



ALPHAWEALTH



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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JOHANNESBURG | CAPE TOWN | DURBAN | LONDON | GENEVA | MAURITIUS

AlphaWealth (Pty) Ltd. Reg. No.: 2004/026495. An authorised financial services provider - FSP Licence No. 13808. Directors: K W Fynn, C Prinsloo. www.alphawealth.co.za
Alpha Private Capital (Pty) Ltd. Reg. No.: 1997/007311/07 An authorised financial services provider - FSP Licence No. 534. Directors: K W Fynn, S Needham.
T: +27 (0) 11 707 1340. Alpha House, Ballywoods Office Park, 33 Ballyclare Drive, Bryanston, 2191. Postnet Suite 575, Private Bag X9, Benmore, 2010.



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1. LIST OF ACRONYMS AND ABBREVIATIONS

“CEO”	Chief Executive Officer
“DIO”	Deputy Information Officer;
“IO”	Information Officer;
“Minister”	Minister of Justice and Correctional Services;
“PAIA”	Promotion of Access to Information Act No. 2 of 2000 as Amended;
“POPIA”	Protection of Personal Information Act No.4 of 2013;
“Regulator”	Information Regulator; and
“Republic”	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 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;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 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;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 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;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 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
- 1.10 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. GENERAL OVERVIEW OF THE BUSINESS

- Alpha Group of companies is a South African independent advisory firm, focused on advisory services and investment solutions.
- AlphaWealth (Pty) Ltd provides bespoke wealth management and advisory services to individuals and entities. Services include financial planning, fiduciary and tax advisory, risk and retirement planning, portfolio management and employee benefits.
- AlphaWealth is an authorised financial services provider with the Financial Sector Conduct Authority (FSCA), under license number FSP13808.
- Alpha Private Capital specialises in personalised investment management services, particularly in the alternative investments market. Services include corporate finance, segregated portfolios, and research services.
- Alpha Private Capital is an authorised financial services provider with the Financial Sector Conduct Authority (FSCA), under license number FSP534.



4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ALPHAWEALTH PTY LTD

4.1. Chief Information Officer

Name: Kerry West Fynn
 Tel: 082 3207915
 Email: kerry@alphawealth.co.za

4.2. Deputy Information Officer

Name: Charlene Prinsloo
 Tel: 082 4484940
 Email: charlene@alphawealth.co.za

4.3 Access to information general contacts

Email: info@alphawealth.co.za

4.4 National or Head Office

Physical Address: Alpha House, Ballywoods Office Park
 33 Ballyclare Drive
 Bryanston
 2191

Telephone: 011 7071340
 Email: info@alphawealth.co.za
 Website: www.alphawealth.co.za

5. PROCESSING OF PERSONAL INFORMATION

5.1 Purpose of Processing Personal Information

AlphaWealth (Pty) Ltd will only collect, process and store personal information, with consent, and for legitimate purposes. This includes the following:

- ✔ To provide advice and intermediary services and products to mandated clients;
- ✔ To assist clients with queries and/or claims relating to financial products or financial plan relevant to them;
- ✔ To confirm and verify client's identity or to verify that the client is an authorised user for security purposes, where applicable;
- ✔ For audit and record keeping purposes.

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

This section specifies the categories of data subjects in respect of whom AlphaWealth (Pty) Ltd processes personal information and the nature or categories of the personal information being processed. The inclusion of any subject of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, contact details, registration numbers or identity numbers, gender, race, employment status, bank details, income and income tax number, medical history, education records, family health history.
Service Providers	Names, contact details, registration number, vat numbers, address and bank details.
Employees	Name, address, contact details, qualifications, salary, bank details, gender and race, income tax number, next of kin, biometric information, medical aid information, medical history, professional licence numbers.



5.3 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 number and names, for criminal checks	South African Police Services ; MIE Background check required for employment at AlphaWealth.
Qualifications, for qualification verifications	South African Qualifications Authority and Financial Sector Conduct Authority ; MIE Background check required for employment at AlphaWealth.
Credit and payment history, for credit information	Credit Bureaus; MIE Background check required for employment at AlphaWealth.
Name, address, registration numbers or identity numbers, employment status and bank details	Third party contractors
Name, address, registration numbers or Identity numbers, Employment status, Bank details, Business information, Trading information, Statutory reports, Business reports.	Regulatory Bodies

5.4 Planned transborder flows of personal information

AlphaWealth (Pty) Ltd uses the Microsoft's Azure storage platform, which is hosted in the Netherlands - European Union. AlphaWealth (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](https://docs.microsoft.com/en-us/azure/security/fundamentals/protection-customer-data)

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

AlphaWealth (Pty) Ltd has its information systems built to the ISO27001 (International Organisation for Standardisation) standards. The acceptable use of all Alphawealth's devices and information systems are governed by the standard and its related policies.

The ISO27001 Standard and related policies allows for the safeguarding of Information, including personal information. It ensures that basic security platforms, solutions, software, principles and architecture are in-place to protect an entity's information systems against data leakage and the misuse of information.

Further to this AlphaWealth has implemented the following safeguards to ensure the confidentiality and integrity if the personal information under our care:

- ✔ Data encryption
- ✔ Anti-virus and Anti-Malware solutions
- ✔ Multi-factor authentication



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

- 6.1. 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.
- 6.2. The Guide is available in each of the official languages and in braille.
- 6.3. The aforesaid Guide contains the description of-
 - 6.3.1. the objects of PAIA and POPIA;
 - 6.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 6.3.2.1. the Information Officer of every public body, and
 - 6.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 6.3.3. the manner and form of a request for-
 - 6.3.3.1. access to a record of a public body contemplated in section 11; and
 - 6.3.3.2. access to a record of a private body contemplated in section 50;
 - 6.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 6.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 6.3.6. 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-
 - 6.3.6.1. an internal appeal;
 - 6.3.6.2. a complaint to the Regulator; and
 - 6.3.6.3. 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;
 - 6.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 6.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 6.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 6.3.10. the regulations made in terms of section 92.
- 6.4. 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.
- 6.5. The Guide can also be obtained-
 - 6.5.1. upon request to the Information Officer;
 - 6.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 6.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 6.6.1. English and Afrikaans

7. APPLICABLE AND RELEVANT LEGISLATION

1. Financial Intelligence Centre Act
2. Financial Advisory and Intermediary Act
3. Collective Investment Schemes Control Act
4. Medical Schemes Act No 131 of 1998
5. Pensions Funds Act No 24 of 1956
6. Long Term Insurance Act No 52 of 1998
7. Income Tax Act No 95 of 1967
8. Financial Services Board Act No 97 of 1990
9. Protection of Personal Information Act 4 of 2013
10. Promotion of Access to Information Act No 2 of 2000
11. The Basic Conditions of Employment Act No 75 of 1997
12. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
13. The Labour Relations Act
14. The Employment Equity Act No 55 of 1998
15. Unemployment Insurance Act 30 of 1996
16. Occupational Health and Safety Act No 85 of 1993
17. Skills Development Act No 97 of 1998
18. Companies Act 71 of 2008
19. Value Added Tax Act 89 of 1991
20. Skills Development Levies Act 9 of 2002
21. Copyright Act No 98 of 1978



8. CATEGORIES OF RECORDS AVAILABLE WITHOUT REQUESTING ACCESS IN TERMS OF SECTION 5 2(2) OF PAIA

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of the Act. The Minister must publish any description so submitted by notice in the gazette.

AlphaWealth (Pty) Ltd has not submitted any such description for publication in the Gazette, however certain records are freely available on www.alphahealth.co.za

Category of records	Available on Website	Available upon request
Privacy Policy	X	X
PAIA Manual	X	X
Complaints Policy	X	X
Conflicts of Interest Policy	X	X

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY ALPHAWEALTH PTY LTD

This section sets out the subjects (i.e. Finance or HR) in respect of which AlphaWealth (Pty) Ltd holds records and the categories of records held on each subject, including records which are created and available in accordance with any of the South African legislation. These records are not freely available but can be requested in terms of form C. The inclusion of any subject of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

Subjects on which the body holds records	Categories of records
Company Secretarial	<ul style="list-style-type: none"> ✔ Company registration details ✔ Memorandum of Incorporation ✔ Minutes of Board of Directors meetings ✔ Records relating to the appointment of directors/auditors ✔ Share certificates
Company Authorisation and Licence	<ul style="list-style-type: none"> ✔ FSCA Licences ✔ CIPC Registration ✔ Employer Registration ✔ VAT Registration ✔ Taxpayer Registration
Financial	<ul style="list-style-type: none"> ✔ Accounting records ✔ Annual Financial statements ✔ Asset Register ✔ Banking records ✔ Invoices ✔ Tax returns ✔ Documents issued to employees for income tax purposes ✔ Records of payments made to SARS ✔ Statutory Compliances: <ul style="list-style-type: none"> ✔ Value Added Tax Returns ✔ Skills Development Levy Returns ✔ Unemployment Insurance Fund Returns ✔ Pay as you Earn Returns ✔ Income Tax returns
Movable and immovable property	<ul style="list-style-type: none"> ✔ Title deeds ✔ Lease agreements ✔ Credit sale agreements ✔ Ordinary sale agreements



Subjects on which the body holds records	Categories of records
Human Resources	<ul style="list-style-type: none"> ✔ Terms and conditions of employment ✔ Employment Contracts ✔ Employee personal information ✔ Employee Performance reviews ✔ Medical Aid information ✔ Pension fund records ✔ Salary Information ✔ Leave records ✔ Employment Equity records ✔ SETA/Training records ✔ Disciplinary information
Clients	<ul style="list-style-type: none"> ✔ Client files ✔ Client database ✔ Client agreements ✔ Client instructions ✔ Client correspondence
Compliance	<ul style="list-style-type: none"> ✔ Compliance Reports ✔ Correspondence with external Compliance Officer and FSCA ✔ Policies, procedures and registers ✔ FIC Records ✔ FAIS Records ✔ Representatives and Key Individuals – mandates and competence documents ✔ FSCA Levies
Suppliers	<ul style="list-style-type: none"> ✔ Contact Information ✔ Contractual Agreements ✔ Accounting records
Insurance	<ul style="list-style-type: none"> ✔ Policies ✔ Insurance Claims

10. FORM OF REQUEST PROCEDURE

- 10.1. A person who wants access to the records of any of the identified private bodies must complete the necessary request form. The request form can be accessed from www.inforegulator.org.za or from AlphaWealth at the address detailed above.
- 10.2. If a person needs assistance to obtain the form or on any other matter, please contact the Deputy Information Officer at the email address detailed above.
- 10.3. The completed request form must be sent to the address or email address provided in the Section 4 and marked for the attention of the Deputy Information Officer. The Deputy Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised.
- 10.4. All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Deputy Information Officer obtains such additional information.
- 10.5. Payment of the prescribed fees are split into two categories:
- 9.5.1. The Request fee : R100
 - 9.5.2. The Access fee: this is calculated by taking into account reproduction costs, search and preparation costs, as well postal costs. See Annexure A for a breakdown of these fees.
- 10.6. Access to certain records may be or must be denied on the grounds set out in PAIA. Mandatory grounds for refusal include, but are not limited to:
- ✔ Information for the protection of the privacy of individuals;
 - ✔ Information for the protection of commercial information and confidential information of third parties;
 - ✔ Information privileged from production in legal proceedings;
 - ✔ Commercial information of the company; and
 - ✔ Research information



11. AVAILABILITY OF THE MANUAL

11.1 A copy of the Manual is available-

11.1.1 on our website – www.alphawealth.co.za

11.1.2 AlphaWealth Pty Ltd – Johannesburg Office for public inspection during normal business hours;

11.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

11.1.4 to the Information Regulator upon request.

12. UPDATING OF THE MANUAL

The internal compliance officer of AlphaWealth Pty Ltd will on a regular basis update this manual.

Duly authorised by the Head of Organisation

A handwritten signature in black ink, appearing to be 'KW Fynn', written in a cursive style.

KW Fynn
CEO of AlphaWealth (Pty) Ltd



Annexure A

Item	Description	Amount
1.	The request fee payable by every requester	R100.00
2.	Photocopy of A4-size page	R1.50 per page or part thereof
3.	Printed copy of A4-size page	R1.50 per page or part thereof
4.	For a copy in a computer-readable form on: Flash drive (to be provided by requestor) Compact disc If provided by requestor In provided to the requestor	R40.00 R40.00 R60.00
5.	For a transaction of visual images per A4-size page	Service to be outsourced. Quoted dependant.
6.	Copy of visual images	Service to be outsourced. Quoted dependant.
7.	Transcription of an audio record, per A4-size page	R24.00
8.	For a copy in an audio record on: Flash drive (to be provided by requestor) Compact disc If provided by requestor In provided to the requestor	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonable required for such search and preparation. To not exceed a total cost of	R100.00 R300.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11.	Postage, email or any other electronic transfer	Actual expense, if any