Luz Financial Services (Pty) Ltd
Reg: 2025/735987/07
Authorised FSP No.: 55489
Director: Thean Botha

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Table of Contents

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 **“DIR”** Director of the Company

1.2 **“KI”** Key Individual

1.3 **“DIO”** Deputy Information Officer;

1.4 **“IO“** Information Officer;

1.5 **“Minister”** Minister of Justice and Correctional Services;

1.6 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000 (as Amended;

1.7 **“POPIA”** Protection of Personal Information Act No.4 of 2013;

1.8 **“Regulator”** Information Regulator; and

1.9 **“Republic”** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a Private 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 Private Body, by providing a description of the subjects on which the Private Body holds records and the categories of records held on each subject;

2.3 know the description of the records of the Private 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 Private 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 Private 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 Private Body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

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

3.1. **Director of the Private Company**

Name:	Thean Botha
Cel:	066 215 2669
Email:	thean@luzfs.co.za

3.2. **Information Officer** *(NB: if one or more Deputy Information Officer(s) is designated, the details* of *every Deputy Information Officer of the Private Body designated in terms of section 17 (1) of PAIA, shall be added into this document. Currently there is no deputy information officer(s) designated).*

Name:	Thean Botha
Cel:	066 215 2669
Email:	thean@luzfs.co.za

3.3 Access to information general contacts

Email:	admin@luzfs.co.za

3.4 **National or Head Office**

Postal Address:	**10 Sandalwood Heights, 341 Sandalwood Dr. Newlands, Pretoria**
Physical Address:	**10 Sandalwood Heights, 341 Sandalwood Dr. Newlands, Pretoria**
Telephone:	066 215 2669
Email:	thean@luzfs.co.za
Website:	www.luzfs.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 number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of the public Private Body, and

4.3.2.2. every Deputy Information Officer (as applicable) of every Public and Private Body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a Private Body contemplated in section 11[3]; and

4.3.3.2. access to a record of a Private Body contemplated in section 50[4];

4.3.4. the assistance available from the Information Officer of a Private Body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

---

[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.*

[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.

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. an application with a court against a decision by the information officer of a Private 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[5] and 51[6] requiring a Private Body, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a Private Body, respectively;

4.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92[11].

---

[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*

[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."*

4.4. Members of the public can inspect or make copies of the Guide from the offices of the Private Body, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://inforegulator.org.za/paia/).

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

5. CATEGORIES OF RECORDS OF THE LUZ FINANCIAL SERVICES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Professional / Business Identity Information (Limited Disclosure)

Category	*Examples of Information*	*Conditions for Automatic Availability*
FSP Representatives (Public-Facing)	Name, surname, designation, contact details (business email/phone), FSCA registration status	Where published on website, business profiles, or regulatory registers
Key Individual / Directors	Name, role, professional designation	Publicly available via CIPC or FSCA
Compliance Officer	Name and contact details (business)	Regulatory requirement (FAIS transparency)

Information Already in the Public Domain

Category	Examples	Source
Regulatory registrations	FSP number, licence categories	FSCA public register
Company information	Directors, registration details	CIPC
Published content	Website profiles, marketing material	FSP website

Aggregated / De-Identified Information

Category	Examples	Condition
Statistical data	Number of clients, product distribution trends	Must not identify individuals
Risk trends	Internal reports (high-level)	Fully anonymised

6. DESCRIPTION OF THE RECORDS OF LUZ FINANCIAL SERVICES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Record / Document	Description (Summary)	Availability	Applicable Legislation / Authority
Memorandum of Incorporation (MOI)	Governing document outlining company structure, shareholder rights, director powers	Available via CIPC or on request	Companies Act
Company Registration Documents (CoR forms)	Incorporation documents, registered details, directors	Public via CIPC	Companies Act
Director Information	Names and positions of directors	Public record	Companies Act
FSP Licence Details	FSP number, licence categories, status	Public FSCA register	Financial Advisory and Intermediary Services Act
Key Individual Details	Names and approved roles	Public via FSCA	Financial Advisory and Intermediary Services Act
Representative Register (Limited)	Names of authorised representatives (not full personal data)	Public FSCA register	Financial Advisory and Intermediary Services Act
PAIA Manual	Manual describing access to information and processing practices	Must be publicly available	Promotion of Access to Information Act
Privacy Policy / POPIA Notice	Overview of how personal information is processed and protected	Public (website or on request)	Protection of Personal Information Act
Conflict of Interest Management Policy	Framework to manage and disclose conflicts	Available on request / summary disclosure to clients	Financial Advisory and Intermediary Services Act
Complaints Resolution Policy	Internal complaints handling process and escalation procedures	Provided to clients	Financial Advisory and Intermediary Services Act
FAIS Disclosure Documents (Section 13)	FSP and representative disclosures (licence, services, remuneration)	Provided to clients upfront	Financial Advisory and Intermediary Services Act
Terms of Business / Client Mandate (Generic)	Standard terms governing advisory relationship	Available to clients	Financial Advisory and Intermediary Services Act
Website Content	Services offered, contact details, general business info	Public	General business practice

Record / Document	Description (Summary)	Availability	Applicable Legislation / Authority
Marketing Material / Brochures	Non-confidential promotional information	Public	General business practice
Code of Ethics / Conduct (if published)	High-level ethical standards and governance principles	Public (if adopted)	King IV Report on Corporate Governance

Record / Document	Description (Summary)	Availability	Applicable Legislation / Authority
Broad-Based Black Economic Empowerment (B-BBEE) Certificate	Verification of B-BBEE status *(not currently applicable)*	Public or on request	Broad-Based Black Economic Empowerment Act
Employment Equity Reports (Summary)	Workforce demographic reporting (aggregated) (not currently applicable)	Available under conditions	Employment Equity Act
Financial Statements (Selective Disclosure)	High-level financial information (where applicable)	On request / stakeholder basis	Companies Act
Tax Compliance Status (TCS PIN)	SARS compliance confirmation	Shared with authorised parties	South African Revenue Service
FICA RMCP (High-Level Summary Only)	Risk management framework summary (not full document)	Limited disclosure	Financial Intelligence Centre Act
Information Officer Details	Contact details for PAIA/POPIA requests	Publicly available	Protection of Personal Information Act
Complaints Contact Details	Contact channels for lodging complaints	Public	Financial Advisory and Intermediary Services Act

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE PRIVATE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE LUZ FINANCIAL SERVICES (PTY) LTD.

Subject Area	Description of Subject	Categories of Records Held
Corporate Governance & Strategic Management	Oversight, direction, and governance of the FSP	- Memorandum of Incorporation (MOI) - Board resolutions and minutes - Strategic plans and business plans - Governance frameworks - Policies and charters - Risk appetite statements
Regulatory Compliance (FAIS / FICA / POPIA)	Compliance with financial services and data protection legislation	- Compliance monitoring plans - Compliance reports and registers - RMCP (Risk Management and Compliance Programme) - Breach and incident registers - POPIA compliance framework - PAIA Manual - Internal audit reports

Subject Area	Description of Subject	Categories of Records Held
Client Advisory & Intermediary Services	Provision of financial advice and intermediary services	- Client fact finds - Records of Advice (ROA) - Needs analysis documents - Product comparisons and quotations - Client mandates and agreements - Policy schedules and application forms
FICA / AML / CFT Compliance	Customer due diligence and financial crime prevention	- Customer Due Diligence (CDD) records - Beneficial ownership records - Risk assessments (client and business level)

Subject Area	Description of Subject	Categories of Records Held
		- Sanctions screening results - Suspicious transaction reports (STRs) - Transaction monitoring records
Finance & Accounting	Financial management and statutory reporting	- Financial statements - General ledger and journals - Invoices and receipts - Commission statements from product providers - Bank records (limited to business accounts) - Tax returns and supporting documentation
Human Resources (HR)	Management of employees and representatives	- Employment contracts - Personnel files - Payroll records - Disciplinary records - Leave records - Performance evaluations
Fit & Proper (FAIS Requirements)	Competency and regulatory compliance of representatives	- RE examination records - Qualifications and certifications - CPD records - Class of Business training records - Supervision records - Fit & Proper declarations
Information Technology & Data Management	Systems, infrastructure, and data security	- IT policies and procedures - Access control registers - System audit logs - Data backup records - Cybersecurity incident reports
Marketing & Business Development	Promotion of services and client acquisition	- Marketing materials and brochures - Website content - Client communication campaigns - Lead databases (subject to POPIA)

Subject Area	Description of Subject	Categories of Records Held
Complaints & Dispute Resolution	Handling of client complaints and regulatory disputes	- Complaints register - Complaint correspondence - Ombud submissions and outcomes - Resolution reports
Operations & Administration	Day-to-day operational support and administration	- Internal procedures and SOPs - Service provider agreements - Operational reports - Document control registers
Risk Management	Identification, assessment, and mitigation of risks	- Risk registers - Risk assessments - Incident reports - Business continuity and disaster recovery plans
Legal & Contracts	Legal obligations and contractual relationships	- Client agreements - Service level agreements (SLAs) - Outsourcing agreements - Legal opinions and correspondence

Subject Area	Description of Subject	Categories of Records Held
Procurement / Supply Chain (SCM)	Acquisition of goods and services	- Supplier agreements - Procurement records - Due diligence on suppliers - Invoices and contracts
Training & Development	Skills development and compliance training	- Training materials - Attendance registers - Competency assessments - Skills development plans

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Purpose Category	Description of Processing Activity	Legal Basis / Justification
Client Onboarding & Identification	Collection and verification of identity, contact, and demographic information to establish a client relationship	Legal obligation (FICA), contract initiation
Provision of Financial Advice	Processing financial, risk, and personal information to conduct needs analysis and provide suitable financial advice	Contractual necessity, FAIS compliance
Intermediary Services	Facilitating applications, policy placements, and product servicing with insurers and product providers	Contractual necessity

Purpose Category	Description of Processing Activity	Legal Basis / Justification
Regulatory Compliance (FAIS)	Maintaining Records of Advice, disclosures, and client interaction evidence	Legal obligation
Anti-Money Laundering & Counter-Terrorism Financing (AML/CFT)	Customer due diligence, risk profiling, sanctions screening, beneficial ownership identification	Legal obligation (FICA)
Ongoing Client Servicing	Updating client records, reviewing policies, managing amendments and renewals	Contractual necessity
Risk Profiling & Suitability Assessment	Determining client risk appetite, financial goals, and investment horizon	FAIS compliance
Complaints Handling & Dispute Resolution	Processing information to investigate and resolve complaints and Ombud matters	Legal obligation, legitimate interest
Financial Administration	Processing commission data, invoicing, and financial reconciliation (note: no client funds held)	Legitimate interest, contractual necessity
Employee & Representative Management	Processing HR, Fit & Proper, and competency-related information	Legal obligation (FAIS), employment contract
Training & Competency Development	Maintaining records of qualifications, CPD, and regulatory training	Legal obligation
Information Security & IT Management	Monitoring access, managing systems, and ensuring data security	Legal obligation (POPIA), legitimate interest

Purpose Category	Description of Processing Activity	Legal Basis / Justification
Marketing & Business Development	Communicating with prospective and existing clients regarding services (subject to consent where required)	Consent, legitimate interest
Legal & Contractual Obligations	Processing information to comply with contracts, legal proceedings, or regulatory requests	Legal obligation
Record Keeping & Audit	Retaining records for statutory periods and audit purposes	Legal obligation

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

Category of Data Subject	Description	Categories of Personal Information Processed
Clients (Individual / Natural Persons)	Individuals receiving financial advice and intermediary services	Identification details (ID/passport), contact details, demographic information, financial information (income, assets, liabilities), employment details, tax information, risk profile, policy/product information, communication records, FICA documentation, political exposure status, health information (where applicable)

Category of Data Subject	Description	Categories of Personal Information Processed
Prospective Clients / Leads	Individuals who have expressed interest but not yet onboarded	Names, contact details, basic demographic information, communication records, marketing preferences
Juristic Persons (Corporate Clients)	Companies, trusts, partnerships receiving services	Registration details, company documents, financial information, operational information, tax details
Directors / Shareholders / Beneficial Owners	Individuals linked to juristic clients	Identification details, ownership information, control structures, contact details, FICA documentation, political exposure status
Employees	Permanent and temporary staff of the FSP	Identification details, contact details, employment records, payroll information, qualifications, disciplinary records, performance records, tax information
Representatives (FAIS)	Authorised representatives rendering financial services	Identification details, qualifications, RE exam results, CPD records, class of business training, employment records, Fit & Proper declarations
Supervised Representatives	Representatives under supervision	Competency records, supervision agreements, training records, performance monitoring data
Compliance Officer / AMLCO	Internal or outsourced compliance function	Identification details, qualifications, appointment records, professional information
Service Providers / Vendors	Third parties providing services (e.g. IT, compliance, administration)	Contact persons, company details, contracts, banking details (business), due diligence information

Category of Data Subject	Description	Categories of Personal Information Processed
Product Providers (Insurers / Investment Houses)	Financial institutions facilitating products	Contact details of representatives, agreements, operational correspondence
Website Users	Individuals interacting with the FSP website	IP address, browser data, cookies, usage analytics
Complainants / Ombud Referrals	Individuals lodging complaints or disputes	Identification details, contact details, complaint details, supporting documentation, correspondence
Regulators / Authorities	FSCA, FIC, SARS, Ombud offices	Official contact details, regulatory correspondence
Referrers / Intermediaries	Individuals or entities referring business	Names, contact details, agreements, commission arrangements

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

LUZ will only disclose personal information to third parties where such disclosure is necessary to fulfil a lawful purpose, including contractual obligations, regulatory requirements, or with the consent of the data subject.

Recipient / Category of Recipient	Types of Personal Information Disclosed	Purpose of Disclosure	Legal Basis
Product Providers (Insurers, Investment Houses, Medical Schemes)	Identification details, contact details, financial information, risk profiles, health information (where applicable), application data	Underwriting, policy issuance, servicing of financial products	Contractual necessity, FAIS
Regulators – Financial Sector Conduct Authority (FSCA)	Client records, ROAs, compliance records, representative information	Regulatory supervision, inspections, enforcement	Legal obligation (FAIS)
Regulators – Financial Intelligence Centre (FIC)	CDD records, suspicious transaction reports, beneficial ownership data	AML/CFT compliance, reporting obligations	Legal obligation (FICA)
Regulators – Information Regulator South Africa	Personal information processing records, breach notifications	POPIA compliance oversight	Legal obligation (POPIA)
Ombud Schemes (e.g. FAIS Ombud)	Client files, advice records, correspondence	Dispute resolution, complaint adjudication	Legal obligation
Law Enforcement (e.g. South African Police Service)	Identification data, transactional records, communications	Investigation of criminal activity, fraud	Legal obligation
Courts / Legal Representatives	Any relevant personal information required for proceedings	Legal proceedings, dispute resolution	Legal obligation
Credit Bureaus	Identification details, financial information (limited context)	Credit assessments, risk evaluation (if applicable)	Legal obligation / consent

Recipient / Category of Recipient	Types of Personal Information Disclosed	Purpose of Disclosure	Legal Basis
Verification Agencies (e.g. ID / Qualification Verification)	Identity numbers, names, qualifications	Verification of identity, credentials, Fit & Proper compliance	Legal obligation / legitimate interest
Compliance Officers / AMLCO (Internal or Outsourced)	Full client records, employee records, compliance data	Monitoring compliance, reporting, advisory	Legal obligation
IT Service Providers / Cloud Providers	Limited personal information stored in systems	Data hosting, system maintenance, security	Legitimate interest (with safeguards)

Recipient / Category of Recipient	Types of Personal Information Disclosed	Purpose of Disclosure	Legal Basis
Auditors (Internal / External)	Financial records, client records (limited), compliance records	Audit and assurance functions	Legal obligation
Tax Authorities – South African Revenue Service (SARS)	Financial information, tax records, remuneration data	Tax compliance and reporting	Legal obligation
Employees / Representatives (Internal Use)	Client and operational data (role-based access)	Service delivery and operational execution	Contractual necessity
Service Providers (e.g. Administrators, Consultants)	Limited personal information relevant to services rendered	Outsourced functions and support services	Contractual necessity
Third-Party Referrers / Intermediaries (where applicable)	Limited client information (with consent)	Facilitating business relationships	Consent
Industry Bodies / Professional Bodies	Qualification and professional status information	Verification and compliance	Legal obligation

8.4 Planned transborder flows of personal information

LUZ may, from time to time, transfer or store personal information outside the Republic of South Africa, although has not specifically planned to do so. Such transborder flows of personal information may occur where the organisation utilises cloud-based systems, software applications, or third-party service providers whose infrastructure is located in jurisdictions outside of South Africa.

These transfers may include, but are not limited to, the storage of client, employee, and operational information on secure cloud platforms, as well as the processing of personal information by international service providers in support of business operations, compliance, and information technology services.

The organisation will only transfer personal information across borders where one or more of the following conditions are met:

- The recipient is subject to a law, binding corporate rules, or agreement that provides an adequate level of protection substantially similar to that afforded under South African data protection laws;
- The data subject has consented to the transfer;

- The transfer is necessary for the performance of a contract between the data subject and the organisation, or for the implementation of pre-contractual measures;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject; or
- The transfer is otherwise permitted in terms of applicable legislation.

LUZ implements appropriate technical and organisational safeguards to ensure that personal information remains secure and protected during such cross-border transfers.

Scenario	Type of Personal Information	Typical Location	Control Measures
Cloud storage (CRM / document management)	Client data, identification, financial profiles	EU, UK, USA	Encryption, access controls, vendor agreements
Email systems (e.g. hosted exchange)	Communication records, attachments	EU / USA	Secure authentication, data loss prevention
Compliance platforms / screening tools	Identity data, sanctions screening	Global databases	Vendor due diligence, contractual safeguards
IT support / hosting services	Limited operational and user data	Various jurisdictions	Role-based access, monitoring
Backup and disaster recovery	Full or partial datasets	Offshore secure data centres	Encrypted backups, restricted access

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

LUZ implements appropriate, reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised access, disclosure, alteration, or destruction, in accordance with applicable data protection legislation.

These safeguards are implemented through a combination of internal controls and the utilisation of secure cloud-based platforms, including Microsoft 365.

The organisation adopts a risk-based approach to information security and continuously reviews and enhances its safeguards to address emerging threats and vulnerabilities.

Technical Safeguards	
Control Area	**Description of Safeguard**
Data Encryption	Encryption of data at rest and in transit using industry-standard protocols (e.g. Microsoft 365 encryption capabilities)
Access Control	Role-based access controls (RBAC) ensuring that only authorised personnel have access to personal information

Technical Safeguards	
Control Area	**Description of Safeguard**
Multi-Factor Authentication (MFA)	Mandatory MFA for user access to systems and cloud services
Endpoint Protection	Anti-virus and anti-malware solutions deployed across all devices
Email Security	Advanced threat protection, phishing detection, spam filtering, and secure email gateways
Firewall & Network Security	Firewalls, intrusion detection/prevention systems, and secure network configurations
Data Backup & Recovery	Regular automated backups with secure storage and disaster recovery capabilities
Audit Logs & Monitoring	System logging and monitoring to detect unauthorised access or suspicious activity
Device Management	Control of company-issued and authorised devices through security policies
Data Loss Prevention (DLP)	Controls to prevent unauthorised sharing or leakage of sensitive data

Organisational Safeguards	
Control Area	**Description of Safeguard**
Policies & Procedures	Formal information security, POPIA, and data protection policies
Access Management	User provisioning, de-provisioning, and periodic access reviews
Employee Awareness & Training	Regular training on data protection, phishing, and information security risks
Confidentiality Agreements	Employees and service providers bound by confidentiality obligations
Incident Response Procedures	Defined processes for identifying, managing, and reporting data breaches

Organisational Safeguards	
Control Area	**Description of Safeguard**
Vendor & MSP Management	Due diligence and contractual controls over third-party service providers
Business Continuity Planning	Disaster recovery and business continuity frameworks in place
Record Retention & Disposal	Secure retention and destruction of records in line with legal requirements

Physical Safeguards	
Control Area	**Description of Safeguard**
Secure Premises	Controlled access to offices and restricted areas

Physical Safeguards	
Control Area	**Description of Safeguard**
Document Security	Secure storage of physical files (locked cabinets, restricted access)
Device Security	Physical protection of laptops and devices, including password protection

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on (www.luzfs.co.za), if any;

9.1.2 head office of the LUZ 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.

9.2 A fee for a copy of the Manual, as contemplated in Annexure A of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of LUZ FINANCIAL SERVICES (PTY) LTD will on a regular basis update this manual, but not less than on an annual basis.

Issued by

Botha

Mr Christiaan Jacobus ("Thean") Botha
Director | Key Individual

Annexure B

Item	Description	Amount
1	Request fee, payable by every requester	R140.00
2	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of the page
3	Printed copy of A4-size page	R2.00 per page or part of the page
4	For a copy in a computer-readable form on: - a flash drive (provided by the requester) - a compact disc (CD) if the requester provides the CD to us - a compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
5	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
7	For a transcription of an audio record, per A4-size page	R24.00
8	For a copy of an audio record on a flash drive (provided by the requester) For a copy of an audio record on compact disc (CD) if the requester provides the CD to us For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R40.00 R40.00 R60.00
9	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure The search and preparation fee cannot exceed	R145.00 R435.00
10	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11	Postage, email or any other electronic transfer	Postage, email or any other electronic transfer

***Note**: To make a format request for access to a record, please do so by completing Form 2 and submitting to the company's Information Officer.*

- ***Click here to access**: Form 2*

VERSION CONTROL AND DOCUMENT MANAGEMENT SHEET

DOCUMENT IDENTIFICATION	
REQUIRMENT	**DETAILS**
Policy Title	**POLICY GUIDANCE FRAMEWORK**
Policy ID	55489 PAIA_GOV_2026_1.0
Document Type	Policy
Policy Category	Governance
Applies To	Key Individual(s), Compliance, Representatives
Document Owner	Thean Botha
Approval Authority	
Approval Date	2026/07/21
Policy Status	Active
Next Review Date	2028/07/01

Version History			
Version	**Date**	**Description of Change**	**Approval by**
1.0	2026/07/21	First issue of PAIA Manual	Key Individual, Internal Control

DISTRIBUTION & AWARENESS	
DESCRIPTION	**DETAILS**
Communication to	**Staff, Clients**
Method of Communication	Read, and publication of website
Acknowledgement Required	Yes
Record Location	Governance

CONTROL STATEMENT

This is a controlled policy document. Only the version indicated above is valid and enforceable. Unauthorised changes are prohibited. Superseded versions must be clearly marked and archived.

If a policy cannot be clearly identified, versioned, and owned, it is not under control.