



JME FINANCIAL SERVICES (PTY) LTD
("NAGA")

Registration Number: 2018/607541/07

PAIA MANUAL

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

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TABLE OF CONTENTS

1.	LIST OF ACRONYMS AND ABBREVIATIONS	3
2.	PURPOSE OF PAIA MANUAL	4
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION	5
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	5
5.	CATEGORIES OF RECORDS OF NAGA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	8
6.	DESCRIPTION OF THE RECORDS OF NAGA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	8
7.	PROCESSING OF PERSONAL INFORMATION	9
8.	PRESCRIBED FEES	11
9.	AVAILABILITY OF THE MANUAL	12
10.	UPDATING OF THE MANUAL.....	12



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”
(as amended); | Promotion of Access to Information Act No. 2 of 2000 |
| 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 IO and DIO 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 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

3.1 Chief Information Officer

Name: Mr. Nikolai Blignaut
Tel: +27 100 065 481
Email: support.za@naga.com

3.2 Access to information general contacts

Email: support.za@naga.com

3.3 National or Head Office

Postal Address: Suite 10, 21 Lighthouse Road, 201 Beacon rock, Umhlanga rocks, 4320
Physical Address: Suite 10, 21 Lighthouse Road, 201 Beacon rock, Umhlanga rocks, 4320
Telephone: +27 100 065 481
Email: support.za@naga.com
Website: www.naga.com/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.

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 IO of every public body, and
 - 4.3.2.2 every DIO 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-
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and

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.*



- 4.3.6.3 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.
- 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.

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.”



4.5 The Guide can also be obtained-

4.5.1 upon request to the IO;

4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5. CATEGORIES OF RECORDS OF NAGA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Public Affairs	Public Product Information	www.naga.com/za	
	Media Releases	www.naga.com/za	
	Public Corporate Records	https://bizportal.gov.za/	
Financial	Financial Statements	Not available	
	Financial Tax Records		In terms of PAIA
	Asset Register		In terms of PAIA
Marketing	Market Information	www.naga.com/za	
Customer	Customer Information		In terms of PAIA
Suppliers	Supplier Information		In terms of PAIA
Employees	Employee Information		In terms of PAIA

6. DESCRIPTION OF THE RECORDS OF NAGA 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. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The Company uses clients' personal information only for the purpose of rendering financial services to them and for the purpose for which it was collected or agreed with the clients, for example:

- to effectively process your transactions
- to identify and verify your identity
- to communicate to you in respect of your funds invested with the Company
- to comply with legal and regulatory requirements
- to comply with auditing and record-keeping requirements
- to detect and prevent fraud
- to share information with service providers with whom the Company has a business agreement to process such information on the Company's behalf or to those who render services to the Company

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	first and last name, e-mail address, details about financial status, residential address, phone number, date of birth, a copy of the national identity card or passport or driving license, a copy of a recent utility bill/bank statement (or similar) as evidence of the residential address, credit card or bank card details, Tax residence and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race, cell phone number, email

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
Customer Information Data	Product suppliers within the confines of rendering the required services to the client



Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	National Competent Authorities upon request
Service Providers information and data	National Competent Authorities upon request
Employees	National Competent Authorities upon request

8.4 Planned transborder flows of personal information

Information and data will flow both inside and outside the borders of the Republic it is required to render the required services to the client.

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

Any and all flows of information between JME Financial Services (Pty) Ltd and any of its service providers will at all times be encrypted. Any such flows will be limited to only the data that is required to facilitate the rendering of the required services to the client.

8. PRESCRIBED FEES

The following applies to requests (other than personal requests):



- 9.1 A requestor is required to complete FORM 2 – REQUEST FOR ACCESS TO RECORD and pay the prescribed fees (R50.00) before a request will be considered.
- 9.2 You will be notified of the amount of the access fee to be paid.
- 9.3 The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.

9. AVAILABILITY OF THE MANUAL

- 10.1 A copy of the Manual is available-
 - 10.1.1 on www.naga.com/za if any;
 - 10.1.2 head office of the JME Financial Services (Pty) Ltd (“NAGA”) for public inspection during normal business hours;
 - 10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 10.1.4 to the Regulator upon request.
- 10.2 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 a JME Financial Services (Pty) Ltd (“NAGA”) will on a regular basis update this manual.

Issued by JME Financial Services (Pty) Ltd (“NAGA”).

