

FSP BUSINESS 4.0

Building Professional Advice Businesses

PAIA & POPIA MANUAL

Promotion of Access to Information Act 2 of 2000 (as amended)
Protection of Personal Information Act 4 of 2013

FSP Business Four Point 0 (Pty) Ltd
Registration Number: 2025/968743/07

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1. Introduction

The Promotion of Access to Information Act, 2 of 2000 (“PAIA”) gives effect to section 32 of the Constitution, which provides for access to information if a person wants to exercise a right or to protect a right, subject to the procedural requirements laid down by PAIA. For this purpose, PAIA requires that FSP Business 4.0 must implement a manual in terms of Section 51 of PAIA setting out the procedures to be followed to have access to information, which procedures are set out in this Manual.

The Protection of Personal Information Act, 4 of 2013 (“POPIA”) on the other hand provides for 8 protection principles that FSP Business 4.0 must comply with to protect the Personal Information of all Data Subjects. FSP Business 4.0 must implement a Manual that must comply with section 14 and 51 of PAIA and is required to make it available to persons who want to access its Personal Information.

Should a person having a right to the Personal Information require access to these Personal Information, then access is allowed by following the procedures laid down by PAIA and as set out in this Manual.

2. Purpose

The purpose of the Manual is to:

- Provide details on records and information of FSP Business 4.0 that are available and accessible once the requirements for access have been met;
- Set out the procedures to be followed by a person that wants access to information (including POPIA Personal Information) that are subject to protection and non-disclosure, if such person wants to exercise or to protect a right;
- Provide a guide on POPIA legislation and how FSP Business 4.0 processes Personal Information;
- Set out the rights of data subjects under POPIA, including objection, correction, deletion, complaint rights, and the implications of automated processing; and
- Describe FSP Business 4.0's approach to processor accountability, security safeguards, breach notification, and internal governance registers.

3. Availability of the Manual

The Manual is made available in terms of Section 4 of the Regulations to POPIA:

- On FSP Business 4.0's website: www.fsp40.com
- By contacting the Information Officer at the contact details provided below. A fee will be levied if copies of the Manual are required and as provided for in terms of Appendix 3.
- At the offices of FSP Business 4.0 for inspection during normal business hours at no cost.

4. Introduction to the Company and Type of Business

Detail	Information
Registered Name:	FSP Business 4 Point 0 (Pty) Ltd
Registration Number:	2025/968743/07
Physical Address:	Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081
Website:	www.fsp40.com

Type of Business:

FSP Business 4.0 is a practice management, compliance, and capability-building ecosystem designed exclusively for South African financial advisers, Financial Services Provider (FSP) owners and principals, adviser teams, and compliance, operations, and leadership stakeholders.

The Company delivers its services both digitally — through an integrated online platform featuring assessments, dashboards, AI-assisted analytics, digital tools, templates, and gamified learning, and face-to-face through workshops, coaching sessions, masterclasses, and consulting engagements. Technology tools assist advisers in managing their businesses, tracking COFI compliance, and building trusted client relationships.

The ecosystem encompasses COFI readiness assessments and implementation, business risk management, strategic business planning, marketing planning frameworks, business valuation methodologies, pricing services, industry benchmarking and surveys, CPD-accredited courses and certifications, trust and ethics training, competency verification, behavioural finance tools, and a professional networking community.

Regulatory Position

FSP Business 4.0 is not a financial services provider licensed under the Financial Advisory and Intermediary Services Act 37 of 2002. It does not give financial advice, does not render intermediary services, and does not act for any adviser's client. Its subscribers are licensed providers; the Company is not.

The ordinary law applying to any South African company applies to the Company in full, including the Companies Act 71 of 2008, POPIA, PAIA, tax legislation and employment legislation. The obligations that attach to a licensed financial services provider — the fit and proper requirements in Board Notice 194 of 2017, the General Code of Conduct, the Financial Intelligence Centre Act 38 of 2001 where it applies to licensed providers, and the Joint Standard on Cybersecurity and Cyber Resilience — bind the Company's subscribers and not the Company.

The Company does not hold the Personal Information of its subscribers' clients. Reports and outputs generated through the ecosystem are downloaded and retained by the subscriber. Where a subscriber's own record-keeping obligation attaches to such a record, that obligation attaches to the subscriber's copy and not to any copy held by the Company.

Partner Ecosystem

FSP Business 4.0 operates as part of a four-company alliance, with each partner contributing specialised expertise:

- FSP Business 4.0 (www.fsp40.com) — Business and practice excellence: COFI readiness, business strategy, compliance, operational systems, benchmarking, and implementation tools.
- Trusted Advisors (trustedadvisor.co.za) — Leadership, trust, ethics, and client-centred behaviour: trust-building methodologies, ethics, business and compliance training, relationship deepening strategies, and Market conduct (COFI) requirements.

- PROpulsion (www.propulsion.co.za) — Continuous education and professional growth: CPD-accredited courses, weekly live learning sessions, professional networking, industry expert workshops, and global thought leadership events.
- Skilzly (www.skilzly.net) — Competency, skills verification, and future readiness: competency assessments, Fit & Proper compliance tracking, skills gap analysis, RE exam preparation, and development pathway planning.

Personal information may be shared between partner companies within the ecosystem where necessary to deliver integrated services, subject to appropriate data processing agreements and in compliance with POPIA.

Leadership Team

Name	Role
Anton Swanepoel CFP®	Practice Management & Compliance; Information Officer
Francois Du Toit CFP®	Technical Training & Adviser Productivity
Johann Maree	Business Management, Behavioural Finance & Client Engagement
Marius Vermeulen	Technology & Digital Platform Architecture
Roch�lle Mylie CFP®	Operations, Compliance; Deputy Information Officer

5. Company Contact Details (PAIA Section 51(1)(a))

5.1 Information Officer

Detail	Information
Name:	Anton Swanepoel
Email:	Anton@fsp40.com
Contact Number:	082 453 4184

5.2 Deputy Information Officer

Detail	Information
Name:	Roch�lle Mylie
Email:	Rochelle@fsp40.com
Contact Number:	081 544 3734

5.3 General Contact

Email: info@fsp40.com | Website: www.fsp40.com

See Section 16 for the Information Officer and Deputy Information Officer Registration Certificate.

6. Contact Details of the Information Regulator

Detail	Information
Business Address:	JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001
Postal Address:	P O Box 31533, Braamfontein, Johannesburg, 2017
General Enquiries:	enquiries@inforegulator.org.za
PAIA Complaints:	PAIAComplaints@inforegulator.org.za

POPIA Complaints:	POPIAComplaints@inforegulator.org.za
Website:	www.inforegulator.org.za

7. Guide on How to Use PAIA (Section 51(1)(b))

PAIA grants a Requester access to records of a private body, if the record is required for the exercise or protection of any rights. Requests in terms of PAIA shall be made in accordance with the prescribed procedures and at the rates provided for in terms of the PAIA Regulations.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission (“SAHRC”), which contains information for the purposes of exercising Constitutional Rights. The Guide is available from the Information Regulator at <https://www.justice.gov.za/infoereg/> in all 11 official languages and in braille.

8. Applicable Legislation (PAIA Section 51(1)(d))

The legislation applicable to FSP Business 4.0 includes, but is not limited to:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Conduct of Financial Institutions Bill (COFI) (when enacted)
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Sector Regulation Act 9 of 2017
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Act 97 of 1998
- Unemployment Contributions Act 63 of 2001
- Value Added Tax Act 89 of 1991

Note: Although FSP Business 4.0 used its best endeavours to provide an up-to-date list, it may not be complete due to constant changes in legislation. Kindly consult the Information Officer regarding the applicability of any legislation.

9. Categories of Records Held (PAIA Section 51(1)(e))

The following categories of records are held by FSP Business 4.0. The inclusion of a category does not mean records will automatically be made available. Records may be freely available (publicly accessible), available subject to limited disclosure, or may not be disclosed on lawful grounds.

Category	Examples of Records	Availability
Public Affairs	Website content and publications Marketing materials and brochures Public policies and manuals Newsletters and articles Thought leadership content	Freely available: publicly accessible on www.fsp40.com
Corporate & Governance	MOI and statutory company records Board and management records Corporate structure documentation Business agreements Company policies and manuals	May not be disclosed: Legally privileged documents Commercial information of private body Confidentiality agreements
Financial	Financial statements and returns Invoices and payment records Tax records PAYE records Bank details and records	May not be disclosed: Commercial information of private body
Human Resources	Employment contracts Personnel records Training and development records Performance records	May not be disclosed: Commercial information of private body Privacy of individuals
Clients & Subscribers	Client onboarding records Subscription agreements Assessment and diagnostic outputs COFI readiness reports and gap analyses Action plans and implementation roadmaps Communications and correspondence Support tickets	Limited disclosure to clients: Subject to client agreement terms Subject to copyright
Operations & Technology	Digital platform records and system logs AI platform processing records CRM system records Learning management system records Gamification and analytics data IT services agreements Backup and restore records	May not be disclosed: Commercial information of private body Intellectual property
Learning & Development	CPD course records and completions Workshop and event attendance records Competency assessment results Fit & Proper tracking records RE exam preparation records Certification and verification records	Limited disclosure: Subject to learner agreements Competency data confidential

Marketing & Research	Market research (aggregated/anonymised) Marketing strategies and plans Survey and benchmarking data Industry remuneration research Brand information Newsletter subscriber lists	May not be disclosed: Commercial information Research data protection
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10. Request Procedure for Access to Records

10.1 Types of Requesters

Personal Requester:

A Personal Requester is a requester who is seeking access to a record containing Personal Information about the Requester itself. Access will be granted by FSP Business 4.0 subject to applicable legislation.

Other Requester:

If a person other than the Personal Requester is seeking access to a record containing Personal Information, then FSP Business 4.0 is not obliged to grant access to such record, unless such person fulfils the requirements for access as provided for in terms of PAIA.

10.2 Request for Information Procedures

The procedures to follow are as follows:

- A Requester must complete and sign the prescribed form enclosed in Appendix 4 together with payment of the required fee (only if it is an Other Requester).
- The completed and signed form together with proof of payment must be emailed to the Information Officer at Anton@fsp40.com.
- If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.
- If a request is made on behalf of another person, the Requester must submit proof of authority.
- A Requester may only request access to a record in order to exercise or protect a right and must clearly state the nature of the right and why the record is required.
- FSP Business 4.0 will process a request within 30 (thirty) days of receipt of the completed form, unless exceptional circumstances apply.
- FSP Business 4.0 shall inform the Requester in writing whether access has been granted or denied, together with reasons.

10.3 Fees Payable

The applicable fees prescribed in terms of the PAIA Regulations are set out in Appendix 3. No fee is payable for access to a requester's own personal information. If preparation requires more than 6 hours, a deposit of not more than one third of the access fee shall be payable.

10.4 Grounds for Refusal

Chapter 4 of PAIA provides for several grounds on which a request may be refused, including where:

- The privacy and interests of other individuals would be unreasonably infringed;
- Commercially sensitive or confidential information is involved;
- Legal privilege applies;
- Disclosure is prohibited by law;
- The request is frivolous or vexatious or involves an unreasonable diversion of resources;
- Research information would be prejudiced; or
- The safety of individuals or property would be endangered.

10.5 Records Not Found

If records cannot be found despite reasonable and diligent searches, the Information Officer will provide the Requester with a notice in the form of an affidavit setting out the measures taken to locate the record and the inability to locate it.

10.6 Remedies Available

If a request is refused, the requester may within 180 days of notification lodge a complaint with the Information Regulator or apply to a court for appropriate relief as provided for in sections 56(3)(c) and 78 of PAIA.

11. POPIA Guide: Processing of Personal Information by FSP Business 4.0

POPIA provides for minimum protection principles for the lawful processing of Personal Information. This section sets out how FSP Business 4.0 processes Personal Information as a Responsible Party.

11.1 Definitions

Term	Definition
Data Subject	The person to whom the personal information relates.
Responsible Party	The entity which determines the purpose of and means for processing personal information. FSP Business 4.0 is the Responsible Party.
Operator	A person who processes personal information for a Responsible Party under a contract or mandate, without coming under the direct authority of that party (e.g. hosting providers, digital tools, AI platforms).
Personal Information	Information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA section 1.
Special Personal Information	Includes religious or political beliefs, race or ethnic origin, trade union membership, health, sexual life, biometric information, and criminal behaviour (POPIA sections 26–33).

Processing	Any operation concerning personal information, including collection, receipt, recording, storage, updating, modification, retrieval, use, dissemination, merging, linking, restriction, erasure, or destruction.
Consent	Any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.
Direct Marketing	The use of personal information for the purposes of direct marketing by means of any form of electronic communication.

11.2 The 8 Protection Principles

FSP Business 4.0 is a Responsible Party in terms of POPIA and has implemented data protection policies and procedures for the protection of all Personal Information. The application of the 8 Protection Principles is set out below:

11.2.1 Accountability

The governing body has appointed an Information Officer and Deputy Information Officer who are responsible for implementing and overseeing POPIA compliance. The Company audits the processes used to collect, record, store, disseminate, and destroy Personal Information, takes steps to prevent information being lost, damaged, or unlawfully accessed, and ensures that staff are properly trained on a regular basis.

11.2.2 Processing Limitation

Personal Information may only be processed lawfully, in a manner that does not infringe the privacy of the Data Subject, where it is adequate, relevant and not excessive given the purpose, and where consent was obtained or processing is otherwise necessary. Consent must be voluntary and specific.

11.2.3 Purpose Specification

The Company defines the purpose of Personal Information gathering clearly, collects only the necessary information, indicates that it is collected for a specific, explicitly defined and lawful purpose, and is clear to whom information is transferred. Personal information is destroyed, deleted, or de-identified when the purpose has been achieved, subject to other legislative retention requirements (e.g. FAIS and FICA 5-year requirements).

11.2.4 Further Processing Limitation

Once the Company has identified and obtained consent for specific purposes, Personal Information cannot be processed contrary to the purpose for which it was collected. Further processing must be compatible with the original purpose, otherwise further consent must be obtained.

11.2.5 Information Quality

The Company takes reasonably practicable steps to ensure that Personal Information is complete, accurate, and updated.

11.2.6 Openness

The Company processes Personal Information in a fair and transparent manner. Data Subjects are notified that their information is being processed, together with the purpose and source of the information. This PAIA/POPIA Manual, privacy notices, and the Company's website provide the required transparency.

11.2.7 Security Safeguards

Personal Information is kept secure against the risk of loss, unauthorised access, interference, modification, destruction, or disclosure. The technical and organisational measures applied are set out in the Company's Information Security Policy, which is reviewed annually. The Company identifies all reasonably foreseeable risks, establishes and maintains appropriate safeguards, regularly verifies that safeguards are adequately implemented, and updates safeguards in response to new risks. All operators must maintain appropriate security safeguards under written agreements.

11.2.8 Data Subject Participation

Data Subjects may request access to their Personal Information and/or request the correction or deletion of any information held. Data Subjects may also request that inaccurate, misleading, or outdated information be updated and have the right to know the identity of third parties that have had access to their information.

11.3 Processing of Personal Information Within FSP Business 4.0

Category	Details
Purpose of processing	Delivering the FSP Business 4.0 platform, digital tools, assessments, and dashboards to financial advisers and FSPs Conducting COFI readiness assessments, gap analyses, and implementation roadmaps Administering workshops, masterclasses, coaching sessions, and live events Delivering CPD-accredited courses and tracking professional development (via PROpulsion) Conducting competency assessments, Fit & Proper tracking, and skills verification (via Skilzly) Providing trust and ethics training and behavioural assessments (via Trusted Advisor) Conducting industry benchmarking, surveys, and research (aggregated/anonymised) Managing client/subscriber relationships, subscription billing, and platform access Gamified learning, progress tracking, and analytics dashboards Marketing and communication of services, newsletters, and industry insights Supporting and managing employees and contractors Compliance with legal and regulatory obligations Purposes expressly agreed or authorised by the client or subscriber
Data Subject categories	FSP owners, principals, and key individuals Financial advisers and representatives Compliance officers and operations staff Subscribers and prospective clients Workshop, masterclass, and event attendees CPD learners and course participants Competency assessment candidates Employees and contractors of FSP Business 4.0 and partner companies Business partners, suppliers, and service providers Website users and platform visitors Podcast listeners and webinar participants

Types of information processed	Personal details (name, ID number, contact information) Professional information (FSP licence number, FSCA registration, qualifications, CPD records) Business information (FSP name, business structure, staff numbers) Assessment responses, diagnostic data, COFI readiness scores, and benchmarking outputs Competency assessment results and Fit & Proper status Workshop attendance and event participation records Course completion, CPD points, and learning progress data Platform usage, engagement analytics, and gamification data Financial details (subscription payments, invoices) Employment details (contracts, payroll, performance) Communications, correspondence, and support tickets
Special Personal Information	FSP Business 4.0 does not intentionally collect, process, or store special personal information as defined in POPIA sections 26–33.
Who information may be shared with	Employees and authorised representatives of FSP Business 4.0 Partner companies within the ecosystem (Trusted Advisor, PROpulsion, Skilzly) where necessary to deliver integrated services, subject to data processing agreements Professional advisers (legal, compliance, accounting, audit) Technology and hosting providers AI platform providers (subject to enhanced data protection controls) Email marketing, CRM, and learning management platforms Payment and subscription management providers Regulatory authorities where legally required Industry bodies and benchmarking partners (anonymised/aggregated data only) Event and workshop co-hosts where relevant
Cross-border transfers	Personal information may be processed outside South Africa where cloud hosting or third-party operator services involve data centres in other jurisdictions. In all cases, compliance with POPIA section 72 is ensured through adequate protection in the recipient country, binding agreements, data subject consent, or contractual necessity.
Information security measures	Access controls and role-based permissions across all platform modules Multi-factor authentication where available Each subscriber must create a unique login and may enable multi-factor authentication (MFA), where available, to enhance account security. Encryption of data in transit (TLS/SSL) and at rest Secure cloud hosting with reputable, certified providers Regular backup with tested restoration procedures Endpoint protection, firewall, and patching Platform audit trails and user activity logging Secure API integrations between partner systems Password policies enforced at platform level Incident detection, logging, and response procedures Clear desk and clear screen policies for office-based operations

11.4 Operator Responsibilities

FSP Business 4.0 acts as a Responsible Party in respect of the Personal Information of its subscribers, authorised users, employees, contractors and prospective customers. It does not act as an Operator on behalf of its subscribers, because the ecosystem does not require, request or store the Personal Information of a subscriber's own clients. Should that position change, an operator agreement complying with sections 20 and 21 of POPIA will be concluded before any such processing begins. This section concerns operators engaged by the Company. FSP Business 4.0 uses third-party operators including hosting providers, digital tools, AI platforms, and professional advisers. All operators must process information under written agreements detailing:

- The legitimate grounds for collecting and processing personal data;
- The lawful purpose and limitations on processing;
- Data minimisation requirements;
- Retention periods and destruction procedures;
- Data subject rights and request handling;
- Security measures to prevent unauthorised access, loss, or destruction; and
- Breach notification obligations.

A full Operator / Third-Party Register is maintained internally as part of the POPIA Master Register.

11.5 Direct Marketing

Direct marketing is only conducted where the data subject has given prior consent or is an existing client and the marketing relates to similar products or services. The Company may only approach a person for consent once and only if they have not previously withheld consent. Every marketing communication includes the identity of the sender and a mechanism to opt out.

12. Rights of Data Subjects Under POPIA

FSP Business 4.0 is committed to giving full effect to the rights conferred on data subjects by POPIA:

Right	Description
Right of Access (s23)	Data subjects may request confirmation of whether the Company holds personal information about them, and request access to that information.
Right to Correction or Deletion (s24)	Data subjects may request correction of inaccurate information or deletion of personal information where the Company is no longer authorised to retain it.
Right to Object (s11(3))	Data subjects may object, on reasonable grounds, to the processing of their personal information.
Right to Object to Direct Marketing (s69)	Data subjects may object to the processing of personal information for purposes of direct marketing by unsolicited electronic communications.
Right to Complain (s74)	Data subjects may submit a complaint to the Information Regulator regarding an alleged infringement, and may institute civil proceedings.
Right to Be Informed (s18)	Data subjects have the right to be notified that their personal information is being collected, the purpose of collection, and in the event of a security compromise.
Right Regarding Automated Processing (s71)	Data subjects have the right not to be subject to a decision based solely on automated processing that significantly affects them, unless appropriate measures are in place.

To exercise any right, data subjects should contact the Information Officer at anton@fsp40.com or the Deputy IO at rochelle@fsp40.com. Prescribed forms are attached as Appendices 5, 6, and 7.

12.1 Objection to Processing

A person who wishes to object to the processing of Personal Information in terms of section 11(1)(d) to (f) of POPIA must complete, sign, and submit to the Information Officer the Form in Appendix 6. Affidavits or other documentary proof may be submitted in support of the objection.

12.2 Request for Correction or Deletion

A person who wishes to request correction, deletion, or destruction of Personal Information in terms of section 24 of POPIA must complete, sign, and submit to the Information Officer the Form in Appendix 7. A request for destruction may be made where the Company is no longer authorised to retain such record.

12.3 Complaints

A person may submit a complaint to the Information Regulator in the prescribed manner alleging interference with the protection of Personal Information. Contact details for the Information Regulator are provided in section 6 above.

13. Processor Accountability: Third-Party Operators

FSP Business 4.0 uses the following categories of operators:

Operator Category	Purpose & Controls
Partner Companies	Trusted Advisor, PROpulsion, and Skilzly process personal information as part of the integrated ecosystem to deliver trust training, CPD courses, and competency assessments. Subject to inter-company data processing agreements, purpose limitation, and aligned POPIA controls.
Hosting Providers	Cloud infrastructure and data storage for the FSP Business 4.0 platform. Subject to operator agreements, encryption requirements, and data residency controls.
Digital Tools & Software	CRM, email marketing, analytics, payment processing, project management, and learning management platforms. Subject to data processing agreements specifying purpose limitation, access controls, and data minimisation.
AI Platforms & Services	AI-powered analytics, content generation, assessment tools, and chatbot services. Subject to enhanced controls: prohibition on model training with client data, purpose limitation, data anonymisation where feasible, and contractual commitments on retention and deletion.
Professional Advisers	Legal, accounting, compliance, and audit service providers. Subject to professional confidentiality obligations and data processing agreements.
Event & Workshop Providers	Venue providers, webinar platforms, and event co-hosts. Limited data shared (name, email for registration). Subject to purpose limitation and deletion after event.

14. Security Incident and Breach Notification

Where reasonable grounds exist to believe that personal information has been accessed or acquired by an unauthorised person, FSP Business 4.0 will, in accordance with POPIA section 22:

- Notify the Information Regulator as soon as reasonably possible;
- Notify affected data subjects, providing details of the nature and extent of the compromise;
- Recommend protective measures; and
- Detail remedial actions taken or proposed.

All incidents are documented in the Data Breach Register (part of the POPIA Master Register). The operational detail of detection, containment, escalation, evidence preservation and notification, including the content requirements in section 22(5) of POPIA, is set out in the Company's Incident Response and Breach Notification Procedure.

15. Internal Registers and Compliance Records

FSP Business 4.0 maintains the following internal registers as part of its POPIA Master Register:

Register	Purpose
Processing Activities Register	Documents all categories of personal information processed, purpose, lawful basis, data subjects, retention periods, and responsible persons.
Data Breach Register	Records all security incidents and breaches, risk assessments, notifications, and remediation outcomes.
Data Subject Request Register	Logs all data subject requests (access, correction, deletion, objection) with tracking through to closure.
Third-Party / Operator Register	Records all operators, services provided, data accessed, agreement status, and review dates.
Training Register	Tracks POPIA awareness training completion for all staff.

16. Information Officer Certificate

 INFORMATION REGULATOR (SOUTH AFRICA) Ensuring protection of your personal information and effective access to information		INFORMATION OFFICER REGISTRATION CERTIFICATE Issued by the Information Regulator on 07/04/2026 at 13:54:56	
ORGANISATION DETAILS			
Organisation Name	FSP BUSINESS 4 POINT 0		
Regulator Registration Number	2026-006028		
Regulator Registration Date	2026-04-07		
Organisation Type	PRIVATE ORGANISATION		
Private Organisation Type	PRIVATE COMPANY [(PTY) LTD]		
Public Organisation Type			
INFORMATION OFFICER DETAILS			
Full Name	Type	Appointment Date	
SWANEPOEL, ANTON BOSMAN	Information Officer	2026-03-02	
MYLIE, ROCHELLE	Deputy Information Officer	2026-03-02	
		 Mr. M Mosala Chief Executive Officer: Information Regulator	
Adv. FDP Tlakula (Chairperson), Adv. LC Stroom (Full-time Member), Ms. AR Tilley (Part-time Member), Mr. MV Gwala (Part-time Member), Mr. M Mosala (Chief Executive Officer)			

17. Availability and Updates

This PAIA & POPIA Manual is available on the Company's website at www.fsp40.com, on request from the Information Officer, and at the Company's offices during normal business hours. This Manual will be reviewed and updated at least annually, or upon material changes in legislation, business operations, or regulatory guidance. It forms part of the Company's governance document set and is read with the Privacy Policy, the Data Flow and Retention Statement, the Information Security Policy, the Incident Response and Breach Notification Procedure, the Business Continuity and Disaster Recovery Plan, and the POPIA Registers.

Issued by:

Anton Swanepoel – Information Officer

FSP Business Four Point 0 (Pty) Ltd



Signature: **Date: 2 October 2026**

APPENDIX 1: DEFINITIONS AND ABBREVIATIONS

The following definitions and abbreviations apply throughout this PAIA and POPIA Manual.

Definitions

Term	Definition
Company / FSP Business 4.0	FSP Business Four Point 0 (Pty) Ltd, Registration Number 2025/968743/07, located at Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081.
Data Subject	The natural or juristic person to whom the personal information relates, as defined in section 1 of POPIA.
Responsible Party	The person or entity that, alone or in conjunction with others, determines the purpose of and means for processing personal information. FSP Business 4.0 is the Responsible Party for all personal information processed under this Manual.
Operator	A person who processes personal information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party (POPIA section 1).
Personal Information	Information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, as defined in section 1 of POPIA.
Special Personal Information	Personal information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric information, or criminal behaviour (POPIA sections 26 to 33).
Processing	Any operation or activity concerning personal information, whether automatic or not, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination, merging, linking, restriction, degradation, erasure, or destruction.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
Direct Marketing	Approaching a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services, or requesting the data subject to make a donation (POPIA section 1).
Record	Any recorded information, regardless of form or medium, in the possession or under the control of the Company, whether or not the Company created it.
Requester	A person making a request for access to a record in terms of section 50 of PAIA. May be a Personal Requester (seeking own information) or an Other Requester.
Information Regulator	The Information Regulator (South Africa) established in terms of section 39 of POPIA, located at JD House, 27 Stiemens Street, Braamfontein, Johannesburg.
Information Officer (IO)	The head of a private body or any person duly authorised by the head, responsible for compliance with POPIA and PAIA. For FSP Business 4.0, this is Anton Swanepoel.

Deputy Information Officer	A person designated in writing by the Information Officer to assist with the duties under PAIA and POPIA. For FSP Business 4.0, this is Roch�lle Mylie.
Personal Information Breach	Any incident that compromises the confidentiality, integrity, or availability of personal information, including unauthorised access, loss, theft, or accidental disclosure.
Cross-Border Transfer	The transfer of personal information by the Company to a third party in a foreign country, governed by section 72 of POPIA.
PAIA Master Register	The internal workbook maintained by the Information Officer recording processing activities, data breaches, data subject requests, third parties, training, consent, PAIA requests, risks, information assets, and the annual review.

Abbreviations

Abbreviation	Meaning
AI	Artificial Intelligence
COFI	Conduct of Financial Institutions (Bill)
CPD	Continuing Professional Development
CRM	Customer Relationship Management
DIO	Deputy Information Officer
DPA	Data Processing Agreement
ECTA	Electronic Communications and Transactions Act 25 of 2002
FAIS	Financial Advisory and Intermediary Services Act 37 of 2002
FICA	Financial Intelligence Centre Act 38 of 2001
FSCA	Financial Sector Conduct Authority
FSP	Financial Services Provider
IO	Information Officer
IT	Information Technology
MFA	Multi-Factor Authentication
MOI	Memorandum of Incorporation
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013
RoPA	Record of Processing Activities
SAHRC	South African Human Rights Commission
SLA	Service Level Agreement
SOC 2	Service Organization Control Type 2
TLS	Transport Layer Security

APPENDIX 2: SUBMISSION OF COMPLAINT TO THE INFORMATION REGULATOR

(POPIA Regulation 7 — Form 5)

This form is used by a data subject to lodge a complaint with the Information Regulator alleging interference with the protection of personal information by FSP Business 4.0 (Pty) Ltd or any operator processing personal information on its behalf, in terms of section 74 of POPIA.

The completed form should be submitted to the Information Regulator at:

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email (POPIA complaints): POPIAComplaints@inforegulator.org.za

Telephone: +27 (0)10 023 5207

Website: <https://inforegulator.org.za>

1. PARTICULARS OF COMPLAINANT (DATA SUBJECT)

Full names and surname: _____

Identity / Passport / Registration number: _____

Residential or postal address: _____

Telephone: _____ Email: _____

Preferred manner of correspondence: ☐ Email ☐ Postal ☐ Telephone

2. PARTICULARS OF PERSON ACTING ON BEHALF OF THE COMPLAINANT (if applicable)

Only complete this section if a person other than the data subject is submitting the complaint on their behalf. Proof of authorisation must be attached.

Full names and surname: _____

Capacity in which acting: _____

Contact details: _____

Proof of authorisation attached: ☐ Yes ☐ No

3. PARTICULARS OF RESPONSIBLE PARTY OR OPERATOR COMPLAINED OF

Name of Responsible Party / Operator: FSP Business Four Point 0 (Pty) Ltd

Address: Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081

Contact details: anton@fsp40.com | www.fsp40.com

4. NATURE OF THE COMPLAINT

Briefly describe the nature of the alleged interference with the protection of personal information. Indicate which of the eight conditions for lawful processing under POPIA is alleged to have been infringed, where known.

5. PARTICULARS OF FACTS GIVING RISE TO COMPLAINT

Provide a chronological account of the relevant facts, including dates, the personal information involved, and any correspondence with the Responsible Party.

6. EARLIER STEPS TAKEN

Have you raised the complaint directly with FSP Business 4.0 first? ☐ Yes ☐ No

If yes, please provide the date and the outcome:

7. RELIEF SOUGHT

State the outcome you are seeking from the Information Regulator.

8. SUPPORTING DOCUMENTATION

Attach copies of any correspondence, records, or supporting documents relevant to the complaint. Tick to indicate which are attached:

☐ Copy of complainant's identity document

☐ Correspondence with the Responsible Party

☐ Copies of the personal information at issue (where appropriate)

☐ Affidavit in support of complaint

☐ Other (specify): _____

9. DECLARATION

I, the undersigned, declare that the information furnished in this complaint is true and correct to the best of my knowledge and belief.

Signed at _____ on this _____ day of _____ 20____

Signature of Complainant / Authorised Person: _____

Full name (printed):

Note:

Section 74 of POPIA provides that any person may submit a complaint to the Information Regulator in the prescribed manner and form alleging interference with the protection of personal information of a data subject. The Information Regulator will, on receipt of a complaint, conduct a pre-investigation and may refer the matter for assessment, investigation, mediation, or enforcement.

APPENDIX 3: PRESCRIBED FEES

The following Fees are payable in respect of Private Bodies (other than personal requests) in terms of Part III of the PAIA Regulations:

Item	Amount
Upfront request fee (Regulation 11(2))	R140.00
Photocopy/printed copy per A4 page	R2.00
Printed copy from computer per A4 page	R2.00
Copy on flash drive (provided by requester)	R40.00
Copy on compact disc (provided to requester)	R60.00
Transcription of audio record per A4 page	R24.00
Search and preparation per hour (after first hour)	R145.00
Deposit (if search exceeds 6 hours)	One third of total
Postage, email, or electronic transfer	Actual costs

Note: No fee is payable for access to a requester's own personal information.

APPENDIX 4: REQUEST FOR ACCESS TO RECORD (Form 2)

(Regulation 7)

The following must be submitted with the completed form: (1) Proof of payment of fees (if applicable); (2) Certified copy of the Requester's identity document; (3) Supporting documentation (if applicable).

TO: The Information Officer, FSP Business Four Point 0 (Pty) Ltd

Email: Anton@fsp40.com

1. PARTICULARS OF PERSON REQUESTING ACCESS TO INFORMATION

Full Names & Surname: _____

Identity Number: _____ Cell phone: _____

Email address: _____

Postal address: _____

2. PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE

Only complete this section if a request is made on behalf of another person.

Full Names & Surname / Legal entity name: _____

Identification / Registration no: _____

Proof of authorisation attached: ☐ Yes ☐ No

3. PARTICULARS OF REQUESTED INFORMATION

Description of record: _____

Reference number (if available): _____

4. FORMAT IN WHICH INFORMATION IS REQUESTED

☐ Printed copy ☐ Electronic copy ☐ Other (specify): _____

5. RIGHT TO BE EXERCISED OR PROTECTED

What right is to be protected: _____

Why the information is required: _____

6. NOTICE OF APPROVAL / REJECTION

You will be notified via email whether your request has been approved or denied.

If you wish to be informed in another manner, please specify:

Signed at _____ this _____ day of _____ 20____

Name: _____ Signature: _____

APPENDIX 5: POPIA EXCLUSIONS

POPIA protection does not apply to the processing of personal information:

- In the course of a purely personal or household activity;
- That has been de-identified to the extent that it cannot be re-identified;
- By or on behalf of a public body involving national security, defence, or public safety;
- For the prevention, detection, investigation, or prosecution of offences;
- By the Cabinet and its committees or the Executive Council of a province; or
- Relating to the judicial functions of a court.

Data Subject consent is not required in instances where it would prejudice a lawful purpose or the information is publicly available.

APPENDIX 6: OBJECTION TO PROCESSING OF PERSONAL INFORMATION

(Section 11(1)(d) to (f) of POPIA)

The following must be submitted: (1) Certified copy of the Requester's identity document; (2) Affidavit and supporting documentation (if applicable).

1. DETAILS OF DATA SUBJECT

Name(s) and surname / registered name:

Unique Identifier / Identity Number:

Residential, postal or business address:

Contact number(s):

Email address:

2. DETAILS OF RESPONSIBLE PARTY

Name: FSP Business Four Point 0 (Pty) Ltd

Address: Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081

Email: Anton@fsp40.com

3. REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)

(Please provide detailed reasons for the objection)

Signed at _____ this _____ day of _____ 20____

Signature of Data Subject / Designated Person: _____

APPENDIX 7: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

(Section 24 of POPIA)

The following must be submitted: (1) Certified copy of the Requester's identity document; (2) Affidavit and supporting documentation (if applicable).

Mark the applicable request with an "X":

☐ Request for CORRECTION of personal information

☐ Request for DELETION of personal information

☐ Request for DESTRUCTION of record of personal information

1. DETAILS OF DATA SUBJECT

Name(s) and surname / registered name:

Unique Identifier / Identity Number:

Residential, postal or business address:

Contact number(s): _____

Email address: _____

2. DETAILS OF RESPONSIBLE PARTY

Name: FSP Business Four Point 0 (Pty) Ltd

Address: Unit 6, Kings Place, 447 Kings Highway, Lynnwood, 0081

Email: Anton@fsp40.com

3. REASONS FOR REQUEST

(1) Correction or deletion of Personal Information in terms of Section 24(1)(a) of POPIA; or

(2) Destruction or deletion of a record where the Responsible Party is no longer authorised to retain it in terms of Section 24(1)(b) of POPIA.

Signed at _____ this _____ day of _____ 20____

Signature of Data Subject / Designated Person: _____