

PROTECTION OF ACCESS TO INFORMATION (PAIA) MANUAL

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Responsible Business Unit	

MANUAL STATEMENT

- This manual forms part of Vista Wealth’s internal business processes and procedures
- Any reference to “Vista Wealth” shall be interpreted to include the “manual owner”
- The organisation’s governing body, its employees, volunteers, contractor, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the manual’s requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

MANUAL ADOPTION

By signing this document, I authorize the manual owner’s approval and adoption of the processes and procedures outlined herein.

Name & Surname	Magnus de Wet
Capacity	Managing Director
Signature	
Date	

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1. DEFINITIONS

Data Subject

The person to whom personal information relates.

Deputy Information Officer

The person to whom any power or duty conferred or imposed on an Information Officer by POPI has been delegated.

Head

In relation to a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
 - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
 - the person who is acting as such or any person duly authorised by such acting person

Information Officer

The head of a private body.

Information Regulator

The Regulator established in terms of Section 39 of POPI.

PAIA

The Promotion of Access to Information Act 2 of 2000

Person

A natural person or a juristic person

Personal Information

- Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person;
- The personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Personal Requester

A requester seeking access to a record containing personal information about the requester

POPI

The Promotion of Personal Information Act 4 of 2013

Private body

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body

Processing

Any operation or activity or any set of operations, whether by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

Public body

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- in any other functionary or institution when:
 - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - exercising a public power or performing a public function in terms of any legislation

Requester

In relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person

Request for access

A request for access to a record of the organisation in terms of section 50 of PAIA.

Record

Any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether it was created by the organisation

Third Party

In relation to a request for access to a record held by the organisation, means any person other than the requester

2. MANUAL PURPOSE

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully

The organisation recognises everyone’s right to access to information and is committed to provide access to the organisation’s records where the proper procedural requirements as set out by PAIA and POPI have been met.

The organisation’s PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

Annexure A : Contact Details & Business Type
This section provides the organisation’s postal and street address, phone and fax number and, if available, the e mail address of the head of the organisation
Annexure B : Section 10 PAIA Guide
This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to
Annexure C : Statutory Records
This section provides a description of the various statutes in terms of which the organisation is required to maintain
Annexure D : Availability of Records
This section provides a list of records held by the organisation along with an indication of whether the record is freely available or only accessible by way of a formal request in terms of the provisions of PAIA. The section also provides a description of the category of data subject(s) to who the respective records relates to along with an indication of the purpose for which the record is being kept. Records that are indicated as “Freely Available” can be accessed by contacting the Deputy Information Officer (see Annexure A), without having to follow any formal procedures. Records that are indicated as a “PAIA Request”, requires the requester to lodge a formal request as provided for in Annexure E
Annexure E : Request Procedure
This section sets out the procedure required to obtain access to a record indicated as a “PAIA Request” in Annexure
Annexure F : Prescribed Fees
This section sets out the fees that are payable to the organisation prior to processing a request to obtain access to a record held by the organisation
Annexure G : Processing of Personal Information
This section sets out the applicable aspects for the processing of personal information
Annexure H : Information Officer and Deputy Information Officer Appointment
This section provides for the formal appointment of an Information Officer and a Deputy Information Officer where so required

3. DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e. creating manual awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below

Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed

The grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person
Grounds for Refusal:
<ul style="list-style-type: none">• The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual)
No Grounds for Refusal
<ul style="list-style-type: none">• The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned• The record consists of information that is already publicly available• The record consists of information that was given to the organisation by the individual to whom it relates, and the individual was informed by or on behalf of the organisation, before it is given, that the information belongs to a class of information that would or might be made available to the public• The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest• The record consists of information about an individual who is deceased, and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin• The record consists of information about an individual who is or was an official of the organisation and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held, or services performed by the individual and the name of the individual on a record prepare by the individual in the course of employment

B: Mandatory Protection of Commercial Information of a Third Party

Grounds For Refusal

- The record consists of information about a third party who has already consented in writing to its disclosure to the requester concerned
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement

D: Mandatory Protection of Safety of Individual and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property

E: Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege

F: Commercial Information of the Organisation**Grounds for Refusal**

- The record consists of information that contains trade secrets of the organisation
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation
- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the organisation, except insofar as it is required to give access to a record to which access is granted in terms of PAIA

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by the organisation or the results of any such testing or investigation carried out by or on behalf of the organisation and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

G: Mandatory Protection of Research Information of a Third Party and the Organisation**Grounds for Refusal**

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party,

a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage

- The record consists of information that contains information about research being or to be carried out by or on behalf of the organisation, the disclosure of which would be likely to expose the organisation, a person that is or will be carrying out the research on behalf of the organisation, or the subject matter of the research to serious disadvantage

4. NOTICE

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any)
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access
- The form in which access will be given, and

- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on
- Exclude, from any such reasons, any reference to the content of the records' and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in the organisation's possession, but cannot be found, or
- Simply does not exist,

the head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists including all communication with every person who conducted the search on behalf of the head.

5. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- on www.vistawealth.co.za;
- head office of Vista Wealth Management (Pty) Ltd for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

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.

6. ANNEXURE A: CONTACT DETAILS AND BUSINESS TYPE

A. Organisation Contact Details

Postal Address:	91 7 th Street, Linden, Johannesburg, 2195
Street Address	91 7 th Street, Linden, Johannesburg, 2195
Phone Number	087 701 0465
Email Address	info@vistawealth.co.za
Website:	www.vistawealth.co.za

B. Head of Organisation

Full Names and Surname	Magnus de Wet
Email Address	magnus@vistawealth.co.za
Phone Number	087 071 0465

C. Information Officer

Full Names and Surname	Gwendoline Linden
Email Address	gwen@vistawealth.co.za
Phone Number	087 701 0465

D. Deputy Information Officer

Full Names and Surname	Magnus de Wet
Email Address	magnus@vistawealth.co.za
Phone Number	087 701 0465

E. Business Type

The organization conducts its main type of business in the following sector	
Agriculture	<input type="checkbox"/>
Mining and Quarrying	<input type="checkbox"/>
Manufacturing	<input type="checkbox"/>
Electricity, Gas & Water	<input type="checkbox"/>
Construction	<input type="checkbox"/>
Retail & Motor Trade and Repair Services	<input type="checkbox"/>
Wholesale Trade, Commercial Agents & Allied Services	<input type="checkbox"/>
Catering, Accommodation & Other Trade	<input type="checkbox"/>
Finance & Business Services	<input type="checkbox"/>
Community, Special & Personal Services	<input type="checkbox"/>
Financial Advisory and Intermediary Services	<input checked="" type="checkbox"/>
If other, please specify	<input type="checkbox"/>

Head Signature	
Date	

7. ANNEXURE B: SECTION 10 PAIA GUIDE

Head Signature	
Date	

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.

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

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- 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 PAIA and section 56 of POPIA ;

- the manner and form of a request for-

access to a record of a public body contemplated in section 11 ; and

access to a record of a private body contemplated in section 50 ;

- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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;

- 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;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 .

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.

The Guide can also be obtained-

- upon request to the Information Officer;
- from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

8. ANNEXURE C: STATUTORY RECORDS

Head Signature	
Date	

The organisation maintains statutory records and information in terms of the following legislation:

Administration of Estates Act	<input type="checkbox"/>
Arbitration Act	<input type="checkbox"/>
Auditing Professions Act	<input type="checkbox"/>
Basic Conditions of Employment Act	<input checked="" type="checkbox"/>
Closed Corporations Act	<input type="checkbox"/>
Collective Investments Schemes Control Act	<input type="checkbox"/>
Companies Act	<input checked="" type="checkbox"/>
Compensation of Occupational Injuries & Diseases Act	<input type="checkbox"/>
Consumer Protection Act	<input type="checkbox"/>
Copyright Act	<input type="checkbox"/>
Customs and Excise Act	<input type="checkbox"/>
Electronic Communications and Transactions Act	<input checked="" type="checkbox"/>
Employment Equity Act	<input checked="" type="checkbox"/>
Financial Advisory & Intermediary Services Act	<input checked="" type="checkbox"/>
Financial Institutions (Protection of Funds) Act	<input type="checkbox"/>
Financial Intelligence Centre Act	<input checked="" type="checkbox"/>
Friendly Societies Act	<input type="checkbox"/>
Income Tax Act	<input type="checkbox"/>
Insolvency Act	<input type="checkbox"/>
Labour Relations Act	<input type="checkbox"/>
Long-term Insurance Act	<input type="checkbox"/>
Medical Schemes Act	<input type="checkbox"/>
National Credit Act	<input type="checkbox"/>
Occupational Health and Safety Act	<input type="checkbox"/>
Patents Act	<input type="checkbox"/>
Pension Funds Act	<input checked="" type="checkbox"/>
Prevention of Organised Crime Act	<input checked="" type="checkbox"/>
Prevention and Combatting of Corrupt Activities Act	<input type="checkbox"/>
Protection of Constitutional Democracy against Terrorist and related Activities Act	<input type="checkbox"/>
Short-term Insurance Act	<input type="checkbox"/>
Skills Development Act	<input type="checkbox"/>
Trademarks Act	<input type="checkbox"/>
Unemployment Insurance Act	<input type="checkbox"/>
Value Added Tax Act	<input checked="" type="checkbox"/>

9. ANNEXURE D: AVAILABILITY OF RECORDS

Head Signature	
Date	

The organisation maintains the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to whom the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health and Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board of Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation

	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by Organisation	PAIA Request	Risk Management	Organisation
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation

	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	ORganisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product/Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client/Customer	Customer/Client Database	PAIA Request	Internal Referencing	Organisation
	Customer/Client Agreements	PAIA Request	Internal Referencing	Organisation
	Customer/Client Files	PAIA Request	Internal Referencing	Organisation
	Customer/Client Instructions	PAIA Request	Internal Referencing	Organisation
	Customer/Client Correspondence	PAIA Request	Internal Referencing	Organisation
Third Party	Rental Agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise Agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

10. ANNEXURE E: REQUEST PROCEDURE

Head Signature	
Date	

The organisation maintains statutory records and information in terms of the following legislation:

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of Information Officer/Deputy Information officer indicated in Annexure A.

The Information Officer/Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Information Officer/Deputy Information Officer will inform you of the outcome of your request and any additional fees that may be due.

Please be advised that PAIA provides several grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the information officer/deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information

- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

A. Particulars of Private Body	
The Head:	
B. Particulars of person requesting access to the record	
I. The particulars of the person who requests access to the record must be recorded below	
II. Furnish a postal address and/or email address in the Republic to which information must be sent	
III. Proof of the capacity in which the request is made, if applicable, must be attached	
Full Names and Surname:	
Identity Number:	
Postal Address:	
Telephone Number:	
Email Address:	
Capacity:	
C. Particulars of person on whose behalf the request is made	
This section must be completed ONLY if a request for information is made on behalf of another person	
Full Names and Surname:	
Identity Number:	
D. Particulars of Record	
I. Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
II. If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of Record:	
Reference Number:	
Any further particulars:	
E. Fees	

I.	A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid	
II.	You will be notified of the amount required to be paid as the requested fee	
III.	The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record	
IV.	If you qualify for exemption of the payment of any fee, please state the reason:	
	Reason for exemption:	
F. Form of access to record		
If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability and indicate in which form the record is required		
	Disability	
	Form in which required:	
Mark the appropriate box with an "X"		
I.	"Your indication as to the required form of access depends on the form in which the record is available	
II.	Access in the form requested may be refused in certain circumstances, in such case you will be informed that access will be granted in another form	
III.	The fee payable for access to the record, if any, will be determined partly by the form in which access is requested	
1.	If the record is in written or printed form:	
	• Copy of record	
	• Inspection of record	
2.	If the record consists of visual images:	
	• View the images	
	• Copy the images	
	• Transcription of the images	
3.	If the record consists of recorded words or information which can be reproduced in sound:	
	• Listen to the soundtrack	
	• Transcription of the soundtrack	
4.	If the record is held on computer or in an electronic or machine-readable form:	
	• Printed copy of the record	
	• Copy in computer readable form	
	Please indicate the preferred method of delivery	
	• By hand	
	• Email	
	• Post	
G. Particulars of right to be exercised or protected		
If the provided space is inadequate, please continue on a separate page and attach it to this form. The requester must sign all additional pages.		
Indicate which right is to be exercised or protected:		

Explain why the record requested is required for the exercise or protection of the aforementioned right:
H. Notice of decision regarding the request for access
You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request
How would you prefer to be informed of the decision regarding your request for access to the record?
I. Signature Page
Signed At:
Date:
Signature of Requester/Person on whose behalf request is made:

11. ANNEXURE F: PRESCRIBED FEES

Head Signature	
Date	

The following applies to request (other than personal requests):

- A requester is required to pay a preliminary request fee before a request will be processed
- If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted)
- A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit
- Records may be withheld until the fees have been paid.

No.	Description	Fee
1.	The fee for a copy of the manual as contemplated in regulation 9(2)(c), for every photocopy of an A4-size page or part thereof	R1.10
2.	The fees for reproduction referred to in regulation 11(1) are as follows:	-
	a) For every photocopy of an A4 size page or part thereof	R1.10
	b) For every printed copy of an A4 size page or part thereof held on a computer or in electronic	R0.75
	d) For a copy in a computer-readable form on compact disc	R70.00
	e) For a transcription of visual images, for an A4 size page or part thereof	R40.00
	f) For a copy of a visual image	R60.00
	g) For a transcription of an audio record	R20.00
	h) For a copy of an audio record	R30.00
3.	The request fee payable by a requester, other than a personal requester, referred to in regulation	R50.00
4.	The request fee payable by a requester, other than a personal requester, referred to in regulation	-
	a) For every photocopy of an A4 size page or part thereof	R1.10

	b) For a printed copy of an A4 size page or part thereof held on a computer or in electronic readable	R0.75
	c) For a copy in a computer readable form on stiffy disc	R7.50
	d) For a copy in a computer readable form on compact disc	R70.00
	e) For a transcription of visual images, for an A4 size page or part thereof	R40.00
	f) For a copy of a visual image	R60.00
	g) For a transcription of an audio record, for A4 size page or part thereof	R20.00
	h) For a copy of an audio record	R30.00
5.	The actual postage fee is payable when a copy of a record must be posted to a requester	-
6.	For purposed of section 54(2) of the Act, the following applies:	-
	a) Six hours as the hours to be exceeded before a deposit is payable	-
	b) One third of the access fee is payable as a deposit by the requester	-

12. ANNEXURE G: PROCESSING OF PERSONAL INFORMATION

Head Signature	
Date	

1. Purpose of Processing Personal Information

Vista Wealth requires clients' personal information to do the following:

- Perform needs analyses
- Prepare an investment proposal
- Prepare and submit quote and application forms
- Request policy information
- Comply with regulatory requirements

2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

Below are the categories of data subjects in respect of whom Vista Wealth processes personal information and the nature or categories of the personal information being processed

Categories of Data Subjects	Personal information that may be processed
Customers/Clients	Name, address, registration or identity numbers, employment status/details, bank and tax details, source of wealth and source of funds, assets, citizenship,
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details
Employees	Address, qualification, gender and race

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
Qualifications, for qualification verification	South African Qualifications Authority (SAQA)

Capital Gains/Interest Earned/Assets and liabilities	South African Revenue Service
Beneficiaries, next of kin	Executor for deceased estates

4. Planned transborder flows of personal information

Vista Wealth will facilitate transborder flows of personal information with JP Morgan (US) and DMA (Bermuda) for offshore investments.

Categories of Data Subjects	Personal information that may be processed
Customers/Clients	Name, address, registration or identity numbers, employment status/details, bank and tax details, source of wealth and source of funds, assets, citizenship,

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

In accordance with Section 42(2)(n) of FICA, Vista Wealth keeps record of all FICA due diligence documents and transaction records.

FICA documents are kept on the database for at least 5 Years from transaction date

Reports submitted to the FIC are kept for 5 years from reporting date.

All documents are stored on Dropbox, strict access controls are in place.

Copies are backed-up quarterly to an external storage device.

13. ANNEXURE H: INFORMATION AND DEPUTY INFORMATION OFFICER APPOINTMENT

Head Signature	
Date	

Vista Wealth has appointed an Information Officer and Deputy Information Officer to facilitate any requests to access records held by the organization. This appointment does not prohibit the person who made the appointment from exercising power concerned or performing the duty concerned himself.

The information Officer, Deputy Information Officer and the Managing Director is responsible for:

- Publication and communication of the manual i.e. creating manual awareness
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing the manual for accuracy and communicating any amendments

As the Head of the organization, I _____ hereby appoint
 _____ as the Organisation’s Information Officer and
 _____ as the Deputy Information Officer

 Head Signature

 Date

 Information Officer Signature

 Date

 Deputy Information Officer Signature

 Date