

PAIA MANUAL

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

Compiled | 27 August 2025 | Revision | 09 September 2025

Definitions

"Data Subject"	The person to whom the personal information relates, as contemplated in terms of section 1 of the POPIA;
"FSP"	SDC Wealth Management (Pty) Ltd, an authorised financial services provider;
"Information Officer"	For a juristic person, this means the CEO (or equivalent) or a person duly authorised by them, including an acting CEO or their authorised delegate (as per section 1 of the Act)
"Information Regulator"	The Regulator established in terms of Section 39 of POPIA;
"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
"Personal Information"	Any information about an identifiable, living natural person (and, where applicable, an existing juristic person). This includes, for example, details such as identity, contact information, race, gender, health, religion, education, financial, employment or criminal history, biometric data, opinions, correspondence, or any other information that can identify the person;
"Personnel"	All partners, directors, officers, employees, individual contractors and other personnel of SDC Wealth Management (Pty) Ltd;
"POPIA"	Protection of Personal Information Act No.4 of 2013;
"Processing"	Any operation, whether automated or not, involving personal information — such as collecting, storing, using, updating, sharing, or deleting it — as contemplated in POPIA;
"Private Body"	A natural person, partnership, or juristic person (past or present) carrying on a trade, business, or profession, but excluding a public body, as contemplated in PAIA and POPIA;
"Public Body"	Any national, provincial, or local government department or municipality, or any other institution exercising public power or performing a public function under the Constitution or any law;
"Record"	Any recorded information, in any form or medium, under the organisation's control, whether created by it or not, and includes personal information as contemplated in PAIA and POPIA;
"Requester"	In relation to a private body, means any person (including a public body or its official) requesting access to a record of that private body, or anyone acting on their behalf, as contemplated in PAIA;
"Third Party"	In relation to a request for access, means any person other than the requester.

YOUR PARTNER IN WEALTH MANAGEMENT

Directors: Daniel Gibhard | Jan Harm Eloff | **Reg No:** 2016/367582/07 | **VAT No:** 4780287696
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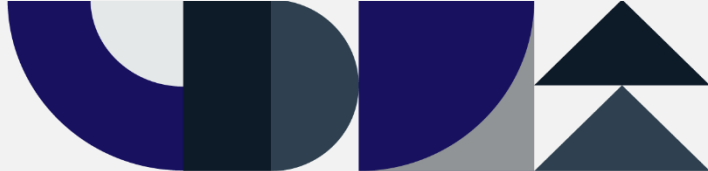


Table of Contents

Definitions	1
1. Introduction	3
2. Purpose of the PAIA Manual	3
3. Key Contact details for access to information of SDC Wealth Management (Pty) Ltd	3
4. Guide on how to use PAIA and how to obtain access to the Guide	4
5. Records automatically available to the Public	5
6. Descriptions of the records of SDC Wealth Management (Pty) Ltd	6
7. Description of the subject on which the body holds records and categories	7
8. Processing of Personal Information	8
9. Availability of the Manual	9
10. Updating the Manual	9

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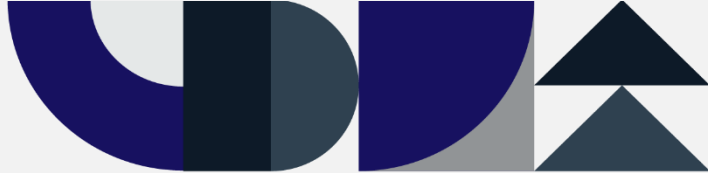
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2



1. Introduction

The Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") was enacted to give effect to the constitutional right of access to information. It applies to records held by both public (government) and private (non-government) bodies where access to such information is required for the exercise or protection of rights.

PAIA promotes transparency and accountability by obliging organisations to provide access to information on request, except where the Act provides lawful grounds for refusal. At the same time, PAIA recognises legitimate limitations on access — including the protection of privacy, commercial confidentiality, and the need for effective governance — ensuring a balance between access rights and other rights contained in the Bill of Rights.

2. Purpose of the 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; 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;
- 2.2. know the description of the records of the body which are available in accordance with any other legislation;
- 2.3. 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;
- 2.4. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.5. 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;
- 2.6. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.8. 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
- 2.9. 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 SDC Wealth Management (Pty) Ltd

Head Office	
Physical address	24 Achter Road, Paulshof, Sandton, 2191
Postal address	24 Achter Road, Paulshof, Sandton, 2191
Telephone	010 900 3809
Email	info@sdwealth.co.za
Website	www.sdcwealth.co.za

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3



Information Officer	
Name	Jan Harm Eloff
Telephone	010 900 3809
Email	janharm@sdwealth.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;
 - 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;
 - 4.3.3.2. and access to a record of a private body contemplated in section 50⁴;
 - 4.3.4. The assistance available from the Information Officer 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 of a decision of the head of a private body;

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.

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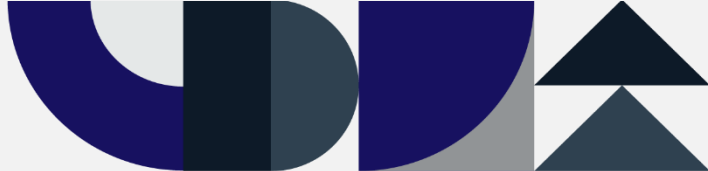
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Rev

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4



5. Records automatically available to the Public

- 5.1. Records of a public nature, typically those disclosed on the website, in its various annual reports and brochures, may be accessed without the need to submit a formal application.
- 5.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

-
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 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.”

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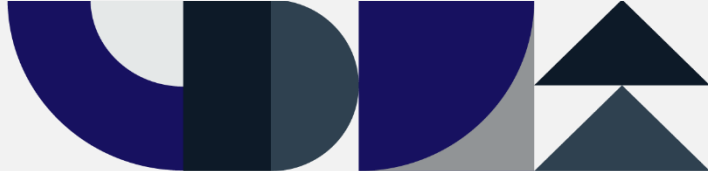
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Rev

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5



6. Descriptions of the records of SDC Wealth Management (Pty) Ltd. which are available in accordance with any other legislation

Records are kept in accordance with applicable legislation which includes but is not limited to the table below

Category of Records	Applicable Legislation
Administration of Estates	Administration of Estates Act 66 of 1965
Electronic Communications	Electronic Communications and Transactions Act 25 of 2002
Employment Records	Basic Conditions of Employment 75 of 1997
	Compensation of Occupational Injuries and Diseases Act 130 of 1993
	Employment Equity Act 55 of 1998
	Labour Relations Act 66 of 1995
	Occupational Health & Safety Act 85 of 1993
	Skills Development Act 97 of 1998
	Skills Development Levies Act 9 of 1999
	South African Qualifications Authority Act 58 of 1995
	Unemployment Insurance Act 63 of 2001
	Unemployment Insurance Contributions Act 4 of 2002
Financial Services	Collective Investment Schemes Control Act 45 of 2002
	Financial Advisory and Intermediary Services Act 37 of 2002
	Financial Intelligence Centre Act 38 of 2001
	Financial Sector Regulation Act 9 of 2017
	Financial Services Laws General Amendment Act 45 of 2013
	Financial Services Ombud Schemes Act 37 of 2004
	Inspection of Financial Institutions Act 80 of 1998
	Long-term Insurance Act 52 of 1998
	Medical Schemes Act 131 of 1998
	Pension Funds Act 24 of 1956
	Prevention of Organised Crime Act 121 of 1998 (POCA)
	Short-term Insurance Act 53 of 1998
	Value Added Tax Act 89 of 1991
Income Tax	Income Tax Act 58 of 1962
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to information Act 2 of 2000
Records	Protection of Personal Information Act 4 of 2013 (POPIA)
Treating Customers Fairly	Consumer Protection Act 68 of 2008

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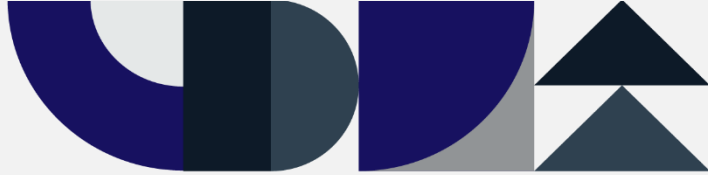
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6



7. Description of the subject on which the body holds records and categories of records held on each subject by SDC Wealth Management (Pty) Ltd.

These include, but are not limited to the following table:

Records	Categories of Records
Administrative	The Financial Services Provider (FSP) License
	The FSP's Compliance Manual
	The FSP's Policies and Procedures
	Personal records provided to the FSP by its personnel
	Records provided to the FSP by third parties concerning its personnel
Human Resources	Personal records provided to the FSP by its personnel
	Records provided by the FSP by third parties concerning its personnel
	Conditions of employment, and other personnel-related contractual and quasi-legal records
	Internal evaluation, performance, and training records
	Other internal records and correspondence
Client Related	Advice and Operational files
	Databases and IT records
	Marketing materials
	Internal communication
	Product files
	Statutory and legal records
	Company rules, Policies, and Procedures
	Treasury, Financial, and Investment records
	Documents created or kept by officials of the FSP
Financial	Financial statements
	Audit records
	Asset inventory
Other Parties	The FSP may possess records relating to other parties, including without limitation
	Contractors, suppliers, subsidiary or holding companies, joint venture companies, and other
	Financial services providers. Such records may include
	- Service Level Agreements
	- Financial Records
	- Correspondance
	Alternatively, certain other parties may possess records which are regarded as belonging to, or
	Concerning, the FSP. These may include
	- Personnel, client, or FSP records that are held by another party
	- Records held by the FSP pertaining to other parties, including without limitation
	a. Financial records
	b. Correspondence
	c. Contractual records
	d. Records provided by other party

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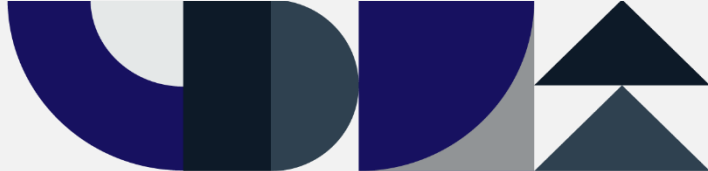
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MANUAL

Rev

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7



8. Processing of Personal Information

8.1. Purpose of Processing Personal Information

Personal information obtained and retained by the FSP, is used solely for the purpose of providing financial and intermediary services, and for promoting and marketing the FSP's products and offerings.

8.2. Description of the categories of data subjects and the types of information relating to each category

Data Subjects	Personal Information That May Be Processed
Employees	Personal and employment-related information, which may include identification details
	(name, surname, identity number, date of birth, age, marital status, gender, race, biometric details)
	Contact details (address, email, next of kin)
	Qualifications, educations and employment
	History, background checks, disabilities and health information, banking and tax details
	And records relating to performance reviews and disciplinary matters. (if applicable)
Clients	Personal and employment-related information, which may include identification details
	(name, surname, identity number, date of birth age, marital status, gender)
	Contact details (address, email, next of kin)
	Qualifications, education and employment
	History, disabilities and health information, banking and tax details
Shareholders and Investors	Company name, registration number, tax numbers and related information, contact details of
	Representatives, banking and other financial information
Service Providers	Names, registration numbers, VAT numbers, addresses, B-BBEE certificates, trade secrets, and bank details

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

Category Of Personal Information	Recipients Or Categories of Recipients to Whom the Personal Information May Be Supplied
Identity numbers and names for a criminal record check	South African Police Services (SAPS)
Qualifications for qualification verifications	South African Qualifications Authority (SAQA)
Credit and payment history, for credit information	Registered Credit Bureaus
All personal information is collected in the ordinary course of business	Authorised Service Providers (here necessary for business and compliance purposes)

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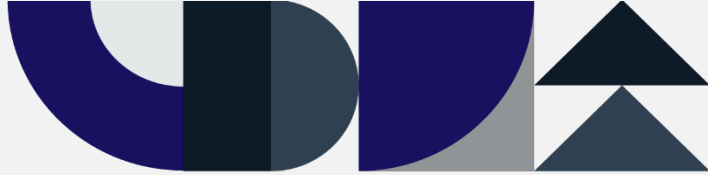
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MANUAL

Rev

00

8



The FSP may disclose personal information to its subsidiaries, business partners, service providers, regulators, courts, and law enforcement agencies where necessary for legitimate business purposes, compliance with legal obligations, or the protection of rights. Such disclosures are made strictly in accordance with POPIA, PAIA, and applicable confidentiality requirements.

Third parties receiving personal information are contractually and legally bound to use it only for the purposes for which it was disclosed, and to apply appropriate safeguards to protect its confidentiality and security.

8.4. Planned transborder flows of personal information

The FSP does not transfer any information out of the borders of South Africa.

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.

The FSP has implemented a range of information security measures designed to ensure the confidentiality, integrity, and availability of all information under its control:

- **Confidentiality:** Access to information is restricted to authorised personnel only, using secure logins and FSP-managed devices. All data backups are encrypted, and physical access to servers is strictly limited to authorised IT staff.
- **Integrity:** User access controls ensure that data can only be modified or processed by authorised personnel. Encrypted local and cloud backups are maintained, accessible only to authorised users with access to Multifactor Authentication. Data Loss Prevention (DLP) policies are applied to prevent unauthorised use or sharing of information.
- **Availability:** Advanced server failover systems, a disaster recovery site, encrypted cloud backups, and local backup storage (NAS) are used to ensure continued availability of data. Security measures include enterprise-grade anti-virus software, firewalls, and intrusion detection and prevention systems (IDS/IPS) to protect against hacking attempts and data loss.

9. Availability of the Manual

9.1. A copy of the manual is available

- 9.1.1. On www.sdcwealth.co.za
- 9.1.2. Our offices for public inspection during normal business hours;
- 9.1.3. To any person upon request and 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 Form 3 of the Regulations, shall be payable per each A4-sized photocopy made.

10. Updating the Manual

The Key Individual of SDC Wealth Management (Pty) Ltd will update this manual on a regular basis.

Issued by **Jan Harm Eloff**

Managing Director | Key Individual | Information Officer

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9