PROMOTION OF ACCESS TO INFORMATION MANUAL

THE WEALTH NETWORK (PTY) LTD

A Juristic Representative of Discovery Life FSP 18147

Company Registration Number:

PAIA MANUAL

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

DATE OF COMPILATION: 01/05/2025
DATE OF REVISION: 01/05/2025

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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 THE WEALTH NETWORK (Pty) Ltd T/A The Wealth Network

3.1. Chief Information Officer

Name:	Levene Naidoo
Tel:	+27 82 779 7000
Email:	levenen@discovery.co.za

3.2 Access to information general contacts

Email:	levenen@discovery.co.za

3.3 National or Head Office

Postal Address:	204 Chatsworth Main Road, Umhlatuzana, Ethekwini, 4092
Physical Address:	204 Chatsworth Main Road, Umhlatuzana, Ethekwini, 4092
Telephone:	031 576 7025
Email:	levenen@discovery.co.za
Website:	https://thewealthnetwork.co.za/

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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.

4.1. The Guide is available in each of the official languages and in braille.

4.2. The aforesaid Guide contains the description of-

4.2.1. the objects of PAIA and POPIA;

4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.2.2.1. the Information Officer of every public body, and

4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA2;

4.2.3. the manner and form of a request for-

4.2.3.1. access to a record of a public body contemplated in section 11[3]; and

4.2.3.2. access to a record of a private body contemplated in section 50[4];

4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.2.6. 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-

4.2.6.1. an internal appeal;

4.2.6.2. a complaint to the Regulator; and

4.2.6.3. 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;

4.2.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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[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.

[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*

4.2.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.2.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.2.10. the regulations made in terms of section 92[11].

4.3. 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.

4.4. The Guide can also be obtained-

4.4.1. upon request to the Information Officer;

4.4.2. 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 and isiZulu

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[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."

5. CATEGORIES OF RECORDS OF THE WEALTH NETWORK PTY LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Records	Type of Records	Website	Email
Company Information	Company overview, contact details, FSP disclosure	X	X
Services Overview	Brochures, financial service categories	X	X
Privacy Documents	POPIA Consent Form, Privacy Policy	X	X
PAIA Manual	This document (full version)	X	X
Complaints Summary	Escalation procedure and contact details	X	X
Disclosure Notices	Legislated disclosure of authorised representative		X
Treating Customers Fairly			X

6. DESCRIPTION OF THE RECORDS OF THE WEALTH NETWORK PTY LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The Wealth Network is required to hold and retain certain records under the following legislation:

Applicable Legislation	Records Held
Companies Act 71 of 2008	Incorporation documents, annual returns
FAIS Act 37 of 2002	Advice records, compliance registers, conflict disclosures
POPIA Act 4 of 2013	Privacy policy, consent forms, data registers
FICA 38 of 2001	KYC documents, verification reports
Income Tax Act 58 of 1962	Tax returns, payroll records, VAT documentation
Long-Term Insurance Act 52 of 1998	Life cover applications, benefit summaries
Short-Term Insurance Act 53 of 1998	Personal and commercial insurance policies
Pension Funds Act 24 of 1956	RA and preservation fund documentation
CISCA 45 of 2002	Collective investment documents, portfolio statements
Basic Conditions of Employment Act 75 of 1997	Employment contracts, leave records
Skills Development Act 97 of 1998	Staff training and compliance records
Electronic Communications and Transactions Act 25 of 2002	Email disclaimers, digital contracts
Medical Schemes Act 131 of 1998	Discovery Health benefit recommendations
Banks Act 94 of 1990	Discovery Bank advice records, deposit product summaries

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE WEALTH NETWORK PTY LTD

Applicable Legislation	Records Held
Finance	Annual financial statements, Tax records, Commission statements, Banking details, Audit logs
Human Resources (HR)	Employment contracts, Payroll records, Leave registers, Training records, Performance reviews
Client Services	Needs analyses, Advice records, Quotes and applications, Disclosure notices, POPIA consent forms
Compliance & Legal	Complaints register, Conflict of interest register, FICA documentation, FAIS compliance records
Marketing and Communications	Advertising materials, Compliance checklists, Social media content approvals
Training & Governance	Training register, DLP meeting notes, Attendance logs
Information Technology (IT)	User access logs, Information security policies, System monitoring reports

8. PROCESSING OF PERSONAL INFORMATION

The Wealth Network processes personal and special personal information to provide financial services, comply with regulations, facilitate onboarding, manage client and employee relationships, and support Discovery's product ecosystem.

8.1 Purpose of Processing Personal Information

- Fulfilling statutory obligations in terms of applicable legislation
- Historical record keeping, research and recording statistics necessary for fulfilling your business objectives.
- Keeping of accounts and records
- Marketing and advertising
- Monitoring, maintaining and managing our contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties
- Obtaining information necessary to provide contractually agreed services to a customers and clients
- Resolving and tracking complaints
- Staff administration
- Verifying information provided to us

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

- Clients and client's employees, prospective clients, representatives, agents, contractors and service Providers
- Existing and former employees (including contractors, agents, temporary and casual employees)
- Healthcare patients and healthcare providers associated with patients
- Our stakeholders
- Suppliers and service providers and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers.

Categories of Data Subjects	Personal Information that may be processed
Natural Persons	Names, Physical and postal addresses, Date of birth, ID number, Tax related information, Medical, dental, mental and/or other healthcare related information, Nationality, Gender, Confidential correspondence, Email address, Telephone number, Policy Numbers
Juristic Persons	Names of contact persons, Name of Legal Entity, Registration Number, Physical and Postal address and contact details, financial information, Authorised signatories, beneficiaries, ultimate beneficial owners, BBBEE information
Categories of special information processed	Racial / ethnic origin, Physical / mental health details

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Categories of Recipients to whom the personal information may be supplied	Category of personal information
Discovery Group	Policy servicing, claims processing, rewards administration
FSCA / Information Regulator	Regulatory reporting and compliance oversight
Third party verification agencies and credit bureau	Aggregation of financial product information
Cloud Providers (Microsoft 365)	Email and document storage
Compliance Officers / Auditors	Internal and third-party compliance reviews
South African Police Services	Identity number and names, for criminal checks
South African Qualifications Authority	Qualifications for qualification verifications

Credit Bureaus	Credit and payment history, for credit information
Other: Claims investigators, Educators and examining bodies, Employees of the organization, Family, associates and representatives of the person whose personal information is processed, Healthcare, social and welfare organizations, Patient associated healthcare facilities and professionals, Suppliers, service providers, vendors, agents and representatives of such entities	

8.4 Planned transborder flows of personal information

It may be required from time to time to share personal information of data subjects with third parties in other countries. Any sharing of personal information of data subjects with third parties in other countries will be done only if the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection which effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in the Protection of Personal Information Act and the data subject consents to the transfer.

Any such transfer will have to be shown to be necessary for the performance of a contract between the data subject and the recipient in question, or for the implementation of precontractual measures taken in response to the data subject's request.

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

Up to date technology is employed to ensure the confidentiality, integrity and availability of the Personal Information under our care. Measures include:

- Acceptable usage of personal information
- Access control to personal information
- All third parties with whom any contract exists are required to ensure that appropriate security, privacy and confidentiality obligations are observed.
- Computer and network security including Firewalls, Virus protection software and update protocols
- Governance and regulatory compliance
- Information security and HR policies including Bring Your Own Device (BYOD) policies

- Internal process to report security breach or anticipated security breach
- Investigating and reacting to security incidents.
- Logical and physical access control
- Monitoring access and usage of private information
- Physical security
- Retention and disposal of information
- Secure communications
- Security in the outsourcing of any activities or functions through appropriate contracts
- Training of staff members

We continuously establish and maintain appropriate, reasonable technical and organisational measures to ensure that the integrity of the Personal Information which may be in our possession or under our control, is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, in industry practice and generally accepted information security practices and procedures applicable.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on https://thewealthnetwork.co.za/, if any;

9.1.2 head office of The Wealth Network 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 Director of The Wealth Network Pty Ltd will on a regular basis update this manual.

Issued by

Levene Naidoo

Signed by Levene Naidoo, levenen@discovery.co.za

13/06/2025 10:43:27(UTC+02:00) SIGNIFLOW

Levene Naidoo

Director of The Wealth Network