



PAIA MANUAL

AE Investment Managers (Pty) Ltd

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

**DATE OF COMPILATION: 01/10/2021
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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“Minister”	Minister of Justice and Correctional Services;
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“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 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 AE Investment Managers (PTY) LTD:

3.1. Chief Information Officer

Name:	Brandon Panther Director
Tel:	011 802 0220
Email:	brandon@aeinvestmentmanagers.co.za

3.3 Access to information general contacts

Email: *info@aeinvestmentmanagers.co.za*

3.4 National or Head Office

Physical Address: 3rd Floor, Oxford Corner, 32a Jellicoe Avenue, Rosebank

Telephone: 011 802 0220

Email: *info@aeinvestmentmanagers.co.za*

Website: www.aeinvestmentmanagers.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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² 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.

³ 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.

⁴ 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.

decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14⁵ and 51⁶ 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 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

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;

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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.”

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

4.6 A copy of the Guide is also available in the following official language, for public inspection during normal office hours-

4.6.1 English

5. CATEGORIES OF RECORDS OF AE Investment Managers 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
Corporate & Registration Information	Company name and registration number; Financial Services Provider (FSP) licence number; business address and contact details; directors / key individuals.	X	X
About Us / Corporate Profile	Company background, mission, vision, values; overview of the team and adviser profiles.	X	
Services & Product Information	Details of financial planning and wealth management services offered (Investments, retirement planning, estate planning, trusts); service descriptions available on the website.	X	X
Legal & Regulatory Disclosures	Licensing information; FAIS and FSCA compliance statements; regulatory disclaimers and disclosures; privacy policy; terms of use	X	X
News, Articles & Announcements	Any news, media releases, published updates, newsletters or educational articles	X	

FAQ & Public Guidance Material	Frequently Asked Questions; educational guides or insights available on the website.	X	X
Contact Information	Company contact details including telephone, email, contact form, and physical business address.	X	X
Disclosures & Notices	Privacy notices, legal notices and disclaimers are available on the website or upon request.	X	X

6. DESCRIPTION OF THE RECORDS OF AE Investment Managers 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

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY AE Investment Managers PTY LTD.

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual/ Bi-Annual or Quarterly Reports and Investment proposals/Strategy Plans

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

AE Investment Managers collects and uses personal information to understand each client's financial needs and to provide appropriate advice and solutions. This includes assisting with applications for financial products, managing investments, keeping records up to date, and maintaining regular communication with clients. The information is also processed to comply with legal and regulatory requirements such as FICA & FAIS Act. In addition, it enables the business to administer fees, maintain accurate records, and provide ongoing service and support.

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	Full names; identity or passport numbers; contact details (address, email, phone); employment and financial information; bank account details; tax numbers; investment and retirement fund details; copies of identification documents; risk profiles and financial objectives
Prospective Clients	Full names; contact details; basic financial information provided voluntarily (e.g. income, assets, investment needs) for the purpose of providing initial advice or proposals.
Service Providers	Names; registration and FSP numbers; VAT numbers; contact details; bank account details for payment; contractual information; business correspondence
Employees	Full names; identity numbers; contact details; residential address; demographic information (including gender and race, where required by law); qualifications; employment history; banking details; tax numbers; next-of-kin details; performance and HR records.

Categories of Data Subjects	Personal Information that may be processed
Job Applications	Full names; contact details; CVs; qualifications; employment history; references; identity numbers.
Regulators	Contact details and official correspondence exchanged with regulatory or supervisory bodies (e.g. FSCA, SARS, FIC).

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

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

AE Investment Managers takes appropriate technical and organisational measures to protect personal information. Access to client information is restricted to authorised staff, and our CRM system (Elite) has built-in security controls. Sensitive documents, such as PDF files, are password protected, and anti-virus and anti-malware software is installed on all devices. Staff receive regular training on information security and phishing awareness. Backups are maintained to ensure data can be restored if necessary, and

physical and digital safeguards are in place to prevent unauthorised access. *These measures are reviewed regularly to ensure ongoing protection of personal information*

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.aeinvestmentmanagers.co.za if any;

9.1.2 head office of the AE Investment Managers 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 AE Wealth Managers will on a regular basis update this manual.

Issued by

Brandon Panther | Director