



PAIA MANUAL

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

**DATE OF COMPILATION: 12/10/2022
DATE OF REVISION: 12/10/2022**

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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	“Republic”	Republic of South Africa

2. PURPOSE OF PAIA 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 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 LATITUDE WEALTH (PTY) LTD

3.1. Information Officer

Name: Johannes Hendrik Jakobus Botha
Cell: 082 465 4046
Email: johan@latitudewealth.co.za

3.2. Deputy Information Officer

Name: Danielle Karin Du Preez
Tel: 012 111 7697
Email: danielle@latitudewealth.co.za

3.3. Access to information general contacts

Email: johan@latitudewealth.co.za

3.4. National or Head Office

Postal Address: PO Box 341
Honeydew
South Africa
2040

Physical Address: 442 Rodericks Street
World Bank Office Park, Block C
Lynnwood, Pretoria
0081

Telephone: 012 111 7697
Email: johan@latitudewealth.co.za
Website: <https://www.latitudewealth.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 and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

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.

- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public 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 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;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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.

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;
- (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.”

- 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/inforeg/>).
- 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
- 4.6.2 Afrikaans

5. CATEGORIES OF RECORDS OF LATITUDE WEALTH (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Access to Information (PAIA)	PAIA Manual	X	X
	Website Disclaimer	X	X
Protection of personal information (POPI)	Privacy Policy	X	
Client Complaints	Complaints Management Policy		X
Conflict of Interest	Conflict of Interest Management Policy		X

6. DESCRIPTION OF THE RECORDS OF LATITUDE WEALTH (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- Financial Intelligence Centre Act (28 of 2001)
- Financial Advisory and Intermediary Act (37 of 2022)
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- The Basic Conditions of Employment Act
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- The Labour Relations Act
- The Employment Equity Act
- Unemployment Insurance Act 30 of 1996
- Unemployment Insurance Contributions Act 4 of 2002;
- Medical Schemes Act 131 of 1998
- Occupational Health and Safety Act No 85 of 1993
- Companies Act 71 of 2008
- Value Added Tax Act 89 of 1991
- Skills Development Levies Act 9 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY LATITUDE WEALTH (PTY) LTD

Subjects on which the body holds records	Categories of records
Financial	<ul style="list-style-type: none"> • Accounting Records • Annual Financial Statements • Invoices • Tax Returns • VAT • PAYE Records • Unemployment Insurance Fund • Commission System • Bank statements
Product Providers	<ul style="list-style-type: none"> • Contractual Agreements • Client transactional documents (application forms, quotes etc.) • FSP Appointments • Product training records • CPD records/hours
Compliance	<ul style="list-style-type: none"> • Compliance Quarterly Audit Reports • Policies, Procedures and registers • Fit and Proper Questionnaires • Research Questionnaires • FSCA Levy payment records • Masthead Compliance and Implementation • Masthead Learning Centre (CPD Online Package)
Clients	<ul style="list-style-type: none"> • Client Planning Report • Client engagement records (SLA, POPI Consent, Fee Agreement etc.) • Client correspondence
Human Resources	<ul style="list-style-type: none"> • HR policies and procedures • Employee contracts • Training Records/registers • Payslips • Leave Records • Terms and Conditions • Medical Aid Information



8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

- To share with and provide relevant products or services to you, to carry out the transaction you requested, and to maintain our relationship;
- To respond to your queries;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- To process investment plans
- For insurance underwriting purposes;
- To assess and process claims;
- For operational purposes required to assist you with the solutions you require;
- For audit and record-keeping purposes;
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details, tax numbers, gender, marriage status, income, dependents details, contact details, beneficiary details, education records, retirement need, financial budgets, payslip, occupation
Service Providers	names, contact details, registration number, vat numbers, address, internal processes, cost structures, rule numbers, available investment portfolios, transaction dates, and bank details.
Employees	Name, address, qualifications, gender, race, bank details, age, marital status, medical aid information, contact details, income tax number, pension fund detail, next of kin, salary information.



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

Category of personal information	Recipients/Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Client Personal Information as per 8.2	Product Providers
Qualifications, for qualification verifications	South African Qualifications Authority/FSCA
Business Information, Statutory Reports, Client Information, Financial Information.	Regulating Bodies (FSCA and FICA)

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

Latitude Wealth (Pty) Ltd has implemented the following information security measures to ensure confidentiality, integrity and availability of the information:

- Two Factor Authentication
- Firewalls
- Anti Virus Program
- System Password Protection

Latitude Wealth (Pty) Ltd uses the Microsoft’s Azure storage platform, which is hosted in the Netherlands - European Union.

Latitude Wealth (Pty) Ltd has enabled the necessary security functionality to its systems which safeguards its information against malicious access and use. These measures are over and above the standard data protection policies that is implemented across the Microsoft platform.

For more on the Microsoft Data Protection policy use the following link:

https://docs.microsoft.com/en-us/azure/security/fundamentals/protection-customer_data

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://www.latitudewealth.co.za> if any;

9.1.2 head office of Latitude Wealth (Pty) Ltd 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 Latitude Wealth (Pty) Ltd will on a regular basis update this manual.

Issued by

Two handwritten signatures in black ink are positioned above a horizontal line. The signature on the left is more stylized and cursive, while the one on the right is more legible and appears to be 'H.N.'.

Johannes Hendrik Jakobus Botha / Henry Nienaber
Chief Executive Officers