

IGROW GROUP OF COMPANIES

(LOGO)

# **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 | <b>“CEO”</b>       | Chief Executive Officer  |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer;  |
| 1.3 | <b>“IO“</b>        | Information Officer;   |
| 1.4 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                     |
| 1.5 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000( as Amended); |
| 1.6 | <b>“POPIA”</b>     | Protection of Personal Information Act No.4 of 2013;               |
| 1.7 | <b>“Regulator”</b> | Information Regulator; and   |
| 1.8 | <b>“Republic”</b>  | 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 IGROW GROUP OF COMPANIES**

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

Name: Melissa Erasmus  
Tel: 021 979 2501  
Email: melissa@igrow.co.za

Deputy Information Officer

Name: Johan van Vuuren  
Tel: 021 979 2501  
Email: johan@igrow.co.za

3.3 Access to information general contacts

Email: info@igrow.co.za

3.4 **Head Office**

Physical Address: 38 Oxford Street, Durbanville, Cape Town, 7550.

Telephone: 021 979 2501

Email: info@igrow.co.za

Website: www.igrow.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

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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.*

- 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 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.

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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. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

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

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 FINAINCAL SERVICES PROVIDER WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

Category of records	Available on Website	Available upon request
Wealth Plan clients		X
PAIA Manual	X	
Privacy Policy	X	
Company Contact Details and Office Locations	X	X
Newsletters and Articles	X	X
Reservation Application Agreements	X	X

**6. DESCRIPTION OF THE RECORDS OF IGROW GROUP OF COMPANIES WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Category of Records	Applicable Legislation
Company registration documents, director records, and statutory filings	Companies Act 71 of 2008

PAIA Manual	Promotion of Access to Information Act 2 of 2000
Client identification and verification records (KYC), risk ratings, and transaction records	Financial Intelligence Centre Act 38 of 2001 (FICA)
Risk management and compliance records	Financial Sector Regulation Act 9 of 2017 and FICA
Records of advice, client needs analyses, financial plans, and disclosures	Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS)
Tax records, VAT submissions, and financial statements	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY IGROW GROUP OF COMPANIES**

IGrow Group of Companies maintains records on various operational, administrative, and regulatory subjects. The categories of records held under each subject are set out below:

Subjects on which the body holds records	Categories of records
Finance	Accounting records, invoices, bank statements, financial statements, tax returns, budgets
Human Resources (HR)	Employment contracts, personnel files, payroll records, leave records, disciplinary records, performance reviews
Information Technology (IT)	System access records, user permissions, system logs, data backups, IT policies and procedures

Subjects on which the body holds records	Categories of records
Legal	Contracts, agreements, legal opinions, litigation records, internal policies (e.g. Privacy Policy, PAIA Manual)
Compliance	Company's Risk Management and Compliance Programme(s), risk ratings, reporting history.
Legal Team: Trusts	Company registration documents, shareholder records, director records, board resolutions, statutory filings
Digital	Marketing material, campaign records, client communications, website content, social media records

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

IGrow Group of Companies processes personal information for purposes that are necessary to conduct its business activities, comply with legal and regulatory obligations, and provide services to clients.

Personal information may be processed for the following purposes:

- To provide financial services and related intermediary services to clients
- To verify client identity in terms of the Financial Intelligence Centre Act (FICA)
- To comply with regulatory obligations under applicable legislation, including FAIS, POPIA, and other financial sector laws
- To conclude and manage contracts and mandates with clients, service providers, and third parties
- To assess client needs and provide suitable financial advice and/or services
- To process transactions, instructions, and service requests
- To manage client relationships and maintain accurate client records
- To conduct risk assessments and internal compliance monitoring
- To perform internal business administration, including finance, auditing, and reporting functions
- To manage employment relationships (where applicable), including HR and payroll functions

- To respond to legal requests, complaints, or dispute resolution processes
- To maintain security of systems, data, and business operations

IGrow Group of Companies ensures that personal information is processed lawfully, fairly, and transparently in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

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

IGrow Group of Companies processes personal information relating to the following categories of data subjects:

Categories of Data Subjects	Personal Information that may be processed
Clients (Individuals)	Full name, identity number, contact details, physical and postal address, banking details, employment details, income information, FICA documents, financial information
Clients (Legal Entities)	Registered entity name, registration number, tax information, contact persons' details, authorised signatories, banking details, financial information, FICA documentation for directors/beneficial owners
Directors / Shareholders / Beneficial Owners	Full names, identity/passport numbers, contact details, residential addresses, ownership structure, FICA verification documents, politically exposed person (PEP) status (where applicable)
Employees	Identity and contact details, employment contracts, banking details, tax numbers, payroll information, performance records, disciplinary records, leave records
Service Providers / Suppliers	Company registration details, contact persons, banking details, tax information, contractual agreements, service history

Categories of Data Subjects	Personal Information that may be processed
Regulators and Authorities (where applicable)	Correspondence records, compliance submissions, reports, and requested documentation in terms of applicable legislation

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

IGrow Group of Companies may disclose personal information to the following categories of recipients, where such disclosure is necessary for business operations, legal compliance, or the provision of services:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Regulatory Authorities and Government Bodies	Including, but not limited to, the Financial Intelligence Centre (FIC), Financial Sector Conduct Authority (FSCA), South African Revenue Service (SARS), and other statutory or regulatory bodies as required by law.
External Auditors and Compliance Officers	Independent auditors, compliance consultants, and other assurance providers appointed to review or assess regulatory and operational compliance.
Financial Institutions and Payment Service Providers	Banks and other financial institutions for the purpose of processing payments, verifying banking details, and facilitating transactions.
Service Providers and Third-Party Contractors	Including IT service providers, cloud storage providers, software platforms, administrative support services, and other outsourced service

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	providers engaged by the Financial Services Provider.
Professional Advisors	Legal advisors, consultants, accountants, and other professional service providers where disclosure is required for advisory, compliance, or dispute resolution purposes.
Employees and Authorised Representatives	Internal staff members and authorised agents who require access to personal information for legitimate business purposes.
Insurance Providers (where applicable)	For the administration of insurance policies, claims handling, and related risk management purposes.
Law Enforcement Agencies and Courts	Where disclosure is required in terms of applicable legislation, court orders, or legal processes.

IGrow Group of Companies ensures that all third parties receiving personal information are subject to appropriate confidentiality and data protection obligations.

#### 8.4 Planned transborder flows of personal information

IGrow Group of Companies may, from time to time, transfer personal information across the borders of the Republic of South Africa for purposes of storage, processing, or service delivery.

Such transborder flows of personal information may occur in the following circumstances:

1. Cloud-based storage and software systems

Personal information may be stored or processed using cloud service providers whose servers may be located outside the Republic of South Africa. This may include jurisdictions such as:

- a. United States of America
- b. European Union (various member states)
- c. United Kingdom

2. Categories of personal information that may be transferred include:

- a. Client identification and KYC/FICA information
- b. Contact details and correspondence
- c. Financial and transactional records
- d. Contractual and mandate information
- e. Employee and supplier records (where applicable)

IGrow Group of Companies will ensure that any cross-border transfer of personal information is conducted in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 (POPIA), and that appropriate safeguards are in place to ensure that the recipient of the information is subject to a law, binding corporate rules, or agreement that provides an adequate level of protection.

**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**

IGrow Group of Companies implements appropriate technical and organisational security measures to protect personal information against loss, damage, unauthorised access, disclosure, alteration, or destruction.

These measures include, but are not limited to, the following:

**1. Access Control Measures**

Access to personal information is restricted to authorised personnel only, based on job roles and the principle of least privilege. User access is monitored and regularly reviewed.

**2. Password and Authentication Controls**

Strong password policies are enforced, including complexity requirements, regular password updates, and where applicable, multi-factor authentication (MFA).

**3. Data Encryption**

Personal information is encrypted during transmission and, where applicable, when stored electronically, to prevent unauthorised access.

4. **Anti-Virus and Anti-Malware Protection**

Systems are protected by updated anti-virus and anti-malware software to detect, prevent, and remove malicious software.

5. **Firewall and Network Security**

Firewalls and secure network configurations are implemented to protect against unauthorised access and cyber threats.

6. **Secure Storage of Physical Records**

Physical documents containing personal information are stored in secure locations with restricted access control.

7. **Data Backup and Recovery Procedures**

Regular data backups are performed to ensure availability and recovery in the event of system failure or data loss.

8. **Staff Training and Awareness**

Employees receive ongoing training on data protection, POPIA requirements, and cybersecurity awareness to minimise human-related risks.

9. **Monitoring and Incident Management**

Systems are monitored for suspicious activity, and a data breach response procedure is in place to ensure prompt action in the event of a security incident.

10. **Third-Party Security Controls**

Where third-party service providers are used, reasonable steps are taken to ensure that they implement adequate security safeguards consistent with POPIA requirements.

IGrow Group of Companies continuously reviews and updates its security measures to ensure ongoing protection of personal information in line with evolving risks and industry standards.

**9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

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

9.1.2 head office of the financial services provider for public inspection during normal business hours;

9.1.3 to any person upon request (Form 2) and upon the payment of a reasonable prescribed fee (Form 3); 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

IGrow Group of Companies' Chief Executive Officer will on a regular basis update this manual alongside the Chief Information Officer and Deputy Information Officer.

*Issued by*

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*Melissa Erasmus (Chief Information Officer)*

*Johan van Vuuren (Deputy Information Officer)*

*Jacques Fouché (Chief Executive Officer)*