

Version Control

Version	Date approved	Approved by	Notes
V1.0	2022/10/11	Karimma Erasmus	Company relevant information updated.
V2.0	2024/09/04	Karimma Erasmus	New Policy developed

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

1. List of Acronyms and abbreviations

- 1.1 **“CEO”** Chief Executive Officer
- 1.2 **“DIO”** Deputy Information Officer;
- 1.3 **“IO”** Information Officer;
- 1.4 **“Minister”** Minister of Justice and Correctional Services;
- 1.5 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000(as Amended);
- 1.6 **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.7 **“Regulator”** Information Regulator; and
- 1.8 **“Minister”** Minister of Justice and Correctional Services;
- 1.9 **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.10 **“Republic”** Republic of South Africa

Purpose of Manual

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.3 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;
- 2.4 know the description of the records of the body which are available in accordance with any other legislation;
- 2.5 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;
- 2.6 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.7 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;
- 2.8 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.9 know the recipients or categories of recipients to whom the personal information may be supplied;

- 2.10 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
- 2.11 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. Details of Practicum's Chief Information Officer

3.1 Chief Information Officer

Name: Karimma Erasmus
Tel: 011 477 0062
Email: karimma@practicuma.co.za

3.2 Deputy Information Officer

Name: Klara Van Der Merwe
Tel: 011 477 0062
Email: klara@practicuma.co.za

3.3 Access to information general contacts

Email: admin@practicuma.co.za

3.4 National or Head Office

Physical Address: Constantia View Office Estate Cnr of 14th Ave and Hendrik Potgieter
Willowbrook House 2 Ground floor

Telephone: 011 477 0062

Email: admin@practicuma.co.za

Website: www.practicumadvisors.co.za

Guide on how to obtain The Information Regulators Manual

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 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;

4.3.3 the assistance available from the IO of a public body in terms of PAIA and POPIA.

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² 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.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ 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.*

4.3.4 the assistance available from the Regulator in terms of PAIA and POPIA;

4.4.4 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;

4.4.5 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;

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

4.4.7 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.4.8 the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ 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.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ 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

⁹ Section 22(1) of PAIA- The information officer of a public 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.

¹⁰ 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.

¹¹ 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;

4.5 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.

4.6 The Guide can also be obtained-

4.6.1 upon request to the Information Officer;

4.6.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.7 A copy of the Guide is also available in the official languages, for public inspection during normal office hours.

5. Categories of Records of Practicum which are available without a person having to request access (Form C)

- Company Introduction
- Advertising Policy as governed by The Financial Advisory and Intermediaries Act 37 of 2002
- Complaints Policy as governed by The Financial Advisory and Intermediaries Act 37 of 2002
- Conflict of Interest Management Policy as governed by The Financial Advisory and Intermediaries Act 37 of 2002
- Promotion to access to information Policy as governed by The Promotion to Access to Information Act 2 of 2002
- Subject access for (Form C)

6. Description of the records of Practicum which are available in accordance with any other legislation

- Company Memorandum of Incorporation as governed by the Companies Act 71 of 2008
- Practicum FAIS Risk Management and Compliance Programme as governed by the Financial Advisory and Intermediaries Act 37 of 2002
- Practicum FICA Risk Management and Compliance Programme as governed by the Financial Intelligence Centre Act 38 of 2001
- Company FSP License as governed by the Financial Services Conduct Authority
- Protection of Personal Information policy as governed by the Protection of Personal Information Act 4 of 2013

(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."*

- Anti-Money Laundering procedure as governed by the Financial Intelligence Centre Act 38 of 2001
- Company Regulatory Universe
- Company Risk Profiles
- Company Beneficial Ownership Organogram as regulated by the Companies Act 71 of 2008
- Annual Quarterly Compliance Monitoring reports as governed by various legislation
- Business Plan as governed by the Financial Advisory and Intermediaries Act 37 of 2002

7. Description of the subjects on which the body holds records and categories of records held on each subject by Practicum Advisors

- Annual Performance Plans
- Clients' names, addresses, Identity numbers, employment status and bank details
- Service Providers names, registration numbers, trading addresses and contact details
- Employees addresses, qualifications, genders and race
- Outsourced services

8. Processing of personal information

8.1 Purpose of Processing Personal Information

Condition 1: Accountability

The FSP remains accountable for the personal information it processes and remains responsible during the process of transferring information to a third party. It is the responsibility of the FSP responsible party” to ensure that all 8 conditions for lawful processing of information are complied with.

Condition 2: Processing Limitation

The processing of information must be lawful and done in a manner which does not infringe the data-subjects privacy; therefore, processing needs to be adequate, relevant and not excessive always taking into consideration the purpose as to why this information is being collected.

Condition 3: Purpose specification

All information processed by the FSP needs to have a clear purpose and ensure that the data subject is aware of the reasons supporting the collection of the information. This condition will also regulate the retention period of information collected, stating information must not be retained for any longer than is necessary to achieve the purpose for which it was collected.

Condition 4: Further processing limitation

Any further processing of information by the FSP needs to be compatible with the original purpose as to why the information was collected for, if any information is re-processed, a new consent needs

to be obtained from the data subject

Condition 5: Information Quality

The FSP must ensure that the information obtained from the data subject is accurate and not misleading and needs to be updated when necessary, according to legislation.

Condition 6: Openness

This condition will require the FSP to be transparent about why they are requesting the information and will be required to explain whether the collection of information is voluntary or mandatory and what are the consequences for not providing the information. This information will need to be documented within Practicum's privacy policy.

Condition 7: Security Safeguards

The FSP must ensure that appropriate, reasonable and technical measures are in place to secure the integrity and confidentiality of the information collected to prevent and loss or damage of information and any unlawful access to the personal information. Storage and safeguarding of information will be kept and stored securely in accordance with POPI, FAIS and FICA legislation.

Condition 8: Data Subject Participation

The data subject has the right to request from the FSP what information is held and has the right to request for information to be deleted or corrected. The Act (POPI) also has regulations regarding direct marketing, and this will be incorporated within the Marketing policy (Practicum does not make use of direct marketing but a policy is in place).

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

- Natural Persons
- Legal persons
- Trusts
- Beneficial Owners
- Service Providers

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

- South African Police Services
- South African Qualifications Authority
- Credit Bureau
- Financial Intelligence Centre
- Financial Sector Conduct Authority
- Any Legislative Court in the Republic
- Information Regulator

- Companies Intellectual Properties Commission
- Department of Labour (CCMA)
- The South African Constitutional Court

8.4 Planned transborder flows of personal information

Practicum is not entitled to transfer personal information to a third part in another country unless there is a legal requirement for it or if the data subject themselves approve of this transfer (Bank account information, Identity documentation) This is usually transferred to offshore parties when settling of estates are conducted.

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

Practicum makes use of password encryption for all client personal documentation as well as anti-virus software protecting Practicum's software.

9. Availability of the manual

9.1 A copy of the Manual is available-

9.1.1 on [eServices: Information Regulator \(info regulator.org.za\)](http://info regulator.org.za)

9.1.2 head office of Practicum 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 Practicum will on a regular basis update this manual as regulations change or at least annually.

Resolution of the Information Officers of Practicum Advisors Pty Ltd

Registration Number: 45975

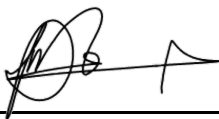
Hereinafter referred to as “the company”

On this day the 5th of September of 2024

In terms of the Promotion to Access to Information, Act 2 of 2000 and as amended by **Practicum Advisors Pty Ltd** is required to create and implement a “Promotion to Access to Information Act Manual”.

Resolved:

- The document titled “Promotion to Access to Information Act Manual” is now approved and accepted as the official PAIA Manual of the Company.
- That every director, employee and mandated Representative (as described in the Promotion to Access to Information Act 2 of 2002) will be required to comply with the terms and processes of the above-mentioned PAIA Manual and that same will be distributed to relevant staff and will be implemented by such staff members.



Signed Karimma Erasmus
Chief Information Officer



Signed Klara Van Der Merwe
Deputy Information Officer