

## PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

### CURRENCY PARTNERS (PTY) LTD.

Registration number: 2015/374045/07

FSB number: 35134 | SARB application number: 1431

#### 1. INTRODUCTION

Currency Partners (Pty) Ltd conducts business as a Foreign Exchange Intermediary and Treasury Outsourcing Company as authorised by the South African Reserve Bank (No. 1431). We are an authorised Financial Services Provider in terms of the Financial Advisory & Intermediary Services Act (No. 35134).

This manual has been prepared in accordance with **Section 51 of the Promotion of Access to Information Act, 2000 (PAIA)**, as amended, and aims to facilitate requests for access to records.

#### 2. KEY DEFINITIONS

To assist in understanding this manual, the following key definitions apply:

- **Information Officer:** The individual responsible for ensuring compliance with PAIA and processing requests for information.
- **Requester:** A person making a formal request for access to a record.
- **Record:** Any recorded information, regardless of form or medium, that is in the possession or under the control of the company.
- **Personal Information:** As defined by the Protection of Personal Information Act (POPIA), includes any identifiable details of a natural or juristic person, such as name, contact information, identification numbers, and financial details.
- **Processing:** Any operation concerning personal information, including collection, storage, modification, retrieval, and sharing.

#### 3. PROCESSING OF PERSONAL INFORMATION

Currency Partners (Pty) Ltd processes personal information in accordance with the Protection of **Personal Information Act (POPIA)** and other applicable regulations. Personal information is collected and processed for purposes such as:

- Rendering financial services in compliance with the Financial Advisory and Intermediary Services Act (FAIS Act).
- Meeting anti-money laundering (AML) and counter-terrorist financing (CTF) obligations under FICA and POCA.
- Fulfilling employment, contractual, and operational obligations.

Please refer to our **Privacy Policy Statement**, and our Terms and Conditions, Clause 7: Processing of Personal Information for more information.

#### 4. THE ACT AND REQUEST FOR ACCESS TO INFORMATION

- 4.1 PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any rights.
- 4.2 Requests must be made in accordance with the prescribed procedures and accompanied by applicable fees.
- 4.3 The South African Information Regulator oversees compliance with PAIA.

#### Contact Details of the Information Regulator:

The Regulator established in terms of Section 39 of POPI.

Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Section 10 PAIA Guide:

In accordance with Section 10 of the Promotion of Access to Information Act (PAIA), a requester may access a guide to assist in understanding the process of requesting information. This guide is available from the South African Information Regulator.

To view the guide, please [click here](#).

5. INFORMATION OFFICER

**Information Officer:** Sephorah Emery  
**Email:** [compliance@currencypartners.co.za](mailto:compliance@currencypartners.co.za)  
**Company Address:** Third Floor, The Terraces, 25 Protea Road, Claremont  
**Phone:** +27 21 203 0081

Information Officer Responsibilities

The Information Officer of **Currency Partners (Pty) Ltd** is responsible for:

- **Receiving and processing** PAIA requests.
- **Ensuring compliance** with PAIA regulations.
- **Determining** whether to grant or refuse access to records based on PAIA provisions.

6. RECORDS HELD BY CURRENCY PARTNERS (PTY) LTD

Category	Examples of Records	Availability
Regulatory & Admin	Licenses, MOI, Board Minutes, Policies	PAIA Request
Human Resources	Employee Information, Contracts, Payroll, Disciplinary Records	PAIA Request
Financial	Financial Statements, Tax Records, Assets & Liabilities Register	PAIA Request
Marketing & Sales	Market Information, Newsletters, Sales Records	PAIA Request
Customers & Partners	Agreements, Correspondence, Client Information	PAIA Request
Third Parties	Rental Agreement, Supplier Contracts, NDAs	PAIA Request

Personal information may be shared with the following third parties where legally required and necessary for business operations:

Category of Information	Recipient
Identity number and names	South African Police Service
Qualifications (for verification)	South African Qualifications Authority
Credit and payment history	Credit Bureaus
Client data for service facilitation	Product Providers

Where necessary, personal information may be processed using cloud-based platforms, such as Zoho CRM, which may involve transborder data flows. Appropriate safeguards are in place to ensure compliance with data protection laws.

## 7. DATA AND INFORMATION SECURITY

At Currency Partners, the security of personal data is a priority. We implement industry best practices to protect against unauthorised access, loss, or misuse of information.

Our security framework includes:

- **Data protection measures**, including secure cloud-based storage and AES 256-bit encryption.
- **Regulatory compliance**, aligning with international standards such as ISO/IEC 27001:2013.
- **Network security**, including firewall protection, DDoS mitigation, and encrypted communications.
- **Access control**, utilising multi-factor authentication (MFA) and strict user permissions.

For a more detailed overview of our security protocols, encryption standards, and compliance frameworks, please refer to our **Technical Security Document**.

## 8. FORM OF REQUEST

8.1 Requests for access to records must be made using **Form 2: Request for Access to Record (Regulation 7)**.

8.2 **Click here** for access to Form 2.

8.3 The completed form must be sent to the Information Officer at the contact details provided in Section 4.

## 9. OUTCOME OF REQUEST AND FEES PAYABLE

9.1 The Information Officer will assess the request and respond using Form 3: **Outcome of Request and Fees Payable (Regulation 8)**.

9.2 **Click here** for access to Form 3.

9.3 Fees payable will be determined in accordance with Regulation 8 of PAIA.

## 10. RIGHT OF ACCESS & GROUNDS FOR REFUSAL

Access to records will be granted unless there are valid legal grounds for refusal, including:

- **Protection of personal privacy** (third-party personal information).
- **Protection of commercial information** (trade secrets, confidential business information).
- **Protection of safety and security** (endangering life or property).
- **Legal privilege** (records protected under legal proceedings).
- **Public interest considerations** (where disclosure is justified despite a ground for refusal).

If a request is refused, the requester will be informed in writing of the reasons and their rights to appeal the decision.

## 11. AVAILABILITY OF THIS MANUAL

This PAIA Manual is available:

- On our website: [www.currencypartners.co.za](http://www.currencypartners.co.za)
- For inspection at our registered head office during normal business hours
- Upon request to the Information Regulator

## 12. STATUTORY RECORDS

Currency Partners (Pty) Ltd maintains statutory records and information as required by various South African laws and regulations applicable to its business operations as a Foreign Exchange Intermediary and Treasury Outsourcing Company. These records are retained in accordance with the prescribed periods and regulatory requirements.

The statutory records maintained by the company relate to the following key legislative categories, including but not limited to:

### 12.1 Financial Services and Regulatory Compliance

- Financial Advisory and Intermediary Services Act (FAIS Act)
- South African Reserve Bank (SARB) Manual
- Financial Intelligence Centre Act (FICA)
- Prevention of Organised Crime Act (POCA)
- Protection of Constitutional Democracy Against Terrorist and Related Activities Act (POCDATARA)

## 12.2 Corporate Governance, Company Law, Financial Reporting & Labour

- Companies Act, 2008
- Protection of Personal Information Act (POPIA)
- Income Tax Act
- Value-Added Tax Act (VAT Act)
- Basic Conditions of Employment Act (BCEA)
- Employment Equity Act (EEA)
- Labour Relations Act (LRA)
- Unemployment Insurance Act (UIA)
- Skills Development Act (SDA)

These records are maintained in accordance with the applicable retention periods and are available as prescribed by law.

## 13. 13.DOCUMENT CONTROL

<b>Document owner:</b>	Information Officer
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Licensed by the FSCA as an authorised Financial Services Provider (No. 35134). Authorised by the SARB to act as a Foreign Exchange Intermediary (No.1431).