Naviganti Financial Planning (Pty) Ltd

PAIA Manual
The Promotion of Access to Information

Last updated Nov 2025

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1. LIST OF ACRONYMS & ABBREVATIONS

1.1	**“DIO”**	Deputy Information Officer;
1.2	**“IO“**	Information Officer;
1.3	**“Minister”**	Minister of Justice and Correctional Services;
1.4	**“PAIA”**	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.5	**“POPIA”**	Protection of Personal Information Act No.4 of 2013;
1.6	**“Regulator”**	Information Regulator; and
1.7	**“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 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 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 NAVIGANTI FINANCIAL PLANNING (PTY) LTD

3.1 Chief Information Officer

Name: Neil Heyward Cairns
Tel: 031 767 5874
Email: neil@navigantifp.co.za

3.2 Deputy Information Officer

Name: Monique Smit
Tel: 031 767 5874
Email: monique@navigantifp.co.za

3.3 Key Individuals:

Name: Neil Heyward Cairns & Byron Heathcote
Tel: 031 767 5874
Email: neil@navigantifp.co.za & byron@navigantifp.co.za

3.4 Access to general information

Name: Monique Smit
Tel: 031 767 5874
Email: monique@navigantifp.co.za

3.5 Office Detail

Postal Address: PO Box 963,
Kloof
3640

Physical Address: Suite 9, Gillitts Office Park
2 Rodger Place
Gillitts
3610

Tel: 031 767 5874

Email: info@navigantifp.co.za

Website: www.navigantifp.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 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, electronic mail address of-

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer 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 ; and

4.3.3.2 access to a record of a private body contemplated in section 50 ;

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;

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 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92 .

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 Information Officer;

4.5.2 from the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available, for public inspection during normal office hours.

5. CATEGORIES OF RECORDS OF NAVIGANTI FINANCIAL PLANNING (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
Compliance	Privacy Policy	X	
Compliance	Conflict of Interest Management Policy		X
Compliance	Complaints Manual	X	
Compliance	Letter of introduction & Disclosures	X	

6. DESCRIPTION OF THE RECORDS OF NAVIGANTI FINANCIAL PLANNING (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Risk Management & Compliance Program (RMCP)	The Financial Intelligence Centre Act, No 38 of 2001 (FICA) and the Prevention of Organized Crime Act, No 121 of 1998 (POCA), more specifically Section 42 of the FIC Act (as amended)
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum of incorporation	Companies Act 71 of 2008
Employment Contracts	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act No 66 of 1995
Company documents	The Companies Act 71 of 2008
POPI Manual	Protection of Personal Information Act (POPI Act)

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY NAVIGANTI FINANCIAL PLANNING (PTY) LTD

Refer to our POPI Manual for more information on the records kept by Naviganti Financial Planning (Pty) Ltd

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Naviganti Financial Planning (Pty) Ltd gathers and processes personal information as part of our service delivery to clients, without collecting or accessing personal information, we will not be able to provide proper service to our clients and assist them with their financial- requirements and needs.

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 and Surname, ID Document and/or ID numbers, address, Passport and/or passport number (where applicable), contact details etc. (Refer to KYC Checklist on RMCP Document for more information)
Service Providers	Names, registration number, contact numbers, address etc.
Employees	Name and Surname, ID Document and/or ID numbers, address, Passport and/or passport number (where applicable), contact details etc, qualifications, Covid vaccination status, 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
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

One may request a copy of the POPI Manual for more information on the personal information that Naviganti Financial Planning (Pty) Ltd gathers, the flows thereof as well as the security measures implemented to ensure confidentiality and integrity.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available-

9.1.1 from the offices of Naviganti Financial Planning (Pty) Ltd for public inspection during normal business hours;

9.1.2 on www.navigantifp.co.za

9.1.3 from 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

Monique Smit, together with Neil Cairns will on a regular basis update this manual.