



Regus Business Centre
Ground Floor, Uni Park Building
Vodacom Lane, Noble Street
Brandwag, Bloemfontein, 9301
FSP NO 51153

Registration No 2020/607576/07

Incorporated In the Republic of South Africa

Tel 051 430 2662

Email info@culmine.co.za

PAIA MANUAL

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

DATE OF COMPILATION: 01/10/2021
DATE OF REVISION: 06/11/2024

At Your Service,

Culmine Financial Planning (Pty) Ltd is an authorised Financial Services Provider
Registration No 2020/607576/07
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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|--------------------|---|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO“ | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended; |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “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 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 CULMINE FINANCIAL PLANNING

3.1. Chief Information Officer

Name: Tshepo Modisenyane
Tel: 051 430 2662
Email: info@culmine.co.za

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Fax number: 086 598 6202

- 3.2. Deputy Information Officer *(Should more than one Deputy Information Officer be designated, the details will be provided hereunder in terms of section 17 (1) of PAIA.*

Name:

Tel:

Email:

Fax Number:

- 3.3 Access to information general contacts

Email: info@culmine.co.za

3.4 National or Head Office

Postal Address: Office 404, Sunday School Building, 154 Charlote Maxeke Street, Bloemfontein

Physical Address: Office 404, Sunday School Building, 154 Charlote Maxeke Street, Bloemfontein

Telephone: 051 430 2662

Email: info@culmine.co.za

Website: www.culmine.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.

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- 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 PAIA¹ and section 56 of POPIA²;
 - 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 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;

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.*

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- 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 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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.”

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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.

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/inforeg/>).

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 and Sesotho

5. CATEGORIES OF RECORDS OF THE CULMINE FINANCIAL PLANNING WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The subjects and categories of official and/or confidential information on which the private body holds records are as follows:

5.1 Financial records, including:

5.1.1 statutory books of account;

5.1.2 budget reports;

5.1.3 bank reports;

5.1.4 audited financial statements;

5.1.5 audit reports; and

5.1.6 insurance records.

5.2 Operational Information, including:

5.2.1 budget reports;

5.2.2 monthly reports; and

5.2.3 minutes of management meetings.

5.3 Business Strategy Information, including

- 5.3.1 business plan;*
- 5.3.2 budget reports;*
- 5.3.3 minutes of board meetings;*
- 5.3.4 monthly reports; and*
- 5.3.5 annual reports.*

5.4 Assets, including:

- 5.4.1 asset register;*
- 5.4.2 bank account reconciliations;*
- 5.4.3 debtors' information; and*
- 5.4.4 share certificates.*

5.5 Liabilities, including:

- 5.5.1 general ledger; and*
- 5.5.2 loan agreements.*

5.6 Marketing, including:

- 5.6.1 business plan; and*
- 5.6.2 communication plans.*

5.7 Information Technology, including:

- 5.7.1 asset register;*
- 5.7.2 IT usage register;*
- 5.7.3 software licenses;*
- 5.7.4 repair and maintenance records;*
- 5.7.5 software programmes; and*
- 5.7.6 software records.*

5.8 Human Resources, including:

- 5.8.1 HR policies and procedures;*
- 5.8.2 employment equity reports;*
- 5.8.3 skills development reports;*
- 5.8.4 contracts of employment;*
- 5.8.5 payroll data; and*
- 5.8.6 employee records.*

- 5.9 Management, including:
 - 5.9.1 records of management meetings.
- 5.10 Client care, including:
 - 5.10.1 client contracts;
 - 5.10.2 client review records;
 - 5.10.3 status reports; and
 - 5.10.4 call reports.
- 5.11 Contractual relationships, including:
 - 5.11.1 contracts with clients;
 - 5.11.2 leases;
 - 5.11.3 HP agreements; and
 - 5.11.4 shareholders' agreements.
- 5.12 Quality, including:
 - 5.12.1 ISO accreditation and manuals.
- 5.13 Company organisational structure, including:
 - 5.13.1 organogram; and
 - 5.13.2 shareholders' agreements.
- 5.14 Company secretarial, including:
 - 5.14.1 statutory documents;
 - 5.14.2 board resolutions;
 - 5.14.3 share certificates;
 - 5.14.4 minute book;
 - 5.14.5 company registers; and
 - 5.14.6 audited results.
- 5.15 Investor Relations, including:
 - 5.15.1 general investor relations communications;

6. DESCRIPTION OF THE RECORDS OF CULMINE FINANCIAL PLANNING WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CULMINE FINANCIAL PLANNING

Please see paragraph 5 above. SEE EXAMPLES BELOW.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

We process personal information that is necessary to enable us to provide our various products and services. Below are the various categories of personal information we collect and who we share personal information with.

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

Subject	Category
Data subject categories and their personal information	<p>Employees: record of employee life cycle</p> <p>General public: general enquiries and viewing the company website; name, e-mail address</p> <p>Industry bodies: membership records</p> <p>Media: records of media interactions</p> <p>Service providers: record of service provider life cycle</p>
Recipients of personal information	<p>Employee pension funds</p> <p>Industry bodies</p> <p>Law enforcement</p> <p>Medical aid schemes</p> <p>purchasers on the sale or other substantial transfer of all of the business of Afrox or the Afrox group of companies</p> <p>operators (service providers)</p> <p>statutory authorities</p>
Expected transnational transfer of personal information	<p>Transfer of personal information to operators</p> <p>Transfer of personal information to Afrox group companies</p>
Security measures to protect personal	We use reasonable security methods to

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information	<p>protect data that is provided to us and resides on our servers. Our security measures include:</p> <p>Physical security measures</p> <ul style="list-style-type: none"> -Access control measures -Internal security measures <p>Cyber security measures</p> <ul style="list-style-type: none"> -Anti-virus measures -Installing security firewalls -Password control <p>Training programmes on information security</p> <p>Information security audits</p> <p>IT-related company policies</p>
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9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on our website www.culmine.co.za;

9.1.2 head office of CULMINE FINANCIAL PLANNING 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

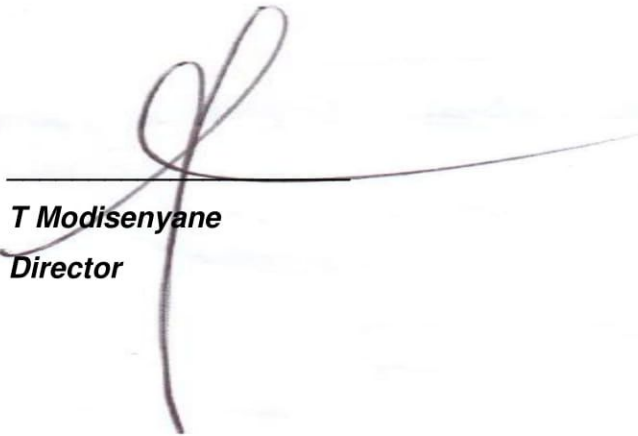
9.1.4 to the Information Regulator upon request.

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

10. UPDATING OF THE MANUAL

The head of CULMINE FINANCIAL PLANNING will on a regular basis update this manual.

Issued by

A handwritten signature in dark ink, consisting of a large loop at the top and a long vertical stroke extending downwards. A horizontal line is drawn across the middle of the signature, intersecting the vertical stroke.

T Modisenyane
Director

At Your Service,