

THE WEALTH ROOM (PTY) LTD  
REG:2017/184220/07  
FSB Number: 8866



# **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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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |             |  |
|-----|-------------|--|
| 1.1 | “CEO”       | Chief Executive Officer  |
| 1.2 | “DIO”       | Deputy Information Officer;  |
| 1.3 | “CIO“       | Chief 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 THE WEALTH ROOM (PTY) LTD**

#### **3.1. Chief Information Officer**

Name: PHILLIPA LEADBETTER  
Tel: 021 853 3316  
Email: phillipa@thewealthroom.co.za

#### **3.2. Deputy Information Officer**

Name: GRANT VAN ZYL  
Tel: 021 853 3316  
Email: grant@thewealthroom.co.za

### 3.3 Access to information general contacts

Email: [phillipa@thewealthroom.co.za](mailto:phillipa@thewealthroom.co.za)

### 3.4 National or Head Office

Postal Address:

PO Box 5051 – Heldervue Somerset West 7135

Physical Address: Shop 7, Langenegger Street, Gants Plaza Strand, 7140

Telephone: 021 853 3316

Email: [info@thewealthroom.co.za](mailto:info@thewealthroom.co.za)

Website: [www.thewealthroom.co.za](http://www.thewealthroom.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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 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 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 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

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> 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 15<sup>7</sup> and 52<sup>8</sup> 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 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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;

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

4.5.2. 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 THE WEALTH ROOM (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Only company related information can be found on our website without consent. It contains key information such as our mandatory Financial Services Provider number: 8866, trading name, our general information on how to contact us, along with our office address, and the products that we are licensed to sell.

It also contains general information about our team members, and our internal processes. These records cannot be downloaded, and can also be confirmed telephonically without prior consent.

Category of records	Types of the Record	Available on Website	Available upon request
POPIA & PAIA	Manual adopted for the protection of Information	X	X
General Information	<ul style="list-style-type: none"><li>- FSP Number</li><li>- Company Information</li><li>- Staff information (names)</li><li>- Licensed Products</li></ul>	X	X

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

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

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

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records
Product Providers	- Codes, contracts, key persons

**8. PROCESSING OF PERSONAL INFORMATION**

**8.1 Purpose of Processing Personal Information**

The Wealth Room (Pty) Ltd needs to abide to the legislative requirements as set out by the Financial Intelligence Centre (FIC) and Financial Sector Conduct Authority (FSCA), to verify a client before entering in to business with the described client. Therefore, in order to provide financial advice along with the service related aspect of selling a product based on the financial advice, we require a client's personal information in order to apply and finalise the sale of the financial product, and

through this process ensure that the client is not committing fraud or putting us as a professional financial body, at risk of being associated with fraud.

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

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details, monthly or annual income, estate information such as property address and valuations
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details, commission payments
Employees	address, qualifications, gender and race, monthly income, address, bank details

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

<b>Category of personal information</b>	<b>Recipients or Categories of Recipients to whom the personal information may be supplied</b>
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Identity Number, names, income, bank account details, address, source of income, contact details	Registered Financial Services Providers

#### **8.4 Planned transborder flows of personal information**

Personal Information of clients and employees are stored on our CRM system, atWORK which is cloud based. Our computers are also backed up daily to our cloud service Acronis. Both are kept up to date with the latest security trends, and is both domiciled locally in South Africa on their respective encrypted servers.

#### **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 Wealth Room recognises the importance and the role of information security. Any reduction in confidentiality, the integrity of information, the loss or unauthorised disclosure of information has the potential to damage the FSP's reputation and cause financial loss. The sole proprietor, representatives and support staff are aware of the responsibilities and that information is only accessed to perform authorised duties. Nominated staff or service level providers responsible to manage the information system are also committed to ensuring adequate security for all computing or network areas to ensure that information can be captured, stored and retrieved.

The FSP is committed to protecting the security of its information and information systems in order to ensure that:

the integrity of information is maintained;

information is always available to those who need it and there is no disruption to the business;

confidentiality is not breached, so that information is accessed only by those authorised to do so;

The FSP meets its legal requirements in relation to information protection.

To give effect to the aforementioned policy the FSP has implemented the following procedures surrounding information security:

Cybersecurity	<p>The FSP has implemented the following measures surrounding cybersecurity:</p> <ul style="list-style-type: none"> <li>• Kaspersky Total Security On all internal computers</li> <li>• Two factor authentication on all logins within the organisation</li> <li>• Latest backups kept on the cloud through Acronis, and means that we will not be a victim to Ransomware, as we can easily restore an earlier version of our computer</li> </ul>
Physical security of assets and data	<p>The FSP has various security measures to secure business premises from unauthorised persons entering the building which include but are not limited to alarm systems and security gates.</p>
Record Keeping and maintenance	<p>The Wealth Room's <a href="#">TWR FAIS: Recordkeeping and maintenance of records procedure</a> describes the FSP record keeping and storage facilities.</p>
Access Control	<p>Only authorised persons to have access to information. Staff will be given access to information required to fulfil his/her relevant duties. Information is password protected.</p>
User Accounts/passwords	<p>Each authorized user has a unique login account and all information is password protected. The user is required to create a complex password.</p>
Backup procedures	<p>The Wealth Room uses the software Acronis Backups which collect data from devices on a daily basis. Acronis is one of the leading backup applications and is protected by AES-256 encryption and is easily accessible.</p>
System testing	<p>The recovery testing procedure shall be done on a annual basis by the IT consultant, At Comp Solutions, who shall provide a written report of the recovery testing findings. We also do a security vulnerability</p>

	test through Camargue to ensure we are safeguarded as best as possible. We receive reports from both service providers and keep record thereof.
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## 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on [www.thewealthroom.co.za](http://www.thewealthroom.co.za), if any;

9.1.2 head office of the THE WEALTH ROOM (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 a THE WEALTH ROOM (PTY) LTD will on a regular basis update this manual.

*Issued by*



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**PHILLIPA LEADBETTER**  
**OPERATIONS OFFICER**

**2026/05/27**