



Elysian Wealth Partners (PTY) LTD

PAIA MANUAL

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

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1. List Of Acronyms and Abbreviations

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;

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- 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 The Elysian Wealth Partners (PTY) LTD

3.1. Chief Information Officer

Name: Brenda Reynolds
Email: ceo@elysianwp.com

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Tregue Minnaar
Email: cto@elysianwp.com

3.3 Access to information general contacts

Email: support@elysianwp.com

3.4 Head Office

Physical Address: *OFFICE 12 1ST FLOOR, WESTWAY OFFICE PARK, 18
THE BOULEVARD WESTVILLE, KWA-ZULU NATAL, 3630*

Email: support@elysianwp.com

Website: www.elysianwp.com

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 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;
- 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-

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.*

- 4.3.6.1. 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/infoereg/>).

5. Categories Of Records Of The Elysian Wealth Partners (PTY) LTD Which Are Available Without A Person Having To Request Access

Category of records	Types of the Record	Available on Website	Available upon request
	Risk Disclosure	X	X
	PAIA Manual	X	X
	POPI Policy	X	X
	Conflict Of Interest	X	X

6. Description Of The Records Of Elysian Wealth Partners (PTY) LTD 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 The Elysian Wealth Partners (PTY) LTD

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records

8. Processing Of Personal Information

8.1 Purpose of Processing Personal Information

In compliance with **Section 18(1)(f) of PAIA** and **Section 13 of POPIA**, Elysian Wealth Partners (Pty) Ltd processes personal information for legitimate business, legal, and regulatory purposes. Below are the key purposes for which personal data is collected, stored, and used:

1. Client Onboarding & Financial Services

- To verify identity (FICA compliance).
- To assess suitability for financial products (FAIS General Code of Conduct).
- To conclude and administer investment, advisory, or brokerage agreements.

2. Regulatory & Compliance Obligations

- To report to the **Financial Sector Conduct Authority (FSCA)** or other regulators.
- To comply with **Anti-Money Laundering (AML)** and **Counter-Terrorist Financing (CTF)** laws.
- To maintain audit trails for compliance with securities regulations.

3. Risk Management & Operational Purposes

- To conduct creditworthiness checks (where applicable).
- To mitigate fraud, financial crime, or reputational risks.
- To ensure IT security and data integrity.

4. Marketing & Client Communication

- To provide updates on market trends, products, or services (opt-in required under POPIA).
- To conduct client satisfaction surveys (with consent).

5. Legal & Dispute Resolution

- To enforce contractual rights or obligations.
- To defend against legal claims or regulatory investigations.

6. Internal Business Operations

- For statistical analysis and business development.
- To train staff in compliance with FAIS and FSCA standards.

Lawful Basis for Processing

Processing is justified under **POPIA Section 11** on the following grounds:

- **Consent** (e.g., marketing communications).
- **Contractual necessity** (e.g., executing client mandates).
- **Legal obligation** (e.g., FICA, FAIS, FSCA reporting).
- **Legitimate interest** (e.g., fraud prevention).

Note: Clients may object to processing for direct marketing or request correction/deletion of personal data (subject to regulatory record-keeping requirements).

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

1. Scope of Transborder Data Transfers

Elysian Wealth Partners (Pty) Ltd may transfer personal information outside South Africa in the following circumstances:

- **Cloud Storage & IT Systems:** Use of international servers (e.g., Microsoft Azure, AWS) with data centers outside South Africa.
- **Global Financial Services:** Sharing client data with cross-border investment platforms, custodians, or counterparties to execute transactions (e.g., offshore investments, international brokerage accounts).
- **Regulatory Reporting:** Submission of data to foreign regulators (e.g., FATCA/CRS reporting to SARS for offshore tax compliance).
- **Third-Party Service Providers:** Engagement with auditors, consultants, or compliance firms operating abroad.

2. Safeguards for Transborder Transfers

In compliance with **POPIA Chapter 9 (Section 72)**, transfers will only occur if:

- The recipient country has **adequate data protection laws** (e.g., EU GDPR), **or**
- The recipient party agrees to binding **POPIA-compliant data processing agreements, or**
- The data subject consents to the transfer (e.g., for offshore investment mandates).

3. Client Rights & Disclosures

- Clients will be notified of transborder transfers via:
 - **Privacy Policy** disclosures.

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- **Mandate Agreements** (for offshore investments).
- Right to **object** or request details of safeguards (contact the Information Officer).

4. Examples of Transborder Data Recipients

- **Financial Institutions:** Offshore banks, asset managers, or custodians.
- **Technology Providers:** CRM systems (e.g., Salesforce), analytics tools.
- **Regulatory Bodies:** SARS (for FATCA/CRS), foreign tax authorities.

Contact for Transborder Data Queries

For questions or objections, contact the **Information Officer**:

- **Email:** support@elysianwp.com

Note: Transfers will align with FAIS and FSCA record-keeping requirements, even for offshore data.

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

1. Governance & Policies

- **Information Security Policy:** Implement and maintain a formal policy aligned with POPIA, ISO 27001, and FSCA cybersecurity guidelines.
- **Risk Assessments:** Regular audits to identify vulnerabilities in data processing activities.
- **Roles & Responsibilities:** Designated Information Officer and IT Security Officer to oversee compliance.

2. Access Control & Authentication

- **Role-Based Access:** Strict access controls ensuring staff only access data necessary for their role (principle of least privilege).
- **Multi-Factor Authentication (MFA):** Required for all systems handling sensitive client or financial data.
- **Password Management:** Enforced complexity rules and regular updates.

3. Data Protection Measures

- **Encryption:**
 - **In Transit:** TLS 1.2+ for emails, client portals, and data transfers.
 - **At Rest:** AES-256 encryption for databases and cloud storage.
- **Pseudonymization:** Client identifiers masked where possible (e.g., internal analytics).
- **Data Minimization:** Only collect and retain data essential for regulatory or contractual purposes.

4. Network & System Security

- **Firewalls & Intrusion Detection:** Enterprise-grade firewalls and real-time monitoring for suspicious activity.
- **Endpoint Protection:** Anti-malware and device encryption on all company devices (laptops, mobile phones).
- **Secure Configurations:** Regular patching of software/systems to address vulnerabilities.

5. Physical Security

- **Office Access Control:** Keycard/biometric access to server rooms and filing archives.
- **Secure Disposal:** Shredding of physical documents and certified wiping of digital media.

6. Incident Response & Business Continuity

- **Breach Protocol:**
 - POPIA-mandated 72-hour notification to Regulators and affected data subjects.
 - Forensic investigation and remediation plans.
- **Backups:**
 - Daily encrypted backups stored offsite/cloud with 30-day retention.
 - Regular restoration testing.

7. Third-Party Risk Management

- **Vendor Due Diligence:** Contracts with service providers (e.g., cloud hosts) must include POPIA-compliant data processing terms.
- **Audit Rights:** Reserved to assess third-party security practices.

8. Training & Awareness

- **Staff Training:** Annual POPIA/FAIS compliance training, including phishing awareness.
- **Mock Drills:** Simulated cyberattack exercises for IT and client-facing teams.

Monitoring & Compliance

- **Logging & Audits:** Automated logs of data access reviewed quarterly.
- **Regulatory Alignment:** Measures updated per FSCA Circulars (e.g., Cybersecurity Framework for FSPs).

Contact for Security Concerns

Report incidents or request details via the **Information Officer:**

- **Email:** support@elysianwp.com

Note: Measures are periodically reviewed to address evolving threats and regulatory changes.

9. Availability Of the Manual

9.1 A copy of the Manual is available-

9.1.1 on www.elysianwp.com

9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.3 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. Update Of the Manual

The head of a Elysian Wealth Partners (PTY) LTD will on a regular basis update this manual.