FINANCIAL REVELATION CC

FSP NUMBER: 51551

Access to information manual prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2002

Contents

1. Introduction 3
2. Financial Revelation CC's Contact Details 4
3. List of records held by Financial Revelation CC 4
4. Request to access information 5
5. Fees payable 6
6. Protection of personal information 6
7. Availability of this manual 7
8. Further guidance 7
9. Updates to this manual 7

Document Control

- **Policy draft and review history**

Version	Version 1.0
Status	Adopted and implemented
Publishing Date	30 September 2024
Last Review Date	N/A
Policy Review Notes	N/A
Frequency of Review	Annually
Next Review Date	1 September 2025
Responsible Persons	Executive Director and Licensed Compliance Officer

- **Policy adoption and approval history**

Adoption Date	23 September 2024

1. Introduction

Financial Revelation CC is authorized as a category 1 financial service provider in terms of the Financial Advisory and Intermediary Services Act 37 of 2002 ("the FAIS Act") as amended. Financial Revelation CC renders financial services as defined in the FAIS Act to corporate clients across the public and private sector.

The Promotion of Access to Information Act 2 of 2000 ("the PAIA") gives effect to the constitutional right of access to information in records held by a private body that is required for the exercise and protection of any rights. Where a valid request is made in terms of PAIA, Financial Revelation CC is obliged to release the information, except where PAIA expressly provides that the information may not be released.

In terms of section 51 of the PAIA, Financial Revelation CC must make a manual available describing:

(a) the categories of records which are available without a person having to request access in terms of PAIA;

(b) the records which are available in accordance with any other legislation;

(c) the subjects on which it holds records and the categories of records held on each subject;

(d) the process to follow to request access to a record;

(e) the remedies available for accessing information before approaching the Information Regulator (Regulator) or Courts;

(f) the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

(g) if personal information will be processed, 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; and

(h) whether appropriate security measures have been implemented to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

Financial Revelation CC respects the right of access to information and accordingly adopted this manual as prescribed by section 51 of PAIA read with Regulation 4(1) of the Protection of Personal Information Act 4 of 2013 ("the POPIA").

2. Financial Revelation CC's Contact Details

Registration number	2010/141969/23
IO email address	admin@finrev.co.za
Website	www.finrev.co.za

3. List of records held by Financial Revelation CC

Company Registration Documents
Financial Services Provider Approval Certificate and related registers
Tax approval certificate issued by the South African Revenue Services
Financial Statements
Statutory Prescribe Policies
Agreements concluded with service providers
Fidelity and Professional Indemnity Insurance Policies
Complaints Registers

Agreements concluded with financial product providers and solutions
Client Agreements and Related Records
Partnership Agreements
Employees and Consultant Records

4. Request to access information

All-access requests must be submitted to the Information Officer by email. The Information Officer will consider all requests in line with the provisions of the PAIA. To request access to a record, complete Form 2, which is available:

- on request from the Information Officer; or
- https://inforegulator.org.za/paia-forms/

It is the requester's responsibility to ensure that the correct form is used because any failure to do so may result in the request being:

- rejected due to lack of procedural compliance;
- refused due to insufficient information; or
- delayed.

The requester must ensure that the completed Form 2:

- has enough information for the Information Officer to identify the requester, specify the requested records, and which form of access is required;
- specifies their email address, postal address, or fax number;
- describes the right that is sought to exercise or protect;
- explain why the requested record is needed to exercise or protect the right;
- provide any other way they would like to be informed of the Information Officer's decision other than in writing; and
- provides proof of the capacity in which the request is made, i.e., if the request is made on behalf of someone else. The Information Officer will decide whether this proof is satisfactory.

The Information Officer will notify the requester in writing if the request has been approved or denied, together with reasons, within 30 calendar days after receiving the completed Form 2.

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

If the PAIA request is denied or there is no response from the Information Officer, a complaint may be lodged by completing the prescribed PAIA complaints Form 5 which can be accessed on https://inforegulator.org.za/paia-forms/ and submitted to PAIAComplaints@inforegulator.org.za.

5. Fees payable

Financial Revelation CC may request a requester to pay an access fee. The fees, unless exempted, must be paid by the requester before the requested information is disclosed. The requester may apply to be exempted from the payment of the prescribed fee. The reasons for being exempt from the payment of the prescribed fees should be included on Form 2.

6. Protection of personal information

Financial Revelation CC is a person responsible as defined in the POPIA. Personal information is processed in compliance with the conditions for lawful processing prescribed by the POPIA. A Data Privacy Policy has been adopted and implemented and can be accessed on the website noted above.

Financial Revelation CC:

- is legally obliged to ensure the adequate protection of personal information and to ensure that data breaches do not occur, for example, accidental disclosure of personal information to someone not authorised to access it.
- will take all reasonable, technical and organisational precautions to prevent data breaches and to ensure that all service providers, having access to client information, have strict policies, rules and measures in place to protect any personal information disclosed for purposes of rendering any services.
- will not keep personal information any longer than is necessary to achieve the purpose for which the information was collected, unless allowed under the POPIA to be kept for longer periods.

Categories of people from who personal information is collected

- clients;
- service providers;
- business partners; and
- employees and consultants;

Purpose for collecting personal information

- provide advice as defined in the FAIS Act;
- Ensure compliance with the labour relations legislation; and
- comply with regulatory and statutory requirements.

Financial Revelation CC may only share personal information with third parties if:

- the client, employee, consultant or product provider has consented to such disclosure;
- it is necessary to put an agreement in place for the benefit of the member or their beneficiaries;
- it is necessary to disclose to law enforcement agencies for purposes of a criminal investigation; or

- disclosure is necessary for the reasons prescribed in POPIA, for example where it is required to do so by law, or it is necessary to protect any rights.

Financial Revelation CC may also share personal information with:

- statutory oversight bodies, regulators, statutory dispute resolution bodies or judicial commissions of enquiry making a request for data;
- any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data;
- the South African Revenue Service, or another similar authority; and
- anyone making a successful application for access in terms of PAIA.

- **Cross-border transfers**

Financial Services CC's service providers may make use of cloud storage service providers who may have data centres that are based in other countries. Except for the purpose of cloud data storage, Financial Revelation CC does not send any personal information to other countries.

7. Availability of this manual

This manual is available on **www.finserv.co.za** and or on written request from the Information Officer.

8. Further guidance

If a requester would like further guidance on how to get access to information under the PAIA, they may contact the Regulator to find out more. The guide is available in all of South Africa's official languages and can be accessed on https://inforegulator.org.za/paia-guidelines/. The Regulator's contact details are:

Information Regulator	
Address	JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001 PO Box 31533, Braamfontein, Johannesburg, 2017
Phone number	+27 10 023 5200
Website	https://inforegulator.org.za/
Email	enquiries@inforegulator.co.za

9. Updates to this manual

This manual will be reviewed and/or updated whenever there are material changes to business processes or relevant legislation.

This Manual has been approved by Financial Revelation CC's Executive Director and is effective as of 1 October 2024.