



PAIA MANUAL

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

Square One Financial Services (Pty) Ltd is an Authorised Financial Services Provider (FSP: 48177)
Registration No. 2017/071136/07



011 749 3315



admin@square1fs.co.za
www.square1fs.co.za



Malgas Avenue, Douglasdale,
Sandton, Gauteng, 2191

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“KI”	Key Individual
1.3	“DIO”	Deputy Information Officer;
1.4	“IO”	Information Officer;
1.5	“Minister”	Minister of Justice and Correctional Services;
1.6	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.7	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.8	“Regulator”	Information Regulator; and
1.9	“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, 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 Information Officer and Deputy Information Officer 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 of South Africa 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 OF THE Square One Financial services

3.1. **Information Officer**

Name: Matthew Bowe

Tel: 011 749 3315

Email: matt@square1fs.co.za

3.2. **Deputy Information Officer** *(if applicable)*

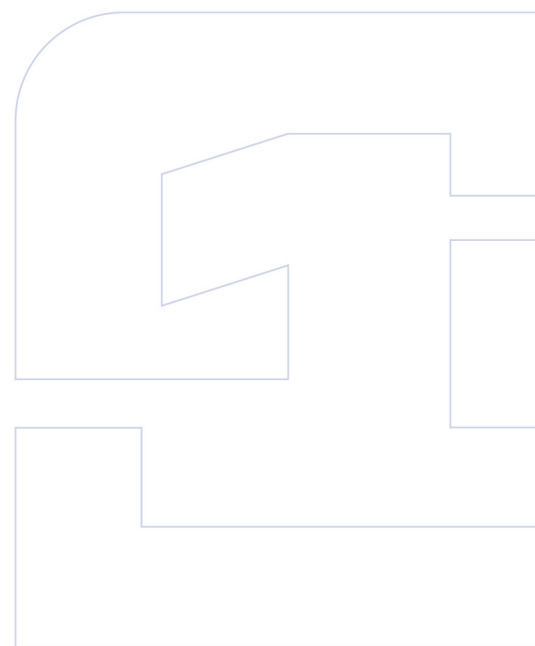
Name: Matthew Bowe

Tel: 011 749 3315

Email: matt@square1fs.co.za

3.3 Access to information general contacts

Email: admin@square1fs.co.za





3.4 Head Office

Postal Address: 81 Marks Crescent, Strubenvale, Springs, 1559

Physical Address: 81 Marks Crescent, Strubenvale, Springs, 1559

Telephone: 011 749 3315

Email: admin@square1fs.co.za

Website: www.square1fs.co.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 English.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA.

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4.3.2. the postal and street address, phone and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every private body, and

4.3.2.2. every Deputy Information Officer of every private body (if applicable);

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a private body contemplated in section 11¹; and

4.3.3.2. access to a record of a private body contemplated in section 50²;

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.

¹ 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.

² 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. 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
- 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 14³ and 51⁴ 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 15⁵ and 52⁶ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.

³ 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.

⁴ 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.

⁵ 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

⁶ 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



4.3.9. the notices issued in terms of sections 22⁷ and 54⁸ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92⁹.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the private body, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer.

⁷ 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.

⁸ 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.

⁹ 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.”

5. CATEGORIES OF RECORDS OF THE (Square One Financial Services PTY LTD) WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
FAIS Act & Associated Board Notices	<ul style="list-style-type: none"> FSP license certificate Mandatory Policy Manuals 	x	X X
Data Protection	<ul style="list-style-type: none"> POPIA manual Privacy Statement 	x	X X

6. DESCRIPTION OF THE RECORDS OF (Square One Financial Services PTY LTD) 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
POPIA Manual	Protection of Personal Information Act 4 of 2013
FICA Risk Management Plan	Financial Intelligence Centre Act 38 of 2001
Mandatory Policy Manuals	<ul style="list-style-type: none"> Complaints Policy Manual Conflict of Interest FSP License Certificate Section 13 Certificate Broker Disclosure Notice

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7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE (Square One Financial Services PTY LTD)

Subjects on which the body holds records	Categories of records
Clients	Personal Information; Investment/ Insurance portfolios; FICA documentation
Employees	FICA documentation; HR Records
Key Individuals/ Representatives	FAIS documentation
Product Suppliers (FAIS)	FAIS documentation; Service Level Agreements
IT Suppliers	Service Level Agreements
External Compliance	FAIS documentation; Service Level Agreements

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal Information of clients is processed for the purposes of carrying out our intermediary services in terms of the FAIS Act as mandated by the client.

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	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race

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
Clients	Product Suppliers
Clients	FAIS Compliance Officer
Clients	Regulators (FSCA/FIC)



8.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.

*Square One Financial Services is committed to ensuring the **confidentiality, integrity, and availability** of all personal information under its care. To achieve this, the company has implemented the following security measures:*

1. Data Protection and Encryption

- *All sensitive and personal data is encrypted using **AES-256 encryption** for storage and transmission.*
- *Secure Socket Layer (SSL) encryption is used to protect online transactions and data exchanges.*
- *Access to client information is restricted to authorized personnel only, with role-based access controls.*

2. Anti-Virus & Anti-Malware Solutions

- *Industry-leading **anti-virus and anti-malware software** is deployed on all company devices and servers.*
- *Regular updates and real-time threat monitoring help prevent, detect, and remove malicious software.*
- *Automated and scheduled scans are performed to identify and neutralize potential threats.*

3. Network and Infrastructure Security

- ***Firewall protection** is in place to prevent unauthorized access to company systems.*
- *Secure Virtual Private Network (VPN) connections are required for remote access to company resources.*
- *Multi-factor authentication (MFA) is enforced for accessing critical systems.*

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4. Data Backup and Disaster Recovery

- Automated **daily backups** are conducted to secure data against loss or corruption.
- Offsite and cloud-based storage solutions are used for data redundancy.
- A **disaster recovery plan** is in place to ensure business continuity in case of cyber incidents or system failures.

5. Employee Training & Compliance

- Regular cybersecurity training is provided to employees to ensure awareness of best practices.
- Strict password policies and access management protocols are enforced.
- Compliance with **Protection of Personal Information Act (POPIA)** and other relevant data protection regulations is continuously monitored.

These measures ensure that Square One Financial Services maintains a high standard of information security to protect both company and client data.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on (www.square1fs.co.za), if any.

9.1.2 head office of the (Square One Financial Services) for public inspection during normal business hours.

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and



9.1.4 to the Information Regulator upon request.

9.2 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 (Square One Financial Services) will on a regular basis update this manual.

Issued by

Matthew Bowe

Director

Please refer to Form 2 (Request for access to record) and Form 3 (Outcome of request and of fees payable) attached hereto.

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