

PAIA MANUAL
MDALISU INVESTMENTS

(In terms of the Promotion of Access to Information Act, 2000)

DEPARTMENT: COMPLIANCE



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1. OVERVIEW AND OBJECTIVES OF THE MANUAL

The Promotion of Access to Information Act (PAIA) gives effect to Section 32 of the Constitution, which provides that every person has the right to access:

- Information held by the State; and
- Information is held by private bodies, where such information is required to exercise or protect any rights.

PAIA promotes a culture of transparency, accountability, and good governance in both public and private institutions.

In line with PAIA, Mdalisu Investment is required to:

- Maintain a manual describing the records it holds; and
- Provide procedures for requesting access to such information.

However, access to information is not absolute, and certain information may be refused in terms of the Act.

PURPOSE OF THIS MANUAL

This manual aims to:

- Provide an outline of the information held by Mdalisu Investment
- Describe how to request access to such information
- Explain which information is automatically available
- Outline applicable fees for access

This manual also ensures that Mdalisu balances:

- Transparency, and
- Confidentiality obligations, especially under Protection of Personal Information Act, 2013 (POPIA) and Financial Intelligence Centre Act, 2001 (FICA)

2. ORGANISATION PROFILE

Mdalisu Investment is a registered Financial Services Provider (FSP) operating within the South African financial sector.

The company provides:

- Funeral, Loans and Consulting products
- Client onboarding and servicing

Mdalisu operates within a regulated environment to ensure:

- Protection of clients
- Compliance with financial laws
- Prevention of financial crime



3. LEGISLATIVE MANDATE

Mdalisu derives its regulatory obligations from various laws, including:

- Financial Intelligence Centre Act, 2001 (FICA)
- Financial Advisory and Intermediary Services Act, 2002 (FAIS)
- National Credit Act, 2005 (NCA)
- Protection of Personal Information Act, 2013 (POPIA)

The purpose of these laws is to:

- Combat money laundering and fraud
- Protect consumers
- Ensure fair and responsible financial services

4. FUNCTIONS OF MDALISU (RELEVANT TO PAIA)

To fulfil its obligations, Mdalisu:

- Collects and processes client information
- Maintains financial and operational records
- Ensures compliance with regulatory requirements
- Provides information to regulators when required

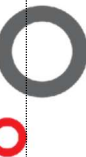
Mdalisu also ensures that information is:

- Stored securely
- Used lawfully
- Retained in line with legal requirements

5. INFORMATION OFFICER

The Information Officer is responsible for:

- Receiving and processing PAIA requests
- Ensuring compliance with PAIA and POPIA
- Protecting confidential and sensitive information



Contact Details

Name of Company	Mdalisu Investments (Pty) Ltd
Registration No	
Information Officer	Muhle Mabika
Deputy Information Officer	Natasha Swartz
Address	Metlife Building 13th floor 391 Anton Lembede Street
Telephone	(+27) 878136301
Email	info@mdalisu.co.za
Website	www.mdalisu.co.za

6. RECORDS HELD BY MDALISU

6.1 Records available without formal request

The following information is available without submitting a PAIA request:

- PAIA Manual
- Company profile and services
- Product information and brochures
- Website information
- Public compliance notices

6.2 Records available upon request

The following categories of records may be requested:

Personal records	Financial Records	Governance	Customer Records	Statutory Documents	Supplier contracts
Employee information	Financial statements	Code of Conduct	Customer information (Subject to PAIA)	Licences and Certificate	Service level agreements
Employee contracts	Invoices and Statements including Payment records	POPI policy	Contracts	Record of Advice	NDA
Policies and procedures	Tax information	Internal Policy and procedures	Payment records	Legal notices	Restraint of Trade
Training Records	Auditor reports		Call recordings	Tax information	
NDA					

7. CONFIDENTIALITY OF INFORMATION

Certain information held by Mdalisu is confidential and will not be disclosed unless permitted by law. This includes:

- Personal client information (POPIA)
- Financial intelligence information (FICA)
- Commercial and business-sensitive information

Information will only be disclosed:

- To the subject of data
- With proper consent
- Where required by law or regulators

8. REQUEST PROCEDURE

To request access to information:

Step 1: Complete request form

- Complete the prescribed PAIA request form.

Step 2: Submit request

- Submit via:
- Email
- Post
- Hand delivery

Step 3: Provide supporting information

Include:

- Clear description of the record
- Proof of identity
- Authority (if acting on behalf of another person)

9. TIMEFRAMES

- A response will be provided within 30 days
- This may be extended to 60 days where necessary

If no response is received → the request is deemed refused

10. GROUNDS FOR REFUSAL

Access to information may be refused where:

- It involves personal information of another individual
- It contains confidential business information
- It relates to legal proceedings



- It may compromise investigations or security
- The request is unreasonable or frivolous

11. FEES

Request Fee

- Payable for non-personal requests

Access Fee

Charged for:

- Copies
- Search time
- Preparation of records

Exemptions

No fees for:

- Personal information requests
- Low-income individuals

12. OUTCOME OF REQUEST

If Approved

Access will be granted where:

- The request complies with PAIA
- Required fees are paid

If refused

- Reasons will be provided
- The requester may apply to court within 180 days

13. SERVICES AVAILABLE

Mdalisu provides:

- Client support and queries
- Access to personal records
- Complaints handling
- Compliance assistance

14. AVAILABILITY OF THIS MANUAL

This manual:

- Is it available upon request
- Will be updated when necessary
- Supports compliance with PAIA

15. PAIA GUIDE

A guide on how to use PAIA is available from the:

- South African Human Rights Commission

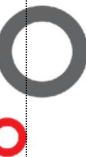
FINAL NOTE

This version:

- Keeps original legal meaning intact
- Uses simple, audit-friendly wording
- Is fully aligned to Mdalisu operations (FSP)
- Can be used for FSCA / FIC / POPIA audits

16. ANNEXURES

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FORM 1**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests are made on behalf of another person, proof of such authorization 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:
	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 <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Records comprise 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	
Records are 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

(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (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)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (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)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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.

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

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



ANNEXURE 3 GLOSSARY ITEM

Access fee	A fee prescribed for the purpose of reproduction, search and preparation of records and, if applicable, postal fees.
Date of submission	The date on which the requester submits the PAIA Request. The Deputy Information Officer must respond to the request within 30 days of this date.
Deputy Information Officer (DIO)	The individual in the public or private body who is responsible for assisting the Information Officer with the PAIA Request.
Grounds for refusal	The Section(s) of PAIA referred to by the Information Officer or Deputy Information Officer in order to refuse a PAIA Request.
Information Officer (IO)	The individual in the public or private body who is responsible for dealing with a PAIA Request.
Inventory	A complete list of items in the custody of a particular public or private body.
Letter of authorization	A letter from an individual who requires the requester to submit a PAIA Request on their behalf in terms of PAIA. The letter must state that the individual authorizes the requester (and other representatives from the requester's organization, if necessary) to submit a request to access information in terms of PAIA on their behalf.
PAIA	The Promotion of Access to Information Act 2 of 2000.
PAIA Request	The name given to the document(s) submitted to a public or private body requesting access to information in terms of PAIA.
PAIA Request reference number	The reference number you allocate for an individual PAIA Request, e.g. 0124/FIC/2010. It is advisable to use this reference number throughout all correspondence with the requester, as well as asking them to do the same.
Personal requester	A requester seeking access to a record containing personal information about themselves.
Private body	Generally, any kind of business operation is independent from government.
Public body	Generally any section of government, or organization that is set up by government, set up by law, or gets its money from government.
Record	Any recorded information irrespective of form or medium.
Requester	An individual seeking or requesting access to records and/or information held by the State and/or public body.

Request fee

The fee that must be paid by the requester before a request can be processed.

