



BlueAsset
Group

BLUEASSET FS AFRICA (PTY) LTD

PAIA MANUAL

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

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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 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 BLUEASSET FS AFRICA (PTY) LTD

3.1. Chief Information Officer

Name: Johannes Jacobus Petrus Oosthuizen
Tel: +27 12 880 1390
Email: pierre@blueassetgroup.com

3.2. Deputy Information Officer

Name: Christian Frederick de Beer
Tel: +27 12 880 1390
Email: christian@blueassetgroup.com

3.3 Access to information general contacts

Email: admin@blueassetgroup.com

3.4 National or Head Office

Postal Address: Southdowns Office Park
22 Karee street
Irene
0157
Physical Address: Southdowns Office Park
Block A

Ground Floor Unit GF08
22 Karee street
Irene
Centurion
Telephone: +27 880 1390
Email: info@blueassetgroup.com
Website: www.blueassetgroup.com

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;

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;*

- 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 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-

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- 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.

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.”

- 4.5.1. 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 in the following two official languages, for public inspection during normal office hours-

- 4.6.1 English
- 4.6.2 Afrikaans

5. CATEGORIES OF RECORDS OF BLUEASSET FS AFRICA (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
Company Policies	Privacy Policy, Terms of Service, AML/KYC Policy	Yes	No
Financial Reports	Annual Reports, Audit Reports, Quarterly Earnings Reports	No	Yes
Transaction Records	User Transaction History, Loan Agreements	Yes	Yes
Customer Information	Account Details, KYC Documents, Customer Support Interactions	Yes	Yes
Marketing Materials	Blog Posts, Newsletters, Press Releases	Yes	No
Compliance Documentation	Regulatory Filings, Licensing Information	No	Yes
Operational Records	System Downtime Reports, Service Level Agreements	No	Yes

6. DESCRIPTION OF THE RECORDS OF BLUEASSET FS AFRICA (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
FAIS	Financial Advisery and Intermediary Services Act 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BLUEASSET FS AFRICA (PTY) LTD

Subjects on which the body holds records	Categories of records
Finance	Banking details, Transaction histories, Loan agreements, Financial statements, Payment records, Audit reports
Customer Information	Personal details (name, address, contact information), KYC documents (ID proofs, address proofs), Account verification, Customer support interactions, User preferences, User activity logs
Legal	Contracts (loan contracts, service agreements), Compliance reports (AML/KYC compliance, regulatory filings), Regulatory filings, Legal correspondence
Operations	Service logs (API logs, server logs), System performance reports, Downtime logs, Maintenance records, Service level agreements (SLAs), Operational procedures, Incident reports
Marketing	Campaign data (campaign performance metrics, target audience data), Customer feedback, Newsletter subscriptions, Marketing materials, Social media interactions, Advertising records, Promotional offers
Human Resources	Employee records (personal details, job titles, employment history), Payroll information, Training records, Performance evaluations, Recruitment records, Attendance records, Benefits information, Advertised posts
Strategic Documents	Market analysis reports, Corporate strategy documents, Risk management plans
Proposals	Business proposals, Funding proposals, Partnership proposals, Project proposals, Grant applications, RFP (Request for Proposal) responses

Subjects on which the body holds records	Categories of records
Recovery	Disaster recovery plans, Data backup records, Business continuity plans, Incident response plans, System restore logs, Post-incident analysis reports

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

At BlueAsset Group, we process personal information to provide tailored financial products and services, ensure compliance with legal and regulatory requirements, manage customer relationships, and enhance the security and functionality of our platform. This includes verifying customer identity, assessing eligibility for products, facilitating transactions, and improving user experience. By processing personal information, we aim to deliver personalized services and maintain the integrity and security of our operations.

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	First name, Surname, Physical Address, Email Address, Cell Phone Number, Date of Birth, IP Address, Identity Number, Bank Account details, Company name and registration number, KYC/KYB/FICA information,
Employees	First name, Surname, Physical Address, Email Address, Cell Phone Number, Date of Birth, Identity Number, Bank Account details, Employment history, Job role, Performance reviews
Third-party Service Providers	First name, Surname, Company name, Contact details, Service agreements, Performance data, Compliance documents, Financial records, Contract details, Technical specifications, Regulatory compliance information (varies by jurisdiction), Security assessments, Data protection agreements, Payment details
Website Visitors	IP Address, Browsing data, Cookie information

Categories of Data Subjects	Personal Information that may be processed
Business Partners	Company name, Registration number, Contact details, Contract details, Financial information
Regulatory Authorities	Company name, Compliance documents, Contact details

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 Information	Government agencies (e.g., Department of Home Affairs), Financial institutions (e.g., banks, credit bureaus)
Contact Information	Financial institutions (e.g., banks, insurance companies), Regulatory authorities (e.g., Financial Intelligence Centre)
Financial Information	Financial institutions (e.g., banks, credit bureaus), Auditors, Tax authorities (e.g., South African Revenue Service)
Transaction Histories	Financial institutions (e.g., banks, payment processors), Auditors, Regulatory authorities (e.g., Financial Sector Conduct Authority)
Compliance Documentation	Regulatory authorities (e.g., Financial Intelligence Centre, South African Reserve Bank), Auditors
Employment Information	Government agencies (e.g., Department of Labour), Financial institutions (e.g., pension funds, medical aid schemes)
KYC (Know Your Customer) Information	Financial institutions (e.g., banks, investment firms), Regulatory authorities (e.g., Financial Intelligence Centre)
Legal Documents	Legal counsel, Regulatory authorities (e.g., Financial Sector Conduct Authority), Courts

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
IP Address and Online Identifiers	Cybersecurity firms, IT service providers, Regulatory authorities (e.g., Information Regulator)
Qualifications	Government agencies (e.g., Department of Education), Employers, Professional certification bodies, Universities, Education Bodies.

8.4 Planned transborder flows of personal information

At BlueAsset FS Africa, we utilize MongoDB Atlas for managing and backing up our data. MongoDB Atlas is a cloud-based database service that provides robust data replication and backup features. Our data is stored and replicated across multiple regions to ensure high availability and disaster recovery.

Data replication is handled through a distributed database system, ensuring that data is synchronized and available both inside and outside the Republic of South Africa. This approach enhances data reliability, security, and accessibility for our users globally.

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

At BlueAsset FS Africa, we implement robust security measures to ensure the confidentiality and integrity of personal information. Our database operations utilize MongoDB Atlas, a fully managed cloud database service, which offers the following security features:

Data Encryption:

- In Transit: Data is encrypted using Transport Layer Security (TLS) or Secure Sockets Layer (SSL).
- At Rest: Uses AES-256 encryption for database files, backups, and snapshots.

Access Controls:

- Role-Based Access Control (RBAC): Defines user roles and permissions.
- IP Whitelisting: Restricts access to approved IP addresses.

Automated Backups:

- Scheduled every 4 hours with point-in-time recovery, and daily backups stored for 5 years.

Monitoring and Alerts:

- Comprehensive monitoring tools and customizable alerts for potential security issues.

Compliance:

- Adheres to industry standards and regulations such as GDPR, HIPAA, and SOC 2.

Advanced Security Options:

- VPC Peering: Allows secure connections between the database and internal networks.
- End-to-End Auditing: Tracks all database operations for a comprehensive record of data access and modifications.

These measures ensure that our data management practices are secure and compliant with international standards, protecting personal information effectively.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.blueassetgroup.com, if any;

9.1.2 head office of the BlueAsset FS Africa (Pty) Ltd 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 a BlueAsset FS Africa (Pty) Ltd will on a regular basis update this manual.

Issued by



Johannes Jacobus Petrus Oosthuizen

Chief Executive Officer/Founder