



EFFECTUS
CAPITAL MANAGEMENT

EFFECTUS CAPITAL MANAGEMENT (PTY) LTD

Authorised Financial Services Provider • FAIS Licence No. 50016 • Category II

100% Black Owned • 10th Floor, Friedman Towers, 13 Friedman Drive, Sandton, 2196

PAIA Manual

Manual in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (incorporating POPIA)

Field	Detail
Document owner	Information Officer — Aviraag Ramdhani
Approved by	Board of Directors
Version	1.0
Effective date	16 June 2026
Next review	June 2027 (or on material change)
Legislation	PAIA (Act 2 of 2000); POPIA (Act 4 of 2013)

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1. Introduction

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and is compiled in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). It explains the records held by Effectus Capital Management (Pty) Ltd ("Effectus", "the Company"), and how a requester may request access to those records.

PAIA gives effect to the constitutional right of access to information held by the State and by another person where that information is required for the exercise or protection of any right. POPIA governs how the Company processes personal information and gives data subjects rights in respect of that information. This manual addresses both.

Effectus is an authorised Financial Services Provider (FAIS FSP 50016, Category II) and is committed to transparency, lawful processing of personal information, and compliance with PAIA and POPIA.

2. Particulars of the Private Body (section 51(1)(a))

Field	Detail
Registered name	Effectus Capital Management (Pty) Ltd
Company registration no.	2015/281719/07
FSP / FAIS licence no.	50016 (Category II)
Head office (physical)	10th Floor, Friedman Towers, 13 Friedman Drive, Sandton, 2196
Postal address	10th Floor, Friedman Towers, 13 Friedman Drive, Sandton, 2196
Telephone	+27 84 882 6073
General email	info@effectuscapital.co.za
Website	www.effectuscapital.co.za
Information Officer (IO)	Aviraag Ramdhani
IO email	aviraag@effectuscapital.co.za
Deputy Information Officer	N/A

Note: all requests for access to records and all POPIA-related requests must be directed to the Information Officer at the contact details above.

3. The Information Regulator

A requester or data subject may lodge a complaint with the Information Regulator. The guide referred to in Section 4 is also available from the Regulator.

Field	Detail
Body	The Information Regulator (South Africa)

Field	Detail
Physical / postal	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 (PO Box 31533, Braamfontein, 2017)
Telephone	+27 (0)10 023 5200
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za

These contact details are correct as at the date of this manual; the current details should be confirmed on the Information Regulator's website.

4. Guide on How to Use PAIA (section 10)

The Information Regulator has, in terms of section 10 of PAIA, compiled a guide in an easily comprehensible form and manner to assist a person who wishes to exercise a right under PAIA or POPIA. The guide is available in each official language on the Information Regulator's website (<https://inforegulator.org.za>) and on request from the Regulator at the contact details in Section 3.

5. Records Available in Terms of Other Legislation (section 51(1)(c))

Certain records of the Company are available, or may be requested, in terms of other legislation. These include, where applicable:

- Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS) and subordinate legislation;
- Financial Intelligence Centre Act 38 of 2001 (FICA);
- Financial Sector Regulation Act 9 of 2017 and applicable Conduct/Joint Standards;
- Companies Act 71 of 2008;
- Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011;
- Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Unemployment Insurance Act 63 of 2001; Skills Development Act 97 of 1998;
- Protection of Personal Information Act 4 of 2013 (POPIA).

6. Categories of Records (sections 51(1)(d) and (e))

6.1 Records that may be requested under PAIA

The Company holds records in the following subject categories. Listing a category does not guarantee access; access is subject to the grounds for refusal in Section 9.

Subject category	Examples of records
Client / advisory records	Client onboarding and FICA records, discretionary mandates, risk profiles, advice records, portfolio and transaction records, correspondence

Subject category	Examples of records
Financial & accounting	Management accounts, financial statements, invoices, bank records, tax records
Statutory & compliance	FAIS licence and representative records, compliance reports, FICA RMCP, risk register, regulatory correspondence, this manual
Corporate / governance	Memorandum of Incorporation, share register, director and resolution records, governance policies and frameworks
Human resources	Employment contracts, payroll, personnel and training records, competency register
Contracts & suppliers	Product-provider and administrator agreements, outsourcing and service agreements, the contract register
IT & operational	Systems, backups, business continuity and cyber-security records (subject to security limitations)
Marketing	Website content, marketing and disclosure material

6.2 Records available without a formal PAIA request

Some records are available without a formal PAIA request, for example records published on the Company's website, statutory disclosures provided to clients, and information made available in the ordinary course of the client relationship.

7. Processing of Personal Information under POPIA (section 51(1)(e))

In accordance with POPIA, the Company sets out below the purpose of processing, the categories of data subjects and personal information, the recipients, any cross-border transfers, and the security safeguards applied.

7.1 Purpose of processing

Personal information is processed to render financial services and discretionary investment management; to comply with FAIS, FICA, POPIA, tax and other legal obligations; to administer client relationships and transactions; to manage employees and service providers; and for legitimate business and operational purposes.

7.2 Categories of data subjects and personal information

Data subjects	Categories of personal information
Clients / prospective clients	Identity and contact details, financial and investment information, FICA/KYC data, risk profile, transaction history
Employees / representatives	Identity, contact and banking details, qualifications, fit-and-proper and competency data, payroll and HR records
Suppliers / service providers	Contact details, banking details, contract and compliance information

Data subjects	Categories of personal information
Beneficiaries / related parties	Identity and contact details as required for the client relationship

7.3 Recipients of personal information

Personal information may be shared, as necessary and lawful, with product providers and administrators, the FSCA, the Financial Intelligence Centre, SARS and other regulators, the external compliance officer, professional advisers, IT and other service providers, and law-enforcement or courts where required by law.

7.4 Cross-border transfers

Where personal information is transferred outside South Africa (for example to a cloud or IT service provider), the Company ensures the transfer complies with section 72 of POPIA.

7.5 Security safeguards

The Company maintains appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in line with section 19 of POPIA and its Cyber Security Policy, including access controls, multi-factor authentication, encryption in transit where appropriate, backups, and staff training.

7.6 Data subject rights

A data subject may, on the prescribed form and subject to POPIA: object to the processing of their personal information (section 11(3)); and request the correction, deletion or destruction of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained (section 24). Such requests must be directed to the Information Officer.

8. How to Request Access to a Record

8.1 Request procedure

1. Complete the prescribed request form — Form 02 (Request for Access to Record), prescribed under Regulation 7 of the PAIA Regulations, 2021.
2. Submit the completed form to the Information Officer at the contact details in Section 2.
3. Provide sufficient particulars to identify the record(s) requested, the requester, the form of access required, and the right the requester seeks to exercise or protect (and why the record is required for that right).
4. Pay the prescribed request fee, and any access fee invoiced, before the record is provided.
5. If the request is made on behalf of another person, submit proof of the capacity in which the request is made.

8.2 Prescribed fees

The fees below are prescribed under the PAIA Regulations, 2021. They are the maximum a private body may charge. The request fee is payable on submission; access fees are payable before access is given.

Fee	Amount
Request fee (payable by every requester)	R140.00
Photocopy / printed copy of A4 page (or part)	R2.00 per page
Copy on flash drive (if provided by requester)	R40.00
Copy on compact disc	R60.00
Transcription / other reproduction and postage	As prescribed in the PAIA Regulations, 2021
Search and preparation time (beyond the first prescribed hours)	As prescribed in the PAIA Regulations, 2021

Refer to the PAIA Regulations, 2021 for the complete fee schedule and any updates.

8.3 Decision and timeframes

The Information Officer will ordinarily decide on a request within 30 days of receipt and will notify the requester of the decision, any fees payable, and the form of access. This period may be extended in the circumstances permitted by PAIA, in which case the requester will be notified.

9. Grounds for Refusal of Access

Access to a record may or must be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, including:

- Mandatory protection of the privacy of a third party who is a natural person (section 63);
- Mandatory protection of the commercial information of a third party (section 64);
- Mandatory protection of certain confidential information, and protection of safety of individuals and property (sections 65–66);
- Mandatory protection of records privileged from production in legal proceedings (section 67);
- Commercial information of the private body (section 68);
- Research information of a third party or of the private body (section 69).

Where a ground for refusal applies only to part of a record, access will be given to the remainder in accordance with section 28.

10. Remedies

PAIA does not provide for an internal appeal against a decision of a private body. A requester or data subject who is dissatisfied with a decision of the Information Officer may, within 180 days, lodge a complaint with the Information Regulator (section 77A), or apply to a court (section 78) for appropriate relief. The Information Regulator's contact details appear in Section 3.

11. Availability of the Manual

This manual is available: at the Company's head office during office hours; on the Company's website (www.effectuscapital.co.za); from the Information Regulator; and on request to the Information Officer (free of charge in electronic form).

12. Updates and Approval

This manual is reviewed at least annually and updated whenever there is a material change to the Company's records, structure or the law. Amendments are approved by the Board.

Version	Date	Summary of change	Approved by
1.0	16 June 2026	Initial adoption	Board of Directors

Approval

Approved and adopted by the Board of Directors of Effectus Capital Management (Pty) Ltd.

Signatory	Signature / Date
L Koyana — Director	_____ Date: _____
S Mayekiso — Director	_____ Date: _____
A Ramdhani — Director & Information Officer	_____ Date: _____