



A1 Financial Services (Pty) Ltd
hereafter addressed as A1 Group

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	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa
1.9	“SAHRC”	South African Human Rights Commission

2. Introduction

2.1 A1 Group trading as A1 Brokers with registration number 2016/209516/07. A1 is an authorised financial services provider that provides financial advice and renders intermediary services to clients on financial products under a licence issued in terms of the Financial Advisory and Intermediary Services Act, Act 37 of 2002.

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by A1 Group which are available without a person having to submit a formal PAIA request;



- 3.2 have a sufficient understanding of how to make a request for access to a record of A1, by providing a description of the subjects on which the A1 Group holds records and the categories of records held on each subject;
- 3.3 know the description of the records of A1 Group which are available in accordance with any other legislation;
- 3.4 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;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if A1 Group 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;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if A1 Group 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
- 3.10 know whether A1 Group has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE A1 FINANCIAL SERVICES (PTY) LTD

4.1. Chief Information Officer

Name: Sanjay Maharajh
Tel: 082 313 1544
Email: sanjay.maharaj@a1financialservices.co.za
Fax number: N/A

4.2. Deputy Information Officer

Name: Sharneel Maharajh
Tel: 071 861 7399
Email: sharneel@a1financialservices.co.za
Fax number: N/A

4.3 Access to information general contacts

Email: enquiries@a1groupsa.com

4.4 National or Head Office

Postal Address: The Queen
11 Byrnes
Avenue,
Wynberg
7800
Physical Address: 11 Byrnes Avenue,
Wynberg
7800
Telephone: 021 300 1020
Email: enquiries@a1groupsa.com

Website:

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

5.1. 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.

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

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a public body contemplated in section 11³; and

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.

- 5.3.3.2. access to a record of a private body contemplated in section 50⁴
- 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6. 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-
- 5.3.6.1. an internal appeal;
- 5.3.6.2. a complaint to the Regulator; and
- 5.3.6.3. 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;
- 5.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

5.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

5.3.10. the regulations made in terms of section 92¹¹.

5.4. 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.

5.5. The Guide can also be obtained-

5.5.1. upon request to the Information Officer;

5.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

5.6 A copy of the Guide is available in the following two official languages, for public inspection during normal office hours-

5.6.1 English and Afrikaans

6. CATEGORIES OF RECORDS OF THE A1 FINANCIAL SERVICES (Pty) Ltd WHICH ARE 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.”

Access to the records held by the private body

- The latest notice regarding the categories of records of the body, which are available without a person having to request access in terms of section 52 (2) of this Act, and at no cost:

Brochures; Pamphlets; Documents related to business activities
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- Records which may be requested in terms of this Act:

Administration:

- Licence of product categories
- Minutes of management meetings
- Minutes of staff meetings
- Correspondence

Human resources:

- Employment contracts
- Mandates
- Policies and procedures
- Training
- Remuneration and benefits policies, and records thereof

Operations:

- Production records
- Compliance manual – FAIS
- Compliance reports
- Complaint's procedures
- Contractual agreements with suppliers
- Procedure's manual - FICA
- Records of advice
- Register of key individuals
- Register of representatives
- Register of non-compliance
- Record of continued compliance by representatives
- Register of premature cancellation of products
- Clients register

Finances:

- Accounting and audit records
- Financial statements
- Assets inventory



Legal Records:

- Documentation pertaining to litigation and arbitration
- General agreements
- Licenses, permits and authorizations

<ul style="list-style-type: none"> ○ Insurance Records including records in respect of insurance coverage, limits and insurers ○ Claims Records
<p>Tax Records:</p> <ul style="list-style-type: none"> ○ Income tax returns and other documentation ○ PAYE Records ○ Skills Development Levies Records ○ Value Added Tax Record.
<p>Employee Records:</p> <ul style="list-style-type: none"> ○ Attendance register ○ Company tax submissions in respect of employee ○ Employment Agreements ○ Confidentiality agreements ○ Restraint of Trade Agreements ○ Disciplinary Records ○ Employee personal details ○ Employment conditions and policies ○ Employment equity plan ○ Medical aid Records ○ Remuneration and benefits records ○ Retirement fund records ○ Training manuals and material ○ Dividend payment list
<p>Information technology:</p> <ul style="list-style-type: none"> ○ Business and data information ○ Domain name registrations ○ IT technology capabilities ○ Asset Registers
<p>Customer Records:</p> <ul style="list-style-type: none"> ○ Agreements and Forms ○ Payment details ○ Sales Records ○ Policy documents and wordings ○ Transaction records ○ Disclosures

7. **Records available in terms of any other legislation**

Basic Conditions of Employment Act No. 75 of 1997
Collective Investments Schemes Control Act No. 45 of 2002
Companies Act No. 71 of 2008
Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993



Consumer Protection Act No. 68 of 2008
Employment Equity Act No.55 of 1998
Financial Advisory and Intermediary Services Act No. 37 of 2002
Financial Intelligence Centre Act No. 38 of 2001
Financial Institutions (Protection of Funds) Act No. 28 of 2001
Financial Services Board Act No. 97 of 1990
Financial Services Ombud Schemes Act No. 37 of 2004
Friendly Societies Act No. 25 of 1956
Income Tax Act No. 58 of 1962
Insurance Laws Amendment Act No. 27 of 2008
Labour Relations Act No. 66 of 1995
Long-term Insurance Act No. 52 of 1998
Medical Schemes Act No. 131 of 1998
Occupational Health and Safety Act No. 85 of 1993
Pension Funds Act No. 24 of 1956
Prevention of Organised Crime Act No. 121 of 1998
Protection of Constitutional Democracy against Terrorist and Related Activities Act No. 33 of 2004
Security Services Act No. 36 of 2004
Short Term Insurance Act No. 53 of 1998
Skills Development Act No.97 of 1998
Skills Development Act No.97 of 1998
Unemployment Contributions Act No. 4 of 2002
Unemployment Insurance Act No. 63 of 2001
Value Added Tax Act No. 89 of 1991

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Client information is used to conclude policies and post-sales activities for example client services and retentions work etc. The information will only be used for the intended purposes, in the event of using the client information for anything else we will obtain the client's consent.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details
Employees	Address, qualifications, gender and race

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 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

8.4 Planned transborder flows of personal information

All information is on cloud-based servers and these servers back up our information internally and not outside the Republic 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

- All **A1** records shall be kept in storage areas or facilities that are appropriate for the type of medium as per the file plan.
- A record must only be kept in paper-based format in cases where it is deemed extremely necessary to keep it in its original form.
- Limited access to system software is password protected as information is only used for its intended purpose. Passwords are requested from Zahir by the managers, with Sanjay copied in the email requests.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on (), if any;



- 9.1.2 head office of the A1 Financial Services (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.
- 9.1.5 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 A1 Financial Services (Pty) Ltd will on a regular basis update this manual.

Issued by



(Sharneel Maharajh)

(Key Individual: Sanjay Maharajh)

Annexure B – Fees in respect of private bodies

Fees in Respect of Private Bodies

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (v) Flash drive (to be provided by requestor) (vi) Compact disc • If provided by requestor • If 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, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."

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¹ As per the Government Gazette No. 45057