



PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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| 1.1. "DIO" | Deputy Information Officer; |
| 1.2. "IO" | Information Officer; |
| 1.3. "Minister" | Minister of Justice and Correctional Services; |
| 1.4. "PAIA" | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.5. "POPIA" | Protection of Personal Information Act No.4 of 2013; |
| 1.6. "Regulator" | Information Regulator; and |
| 1.7. "Republic" | Republic of South Africa. |

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1. check the categories of records held by a body that are available without a person having to submit a formal PAIA request;
- 2.2. 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;
- 2.3. know the description of the records of the body which are available in accordance with any other legislation;
- 2.4. 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;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. 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;

- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. 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
- 2.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF NOBLE FINANCIAL ADVISORS

3.1. Information Officer:

Name and surname	Shelley Anne Boonzaier
Telephone number	076 481 9061
Email address	shelley@nobleadvisors.co.za
Physical address	3 Simonsberg Mews, 2 Tugwell Crescent, Edgemoed, Cape Town, 7441.

3.2. Deputy Information Officer:

Name and surname	Lara Boonzaier
Telephone number	068 290 8212
Email address	lara@nobleadvisors.co.za
Physical address	3 Simonsberg Mews, 2 Tugwell Crescent, Edgemoed, Cape Town, 7441.

3.3. Head/National office:

Physical address	3 Simonsberg Mews, 2 Tugwell Crescent, Edgemoed, Cape Town, 7441.
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Postal address	12 Newberry Square, Edgemeanad, Cape Town, 7441.
Telephone number	068 290 8212
Email address	connect@nobleadvisors.co.za
Website address	www.nobleadvisors.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. 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.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of:

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone number, electronic mail address of:

4.3.2.1. The information Officer of every private body, and

4.3.2.2. every Deputy Information Officer of every private body designated in terms of section 56 of POPIA¹;

4.3.3. the manner and form of a request for:

¹ Section 56(a) of POPIA: Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

- 4.3.3.1. access to a record of a private body contemplated in section 50²;
- 4.3.4. the assistance available from the IO of a private body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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:
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
- 4.3.7. the provision of section 51³ requiring a private body, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provision of section 52⁴ providing for the voluntary disclosure of categories of records by a private body;

² Section 50(1) of PAIA: A requester must be given access to any record of a private body if:

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 51(1) of PAIA: The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above

⁴ Section 52(1) of PAIA: The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

- 4.3.9. the notices issued in terms of section 54⁵ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92⁶.
- 4.4. 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.
- 4.5. The Guide can also be obtained:
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>)
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours:
 - 4.6.1. English; and
 - 4.6.2. Afrikaans.

5. CATEGORIES OF RECORDS OF THE NOBLE FINANCIAL ADVISORS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

⁵ Section 54(1) of PAIA: The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁶ Section 92(1) of PAIA provides that: "The Minister may, by notice in the Gazette, make regulations regarding:

- a) any matter which is required or permitted by this Act to be prescribed;
- b) any matter relating to the fees contemplated in sections 22 and 54;
- c) any notice required by this Act;
- d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

These records may be available on the website, and a person may download or request them telephonically, by email, or by letter.

Category of record	Available on website	Available upon request
PAIA Manual	X	X
PAIA Guidelines	X	X
Disclaimer	X	X
Complaints procedure	X	X
TCF Policy	X	X
Conflict of interest	X	X

6. DESCRIPTION OF THE RECORDS OF NOBLE FINANCIAL ADVISORS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of data subjects	Purpose for processing the information
PAIA Manual	Promotion of Access to Information Act 2 of 2000.
Privacy Notices	The Protection of Personal Information Act of South Africa, 4 of 2013.
Memorandum of Incorporation	Companies Act 71 of 2008.

7. DESCRIPTION OF THE SUBJECTS ON WHICH NOBLE FINANCIAL ADVISORS HOLD RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY US

Subjects on which Noble Financial Advisors holds records	Categories of records

Public Affairs	Media Releases, brochures, public company information, website information, public policies and manuals, publications and articles.
Secretarial, Corporate Governance, Legal and Compliance	Company records, corporate structure and associations documents of incorporation, meeting minutes, business agreements, intellectual property, management information, statutory returns, company policies and manuals, compliance strategies, market information and strategies, business development and strategies.
Financial	Financial statements and returns, client invoices and statements, PAYE records, tax records, assets and liabilities, bank details and records.
Human resources	Employment records, staff agreements, training records, performance appraisals and competence registers.
Operations and marketing	Compliance records and reports, client database, communications and correspondence, access control and security records, research documents, intellectual property documents, fee structures, service providers, services agreements, performance and sales records, and brand information.
Client Services	Compliance records, client advice and review records, FICA documents, emails and communications, complaints records, and claims records.
Information Technology	IT services agreements, licenses, systems and facilities, IT record keeping, backup and restore records.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Noble Financial Advisors processes the personal information of data subjects (mentioned below), under its care in the following ways:

Category of data subjects	Purpose for processing the information
Employees	Communicate and manage the relationship, render financial services, provide value-added services, pay remuneration and benefits, pay SARS and third parties, and comply with relevant legislation and regulatory requirements.
Clients (or potential clients) and their members/policyholders/subscribers	Communicate and manage the relationship and fulfil contractual obligations.
Service Providers	Communicate and manage the relationship and payments and fulfil contractual obligations.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Category of data subjects	Personal Information processed
Employees	Name and surname, identity number and document, contact details, previous employment details, qualifications, bank account details, income tax number, emergency details
Clients (or potential clients) and their members/policyholders/subscribers	First name, surname, contact details, proof of address, current employment details, Identity number and document, bank account details, spouse's details, marital status, spouse's employment details, dependants' information, views,

	preferences and opinions, goals, needs and priorities, your and your spouse's current financial information, your health, education, copy of will, guardian details of your child, date of birth, medical aid history, medical history, gap cover preferences, type of cover required and plan options and preferences.
Service Providers	Contact details, billing information, VAT number, registration number, and agreements.

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

Category of personal information	Recipients to who the personal information may be supplied
Names, surnames, identity numbers, Company registration numbers, VAT registration numbers, income tax numbers, and contact details.	South African Revenue Service
Clients (or potential clients) and their members/policyholders/subscribers' personal information such as their first name, surname, contact details, proof of address, current employment details, Identity number and document, bank account details, spouse's details, marital status, spouse's employment details, dependants' information, views, preferences and opinions, goals, needs and priorities, your and your spouse's current financial information, your health, education, copy of will, guardian details of your child, date of birth, medical aid history, medical history, gap cover preferences, type of cover required and plan options and preferences.	Sanlam Old Mutual Hollard Life Liberty Momentum Discovery Allan Gray Ninety-One Stanlib Stratum Zestlife Sygnia TSA Capital Legacy

8.4 Planned transborder flows of personal information

There is no current or planned transborder flow of personal information.

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

Noble Financial Advisors has in place technical, administrative and physical procedures to protect personal information from accidental, unlawful or unauthorised loss, access, disclosure, use, alteration or destruction.

We have access control in place to prevent unauthorised access to personal information, and we password-protect any documents containing personal information.

9. AVAILABILITY OF THE MANUAL

9.1. A copy of the Manual is available:

- 9.1.1. on the website: www.nobleadvisors.co.za;
- 9.1.2. head office of the Noble Financial Advisors for public inspection during normal business hours;
- 9.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4. to the Information Regulator upon request.

9.2. 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.

10. UPDATING OF THE MANUAL

The head of Noble Financial Advisors will update this manual on a regular basis.

Issued by:

Shelley Anne Boonzaier

(Certified Financial Planner and Information Officer)