PAIA MANUAL
EFS FINANCIAL ADVISORY (PTY) LTD

FSP Number: 45303

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

Date of Compilation: 15 May 2025
Date of Revision: 5 November 2026

1. INTRODUCTION

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 ("PAIA") and addresses the requirements of the Protection of Personal Information Act, 2013 ("POPIA").

The purpose of this Manual is to facilitate requests for access to records held by EFS Financial Advisory (Pty) Ltd and to provide information regarding the processing of personal information.

2. COMPANY INFORMATION

Company Name: EFS Financial Advisory (Pty) Ltd

Company Registration Number: 2014/081460/07
FSP Number: 45303

Physical Address:
81 Featherview Estate, Falls Road, Krugersdorp, 1739

Postal Address:
81 Featherview Estate, Falls Road, Krugersdorp, 1739

Telephone: 083 319 6476

Email: info@efsfin.co.za / chris@efsfin.co.za

Website: www.efsfin.co.za

3. INFORMATION OFFICER

Chief Information Officer

Name: Armin Bartholoma

Designation: Manager and Information Officer

Telephone: 066 222 4827

Email: admin@fincor.ai

Deputy Information Officer

Name: Chris Coetzee
Telephone: 083 319 6476
Email: chris@efsfin.co.za

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has compiled a guide explaining how to use PAIA and POPIA. The guide explains how to request records, the assistance available, applicable fees and remedies.

The guide is available from the Information Officer and the Information Regulator. A copy is available in English and Afrikaans for public inspection during normal office hours.

Information Regulator (South Africa)
Website: https://www.inforegulator.org.za
Email: enquiries@inforegulator.org.za

5. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

The following records are available without a formal PAIA request:

Category	Availability
PAIA Manual — Afrikaans version	Upon request
Privacy Policy	Website
Disclaimer	Website

6. RECORDS AVAILABLE IN TERMS OF 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. CATEGORIES OF RECORDS HELD

Subjects	Categories of Records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	HR policies and procedures Advertised posts Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing

8.1.1 Provision of Financial Services

To advise on, market, and sell long-term insurance products—specifically funeral policies—and to facilitate the underwriting, issuing, and ongoing servicing of such policies.

8.1.2 Client Onboarding and Verification

To perform identity verification, risk profiling, and compliance checks (including FICA and anti-money laundering requirements) during the onboarding process.

8.1.3 Contractual Obligations

To fulfill obligations in terms of policy contracts, including the administration of benefits, claims processing, and communication regarding policy matters.

8.1.4 Regulatory Compliance

To meet legal and regulatory requirements set out by industry regulators, including the Financial Sector Conduct Authority (FSCA) and the Prudential Authority.

8.1.5 Customer Relationship Management

To maintain and manage relationships with clients by providing ongoing support, policy updates, product information, and relevant service communications.

8.1.6 Business Operations and Reporting

To carry out internal processes such as audits, reporting, training, monitoring performance, and improving service delivery.

8.1.7 Consent-Based Communication

Where applicable, to contact clients with marketing or promotional information, subject to prior consent and in line with applicable privacy regulations.

8.2 Categories of Data Subjects and Personal Information

Categories of Data Subjects	Personal Information
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, and bank details
Employees	address, qualifications, identity documents, proof of bank account

8.3 Recipients of Personal Information

Category of Personal Information	Recipients
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority

8.4 Transborder Information Flows

All information is stored locally.

8.5 Information Security Measures

8.5.1. Access Controls: Role-based access permissions ensure that only authorised personnel can access personal information relevant to their responsibilities.

8.5.2. Anti-virus and Anti-malware Solutions: All systems and devices used within the organisation are protected with up-to-date anti-virus and anti-malware software to guard against cyber threats.

8.5.3. Secure Password Protocols: Strong password policies

8.5.4. Firewall and Network Security: Firewalls and intrusion detection systems are in place to monitor and protect our networks from external threats.

8.5.5. Data Backup and Recovery: Regular data backups are conducted and securely stored to ensure business continuity and information recovery in the event of data loss or system failure.

8.5.6. Physical Security Measures: Access to physical premises and filing systems is restricted and monitored.

8.5.7. Staff Training and Awareness.

9. REQUEST PROCEDURE

Submit the prescribed PAIA request form to the Information Officer. General access-to-information enquiries may be sent to info@efsfin.co.za.

The requester must:

Complete the prescribed form.

Provide sufficient detail to identify the requested records.

Pay any prescribed fees where applicable.

10. AVAILABILITY OF THIS MANUAL

This Manual is available at the EFS Financial Advisory head office for public inspection during normal business hours. Copies are available to members of the public and the Information Regulator upon request.

A prescribed copying fee may be payable for photocopies of the Manual, as contemplated in Annexure B of the Regulations.

11. UPDATING OF THE MANUAL

The head of EFS Financial Advisory will review and update this Manual regularly.

Issue Date: May 2025

Revision Date: November 2026

Issued by:

Chris Coetzee
Director