

The Finsolve Group

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PAIA MANUAL

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

Finsolve Solutions (Pty) Ltd

(Registration number: 2015/311781/07)

Last Updated: June 2026

Organisation	Finsolve Solutions (Pty) Ltd
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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;

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- 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 FINSOLVE SOLUTIONS (PTY) LTD

3.1. Chief Information Officer

Name: Gavin Beretta

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Durbanville
7550
Tel: 021 300 1230
Email : info@finsolve.co.za



Tel:	021 300 1230
Email:	gavin.beretta@finsolve.co.za
Fax number:	N/A

3.2. Deputy Information Officer

Name:	Melanie De Swardt
Tel:	021 300 1230
Email:	melanie.ds@finsolve.co.za
Fax Number:	N/A

3.3 Access to information general contacts

Email:	info@finsolve.co.za
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3.4 National or Head Office

Physical Address:	9 Altair Way, Pinehurst, Durbanville, 7550
Postal Address:	9 Altair Way, Pinehurst, Durbanville, 7550
Telephone:	021 300 1230
Email:	info@finsolve.co.za
Website:	www.finsolve.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 the English language.
 - 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 PAIA and section 56 of POPIA;
 - 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 11; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50;
 - 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator and

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- 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 14 and 51 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 15 and 52 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 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92.
 - 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/>).
 - 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 & Afrikaans

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

Category of records	Types of the Record	Available on website	Available on request
Contact Information	The postal and street address, phone and fax number, and email address of the organization's head (Information Officer) and any designated Deputy Information Officers.	X	
	Contact details for other relevant personnel who handle information requests.		X
Organizational Structure and Operations	A description of the organization's functions and activities		

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	Information about any parent companies, subsidiaries, or related entities	X	
	Details about contractors or operators who may hold information on behalf of the organization	X	X
Information Available Without Request	A list of records that are automatically available to the public without needing a formal PAIA request.		X
	Annual reports, brochures, or other publicly accessible documents.		X
Requesting Information	A step-by-step guide on how to make a formal request for information under PAIA		X
	Information on the required		X

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		forms, fees, and timelines.		
		Grounds for refusing access to information, such as protecting personal information of third parties or confidential information.		X
Categories of Information		A description of the types of records held by the organization, categorized for easy access	X	X
		Financial records, personnel records, or operational records.		X
		Personal information and special personal information (as defined by POPIA).	X	X
		Records related to data subjects, including the	X	X

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	type of information processed and security measures in place.		
POPIA Compliance	Information about the organization's data processing activities under POPIA	X	X
	Details on how personal information is collected, used, and protected.	X	X
	Security measures implemented to safeguard personal information.	X	X
Other Relevant Legislation	A list of other relevant legislation that applies to the organization, such as the Employment Equity Act or the Income Tax Act.	X	X

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6. CATEGORIES OF RECORDS OF THE FINSOLVE SOLUTIONS (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
POPI Policy	Protection of Personal Information Act, 2013

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY FINSOLVE SOLUTIONS (PTY) LTD

Subjects on which the body holds records	Category of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures - Advertised posts - Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Section 9 of POPI states that “Personal Information may only be processed if, given the purpose for which it is processed, is adequate, relevant and not excessive.”

The Client’s Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:

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- a) Providing products or services to clients and to carry out the transactions requested;
 - b) Confirming, verifying and updating client details;
 - c) Conducting market or customer satisfaction research;
 - d) For audit and record keeping purposes;
 - e) Providing Finsolve services to clients, to render the services requested and to maintain and constantly improve the relationship;
 - f) Providing communication in respect of Finsolve and regulatory matters that may affect clients; and
 - g) In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for **Finsolve** processing of Personal Information:

- a) The client's consent to the processing: - consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship, usually in the form of an email;
- b) The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of financial services, accounting and tax
- c) Processing complies with an obligation imposed by law on **Finsolve**;
- d) Processing is necessary for pursuing the legitimate interests of **Finsolve** or of a third party to whom information is supplied in order to provide **Finsolve** clients with products and or services both **Finsolve** and any of our product suppliers require certain personal information from the clients in order to make an expert decision on the unique and specific product and or service required.

Finsolve aims to have agreements in place with all product suppliers and third party service providers to ensure a mutual understanding with regard to the protection of the

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clients' personal information. **Finsolve** suppliers will be subject to the same regulations as applicable to **Finsolve**.

With the client's consent, **Finsolve** may also supplement the information provided with information **Finsolve** receives from other providers in order to offer a more consistent and personalized experience with the client's interaction with **Finsolve**.

For purposes of this Policy, clients include potential and existing clients.

HOW WE USE YOUR INFORMATION

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:

1. Providing products or services to clients and to carry out the transactions requested;
2. Confirming, verifying and updating client details;
3. Conducting market or customer satisfaction research;
4. For audit and record keeping purposes;
5. Providing **Finsolve** services to clients to render the services requested and to maintain and constantly improve the relationship;
6. Providing communication in respect of **Finsolve** and regulatory matters that may affect clients and
7. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

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- b) The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of financial training
- c) Processing complies with an obligation imposed by law on **Finsolve**;
- d) Processing is necessary for pursuing the legitimate interests of **Finsolve** or of a third party to whom information is supplied in order to provide **Finsolve** clients with products and or services both **Finsolve** and any of our product suppliers require certain personal information from the clients in order to make an expert decision on the unique and specific product and or service required.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity
Service Providers	names, registration number, vat numbers, address,
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

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Qualifications, for qualification	South African Qualifications Authority
Credit and payment history, for	Credit Bureaus

8.4 Planned transborder flows of personal information

All personal information is stored in the Republic of South Africa according to the categories of personal information in terms of clause 8.

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

8.5.1. SAFEGUARDING CLIENT INFORMATION

Finsolve Solutions (Pty) Ltd will continuously review its security controls and processes to ensure that personal information is secure.

The following procedures are in place in order to protect personal information:

1. **THE FINSOLVE GROUP INFORMATION OFFICER** is **Gavin Beretta** whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPI.
2. THIS POLICY has been put in place throughout **The Finsolve Group** and training on this policy and the POPI Act No.4 of 2013 has already taken place amongst the company's employees, stakeholders and third party associates.
3. Each new employee will be required to sign an EMPLOYMENT CONTRACT containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;

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4. Every employee currently employed within **The Finsolve Group** will be required to sign an addendum to their EMPLOYMENT CONTRACTS containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
 5. **Finsolve** archived client information is stored on site which is also governed by POPI, access is limited to these areas to authorized personal.
 6. **Finsolve** product suppliers, insurers and other third party service providers will be required to sign a SERVICE LEVEL AGREEMENT guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.
 7. All electronic files or data are BACKED UP by the Group IT Division which is also responsible for system security that protects third party access and physical threats. The Group IT Division is responsible for Electronic Information Security;
 8. CONSENT to process client information is obtained from clients (or a person who has been given authorisation from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of the Manual is available-
 - 9.1.1 on www.finsolve.co.za, if any;
 - 9.1.2 head office of Finsolve Solutions (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.

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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 Information Officer of Finsolve Solutions (Pty) Ltd will on a regular basis update this manual.

Issued by



GAVIN BERETTA

FINANCIAL DIRECTOR (CHIEF INFORMATION OFFICER)