

PAIA MANUAL

FSP Business Four Point 0 (Pty) Ltd

Registration Number: 2025/968743/07

Prepared in accordance with Section 51 of the

Promotion of Access to Information Act 2 of 2000 (as amended)

Date of Compilation: January 2025

Last Updated: February 2026

1. Introduction

The Promotion of Access to Information Act, 2 of 2000 (“PAIA”) gives effect to the constitutional right of access to information contained in section 32 of the Constitution of the Republic of South Africa.

This PAIA Manual has been compiled to:

- Provide information on the records held by FSP Business Four Point 0 (Pty) Ltd
- Outline the procedure to request access to records
- Comply with the requirements of PAIA and the Protection of Personal Information Act 4 of 2013 (“POPIA”)
- Provide guidance on how FSP Business 4.0 processes personal information

2. Definitions

For purposes of this Manual:

- “Act” means the Promotion of Access to Information Act 2 of 2000
- “Company”, “we”, “us” means FSP Business Four Point 0 (Pty) Ltd
- “Data Subject” means the person to whom the personal information relates
- “Information Officer” means the person designated in terms of PAIA and POPIA
- “Personal Information” means information relating to an identifiable, living, natural person or juristic person
- “Record” means any recorded information, regardless of form or medium
- “Requester” means any person requesting access to a record
- “Responsible Party” means the entity which determines the purpose of and means for processing personal information

3. Purpose of PAIA Manual

This PAIA Manual is compiled in terms of section 51 of PAIA. The Act requires private bodies to compile a manual as a guide to requesters of information.

This Manual is intended to assist the public to:

- Check the categories of records held by FSP Business 4.0 which are available without a formal PAIA request
- Understand how to make a request for access to a record by providing a description of the subjects on which FSP Business 4.0 holds records and the categories of records held on each subject
- Know the description of records available in accordance with other legislation
- Access the relevant contact details of the Information Officer and Deputy Information Officer
- Understand the guide on how to use PAIA, as updated by the Information Regulator
- Know whether FSP Business 4.0 processes personal information, the purpose of such processing, and the categories of data subjects and information involved
- Know the recipients or categories of recipients to whom personal information may be supplied
- Know whether FSP Business 4.0 has planned to transfer personal information outside the Republic of South Africa

- Know whether FSP Business 4.0 has appropriate security measures to ensure the confidentiality, integrity, and availability of personal information

4. Company Overview

Registered Name: FSP Business Four Point 0 (Pty) Ltd

Registration Number: 2025/968743/07

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

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

Nature of Business:

FSP Business 4.0 is a business management, strategy, and capability-building ecosystem designed to support financial advisers, financial services provider (FSP) owners and principals, adviser teams and staff, and compliance, operations, and leadership stakeholders.

The ecosystem provides business insights, tools, and frameworks including:

- Business diagnostics, assessments, benchmarks, and reports
- Educational content, frameworks, templates, and methodologies
- Digital platforms, tools, dashboards, and portals
- Events, workshops, courses, and communities

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

5.1 Information Officer

Name: Anton Swanepoel

Email: anton@fsp40.co.za

Contact Number: 082 453 4184

5.2 Deputy Information Officer

Name: Marius Vermeulen

Email: marius@fsp40.co.za

5.3 General Contact

Email: info@fsp40.co.za

Website: www.fsp40.co.za

6. Contact Details for the Information Regulator

Address: JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001

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.

The Information Regulator has published a Guide on how to use PAIA, which is available:

- From the Information Regulator of South Africa
- At: <https://www.justice.gov.za/infoereg/>
- In all 11 official languages and in braille

8. Categories of Records Automatically Available (Section 51(1)(c))

The following records are available without a formal PAIA request, subject to availability:

- Website content and publications
- Marketing material and brochures
- Public policies and notices
- Thought leadership articles and insights
- Public announcements and newsletters

9. Records Available in Terms of Other Legislation (Section 51(1)(d))

Records may be held in terms of, including but not limited to:

- Companies Act 71 of 2008
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Electronic Communications and Transactions Act 25 of 2002
- Financial Sector Regulation Act 9 of 2017
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Conduct of Financial Institutions Bill (COFI) (when enacted)
- Basic Conditions of Employment Act 75 of 1997
- Income Tax Act 58 of 1962
- Value Added Tax Act 89 of 1991

10. Description of Records Held (Section 51(1)(e))

The Company holds records relating to the following categories:

10.1 Corporate and Governance

- Memorandum of Incorporation
- Company registrations and statutory records

- Board and management records

10.2 Financial

- Financial statements
- Accounting and tax records
- Invoices and payment records

10.3 Clients and Stakeholders

- Client onboarding records
- Service and subscription agreements
- Communications and correspondence
- Assessment and diagnostic outputs

10.4 Operations and Technology

- Systems documentation
- Digital platform records
- Data governance documentation

10.5 Human Resources

- Employment contracts
- Personnel records
- Training and development records

10.6 Marketing and Research

- Market research (aggregated/anonymised where applicable)
- Marketing strategies and materials
- Survey and benchmarking data

Note: Inclusion of a record category does not guarantee access. Access may be refused on lawful grounds.

11. Processing of Personal Information (POPIA Alignment)

11.1 Purpose of Processing

Personal information is processed to:

- Deliver services, digital tools, assessments, and insights to financial advisers and FSPs
- Manage client and stakeholder relationships
- Conduct research, diagnostics, benchmarking, and analytics
- Communicate updates, insights, and educational content
- Comply with legal and regulatory obligations

11.2 Categories of Data Subjects

- Clients and prospective clients (FSPs, financial advisers, principals)
- Employees and contractors

- Business partners and suppliers
- Website users and participants in assessments

11.3 Categories of Personal Information

- Identifying information (name, ID number)
- Contact details (email, phone, address)
- Professional and business information (FSP licence details, qualifications)
- Assessment responses and engagement data

11.4 Special Personal Information

FSP Business 4.0 does not collect, process, or store special personal information as defined in sections 26 to 33 of POPIA, including information relating to race, ethnic origin, health, sex life, religious beliefs, political persuasion, trade union membership, biometric information, or criminal behaviour.

11.5 Recipients of Personal Information

- Employees and authorised representatives
- Professional advisers (legal, compliance, accounting)
- Technology and hosting providers
- Regulators where legally required

11.6 Cross-Border Transfers

Where applicable, personal information may be processed outside South Africa (for example, where our cloud hosting or third-party operator services involve data centres in other jurisdictions, including the European Union). In all cases, we ensure compliance with section 72 of POPIA by confirming that the recipient country provides an adequate level of protection or that appropriate contractual safeguards (including operator agreements) are in place.

11.7 Security Measures

Reasonable technical and organisational measures are implemented to protect confidentiality, integrity, and availability of personal information, including access controls, encryption where appropriate, secure hosting environments, and internal governance policies.

12. Request Procedure for Access to Records

12.1 Request Submission

Requests must be made in writing using the prescribed Form 2 (attached as Annexure A) and submitted to the Information Officer via email at anton@fspbusiness.co.za.

The request must:

- Identify the record requested with sufficient detail
- State the right being exercised or protected
- Explain why the record is required for the exercise or protection of that right
- Include proof of identity

12.2 Request Fees

- A prescribed request fee may apply
- No fee is payable for access to a requester's own personal information
- Access and reproduction fees may apply as per Annexure B

Fees will be communicated prior to processing.

12.3 Response Time

Requests will be processed within 30 days, unless an extension is permitted by law.

13. Grounds for Refusal

Access may be refused in accordance with Chapter 4 of PAIA, including where:

- Disclosure would unreasonably infringe privacy
- Commercially sensitive or confidential information is involved
- Legal privilege applies
- Disclosure is prohibited by law
- The request is frivolous or vexatious
- Research information would be prejudiced

14. Remedies Available

If a request is refused, the requester may within 180 days of notification:

- Lodge a complaint with the Information Regulator
- Apply to a court for appropriate relief as provided for in sections 56(3)(c) and 78 of PAIA

15. Objection to Processing of Personal Information

A data subject 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 contained in Annexure C.

16. Request for Correction or Deletion of Personal Information

A data subject who wishes to submit a request to rectify, delete, or destroy personal information in terms of section 24 of POPIA must complete, sign, and submit to the Information Officer the Form contained in Annexure D.

17. Availability of This Manual

This PAIA Manual is available:

- On the Company's website at www.fspbusiness.co.za
- On request from the Information Officer
- At the offices of the Company for inspection during normal business hours

18. Updates to This Manual

This Manual will be reviewed and updated as required to ensure ongoing compliance with PAIA and POPIA.

Issued by:

Anton Swanepoel

Information Officer

FSP Business Four Point 0 (Pty) Ltd

Signature: _____

Date: _____

ANNEXURE A

FORM 2: REQUEST FOR ACCESS TO RECORD

(Regulation 7)

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests are made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The Information Officer

FSP Business Four Point 0 (Pty) Ltd

Email: anton@fspbusiness.co.za

PERSONAL INFORMATION OF REQUESTER

Full Names: _____

Identity Number: _____

Postal Address: _____

Street Address: _____

Email Address: _____

Contact Numbers: _____

PARTICULARS OF RECORD REQUESTED

Description of record: _____

Reference number (if available): _____

RIGHT TO BE EXERCISED OR PROTECTED

Indicate which right is to be exercised or protected:

Explain why the record is required:

Signed at _____ this _____ day of _____ 20____

Signature of Requester

ANNEXURE B – PRESCRIBED FEES

Item	Amount
Initial request fee	R140.00
Photocopy/printed copy per A4 page	R2.00
Copy on flash drive (provided by requestor)	R40.00
Copy on compact disc (provided to requestor)	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, e-mail or electronic transfer	Actual costs

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

ANNEXURE C

OBJECTION TO PROCESSING OF PERSONAL INFORMATION

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

NOTE: Proof of identity and supporting documentation must be attached.

DETAILS OF DATA SUBJECT

Full Names: _____

Identity Number: _____

Contact Details: _____

REASONS FOR OBJECTION

Signed at _____ this _____ day of _____ 20____

Signature of Data Subject

ANNEXURE D

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

(Section 24 of POPIA)

NOTE: Proof of identity and supporting documentation must be attached.

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

DETAILS OF DATA SUBJECT

Full Names: _____

Identity Number: _____

Contact Details: _____

REASONS FOR REQUEST

Signed at _____ this _____ day of _____ 20____

Signature of Data Subject