

ADVICEWORX
PAIA MANUAL

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Prepared in terms of section 51 of the Promotion of Access to Information Act of 2000 (as amended) (PAIA) and The Protection of Personal Information Act, 4 of 2013 (POPIA).

1. PURPOSE OF PAIA MANUAL

This manual contains information required to request access to records held by Adviceworx. This PAIA Manual is useful for the public to:

- 1.1. check the categories of records held by Adviceworx which are available without a person having to submit a formal PAIA request.
- 1.2. have sufficient understanding of how to make a request for access to a record of Adviceworx, by providing a description of the subjects on which Adviceworx holds records and the categories of records held on each subject.
- 1.3. know the description of the records of Adviceworx which are available in accordance with any other legislation.
- 1.4. access all the relevant contact details of the Privacy Team who will assist the public with the records they intend to access.
- 1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 1.6. know if Adviceworx will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and the information or categories of information relating thereto.
- 1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 1.8. know the recipients or categories of recipients to whom the personal information may be supplied.
- 1.9. know if Adviceworx plans 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
- 1.10. know whether Adviceworx has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information which is to be processed.

Note: References to “Adviceworx” shall be construed to mean both Adviceworx (Pty) Ltd and Adviceworx Advisory (Pty) Ltd.

2. KEY CONTACT DETAILS TO ACCESS INFORMATION FROM ADVICEWORX

2.1. Privacy Team

Email: enablement@adviceworx.co.za

2.2. Access to information general contacts

Email: enablement@adviceworx.co.za

2.3. Head Office Postal Address:

Adviceworx
PO Box 55363,
Northlands,
2116

Physical Address:

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

General Email: enablement@adviceworx.co.za

Website: www.adviceworx.co.za

3. CATEGORIES OF ADVICEMORX RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 3.1. 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.
- 3.2. The Guide is available in all official languages.
- 3.3. The aforesaid Guide contains the description of:
 - 3.3.1. the objects of PAIA and POPIA.
 - 3.3.2. the postal and street address, phone, and fax number and, if available, email address of:
 - 3.3.2.1. the Information Officer of every public body, and
 - 3.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.
 - 3.3.3. the manner and form of a request for:
 - 3.3.3.1. access to a record of a public body contemplated in section 11; and
 - 3.3.3.2. access to a record of a private body contemplated in section 50.
 - 3.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA.
 - 3.3.5. the assistance available from the Regulator in terms of PAIA and POPIA.
 - 3.3.6. 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:
 - 3.3.6.1. an internal appeal.
 - 3.3.6.2. a complaint to the Regulator; and
 - 3.3.6.3. 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.
 - 3.3.7. 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.
 - 3.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
 - 3.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 3.3.10. the regulations made in terms of section 92.
- 3.4. 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.
- 3.5. The Guide can also be obtained:
 - 3.5.1. upon request to the Privacy Team;
 - 3.5.2. from the website of the Regulator (<https://inforegulator.org.za/paia-guidelines/>).
- 3.6. A copy of the Guide is available for public inspection during normal office hours.

4. CATEGORIES OF ADVICEWORX RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of Section 52 of PAIA, the following categories of Adviceworx records are available without a person having to request access:

- 4.1. Annual financial reports.
- 4.2. Interim audited report.
- 4.3. Product information.
- 4.4. Advertising pamphlets and brochures.
- 4.5. Newsletters.
- 4.6. Memorandum of Incorporation (MOI).

5. DESCRIPTION OF ADVICEWORX RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Memorandum of incorporation Shareholder Records Secretarial Records Audit Records Banking Records Directors Details	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
The following information about clients: Name and surname, contact number, identity number, date of birth, phone number, age, address, country of residence, banking details, credit score, occupation. Transactional details	Long Term Insurance Act 52 of 1998 Short-term Insurance Act 53 of 1998
Clients' identification details and document Demographic records Demographic details (age, income, gender, location) Financial records Records of premature cancellations of transactions or financial products by clients Records of complaints received together with an indication whether any such complaints have been resolved. Full and proper accounting records Records of all funds received, and payments made and of all assets, liabilities, and financial transactions	Financial Advisory and Intermediary Services Act 37 of 2002

The following details about members/ investors: Name and surname, contact number, identity number, passport number, phone number, age, address, banking details. Transactional details financial statements Association license Employment history Proposed resolution by investors Certificate of registration of conversion	Collective Investments Schemes Control act 45 of 2002
The following information about Employees (and clients where applicable): Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details) Family Records (i.e. next of kin name and surname, contact number) Medical Details Professional History (Occupation, Qualifications) Demographic details (Age, Income, Gender, Location) Financial Records (Salary, Banking Details, SARS related information) Behavioural data (Criminal checks, performance, disciplinary)	Employment Equity Act 55 of 1998 Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Income Tax Act, 58 of 1962
Identity of prospective or existing client and occupation Ownership and Control Structure of the Client/Entity Information regarding the business relationship (nature and purpose of business) The source of income/ funds/wealth that the client expects to use during the business relationship. The anticipated level and nature of the activity that is to be undertaken during the business relationship. The nature and extent of the activity/business activity that the client may be involved in	Financial Intelligence Centre Act 38 of 2001 Prevention of Organised Crime Act, 121 of 1998
Record statistics and information regarding the occurrence and causes of accidents and occupational diseases. Employee identification details and documents Employee to submit to medical examination. A register or other record of wages, time worked, payment for piece work and overtime and all other prescribed particulars. Any document that is seen as evidence: e.g., sworn statement, etc.	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Address of the Employer, and its branches Names, identification numbers and monthly remuneration of employees and the address at which the employee is employed. Employee Identification details and documents Financial Records (Salary, Banking Details, SARS details) Amount of benefits for purposes of section 13(3) Benefits the applicant is entitled to	Unemployment Insurance Act 63 of 2001

6. DESCRIPTION OF THE SUBJECTS ADVICWORX HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

CATEGORY OF RECORDS HELD	
Long-term insurance products	Administration of Retirement Annuities and Pension Funds
Savings products	Trust services
Unit trust products	Investment and wealth management services
Investment and risk products to groups and schemes	Actuarial and consulting services to the group retirement industry
Short-term Insurance products	Health Care products
Linked Investment services	Administration of medical schemes
Managed care services to the healthcare industry	Financial advice
COMPANY RECORDS	
Finance and supporting documentation	Distribution
Actuarial	Marketing
Client care	Information Technology
Product management	Human Resources
All records kept in terms of the Company Laws of South Africa	

SUBJECT ON WHICH RECORDS ARE HELD		
Advisor	Employer	Offender/Suspected Offender
Banking Institutions	Event Delegate	Official
Beneficiary (where applicable)	External Juristic	Advicworx Employee
Board Member	Independent Broker	Policyholder
Candidate	Independent Contractor	Premium Payer
Child	Individual Acting Onon Behalf Of	Prospect
Complainant/Enquirer	Individual Captured by CCTV Images	Referee
Consultant	Interested Individual	Shareholder
Contracting Party	Intermediary	Social Responsibility Recipient
Co-Signatory	Investor	Subsidiary Company
Customer	Life Covered	Vendor
Director	Member	Witness
Donor	Next of Kin	

THE FOLLOWING RECORDS ARE HELD IN RESPECT OF THE ABOVEMENTIONED DATA SUBJECTS		
Confidential	Consultant	Group/Company Structure
Personal	Information Technology	Policyholder
Commercial	Client	Shareholder
Financial	Product and Services	External Companies
Group/Company Incorporation	Contracts	Broker
Group/Company Financial	Scientific	Directors
Group/Company Departments	Research	Employee
Strategy	Operational	Banking Institutions
Contractor	Trade	Official/Legal
Subsidiary Companies	Business	Policy Documents
Advisor	Internal Group/Company Divisions	

7. PROCESSING OF PERSONAL INFORMATION

7.1. Purpose of Processing Personal Information

PURPOSE OF THE PROCESSING		
Application for Employment	Fraud, Crime, and Money Laundering Detection	Personal Information Maintenance
Compliance Assessment	Identify Verification	Provision of Products and Services
Compliance with Legislation	Legal Proceedings	Record Keeping
Credit Reference Checking	Market Research and Statistical Analysis	Underwriting
Debt Tracing and Recovery	Marketing	Personal Information Maintenance
Employment Management and Administration	Operations	Provision of Products and Services

7.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

CATEGORIES OF DATA SUBJECTS		
Shareholders	Subsidiary Companies	Policyholders
Board Members/Directors	Advisors	Beneficiaries (where applicable)
Employees	Independent Brokers	Individuals captured by CCTV images
Officials	Lives Covered	Individuals who have indicated an interest in our services.
Consultants	Premium Payers	Prospective employees/candidates
Offenders and suspected offenders	Clients	Co-Signatories and Individuals Acting on Behalf Of
Complainants, enquirers	Banking Institutions	Next of Kin
Employers and employees of other organisations	External companies/Contractors	Children
Witnesses	Suppliers and Service Providers	Prospective Employee Referees

CATEGORY AND TYPE OF PERSONAL INFORMATION PROCESSED	
Personal Information Category	Personal Information Type
Identifier	Name Address Information/Details Contact Number Email Address Identifying Number Location Information/Data Online identifier Other Particular Assignment to Data Subject Symbol
Physiological/Physical/Mental	Age Date of Birth Gender
Economic	Education Information Employment Information Financial Information
Cultural/Social	Race Correspondence Sent Culture Language Marital Status National Origin Personal Opinions, Views, or Preferences of the Data Subject Social Origin Views/opinions of another individual about the Data Subject

CATEGORY AND TYPE OF SPECIAL PERSONAL INFORMATION PROCESSED	
Personal Information Category	Personal Information Type
Physiological/Physical/Mental	Health Information
Biometric/Genetic Information	Biometric Information/Data Genetic Information/Data
Cultural/Social	Criminal Information Ethnic Origin Race Religious or Philosophical Beliefs

7.3. The recipients or categories of recipients to whom the personal information may be supplied.

We sometimes wish to share the personal information we process with the individual themselves and with other organisations. Where this is necessary, we are required to comply with all aspects of the POPIA.

What follows is a description of the types of organisations we may choose to share some of the personal information we process with for one or more reasons. Where necessary or required we share information with:

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	Claims investigators
Credit reference agencies	Suppliers and service providers
Healthcare, social and welfare organisations	Private investigators
Healthcare professionals	Industry bodies
Central government	Ombudsman and regulatory authorities
Police forces and courts, where necessary	Survey and research organisations
Operators	Debt collection and tracing agencies
Business associates and other professional advisers	Other companies in the Old Mutual Group
Professional advisers and consultants	Auditors
Claimants, beneficiaries, assignees, and payees	Pension fund administrators
Press and the media	Security organisations
Persons making an enquiry or complaint	

7.4. Planned transborder flows of personal information.

From time to time, we may wish to share personal information of data subjects with third parties in other countries. We are required to ensure that when we need to do this, we comply with POPIA.

Such sharing will only be done if one of the following requirements are met:

- 7.4.1. 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:
 - 7.4.1.1. 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
 - 7.4.1.2. 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.
- 7.4.2. the data subject consents to the transfer.
- 7.4.3. 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 data subject's request.
- 7.4.4. 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
- 7.4.5. the transfer is for the benefit of the data subject, and:
 - 7.4.5.1. it is not reasonably practicable to obtain the consent of the data subject to that transfer; and
 - 7.4.5.2. if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

- 7.5. General description of Information Security Measures to be implemented by Adviceworx to ensure the confidentiality, integrity, and availability of the information
- 7.5.1. Information is one of our most valuable assets. Safeguarding and preserving the confidentiality, integrity, and availability of our customer and employee information is imperative to our operations and treated as critical to our business strategy.
 - 7.5.2. As a responsible business and as threats evolve, we are investing to continuously improve our information security posture. We are committed to embed an information security culture throughout our organization and are continually working towards improving the security of our environment and information by:
 - 7.5.2.1. Making sure information security controls are adequately implemented and applying monitoring of the control environment.
 - 7.5.2.2. Making sure that information is protected with appropriate access, disclosure, disruption, modification, or destruction.
 - 7.5.2.3. Making sure access is restricted based on function with permission granted and modified based on changes in function with access revoked on termination of employment.

8. AVAILABILITY OF THE MANUAL

- 8.1. A copy of the Manual is available:
- 8.1.1. on www.adviceworx.co.za
 - 8.1.2. at the head office of Adviceworx for public inspection during normal business hours.
 - 8.1.3. to any person upon request and upon the payment of a reasonable prescribed fee (where applicable); and
 - 8.1.4. to the Information Regulator upon request.
- 8.2. A fee for a copy of the Manual, as contemplated in Annexure B of the PAIA Regulations, shall be payable per each A4– size photocopy made.

9. HOW TO REQUEST ACCESS IN TERMS OF POPIA AND PAIA

- 9.1. The various request Forms available in terms of POPIA and PAIA are:

POPIA	PAIA
Form 1: Objection to the Processing of Personal Information	Form 01: Request for a Copy of the Guide from an Information Officer [Regulations 3]
Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information	Form 02: Request for Access to Record [Regulation 7]

- 9.2. Requestors are to complete the relevant prescribed Form which can accessed by clicking on the relevant link in the table above.

9.3. The completed Form may be posted or emailed to the Adviceworx Privacy Team at the following addresses:

Email address	enablement@adviceworx.co.za
Postal address	Adviceworx PO Box 55363, Northlands, 2116
Street address	1st Floor, Building 5, Commerce Square, 39 Rivonia Road (c/o Melville & Helling Roads), Sandhurst, 2194

9.4. The Privacy Team will process the request and inform the requestor of the fees, (if any) that he/she must pay and of the further steps that will follow in the processing of the request.

9.5. Please contact the Privacy Team should you be unsure of which Form to use.

Note: Access to certain records may be denied on the grounds set out in PAIA.

10. MANUAL UPDATES

The Privacy Team may on a regular basis update this manual. Please check the Adviceworx website periodically to inform yourself of any changes.

Issued by the Adviceworx Privacy Executive.

11. DOCUMENT GOVERNANCE

POLICY DETAILS			
Policy Title		Adviceworx PAIA & POPI Manual	
Legal Entity		Adviceworx (Pty) Ltd and Adviceworx Advisory (Pty) Ltd	
Date of Revision		September 2026	
Version		3.0	
Duration		2 years (subject to biennial review)	
Period Covered		Scheduled for review on 2028/09/01	
Document History			
Version	Revision Date	Summary of Changes	Author/Reviewer
1.0	November 2014	Initial publication	Head of Risk and Governance
2.0	February 2024	• Incorporation of Adviceworx Advisory into the document. • Updates to information. • Cosmetic changes	Business Enablement: Regulatory
3.0	September 2026	• Updated Contact Information	Business Enablement: Regulatory



Adviceworx is a juristic representative of Adviceworx Advisory (FSP33002) and an authorised Financial Services Provider (FSP44914)