TANDEM WEALTH

INVESTING SIDE BY SIDE

PAIA Manual

Promotion of Access to Information Act

Tandem Wealth Solutions (Pty) Ltd

Authorised FSP 56103

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

PAIA Manual

ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator / IR	Information Regulator

1. PURPOSE OF THIS MANUAL

This PAIA Manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"). PAIA gives effect to section 32 of the Constitution of the Republic of South Africa, which provides every person with the right to access information held by private bodies where such access is required for the exercise or protection of a right.

This Manual is intended to help members of the public to:

- Understand what categories of records Tandem Wealth holds and which are available without a formal request.
- Know how to submit a formal request for access to records.
- Understand the fees that apply to access requests.
- Know what grounds may result in a request being refused.
- Access the contact details of Tandem Wealth's Information Officer and Deputy Information Officer.
- Understand what Personal Information Tandem Wealth processes and for what purpose.

2. INFORMATION OFFICER CONTACT DETAILS

In terms of section 51(1) of PAIA, Tandem Wealth has designated an Information Officer who is responsible for managing access to information requests.

Information Officer – Name & Surname:	Tania Hough
Information Officer – Title:	Key Individual
Information Officer – Email:	tania@tandemwealth.co.za
Information Officer – Telephone:	082 887 5083
Deputy Information Officer – Name & Surname:	Shirley Rademeyer
Deputy Information Officer – Email:	shirley@tandemwealth.co.za
Deputy Information Officer – Telephone:	(021) 831 5450

Head Office Physical Address:	705 Touchstone House, 7 Bree Street, Cape Town, 8001
Head Office Telephone:	(021) 831 5450
Website(s):	www.tandemwealth.co.za

3. GUIDE ON HOW TO USE PAIA

The Information Regulator has compiled a guide on how to use PAIA, in terms of section 10 of PAIA. The guide is available in all official languages and in Braille.

The guide describes:

- The objects and purposes of PAIA and POPIA.
- Contact details for Information Officers of public and private bodies.
- How to submit a request for access to records.
- Assistance available from the Information Regulator.
- All legal remedies available for acts or failures under PAIA.
- How to lodge an internal appeal, complaint, or court application.
- The applicable fee structure.

The guide is available:

- From the Information Regulator's website: https://inforegulator.org.za/
- From Tandem Wealth's Information Officer upon request.
- At Tandem Wealth's offices during normal business hours.

A copy of the guide is available in the following official languages: English and Afrikaans

4. RECORDS AVAILABLE WITHOUT A FORMAL REQUEST

In terms of section 52 of PAIA, Tandem Wealth may on a voluntary basis make certain categories of records automatically available without requiring a formal access request. Currently, no specific notice has been published in terms of section 52(2) designating categories of records for automatic availability.

The following records may generally be accessed without a formal request:

Category of Records	Available on Website	Available Upon Request
This PAIA Manual	Yes	Yes
The POPIA and Data Protection Policy	Yes	Yes
Company registration details (where publicly available)	No	Yes
General company contact information	Yes	Yes

Please note: the inclusion of a category in this Manual does not mean that all records within that category will automatically be provided. Grounds for refusal may still apply.

5. RECORDS AVAILABLE UNDER OTHER LEGISLATION

Certain records held by Tandem Wealth are created or maintained in terms of other legislation. The following table provides examples:

Category of Record	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Manual / Compliance Records	Protection of Personal Information Act 4 of 2013
FAIS Compliance Records	Financial Advisory and Intermediary Services Act 37 of 2002
FICA Compliance Records	Financial Intelligence Centre Act 38 of 2001
Tax Records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
Employee Records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995

6. CATEGORIES OF RECORDS HELD BY TANDEM WEALTH

Tandem Wealth holds records across the following subjects:

Subject Area	Categories of Records Held
Strategic and Corporate Governance	Company registration documents, board resolutions, annual reports, strategic plans.
Human Resources	Employment contracts, employee records, payroll records, performance reviews, disciplinary records, training records.
Client / Customer Records	Onboarding documentation, FICA/KYC records, investment mandates, portfolios, correspondence, complaints.
Financial Records	Management accounts, audited financial statements, tax records, invoices, bank records.
Legal and Compliance	Regulatory filings, compliance reports, legal agreements, FAIS/FICA records, licences.
Service Provider / Operator Agreements	Contracts with third-party operators, service level agreements, confidentiality agreements.
IT and Information Security	System access records, cybersecurity policies, data breach logs.
Marketing and Communications	Marketing materials, client communications, consent records.

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing

Tandem Wealth processes Personal Information for the following purposes:

- Providing financial advisory, investment management, and related services to clients.
- Complying with legal and regulatory obligations (FAIS, FICA, POPIA, tax legislation).

- Employee recruitment, onboarding, and human resources management.
- Fraud detection, prevention of financial crime, and credit risk management.
- Maintaining accurate client and business records.
- Conducting market research and improving client experience.

7.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information Processed
Clients / Customers	Full name, ID/passport number, contact details, address, employment status, financial information, investment history, risk profile, FICA/KYC documentation, correspondence.
Employees	Full name, ID number, address, qualifications, employment history, payroll information, biometric data, performance and disciplinary records.
Service Providers / Operators	Company name, registration number, VAT number, contact details, bank details, contractual records.
Directors and Shareholders	Full name, ID number, residential address, shareholding information, directorship details.

7.3 Recipients of Personal Information

Category of Personal Information	Recipients or Categories of Recipients
Identity documents, for client verification	Financial Intelligence Centre (FIC), regulatory bodies
Credit and financial information	Credit bureaus, financial institutions
Tax-related information	South African Revenue Service (SARS)
Employment and qualification data	South African Qualifications Authority (SAQA), background check providers
Investment and portfolio data	Fund managers, stockbrokers, custodians (where applicable)
Any information subject to court order or legal process	Courts, attorneys, law enforcement bodies

7.4 Cross-Border Transfer of Personal Information

Tandem Wealth may transfer Personal Information outside South Africa where required for processing or storage (for example, cloud-based systems hosted abroad). Such transfers are governed by written agreements that ensure equivalent levels of data protection.

7.5 Information Security Measures

Tandem Wealth implements the following security measures to protect the confidentiality, integrity, and availability of Personal Information:

- Data encryption (in transit and at rest).
- Anti-virus and anti-malware solutions.
- Access controls and role-based permissions.

- Regular security audits and vulnerability assessments.
- Staff training on data protection and information security.
- Written data processing agreements with all third-party Operators.

8. HOW TO REQUEST ACCESS TO RECORDS

8.1 Who May Request Access?

Anyone may submit a request for access to records held by Tandem Wealth. There are two types of requesters:

- Personal Requester: a person requesting access to records containing their own Personal Information. Tandem Wealth will grant access subject to applicable legislation.
- Other Requester: a person requesting access to records that do not primarily concern them. Access will only be granted if the requester meets the requirements of PAIA – specifically, that access is required to exercise or protect a right.

8.2 Request Procedure

To request access to a record, the following steps must be followed:

- Complete the prescribed Form 2 (Appendix 1 of this Manual) in full.
- Pay the required request fee of R140.00 (applicable to Other Requesters). Personal Requesters seeking access to their own information do not pay a request fee.
- Submit the completed form and proof of payment to the Information Officer by post, by hand, or by email.
- If you are unable to complete the form due to illiteracy or disability, you may make an oral request directly to the Information Officer.
- If you are making a request on behalf of another person, include proof of authorisation.

Your request must clearly state:

- Your full name and contact details.
- A description of the record(s) you are requesting.
- The format in which you require access.
- The right you wish to exercise or protect, and why the record is needed for that purpose.

8.3 Processing of Requests

Tandem Wealth will process your request within 30 days of receiving your completed form and payment (where applicable). Tandem Wealth will notify you in writing whether your request has been approved or denied, with reasons. If you demonstrate exceptional circumstances requiring urgent processing, the 30-day period may be shortened.

8.4 Forms of Access

You may request access in any of the following forms (mark your preference on the request form):

- Printed copy of the record.
- Written or printed transcription of visual images.
- Copy on flash drive or compact disc.
- Copy saved on cloud storage.
- Personal inspection at Tandem Wealth's registered address.
- Electronic delivery by email or cloud share.

9. GROUNDS FOR REFUSAL

PAIA provides specific grounds on which Tandem Wealth may or must refuse a request for access to records. A full list of grounds for refusal is set out in Chapter 4 of PAIA. The main grounds include where:

- Disclosure would unreasonably infringe the privacy of a third party.
- The record is already publicly available.
- Disclosure would not serve the public interest.
- Mandatory protection of third-party commercial information applies.
- Mandatory protection of confidential third-party information applies.
- Disclosure would prejudice a law enforcement or legal process.
- The record relates to communications between an attorney and client (legal professional privilege).

Where access is refused, Tandem Wealth will provide written reasons and inform you of your right to appeal or seek further remedies.

10. FEES

The following fees are applicable to access requests by private bodies, as prescribed by the Minister of Justice:

Item	Description	Fee
1	Request fee (payable by Other Requesters before processing)	R140.00
2	Photocopy / printed black & white copy of A4-size page	R2.00 per page
3	Printed copy of A4-size page	R2.00 per page
4	Copy in computer-readable form – flash drive (provided by requester)	R40.00
5	Copy in computer-readable form – compact disc (provided by requester)	R40.00
6	Copy in computer-readable form – compact disc (provided to requester)	R60.00
7	Transcription of visual images, per A4-size page	Outsourced – quotation from service provider
8	Transcription of audio record, per A4-size page	R24.00
9	Copy of audio record – flash drive (provided by requester)	R40.00

10	Copy of audio record – compact disc (provided by requester)	R40.00
11	Copy of audio record – compact disc (provided to requester)	R60.00
12	Search and preparation fee (per hour or part thereof, excluding first hour)	R145.00 per hour (max R435.00 total)
13	Deposit: where search exceeds 6 hours	One-third of total estimated fee
14	Postage, email or electronic transfer	Actual cost incurred

Notes:

- Other Requesters must pay the R140.00 request fee before Tandem Wealth begins processing a request.
- The access fee will be communicated to you after your request is received and the scope of the search is determined.
- If you qualify for an exemption from fees, please state the reason on your request form.
- Where the search and preparation time is estimated to exceed 6 hours, a deposit of one-third of the anticipated total fee must be paid in advance.

11. AVAILABILITY OF THIS MANUAL

This Manual is available:

- On the company website: www.tandemwealth.co.za
- At Tandem Wealth's office for public inspection during normal business hours, at no cost.
- To any person upon request to the Information Officer.
- To the Information Regulator upon request.

A fee per A4-size photocopy may be charged for physical copies of this Manual, as per the prescribed fee schedule.

12. UPDATING OF THIS MANUAL

Tandem Wealth will update this Manual regularly to reflect any changes in legislation, the organisation's structure, or the categories of records it holds. This Manual will be reviewed at least annually.

VERSION CONTROL AND APPROVAL

Version	Date Approved	Approved By	Next Review Date
V1.0	1 September 2026	Tania Hough	1 September 2027

APPENDIX 1

FORM 2

REQUEST FOR ACCESS TO RECORDS

[Regulation 7 of the Promotion of Access to Information Act 2 of 2000]

NOTE:

- Proof of identity must be attached by the requester.
- If the request is made on behalf of another person, proof of such authorisation must be attached.

TO: The Information Officer

Name of Organisation: Tandem Wealth

Email: tania@tandemwealth.co.za

☐ **Request is made in my own name**	☐ **Request is made on behalf of another person**

SECTION A: PARTICULARS OF REQUESTER	
Full Name	
Identity / Passport Number	
Capacity (if on behalf of another)	
Postal Address	
Street Address	
Email Address	
Telephone (Business)	
Facsimile	
Cellular	

SECTION B: DETAILS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (IF APPLICABLE)	
Full Name	
Identity / Passport Number	
Postal Address	
Street Address	
Email Address	
Telephone (Business)	
Cellular	

SECTION C: PARTICULARS OF RECORD REQUESTED

Description of Record	
Reference Number (if known)	
Further Particulars	

SECTION D: TYPE OF RECORD

☐ Record is in written or printed form

☐ Record comprises visual images (photographs, video recordings, computer-generated images, sketches, etc.)

☐ Record consists of recorded words or information reproducible in sound

☐ Record is held on a computer or in electronic/machine-readable form

SECTION E: FORM OF ACCESS REQUESTED

☐ Printed copy of record

☐ Written or printed transcription of visual images

☐ Transcription of soundtrack (written or printed document)

☐ Copy of record on flash drive

☐ Copy of record on compact disc

☐ Copy of record saved on cloud storage

☐ Personal inspection at registered address

☐ Email of information

☐ Cloud share / file transfer

SECTION F: RIGHT TO BE EXERCISED OR PROTECTED	
Which right do you wish to exercise or protect?	
Why is this record required for that purpose?	

SECTION G: FEES
a) A request fee must be paid before this request will be processed. b) You will be notified of the access fee amount once the scope of your request is assessed. c) The fee depends on the form of access required and time needed to locate and prepare the record. d) If you qualify for a fee exemption, please state your reason below:

SECTION H: PREFERRED MANNER OF CORRESPONDENCE		
Postal Address/Courier service to street address	Facsimile	Electronic Communication (specify)

Preferred language

(Note that if the record is not available in the language you prefer, access may be granted in

the language in which the record is available)

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Requester / Person on whose behalf request is made

FOR OFFICIAL USE ONLY

Reference Number:	
Request Received By (Name & Surname of Information Officer):	
Date Received:	
Access Fees:	
Deposit (if any):	

_____

Signature of Information Officer