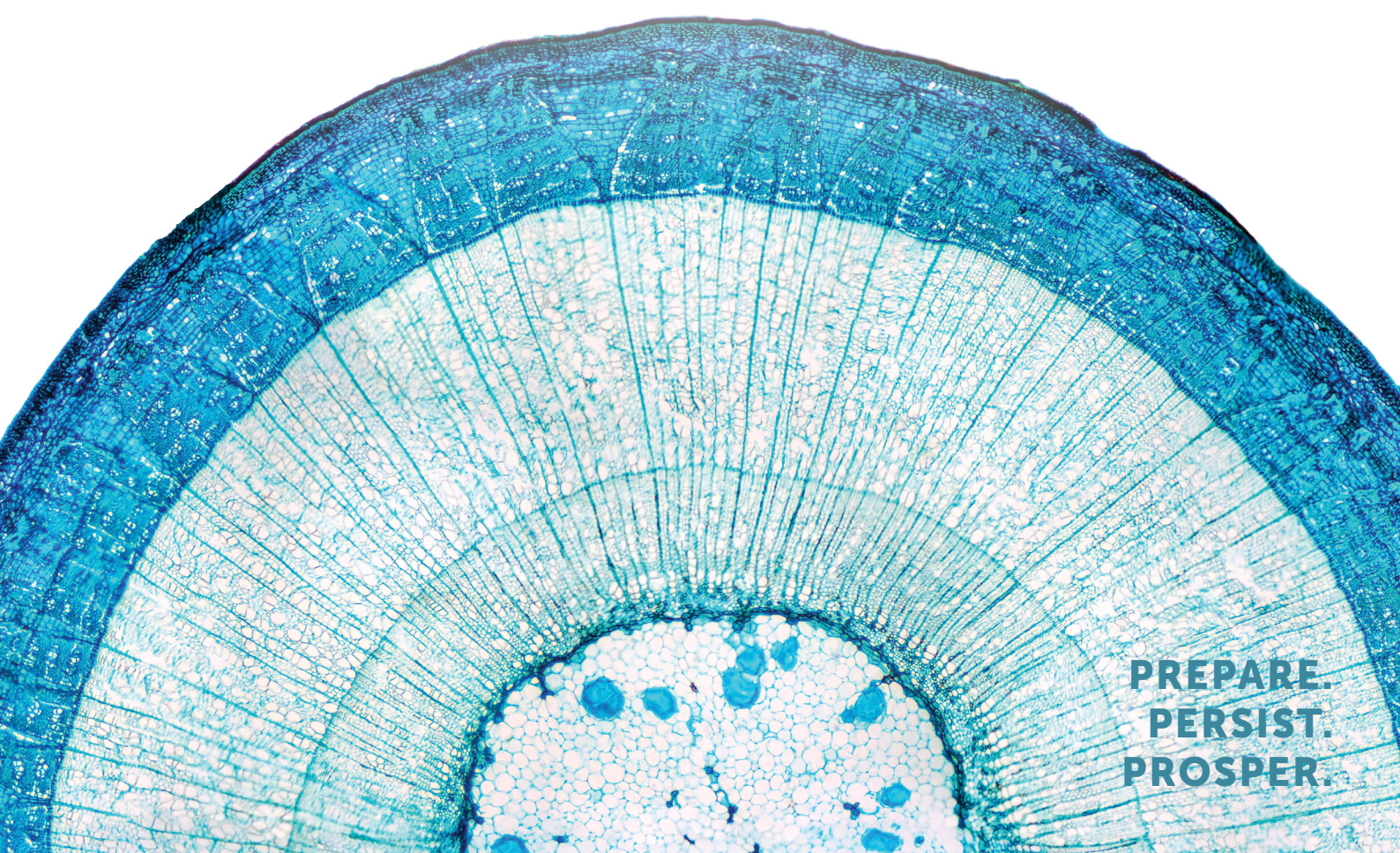


ATOM

CAPITAL

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

PAIA
MANUAL



PREPARE.
PERSIST.
PROSPER.

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1. DEFINITIONS

CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary, and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2. PURPOSE OF THE 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 and 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 IO and DIO who will assist the public with the records that 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 recipients or categories of recipients to whom the personal information may be supplied.
- 2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 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 ATOM CAPITAL (PTY) LTD

3.1 Chief Information Officer

Name	Bruce Andre Merwin Deane
Contact number	+27 84 582 4469
Email address	bruced@atomcapital.co.za

3.2 Deputy Information Officer

Name	Rosanna Couto
Contact number	+27 76 757 0852
Email address	rosannac@atomcapital.co.za

3.3 General contacts for access to information

Email address	admin@atomcapital.co.za
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3.4 National or head office

Company registration number	2022/589841/07
Postal address	Ground Floor, Block G, Pin Mill Farm 164 Katherine Street Sandown, Sandton 2196
Physical address	Ground Floor, Block G, Pin Mill Farm 164 Katherine Street Sandown, Sandton 2196
Contact number	+ 10 143 3760
Email	admin@atomcapital.co.za
Website	www.atomcapital.co.za

3.5 Subsidiaries and affiliates:

Company name	Affinity Capital Group (Affiliate)
Company registration number	2016/48513/07
Information Officer	Bruce Deane
Email	bruced@atomcapital.co.za
Contact number	+27 84 582 4469

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 each of the official languages and in braille.
- 4.3. The aforesaid guide contains the description of:
- 4.3.1. The objects of PAIA and POPIA;
 - 4.3.2. The postal and street address, phone, and fax number and, if available, email address of:
 - 4.3.2.1. The IO of every public body, and
 - 4.3.2.2. Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
 - 4.3.3. The manner and form of a request for:
 - 4.3.3.1. Access to a record of a public body contemplated in section 11 .
 - 4.3.3.2. Access to a record of a private body contemplated in section 50 .
 - 4.3.3.3. An internal appeal.
 - 4.3.3.4. A complaint to the Regulator.
 - 4.3.3.5. An application with a court against a decision by the IO 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.
 - 4.3.4. The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.5. The provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.6. The notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access;
 - 4.3.7. The regulations made in terms of section 92 ;
 - 4.3.8. The assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.9. The assistance available from the Regulator in terms of PAIA and POPIA; and
 - 4.3.10. 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.
- 4.4. Members of the public can inspect or make copies of the guide from the offices of the public and private bodies, 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 IO.
 - 4.5.2. From the website of the Regulator (www.inforegulator.org.za.)
- 4.6. A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:
- 4.6.1. English.
 - 4.6.2. Afrikaans.
 - 4.6.3. Zulu.

¹ Section 56(a) of POPIA – Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA

² Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 50 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 Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

⁵ Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

⁶ Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁷ Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁸ Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

⁹ Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

¹⁰ Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

5. GUIDE OF INFORMATION REGULATOR

- 5.1. A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.
- 5.2. The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.
- 5.3. Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.
- 5.4. You may also inspect the guide at the company's offices during ordinary working hours.
- 5.5. You may also request a copy of the guide from the Information Regulator at the following details:
- | | |
|----------------|---|
| Postal address | P O Box 31533, Braamfontein, Johannesburg, 2017 |
| Contact number | +27 (10) 023-5200 |
| Website | www.inforegulator.org.za |
| Email | PAIAComplaints@inforegulator.org.za |

6. LATEST NOTICES IN TERMS OF SECTION 52(2) OF PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

7. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

- 7.1 Categories of records of the Atom Capital (Pty) Ltd which are available without a person having to request access:

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Atom Capital's current PAIA Manual	X	X
Company Information	Company profile, business overview, investment philosophy, service offerings, contact details, FSP information	X	X
Regulatory Information	Financial Services Provider (FSP) licence information, regulatory disclosures, compliance notices, and statutory disclosures	X	X
Privacy and Data Protection	Privacy Policy, Cookies Policy, POPIA notices, Data Subject Rights information	X	X
Contact Information	Information Officer contact details, company contact details and office locations	X	X
Financial Services Information	Information regarding wealth management, investment advisory services, portfolio management services, retirement planning, and related financial services offered by Atom Capital	X	X
Client Education Material	Investment insights, market commentary, educational resources, newsletters, articles, and financial literacy material	X	X
Legal and Compliance Documents	Public disclaimers, website terms and conditions, conflict of interest disclosures and other public compliance notices	X	X
Marketing Material	Company brochures, service guides, promotional material, and presentations intended for public distribution	X	X
News and announcements	Company announcements, media releases, updates to services and business developments	X	X
Corporate Governance Information	Corporate governance information available to the public, including information regarding directors and executive management where publicly disclosed	X	X
Complaints Information	Complaints procedures, client service standards, and complaints escalation processes	X	X
B-BBEE Information	B-BBEE certificates or affidavits (where applicable)	X	X

Recruitment Information	Employment opportunities and career information made available to the public	X	X
POPIA and PAIA awareness training certificates	Records of internal or external training / awareness sessions on data protection (POPIA) and access to information (PAIA)	-	X
Supplier Information	Supplier onboarding requirements and procurement-related information available to prospective service providers	X	X
Contact information for IO	Name, designation, email address, telephone / fax / physical address	X	X

7.2 Description of the records/subjects of (Insert company name) which are available in accordance with any other legislation:

Category of Records	Applicable Legislation	Department/ Subject Area
Memorandum of Incorporation (MOI), company registration documents, statutory records, director records, shareholder records, board resolutions, and governance records	Companies Act, 71 of 2008	Corporate Governance
Employment contracts, personnel records, attendance records, remuneration records, leave records and employee information	Basic Conditions of Employment Act, 75 of 1997	Human Resources (HR)
Disciplinary records, grievance records, labour dispute records, CCMA documentation, and labour-related correspondence	Labour Relations Act, 66 of 1995	HR
Employment Equity Plans, Employment Equity Reports, and committee records	Employment Equity Act, 55 of 1998	HR
Financial statements, accounting records, management accounts, tax records, SARS submissions, and supporting documentation	Income Tax Act, 58 of 1962; Tax Administration Act, 28 of 2011	Finance
Workplace Skills Plans, Annual Training Reports, learnership agreements and training records	Skills Development Act, 97 of 1998	Training and Development
Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records	Unemployment Insurance Act, 63 of 2001; Unemployment Insurance Contributions Act, 4 of 2002	HR
Occupational health and safety records, risk assessments, incident reports, and safety records	Occupational Health and Safety Act, 85 of 1993	Occupational Health and Safety
VAT registrations, VAT returns, supporting VAT records and SARS correspondence	Value-Added Tax Act, 89 of 1991	Finance
Compensation claims and injury-on-duty records	Compensation for Occupational Injuries and Diseases Act, 130 of 1993	Occupational Health and Safety
Financial needs analyses, client mandates, Record of Advice (ROA), suitability assessments, risk profiles, and advisory records	Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS)	Client Services and Compliance
Investment advisory records, portfolio information, retirement planning records, wealth management records, and financial planning records	Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS)	Client Services
Client complaints, complaint registers, complaint investigations, and complaint resolutions	Financial Sector Regulation Act, 9 of 2017; FAIS Act, 37 of 2002	Compliance
B-BBEE certificates, ownership, and supplier development records	Broad-Based Black Economic Empowerment Act, 53 of 2003	Supply Chain Management (SCM)
Client contracts, service agreements, disclosures, marketing material, and client communications	Consumer Protection Act, 68 of 2008	Client Services/ Marketing
Data subject consent records, privacy notices, operator agreements, processing activity records, security incident records, and data subject requests	Protection of Personal Information Act, 4 of 2013	Legal and Compliance
PAIA Manual, access requests, request registers, and PAIA-related correspondence	Promotion of Access to Information Act, 2 of 2000 (PAIA)	Legal and Compliance

Know Your Client (KYC) records, client identification documents, verification records, risk assessments, and anti-money laundering documentation	Financial Intelligence Centre Act, 38 of 2001 (if applicable)	Client Services/ Finance
Regulatory submissions, compliance monitoring reports, audit reports, and regulatory correspondence	Financial Sector Regulation Act, 9 of 2017	Compliance
Supplier agreements, service level agreements, procurement records, and vendor information	Companies Act, 71 of 2008 and common law contractual obligations	Operations and Procurement
Electronic communications, website terms and conditions, electronic agreements, digital transaction records, and electronic signatures	Electronic Communications and Transactions Act, 25 of 2002	Information Technology (IT)
Pension, retirement, and employee benefit advisory records	Pension Funds Act, 24 of 1956	Client Services
Information security records, access control records, cybersecurity records, and IT governance documentation	Electronic Communications and Transactions Act, 25 of 2002	Information Technology
Long-term insurance, risk planning, and related advisory records (where applicable)	Insurance Act, 18 of 2017 and FAIS Act, 37 of 2002	Client Services
Marketing communications, newsletters, website content, and client engagement records	Consumer Protection Act, 68 of 2008; Electronic Communications and Transactions Act, 25 of 2002	Marketing
Document retention and disposal schedules, archive logs	National Archives and Records Service Act, 43 of 1996	Records Management

Although Atom Capital (Pty) Ltd has used its best endeavours to identify all legislation that may require or permit the retention and disclosure of records, this list may not be exhaustive. Whenever it becomes apparent that additional legislation permits or requires access to records held by the Company, this section will be updated accordingly. Where a requester seeks access to records in terms of legislation other than PAIA, the requester should identify the legislative basis upon which access is sought to enable the Information Officer to properly consider the request

- 7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:
- 7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.
 - 7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
 - 7.3.3 Further information which may be made available upon request.
- 7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8. REQUEST PROCESS

- 8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.
- 8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
- 8.4.1 The record(s) requested;
 - 8.4.2 The identity of the requestor;
 - 8.4.3 What form of access is required; and
 - 8.4.4 The postal address or fax number of the requestor.
- 8.5 The requestor must state that the records are required for the requestor to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.

- 8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.
- 8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
 - 8.8.2 Fees payable.
- 8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.
- 8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.
- 8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.
- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.
- 8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.
- 8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.
- 8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9. GROUNDS FOR REFUSAL

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
 - 9.2.2 Financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 9.4 Mandatory protection of the safety of individuals and the protection of property.
- 9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;
 - 9.6.2 Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;

- 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
- 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.
- 9.7 Research information of the company or a third party if such disclosure would place the research or the researcher at a serious disadvantage.
- 9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10. REMEDIES SHOULD A REQUEST BE REFUSED

- 10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11. FEES

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email, or any other electronic transfer	Actual expense if any

12. 1PROESSING OF PERSONAL INFORMATION

- 12.1 The purposes for processing personal information include:

Client Onboarding and Relationship Management

- 12.1.1 To establish, maintain and administer relationships with prospective and existing clients.
- 12.1.2 To assess clients' financial circumstances, objectives, needs, risk tolerance and investment requirements.

- 12.1.3 To conduct financial needs analyses, suitability assessments and risk profiling.
- 12.1.4 To provide wealth management, investment advisory, retirement planning, financial planning, risk planning and related financial services.
- 12.1.5 To facilitate the application, implementation, administration and servicing of financial products and investment solutions on behalf of clients.
- 12.1.6 To communicate with clients regarding their portfolios, investments, financial plans, transactions, reviews, service requests and other related matters.

Regulatory and Legal Compliance

- 12.1.7 To comply with applicable legal, regulatory and professional obligations, including obligations imposed by the Financial Advisory and Intermediary Services Act, 37 of 2002 ("FAIS"), the Financial Intelligence Centre Act, 38 of 2001 ("FICA"), the Protection of Personal Information Act, 4 of 2013 ("POPIA"), tax legislation and other applicable laws.
- 12.1.8 To conduct client identification, verification, screening and due diligence processes in accordance with anti-money laundering and combating the financing of terrorism requirements.
- 12.1.9 To maintain records required by law, regulatory authorities, professional bodies and internal governance requirements.
- 12.1.10 To comply with requests, inspections, investigations, audits and reporting obligations imposed by regulatory authorities, ombuds, supervisory bodies and law enforcement agencies.

Service Delivery and Business Operations

- 12.1.11 To respond to enquiries, complaints, claims, requests for information and service-related requests.
- 12.1.12 To manage, administer and improve Atom Capital's products, services, systems and business operations.
- 12.1.13 To process fees, invoices, payments, commissions, reconciliations and financial transactions relating to the services provided.
- 12.1.14 To liaise with investment managers, asset managers, financial institutions, product providers, administrators, insurers and other authorised service providers in connection with the provision of services to clients.
- 12.1.15 To manage supplier, contractor and service provider relationships and contractual obligations.

Marketing and Client Engagement

- 12.1.16 To provide clients and prospective clients with newsletters, market commentary, investment insights, educational content and information regarding services and products.
- 12.1.17 To conduct market research, client satisfaction surveys and service improvement initiatives.
- 12.1.18 To communicate promotional material, event invitations and marketing communications where permitted by law or where consent has been obtained.

Human Resources and Employment Administration

- 12.1.19 To administer recruitment, employment, payroll, employee benefits, training, performance management and employment-related obligations.
- 12.1.20 To maintain employee records and comply with labour, employment, tax and social security legislation.

Information Security and Risk Management

- 12.1.21 To verify identities, authenticate users and control access to systems, premises and information.
- 12.1.22 To protect Atom Capital's information, systems, infrastructure, employees, clients and business operations.
- 12.1.23 To detect, prevent and investigate fraud, misconduct, financial crime, unauthorised access, cybersecurity incidents and other unlawful activities.
- 12.1.24 To manage legal proceedings, dispute resolution processes, insurance claims, risk management activities and internal investigations.

POPIA and PAIA Administration

- 12.1.25 To process requests made in terms of the Promotion of Access to Information Act, 2 of 2000 ("PAIA").
- 12.1.26 To respond to requests from data subjects exercising their rights under POPIA.
- 12.1.27 To maintain records of processing activities, consent records, privacy notices, operator agreements, security incidents and compliance documentation.

Corporate Governance

- 12.1.28 To fulfil corporate governance, compliance, risk management, audit and reporting obligations.
- 12.1.29 To maintain business continuity, records management, document retention and organisational administration processes.
- 12.1.30 To exercise and protect the lawful rights, interests and obligations of Atom Capital (Pty) Ltd, its clients, employees, service providers and stakeholders.

12.1. 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
Clients / Investors	Full names, identity numbers, passport numbers, dates of birth, contact details, residential and postal addresses, marital status, employment information, tax numbers, banking details, financial information, investment portfolios, retirement information, estate planning information, beneficiary information, policy information, financial product information, transaction records, Record of Advice (ROA), risk profile information, FICA documentation, compliance records and correspondence.
Prospective Clients	Full names, identity numbers, passport numbers (where applicable), dates of birth, contact details, residential and postal addresses, marital status, employment information, financial circumstances, investment objectives, risk tolerance, financial needs analysis information, correspondence, and communication records.
Beneficiaries, Dependants and Nominees	Full names, identity numbers, dates of birth, relationship to client, contact information, beneficiary nominations, financial dependency information, and supporting documentation.
Service Providers and Suppliers	Names, registration numbers, VAT numbers, contact details, business addresses, banking details, contractual information, service level agreements, tax information, B-BBEE information and correspondence records.
Employees	Full names, identity numbers, tax numbers, contact details, residential addresses, banking details, employment contracts, payroll information, leave records, performance records, disciplinary records, qualifications, training records, race and gender information (for Employment Equity compliance), next-of-kin information, medical aid and benefit information, health and safety records and employment-related correspondence.
Job Applicants	Full names, contact details, curriculum vitae, qualifications, employment history, references, interview records, background verification information, criminal record checks, and credit checks (where permitted by law and relevant to the position).
Contractors and Consultants	Full names, identity numbers, contact details, banking information, tax information, contracts, qualifications, professional registrations, work history, and performance-related information.
Visitors to Company Premises	Full names, contact details, visitor register information, vehicle registration details, and CCTV footage where security monitoring is implemented.
Regulatory Authorities and Industry Bodies	Contact person details, regulatory correspondence, licence information, compliance reports, submissions, audit records, and investigation-related documentation.
Directors, Key Individuals and Representatives	Full names, identity numbers, contact details, residential addresses, qualifications, fit and proper information, FSCA registration information, declarations, disclosures, governance records, and compliance-related information.
Shareholders and Members (where applicable)	Full names, contact details, identity numbers, shareholding information, banking details, resolutions, declarations, and correspondence records.

Product Providers, Investment Managers and Business Partners	Contact details, business information, contractual records, accreditation information, service agreements, compliance records, and correspondence.
Website Users	IP addresses, browser information, cookies, website usage information, online identifiers, enquiry details, and website interaction information.
Marketing and Newsletter Subscribers	Full names, contact information, communication preferences, consent records, subscription records, and marketing engagement information.
Information Requesters and Data Subjects Exercising Rights	Identification information, contact details, PAIA request records, POPIA requests, objections, complaints, correction requests, deletion requests, and related correspondence.
Emergency Contacts and Next of Kin	Full names, contact details, relationship to employee or client and emergency contact information.
Children and Dependents (where relevant to financial planning, beneficiary nominations, trusts, or estate planning services)	Full names, identity numbers, dates of birth, relationship information, beneficiary details, and supporting documentation required for financial planning, trust administration, estate planning, or investment administration purposes.
Financial Institution Representatives, Insurers and Product Provider Representatives	Full names, contact details, designation, business information, accreditation details, and correspondence records.
Information Officer and Deputy Information Officer Records	Contact details, appointment records, regulatory registrations, training records, and compliance-related information.

13. THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED.

Categories of Data Subjects	Personal Information that may be Processed
Identity numbers, names, dates of birth, contact details and verification documentation for client identification and due diligence purposes	Financial Intelligence Centre (FIC), accredited identity verification providers, authorised verification service providers, financial institutions and regulatory authorities where required by law
Know Your Client (KYC), FICA, and anti-money laundering documentation	Financial institutions, product providers, investment administrators, insurers, regulatory authorities, compliance service providers, and verification service providers
Financial needs analyses, risk profiles, investment objectives, retirement planning information, and financial planning records	Investment managers, asset managers, discretionary fund managers, financial product providers, retirement fund administrators, insurers, and authorised service providers involved in servicing the client
Investment records, portfolio information, retirement fund information, policy information, and financial product information	Investment managers, asset managers, collective investment scheme managers, financial product providers, retirement fund administrators, insurers, and authorised service providers
Banking details, payment instructions, and transaction information	Banks, financial institutions, payment service providers, investment administrators and authorised financial product providers
Beneficiary information, dependant information, trust information, and estate planning documentation	Financial product providers, insurers, retirement fund administrators, trustees, executors, legal practitioners, and authorised service providers where necessary for service delivery
Tax numbers, tax residency information, financial records, and supporting documentation	South African Revenue Service (SARS), tax practitioners, financial institutions, and authorised service providers where required by law
Regulatory compliance records, client complaints, audit records, and compliance documentation	Financial Sector Conduct Authority (FSCA), Financial Intelligence Centre (FIC), FAIS Ombud, National Financial Ombud Scheme South Africa (NFO), auditors, legal advisors, and regulatory authorities

Regulatory compliance records, client complaints, audit records, and compliance documentation	Financial Sector Conduct Authority (FSCA), Financial Intelligence Centre (FIC), FAIS Ombud, National Financial Ombud Scheme South Africa (NFO), auditors, legal advisors, and regulatory authorities
Employment records, payroll information, employee tax records, and employee benefit information	Payroll administrators, SARS, employee benefit providers, pension fund administrators, medical aid providers, and labour-related regulatory bodies
Qualifications, professional registrations, and accreditation information	Professional bodies, qualification verification agencies, regulatory authorities, and training providers
Supplier and service provider information, including registration details, banking details, and contractual information	Financial institutions, auditors, legal advisors, and authorised business service providers
Information technology records, user account information, system access records, login credentials, IP addresses, and cybersecurity information	Managed IT service providers, cloud hosting providers, software vendors, cybersecurity service providers, and authorised system administrators
Website user information, cookies, online identifiers, and website interaction information	Website hosting providers, analytics providers, and authorised technology service providers
Marketing preferences, communication records, and newsletter subscription information	Authorised marketing service providers, communication platforms, customer relationship management (CRM) providers, and communication service providers
CCTV footage, visitor records, and security incident information	Authorised security service providers, law enforcement authorities, insurers, and regulatory authorities where required by law
Litigation records, legal opinions, investigation records, and dispute resolution documentation	Legal advisors, courts, regulatory authorities, mediators, arbitrators, insurers, and law enforcement agencies
PAIA requests, POPIA requests, complaints, and related correspondence	Information Regulator, legal advisors, courts, regulatory authorities, and authorised compliance service providers
Personal information relating to directors, key individuals, and representatives	FSCA, FIC, professional bodies, auditors, legal advisors, and regulatory authorities as required by applicable legislation
General personal information where disclosure is required or authorised by law	Courts, tribunals, regulators, law enforcement agencies, and any other party authorised or required by applicable legislation

14. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Atom Capital (Pty) Ltd may transfer, access, process or store certain categories of personal information outside the Republic of South Africa where necessary for the provision of financial services, regulatory compliance, business operations, information technology services, disaster recovery, cybersecurity, cloud storage, communications, or where authorised third-party service providers are located in foreign jurisdictions.

Such transfers may occur through the use of cloud-based systems, financial planning software, investment administration platforms, portfolio management systems, customer relationship management (CRM) systems, email and communication platforms, website hosting services, cybersecurity solutions, data backup services and other authorised service providers used in the ordinary course of business.

Where personal information is transferred outside the Republic of South Africa, Atom Capital (Pty) Ltd will take reasonable steps to ensure that the recipient is subject to laws, binding corporate rules, contractual obligations or other safeguards that provide an adequate level of protection substantially similar to that required under the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The table below identifies the jurisdictions in which personal information may potentially be stored or processed and the categories of personal information that may be affected:

The country in which personal information will be stored

Republic of South Africa - All categories of personal information processed by Atom Capital (Pty) Ltd.

United States of America (where applicable) - Client information, employee information, communication records, cloud-hosted information, website information, cybersecurity records, and software platform data.

United Kingdom (where applicable) - Client information, employee information, compliance records, communication records, and cloud-hosted business information.

European Union Member States (where applicable) - Client information, employee information, supplier information, compliance records, communication records, and cloud-hosted business information.

Other jurisdictions utilised by authorised cloud service providers, financial product providers, investment administrators, software vendors, website hosting providers, or information technology service providers - Personal information necessary for service delivery, regulatory compliance, system administration, information security, business continuity, and operational purposes.

14.1. The Company may share personal information with third parties and in certain instances this may result in transborder flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013. General description of information security measures to ensure the confidentiality, integrity, and availability of the information:

- 14.1.1. Keeping our systems secure through access controls, system monitoring, and usage tracking;
- 14.1.2. Storing physical and digital records in secure, access-controlled environments;
- 14.1.3. Restricting access to buildings, systems, and records to authorised personnel only;
- 14.1.4. Securely destroying or deleting personal information once it is no longer required;
- 14.1.5. Ensuring compliance with relevant data protection standards, legal requirements, and industry codes of conduct.

14.2. In addition, the following technical security safeguards have been implemented to support these-objectives:

- 14.2.1. Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
- 14.2.2. Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
- 14.2.3. Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
- 14.2.4. Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
- 14.2.5. Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
- 14.2.6. Ongoing system monitoring and access logging to detect and respond to suspicious activity;
- 14.2.7. Physical security controls such as keycard access, secure storage, and visitor management procedures;
- 14.2.8. Employee training and awareness programmes to promote secure data handling and prevent human error;
- 14.2.9. Secure disposal of physical and electronic records when no longer needed or when required by law.
- 14.2.10. These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

15. AVAILABILITY OF THE MANUAL

15.1. A copy of the manual is available:

- 15.1.1. On www.atomcapital.co.za or at any head office of Atom Capital (Pty) Ltd for public inspection during normal business hours;
- 15.1.2. To any person upon request and upon the payment of a reasonable prescribed fee; and
- 15.1.3. To the Information Regulator upon request.

15.2. 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.

16. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT

- 16.1. A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.
- 16.2. A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.
- 16.3. A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.
- 16.4. If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

17. REQUEST FOR CORRECTION/DELETION OF PERSONAL INFORMATION OR DESTRUCTION/ DELETION OF RECORD OF PERSONAL INFORMATION

- 17.1. A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- 17.2. A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 17.3. A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.
- 17.4. A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- 17.5. A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.
- 17.6. A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request.

18. UPDATING OF THE MANUAL

The head of Atom Capital (Pty) Ltd will update this manual on a regular basis.

Name of IO	Bruce Deane
Title of the head of the body	Director

APPLICABLE FORMS

PAIA Forms

Form 01: Request for a Copy of the Guide from an Information Officer [Regulation 3]

Form 02: Request for Access to Record [Regulation 7]

Form 03: Outcome of Request and of Fees Payable [Regulation 8]

Form 05: Complaint Form [Regulation 10]

Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)]

POPIA Forms

Form 1: Objection to the Processing of Personal Information

Form 2: Request for Correction or Deletion of Personal Information or Deletion of Record of Personal Information

Form 3: Application for the Issue of a Code of Conduct

Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing

Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing