



***SPEKTRA Financial Services CC
FSP10679: An Authorised Financial Services Provider
1998/067770/23***

SECTION 51 MANUAL ON THE PROMOTION OF ACCESS TO INFORMATION ACT (PAIA)

OWNERSHIP:

This manual is owned by SPEKTRA FINANCIAL SERVICES CC (1998/067770/23) a duly authorised. Financial Services Provider (hereunder referred to as the “FSP”).

As Key Individual of the aforementioned Financial Services Provider I, Christoffel Jacobus Viljoen hereby confirm the adoption of this manual.

A handwritten signature in black ink, appearing to read 'C. Viljoen', written over a horizontal line.

Key Individual Signature

2025/09/02

Date

Version	2025_V1
Publishing Date	October 2023
Last Review Date	September 2025
Frequency of Review	Annually
Next Review Date	September 2026
Policy Owner	Christoffel Jacobus Viljoen
Responsible Person	Christoffel Jacobus Viljoen

Table of Contents

1. INTRODUCTION.....	3
2. FSP CONTACT DETAILS.....	3
3. GUIDE ON THE PROMOTION OF ACCESS TO INFORMATION ACT (Section 10 Guide).....	4
4. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION	4
5. FEES PAYABLE.....	5
6. TYPE OF RECORDS HELD BY THE FSP	5
7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION	6
8. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS.....	7
9. MANUAL AVAILABILITY	7

1. INTRODUCTION

The Promotion of Access to Information Act, 2000, PAIA gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State, as well as information held by another person (or private body) when such privately held information is required to exercise a right or to protect a right.

PAIA, provides that a person requesting information must be given access to any record of a private body, if that record is required for the exercise or the protection of a right. However, such request has to comply with the procedural requirements laid down by the Act.

This manual is compiled in accordance with Section 51 of PAIA and contains the following provisions:

- the FSP's postal address, street address, phone, and e-mail address.
- a brief description of the guidance document on the application of the Promotion of Information Act and the process to be followed in order to obtain a copy of this guide (compiled by the Human Rights Commission in terms of section 10 of the Act).
- the process to be followed in order to access information held by the FSP. **See Form 2.**
- a description of the typology of records held by the FSP (i.e., various information subjects held on each category type). **See Annexure A.**
- a description of records which are freely available without having to submit a formal request to access information in terms of the Act. **See Annexure B.**
- a description of the FSP's information which are available in accordance with any other legislation.

2. FSP CONTACT DETAILS

<i>Information Officer's Name</i>	Christo Viljoen
<i>Phone Number</i>	+27(0)12 567 5502
<i>e-Mail Address</i>	spektra@prispek.co.za
<i>Physical Address</i>	Shop 8, Kruin Sakesentrum
	406 Braam Pretorius Street
<i>Postal Address</i>	PO Box 16
	Magalieskruin
	0150
<i>Website</i>	www.spektra.co.za

3. GUIDE ON THE PROMOTION OF ACCESS TO INFORMATION ACT (Section 10 Guide)

The guidance document on the application of the Promotion of Access to Information Act has been compiled by the South African Human Rights Commission. The guidance document has been developed in order to assist people to access records and to exercise their right to information.

The guide is available in all South African official languages free of charge, and any person may request a copy of the guide. A copy of the guide may be obtained by contacting the South African Human Rights Commission at:

*Private Bag X2700,
Houghton, 1041*

or

*Sentinel House, Sunnyside Office Park
32 Princess of Wales Terrace
Parktown, JOHANNESBURG*

or

Telephone: 011 877 3600

e-Mail: paia@sahrc.org.za

Website: www.sahrc.org.za

4. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

Any person who wishes to request any information held by the FSP in order to protect or exercise a right must follow the below procedure:

- The requester must complete the prescribed “**Form 2 - Request for Access to Record**” in full and in a legible form to request for access to a record. This must be made to Information Officer. The request must be made to our postal, or e-mail address contained above.
- The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester must also indicate which form of access is required and specify its postal or e-mail address in the Republic.
- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation as to why the requested record is required for the exercise of that right.
- If the request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer of the Organisation.
- The form (as well as any additional pages attached thereto) must be signed by the person submitting the form.

A person submitting the request must:

- indicate the identity of the person seeking access to the information.
- provide sufficient particulars to enable the information officer to identify the information requested.
- specify the format in which the information is required.
- indicate the contact details of the person requiring the information.
- indicate the right to be exercised and/or to be protected and specify the reasons why the information required will enable the person to protect and/or exercise the right.
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed.
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

5. FEES PAYABLE

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.

Every other requester, who is not a personal requester, must pay the required request fee:

- The Information Officer must notify the requester (other than a personal requester) by notice once the "Request for Access to Record" form has been submitted, requiring the requester to pay the prescribed fee before further processing the request.
- The requester must pay a fee of R50. The requester may lodge an application to court against the tender or payment of the request fee.
- After the Information Officer has made a decision on the request, the requester will be notified in the required form.
- If the request is granted, a further access fee must be paid for the search, reproduction, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

6. TYPE OF RECORDS HELD BY THE FSP

Request for access to documents held by the FSP will be in accordance with the Act. The type of records available to the person requesting the information are listed in Annexure A.

A description of records which are freely available without having to submit a formal request to access information in terms of the Act are listed in Annexure B.

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The person requiring the information may also request information which is available in terms of the following legislation:

NOTE: *There may not be specific records that mention Spektra by name in the records of all or any of the institutions that administer the Acts mentioned below, but the following legislation is applicable to our business;*

- The Financial Services Board Act No. 97 of 1990 – we are categorized as a financial institution in terms hereof.
- The Long-Term Insurance Act No. 52 of 1998 – we are registered as an Intermediary in terms hereof.
- The Financial Institutions Act No. 28 of 2001 – we are categorized as a financial institution in the definitions herein.
- The Collective Schemes Control Act No. 45 of 2002 – we are registered as a “manager” in terms hereof.
- The Financial Advisory and Intermediary Services Act No. 37 of 2002 (FAIS) – we are categorized as a Financial Services Provider (FSP) in terms hereof and are licenced as such by the Financial Services Board, under Licence Number 10679
- The Pension Funds Act No. 24 of 1956.
- The Medical Schemes Act No. 131 of 1998.

NOTE: *Certain legislation is not directly applicable to our business, but it impacts on the activities of investors of funds and places a duty of care on the entire Financial Service Industry to ascertain the source of investment funds and in some instances (monies emanating from or subject to money laundering, drugs and drug trafficking, stolen goods, other unlawful activities as well as tax evasion) it imposes an obligation on financial advisers to report the activities of clients to the authorities. The following Acts are applicable: -*

- Drug and Drug Trafficking Act No. 140 of 1992.
- Prevention of Organized Crime Act No. 121 of 1998
- Financial Centre Intelligence Act NO. 38 of 2001.

8. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The Promotion of Access to Information Act provides a number of grounds on which a request for access to information must be refused. These grounds mainly concern instances where the privacy and interests of other individuals are protected, where such records are already otherwise publicly available, instances where public interest are not served, the mandatory protection of commercial information of a third party, as well as the mandatory protection of certain confidential information of a third party.

A complete list of the grounds for refusal are indicated within Chapter 4 of the Act.

9. MANUAL AVAILABILITY

The manual is available for inspection free of charge:

- At the office of Spektra Financial Services CC during office hours
- On the company website: www.spektra.co.za

ANNEXURE A

RECORD TYPOLOGY

Request for access to documents held by the FSP will be in accordance with the Act. The type of records available to the person requesting the information are listed hereunder.

Administrative Records

These include, but are not limited to the following:

- the FSP's license
- the FSP's compliance manual
- the FSP's policies
- the FSP's internal rules and procedures
- any personal records provided to the FSP by its personnel.
- any records which a third party has provided to the FSP about any of its personnel.

Human Resources Records

These include, but are not limited to the following:

- any personal records provided to the FSP by its personnel.
- any records which a third party has provided to the FSP about any of its personnel.
- conditions of employment and other personnel-related contractual and quasi-legal records
- internal evaluation and training records
- other internal records and correspondence

Client-related Records

These include, but are not limited to the following:

- advice records
- operational records
- databases
- information technology
- marketing records
- internal correspondence
- product records
- statutory records
- internal policies and procedures
- treasury-related records
- securities and equities
- records held by officials of the FSP.

Financial Records

These include, but are not limited to the following:

- financial statements
- audit records
- assets inventory

Other Parties

The FSP may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies and other financial services providers.

These records include:

- service level agreements
- financial records
- correspondence

Alternatively, such other parties may possess records which can be said to belong to the FSP. The following records fall under this category:

- personnel, client, or FSP records which are held by another party.
- records held by FSP pertaining to other parties, including without limitation:
 - × financial records
 - × correspondence
 - × contractual records
 - × records provided by the other party.

ANNEXURE B AUTOMATICALLY AVAILABLE RECORDS

The following records are automatically available without having to submit a formal request to access the information in terms of the Act.

For inspection purposes:

Not Applicable

For purchasing:

Not Applicable

For copying:

Not Applicable

Available free of charge:

Not Applicable

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer