

PAIA Manual

Promotion of Access to Information Act 2 of 2000

Section 51 Manual

Entity Name	Diversity Financial (Pty) Ltd
Registration Number	2013/299660/07
Physical Address	34 Impala Road, Chislehurst, Sandton, 2196
Telephone	011 568 2750
Email Address	info@diversityfinancial.co.za
Website	www.diversityfinancial.co.za
Information Officer	Athabile Jojo
Deputy Information Officer	Natalie Zulu
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This manual is compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and is available to any person upon request.

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1. Introduction and Purpose

Diversity Financial (Pty) Ltd (“Diversity Financial” or “the Company”) is a standalone entity registered in the Republic of South Africa, providing Retirement Benefits Counselling services in accordance with the Pension Funds Act 24 of 1956 and the 2017 Default Regulation. The Company is not a Financial Services Provider and does not hold a FAIS licence.

This manual (“the Manual”) is compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”) and gives effect to the constitutional right of access to information held by private bodies, as entrenched in section 32 of the Constitution of the Republic of South Africa, 1996.

Purpose of PAIA

PAIA gives effect to the right of access to any information held by a private body, where such information is required for the exercise or protection of any right. The Act aims to foster a culture of transparency and accountability in private and public bodies by giving effect to the right of access to information.

Scope of this Manual

This Manual applies to all records held by Diversity Financial in any form, including paper, electronic, and other formats. It describes:

- The categories of records held by the Company;
- Records automatically available without a formal request;
- The procedure for requesting access to records;
- The fees applicable to requests; and
- The grounds on which access may be refused.

This Manual must be read together with PAIA and the Regulations promulgated thereunder, and with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

2. Contact Details of the Information Officer

In terms of section 51(1)(a) of PAIA, every private body must designate an Information Officer who is responsible for ensuring compliance with PAIA and for facilitating access to records.

Information Officer	Athabile Jojo
Designation	Information Officer
Company	Diversity Financial (Pty) Ltd
Physical Address	34 Impala Road, Chislehurst, Sandton, 2196
Postal Address	34 Impala Road, Chislehurst, Sandton, 2196
Telephone	011 568 2750
Email Address	info@diversityfinancial.co.za
Website	www.diversityfinancial.co.za

Responsibilities of the Information Officer

The Information Officer is responsible for:

- Encouraging compliance with PAIA and POPIA;
- Dealing with requests made in terms of PAIA;
- Working with the Information Regulator in relation to investigations;
- Ensuring that a PAIA manual is available as required by PAIA;
- Developing internal measures and systems to facilitate requests; and
- Submitting compliance reports to the Information Regulator where required.

3. Guide on How to Use PAIA

The South African Human Rights Commission (“SAHRC”) has compiled a guide on how to use PAIA as contemplated in section 10 of PAIA. This guide is available from the SAHRC and provides information on:

- How to submit a request for access to records;
- The assistance available from the SAHRC;
- Remedies where access is refused; and
- All other matters that the SAHRC considers relevant.

SAHRC Physical Address	The Research and Documentation Department, South African Human Rights Commission, Braampark Forum 3, 33 Hoofd Street, Braamfontein, 2001
SAHRC Postal Address	Private Bag 2700, Houghton, 2041
SAHRC Telephone	+27 11 877 3600
SAHRC Website	www.sahrc.org.za
Information Regulator	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Information Regulator Email	infoereg@justice.gov.za

4. Records Held by Diversity Financial

In terms of section 51(1)(e) of PAIA, a private body must describe the categories of records held by it. The following categories of records are held by Diversity Financial:

4.1 Corporate and Statutory Records

- Certificate of Incorporation and Memorandum of Incorporation (MOI)
- Company registration documents
- Shareholders' register and share certificates
- Minutes of board and shareholder meetings
- Annual financial statements
- Tax registration and compliance certificates (SARS)
- B-BBEE verification certificate
- Banking and financial records

4.2 Human Resources and Employment Records

- Employment contracts and offer letters
- Employee personal records (ID documents, qualifications, FICA compliance)
- Payroll records and salary schedules
- Leave records
- Disciplinary and grievance records
- Training and development records
- UIF and PAYE records

4.3 Client and Member Records

- Retirement benefit counselling session recordings and transcripts
- Member FICA and identity verification documents
- SMS confirmation records and digital audit trails
- Fund membership and benefit election information
- Correspondence with pension fund administrators and trustees
- Counselling session outcomes and reports

4.4 Contracts and Commercial Records

- Service level agreements with pension funds and fund administrators
- Supplier and vendor contracts
- Non-disclosure agreements
- Insurance policies

4.5 Information Technology and Security Records

- IT system access logs and call recording system records
- Data processing agreements with third-party service providers
- Information security policies and incident records
- Website analytics data (anonymised)

4.6 Compliance and Regulatory Records

- PAIA Manual (this document)
- POPIA privacy policy and processing records
- FICA compliance records and risk assessments
- Correspondence with regulatory bodies (FSCA, Information Regulator, FIC)
- Audit trail documentation required under PFA Guidance Notice No. 8 of 2018

5. Records Automatically Available

The following records are available without a person having to submit a formal PAIA request. These records may be obtained directly from the Information Officer or via the Company's website:

- This PAIA Manual
- The Diversity Financial Privacy Policy (POPIA)
- General company information published on the website (www.diversityfinancial.co.za)
- Information about the retirement benefit counselling service and process

To obtain any of the above, please contact the Information Officer at the details set out in section 2 of this Manual.

6. Records Available in Terms of Other Legislation

Certain records held by Diversity Financial are made available in terms of other legislation, independent of PAIA. These include:

Legislation	Type of Record
Pension Funds Act 24 of 1956 & 2017 Default Regulation	Counselling session records, audit trails, and member benefit documentation
Financial Intelligence Centre Act 38 of 2001 (FICA)	Client identity verification documents and FICA compliance records
Protection of Personal Information Act 4 of 2013 (POPIA)	Personal information processing records and privacy notices
Companies Act 71 of 2008	Incorporation documents, annual financial statements, and company registers
Income Tax Act 58 of 1962	Tax records, PAYE documentation, and SARS correspondence
Basic Conditions of Employment Act 75 of 1997	Employment contracts, leave records, and payroll records
Labour Relations Act 66 of 1995	Disciplinary records and employment dispute documentation
Unemployment Insurance Act 63 of 2001	UIF registration and contribution records

7. How to Request Access to Records

7.1 Who May Request Access

Any person (including a juristic person) may submit a request for access to records held by Diversity Financial, provided the requester:

- Is a South African citizen or permanent resident; or
- Is a juristic person incorporated or registered in South Africa; or
- Requests access in order to exercise or protect a right.

A requester who is not a South African citizen or permanent resident may only request access to records where they require such information to exercise or protect a right.

7.2 How to Submit a Request

Requests must be submitted in writing using Form C as prescribed under PAIA. The prescribed form is available from:

- The Information Officer of Diversity Financial;
- The South African Human Rights Commission (www.sahrc.org.za); or
- The Information Regulator (www.justice.gov.za/infoereg).

Completed requests must be submitted to:

Information Officer	Athabile Jojo
Physical Address	34 Impala Road, Chislehurst, Sandton, 2196
Email Address	info@diversityfinancial.co.za
Telephone	011 568 2750

7.3 Information to Include in the Request

The request form must include:

- The full name and contact details of the requester;
- The form in which the requester wishes to receive the records (e.g. copy, inspection, electronic);
- A description of the records requested with sufficient detail for the Information Officer to identify the records;
- The right the requester is seeking to exercise or protect; and
- An explanation of why the requested records are required for the exercise or protection of that right.

7.4 Response Timeframes

The Information Officer will respond to a request within 30 days of receipt of the request. This period may be extended by a further 30 days in exceptional circumstances, in which case the requester will be notified of the extension and the reasons therefor.

The response will either:

- Grant access and advise the requester of the applicable fees;
- Refuse access and provide written reasons; or
- Indicate that the records cannot be found or do not exist.

7.5 Third-Party Records

Where a request relates to records that concern a third party, the Information Officer will notify that third party and allow them an opportunity to make representations before a decision is made. The third party has 21 days to respond to such notification.

8. Grounds for Refusal of Access

The Information Officer may refuse access to records on the grounds set out in Chapter 4 of PAIA. These include, but are not limited to:

- **Protection of personal information:** Records containing personal information about a third party that has not consented to disclosure (section 63 of PAIA).
- **Commercial information:** Records containing trade secrets, financial, commercial or technical information, the disclosure of which could harm the commercial interests of Diversity Financial or a third party (section 64 of PAIA).
- **Confidential third-party information:** Records obtained from a third party in confidence, where disclosure would prejudice the third party's interests (section 65 of PAIA).
- **Safety of individuals:** Records that could endanger the life or physical safety of any person (section 66 of PAIA).
- **Legally privileged information:** Records subject to legal professional privilege (section 67 of PAIA).
- **Research information:** Records relating to research that has not yet been published, where disclosure could expose the researcher or the research to harm (section 69 of PAIA).
- **Mandatory protection of third-party information:** Where a third party has objected to disclosure and the Information Officer is satisfied that disclosure would result in harm (section 71 of PAIA).

Where a record contains both information that may be disclosed and information that must be refused, the Information Officer will consider whether the record can be severed and the disclosable portions provided.

9. Fees

9.1 Request Fee

A requester (other than a personal requester seeking their own records) may be required to pay a request fee before the request is processed. The prescribed request fee is R50.00 (fifty rand) as set out in the PAIA Regulations. This fee must be paid before the request is processed.

Personal requesters (i.e. those requesting access to their own personal records) are not required to pay a request fee.

9.2 Access Fee

Upon granting access, an access fee may be charged to cover the costs of reproduction and search. The prescribed access fees are as published in the PAIA Regulations and include:

Item	Prescribed Fee
Request fee (non-personal requester)	R50.00
Photocopy per A4 page	R1.10
Printed copy per A4 page	R0.75
Scan per A4 page	R0.75
Electronic copy (CD/DVD)	R70.00
Search and preparation per hour (or part thereof)	R30.00
Postage and packaging (if applicable)	Actual cost

Fees are subject to change as prescribed by the Minister of Justice and Constitutional Development. The Information Officer will confirm the applicable fee at the time of the request.

9.3 Fee Waiver

The Information Officer may waive the access fee if the requester demonstrates that they are unable to pay the fee and that the request serves the public interest. Requests for fee waivers must be made in writing together with the access request.

10. Remedies Available to a Requester

10.1 Internal Appeal

PAIA does not provide for an internal appeal mechanism against decisions of private bodies. Where access is refused by the Information Officer of Diversity Financial, the requester's remedies are as set out below.

10.2 Application to Court

A requester who is aggrieved by a decision of the Information Officer may apply to the appropriate court for relief. Such an application must be made within 180 days of receiving the decision to refuse access.

The requester may approach:

- The High Court having jurisdiction over the matter; or
- The Equality Court in appropriate circumstances.

10.3 Complaint to the Information Regulator

A requester may also lodge a complaint with the Information Regulator if they believe that Diversity Financial has:

- Failed to comply with a provision of PAIA;
- Unreasonably denied access to records; or
- Failed to respond within the prescribed timeframe.

Information Regulator Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email Address	inforeg@justice.gov.za
Website	www.justice.gov.za/inforeg

11. Processing of Personal Information (POPIA)

Diversity Financial processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"). This section provides a high-level overview of the Company's processing activities. The full Privacy Policy is available on the Company's website and from the Information Officer upon request.

11.1 Categories of Data Subjects

- Pension fund members receiving retirement benefit counselling
- Employees and contractors of Diversity Financial
- Clients (pension funds and fund administrators)
- Website visitors
- Marketing subscribers

11.2 Categories of Personal Information Processed

- Identity and contact information (name, ID number, address, telephone, email)
- FICA and compliance documents
- Employment and retirement fund information
- Counselling session recordings and transcripts
- SMS confirmation records
- Website usage and analytics data (anonymised)

11.3 Purpose of Processing

- To provide retirement benefit counselling in compliance with the Pension Funds Act and the 2017 Default Regulation
- To fulfil FICA obligations
- To maintain regulatory audit trails
- To communicate with members and clients
- To comply with applicable law and regulatory obligations

11.4 Data Subject Rights

Data subjects have the right to:

- Request access to their personal information;
- Request correction of inaccurate or incomplete information;
- Request deletion of personal information (subject to retention obligations);
- Object to processing in certain circumstances; and
- Lodge a complaint with the Information Regulator.

To exercise these rights, data subjects must contact the Information Officer at the details in section 2 of this Manual.

11.5 Retention of Personal Information

Personal information is retained in accordance with applicable legislation. FICA records and counselling session records are retained for a minimum of five years. Information is securely deleted or de-identified when it is no longer required.

12. Availability of this Manual

This Manual is available:

- On the Diversity Financial website at www.diversityfinancial.co.za;
- From the Information Officer upon request at no charge; and
- At the registered office of Diversity Financial during normal business hours.

This Manual will be updated when there are material changes to the Company's structure, the records it holds, or the applicable legal framework. The current version will always be available on the Company's website.

Version History

Version	Date	Compiled By	Description
1.0	May 2026	Athabile Jojo	Initial compilation

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