

PAIA MANUAL

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

DATE OF COMPILATION: 2026/05/26

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|-------------|---|
| 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 |
| 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 REDWOOD UNLIMITED FINANCIAL SERVICES (Pty) Ltd

3.1 Chief Information Officer

Name: Dante Sinibaldi

Tel: 083 253 4256

Email: dante@redwoodunlimited.co.za

3.2 Deputy Information Officer

Name: Shaloma Ramchurrán

Tel: 031 572 3427

Email: shaloma@redwoodunlimited.co.za

3.3 Access to information general contacts

Email: dante@redwoodunlimited.co.za

3.4 Main office

Postal Address: 20 Bute Road, Morningside, Durban, 4001

Physical Address: 20 Bute Road, Morningside, Durban, 4001

Telephone: 083 253 4256

Email: info@redwoodunlimited.co.za

Website: www.redwoodunlimited.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 in the following two official languages, for public inspection during normal office hours–

4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF REDWOOD UNLIMITED FINANCIAL SERVICES (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
PAIA Manual	Manual	Yes	Yes
FSP License	License	No	Yes

6. DESCRIPTION OF THE RECORDS OF REDWOOD UNLIMITED FINANCIAL SERVICES (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 REDWOOD UNLIMITED FINANCIAL SERVICES (Pty) Ltd

Subjects on which the body holds records	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 Personal Information

- *To provide financial advisory and intermediary services to clients in accordance with the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS);*
- *To fulfil regulatory and compliance obligations, including FICA (Financial Intelligence Centre Act), income tax reporting to SARS, and Employment Equity reporting;*

- To manage employment relationships, including payroll, leave, performance and HR administration;
- To engage and manage service providers and contractors;
- To conduct client onboarding, including FICA due diligence and KYC (Know Your Client) verification;
- To communicate with clients regarding their portfolios, product offerings and regulatory updates; and
- To protect the legitimate interests of the company, its clients and employees.

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, address, registration numbers or identity numbers, employment status and bank details
Service Providers	Names, registration number, VAT numbers, address, trade secrets and bank details
Employees	Address, qualifications, 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

8.4 Planned transborder flows of personal information

Redwood Unlimited Financial Services (Pty) Ltd may store certain personal information on cloud-based platforms, some of which may be hosted on servers located outside the Republic of South Africa. Where such transfers occur, the company ensures that adequate data protection safeguards are in place in accordance with POPIA, and that the recipient country provides a comparable level of protection for personal information.

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

Redwood Unlimited Financial Services (Pty) Ltd has implemented the following information security measures to ensure the confidentiality, integrity and availability of personal information under its care:

Data encryption of client records and sensitive electronic communications;
Anti-virus and anti-malware solutions on all company devices;

Access controls and user authentication, including password policies and restricted access on a need-to-know basis;

Secure document storage, with physical and electronic safeguards against unauthorised access or loss;

Regular staff awareness and training on data protection obligations under POPIA; and Incident response procedures for the timely reporting and management of data breaches to the Information Regulator and affected data subjects, in accordance with section 22 of POPIA.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available–

9.1.1 on www.redwoodunlimited.co.za;

9.1.2 head office of Redwood Unlimited Financial Services (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 Redwood Unlimited will on a regular basis update this manual.

Issued by



Dante Sinibaldi

Director