

Postal address:

PO Box 55363
Northlands
2116

Telephone number:

011 268 9600

Fax number:

011 268 9635

E-mail: governance@adviceworx.co.za

Physical address:

1st Floor
Building 5
Commerce Square
39 Rivonia Road (C/o Melville & Helling Roads)
Sandhurst
2194.

4. The Act

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.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided (refer to paragraphs 10 and 11 below). The forms and tariffs are determined in paragraphs 6 and 7 of the Act.

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. 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

5. Copies of this manual

The manual is available for inspection, free of any charge, on the website www.adviceworx.co.za and at the offices of Adviceworx. Copies are also available from the South African Human Rights Commission ("SAHRC").

Adviceworx will charge a fee for a copy of any page or part thereof of this manual.

6. Records are held in terms of the following legislation

Adviceworx holds records in terms of the following legislation:

Basic Conditions of Employment Act, 75 of 1997	Collective Investment Schemes Control Act, 45 of 2002
Pension Funds Act, 24 of 1956	Financial Services Board Act, 97 of 1990
Employment Equity Act, 55 of 1998	Financial Intelligence Centre Act, 38 of 2001
Protection of Personal Information Act, 4 of 2013	Financial Advisory And Intermediary Services Act, 37 of 2002
Skills Development Levies Act, 9 of 1999	Income Tax Act, 58 of 1962
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	Prevention of Organised Crime Act, 121 of 1998
Labour Relations Act, 66 of 1995	Unemployment Insurance Act, 30 of 1966
Trade Marks Act, 194 of 1993	Security Services Act, 36 of 2004
Companies Act, 71 of 2008	Value-Added Tax Act, 89 of 1991
Unemployment Insurance Act, 63 of 2001	Long-term Insurance Act, 52 of 1998
Electronic Communications And Transactions Act, 25 of 2002	

All records kept and made available, in terms of legislation applicable to any of the subjects listed in this manual and the financial services industry in general, and as it applies to the specific environment in which Adviceworx operates, are available in accordance with that legislation.

7. Subjects and categories of records held by Adviceworx

Products and Services -	
Financial advice	Investment & wealth management services
Investment and risk products	

Company Records	
Finance and supporting documentation	Human Resources
Client servicing	Information Technology
Marketing	Operational processes
All records kept in terms of the Company Laws of South Africa	Tax records

Subjects on which records are held	
Shareholders	Clients
Board members	Advisors
Directors	Independent brokers
Employees	External companies / contractors
Officials	Suppliers and service providers
Consultants	Joint venture companies
Investors	

The following records are held in respect of the abovementioned data subjects	
Confidential	Group / company structure
Personal	Research
Commercial	Operational
Financial	Trade
Group / company incorporation	Business
Group / company financial	Internal group / company divisions
Group / company departments	Strategy

8. Protection of Personal Information

Purpose of the processing	
Providing financial services and advice	Market research and statistical analysis
Supporting and managing Adviceworx employees	Verifying client's identities
Promoting Adviceworx's services	Fraud prevention and detection
Maintaining Adviceworx's accounts and records	Credit searches and/or verification
Compliance with legal and regulatory requirements	

Categories of data subjects	
Shareholders	Advisors
Board members	Clients
Directors	Independent brokers
Employees	External companies / contractors
Officials	Suppliers and service providers
Consultants	Trustees
Complainants, enquirers	Pension Fund members and beneficiaries

Investors	Individuals who have indicated interest in our products and/or services
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Type/classes of information processed	
Personal details	Family details
Lifestyle and social circumstances	Education and employment details
Business activities of the person whose personal information we are processing	Visual images of individuals captured on CCTV footage
Personal views, preferences or opinions of individuals	Financial details
Goods or services provided	

Who the information may be shared with	
<p>Adviceworx may sometimes need to share the personal information processed with the individual themselves and also with other organisations. Where this is necessary Adviceworx is required to comply with all aspects of the Protection of Personal Information Act. What follows is a description of the types of organisations Adviceworx may need to share some of the personal information processed with for one or more reasons. Where necessary or required information is shared with:</p>	
Family, associates and representatives of the person whose personal information we are processing	Current, past and prospective employers
Employment and recruitment agencies	Educators and examining bodies
Financial organisations	Security organizations
Credit reference agencies	Suppliers and service providers
Healthcare, social and welfare organisations	Survey and research organizations
Healthcare professionals	Industry bodies
Central government	Ombudsman and regulatory authorities
Police forces and courts, where necessary	Pension fund administrators
Operators	Debt collection and tracing agencies
Business associates and other professional advisers	Other companies in the Old Mutual Group
Professional advisors and consultants	Auditors
Claimants, beneficiaries, assignees and payees	Persons making an enquiry or complaint
Press and the media	

Transborder flows of personal information
<p>The companies listed in this manual may from time to time need to share personal information of data subjects with third parties in other countries. Adviceworx is required to ensure that when we need to do this we comply with the Protection of Personal Information Act.</p> <p>Such sharing will only be done if one of the following requirements are met:</p> <p>(a) the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that—</p> <p>(i) effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the Protection of Personal Information Act; and</p> <p>(ii) includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;</p> <p>(b) the data subject consents to the transfer;</p> <p>(c) the transfer is necessary for the performance of a contract between the data subject and the company in question, or for the implementation of pre-contractual measures taken in response to the</p>

data subject's request;

(d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company in question and a third party; or

(e) the transfer is for the benefit of the data subject, and—

(i) it is not reasonably practicable to obtain the consent of the data subject to that transfer; and

(ii) if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

9. Process for requesting information

A request for information, in terms of the Act, must be made using the prescribed form attached hereto (the Request Form). The Request Form may be obtained from the Information Officer at the contact details contained herein, or from the website www.adviceworx.co.za

- Requesters are to complete the Request Form.
- The completed Request Form may be **posted, faxed or emailed** to the Information Officer of Adviceworx at the address in paragraph 3 above.
- Provide sufficient details to enable Adviceworx to identify:
 - a) The record(s) requested;
 - b) The requestor (and if an agent is lodging the request, proof of capacity);
 - c) The form of access required, if the request is granted;
 - d) (i) The postal address or fax number of the requestor in the Republic;
(ii) If the requestor wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
 - e) The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- **Note: Access to certain records may be denied on the grounds set out in the Promotion of Access to Information Act, No 2 of 2000.**

Failure to fully complete the prescribed form will result in delaying the process while Adviceworx requests further information.

10. Fees payable

Once a request has been received, the Information Officer will inform you of the fees (if any) payable and the different procedures that must be followed until your application has been finalised. These fees have been prescribed by regulations to the Act.

Reproduction fees

A fee will be payable for the reproduction of any page of this manual. Records may be withheld until the fees have been held.

Request fee

This fee is payable where a person (the requester) requests information from Adviceworx on a person other than the requestor himself/herself. The fee is payable upfront before the request will be processed any further.

Access fee

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specifically excluded in terms of the Act or an exclusion is determined by the Minister in terms of section 54(8) of the Act.

Deposits

Where Adviceworx receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record for disclosure will take more than six hours, a deposit is payable by the requester.

The amount of the deposit is equal to one third of the amount of the applicable access fee.

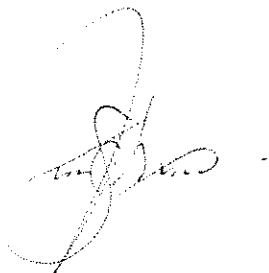
The fee structure is available on the SAHRC website at www.sahrc.org.za

Adviceworx Policy Owner: Head of Risk & Governance

Date: 17 December 2015

Revision History

Revision Date	Version	Summary of Changes	Author / Reviewer
2015/12/17	1.0	Original draft	Head of Risk & Governance



D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

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2. Reference number, if available:

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3. Any further particulars of record:

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E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

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FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability: Mark the appropriate box with an X. NOTES: (a) Compliance with your request for access in the specified form may depend on the form in which the record is available. (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	Form in which record is required:
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1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
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G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form.
The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

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2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

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H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....

Signed at this day of year

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE