



WENRU

Creating Informed Decisions

PAIA

Promotion of Access
to Information Act, 2000



PAIA MANUAL - WENRU (PTY) LTD

FSP Number: 45153

Version: 2.0

Effective Date: 23 January 2026

Status: Approved

DOCUMENT CONTROL AND GOVERNANCE

This Promotion of Access to Information Act (“PAIA”) Manual is issued in accordance with section 51 of the Promotion of Access to Information Act, 2 of 2000, as amended, and is aligned with the Protection of Personal Information Act, 4 of 2013 (“POPIA”). It operates subject to applicable legislation and regulatory requirements.

This Manual must be read together with:

- Wenru’s POPIA Policy
- Risk Management and Compliance Programme (RMCP)
- Governance Framework
- Operations Manual and SOPs
- Complaints Management Policy

This Manual forms part of Wenru’s broader governance and compliance framework and is subject to version control, periodic review, and regulatory oversight.

1. INTRODUCTION AND PURPOSE

The purpose of this PAIA Manual is to provide a clear framework through which access to records held by Wenru (Pty) Ltd may be requested and considered in accordance with PAIA.

This Manual:

- sets out the process for requesting access to records;
- describes the categories of records held by Wenru;
- explains how PAIA interacts with POPIA and other regulatory obligations; and
- ensures transparency while protecting confidential, personal, and regulated information.

Wenru recognises the constitutional right of access to information while balancing this right against obligations relating to confidentiality, privacy, commercial sensitivity, and statutory record-keeping.

Authority and Alignment

This PAIA Manual is issued in accordance with section 51 of PAIA under the authority of Wenru (Pty) Ltd’s Governance Framework.

This Manual is procedural in nature and governs the manner in which requests for access to information are submitted, processed, assessed, and recorded. All access to records is subject to applicable data protection, confidentiality, and security requirements.

2. LEGISLATIVE AND REGULATORY FRAMEWORK

This Manual must be applied in accordance with:

- Promotion of Access to Information Act, 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Financial Advisory and Intermediary Services Act, 37 of 2002
- Financial Intelligence Centre Act, 38 of 2001
- Applicable regulations, directives, and guidance

Where any conflict arises, applicable legislation prevails.

3. COMPANY DETAILS

Company Name: Wenru (Pty) Ltd

Financial Services Provider (FSP) Number: 45153

Business Type: Licensed Financial Services Provider

Email Address: info@wenru.co.za

4. INFORMATION OFFICER

In terms of PAIA and POPIA, the **Key Individual of Wenru (Pty) Ltd** is the designated Information Officer.

All PAIA and POPIA-related requests must be submitted to:

 peet@wenru.co.za

The Information Officer may delegate administrative functions but retains overall responsibility for compliance.

5. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain records may be accessed without submitting a formal PAIA request, subject to availability and legal limitations. These may include:

- public corporate information;
- regulatory disclosures required by law; and
- published policies and manuals where appropriate.

6. CATEGORIES OF RECORDS HELD BY WENRU

Wenru holds records across multiple operational, regulatory and support functions. These include, but are not limited to, the following categories:

6.1. Client and Advice Records

- Client onboarding and identification records
- Customer Due Diligence (CDD) documentation
- Beneficial ownership records
- Records of Advice (ROAs)
- Needs analyses and financial planning documentation
- Servicing, review and amendment records

6.2. Compliance and Regulatory Records

- Risk Management and Compliance Programme (RMCP) documentation
- Compliance monitoring reports
- Breach, incident and escalation registers
- Regulatory correspondence
- Training and competency records

6.3. POPIA and Information Management Records

- Data processing records
- Data subject request registers
- POPIA consent and objection records
- Data protection and security documentation

6.4. Complaints and Dispute Records

- Complaints registers
- Investigation records
- Resolution outcomes
- Ombud-related correspondence

6.5. Financial and Accounting Records

- Accounting and financial statements
- Invoices and payment records
- Tax-related documentation

6.6. Human Resources Records

- Employment contracts
- Personnel records
- Training and performance records

6.7. Outsourcing and IT Records

- Outsourcing agreements
- Service provider due diligence
- IT access controls and system logs
- Business continuity and disaster recovery documentation

Inclusion of a category does not guarantee access. All requests are assessed in accordance with PAIA, POPIA and other applicable laws.

7. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

7.1. Submission of Requests

Requests for access to records must:

- Be submitted in writing using the prescribed PAIA request form (Annexure A); and
- Be addressed to the Information Officer.

7.2. Assessment Process

Upon receipt, requests are:

- Logged and acknowledged;
- Assessed to determine whether they fall under PAIA or POPIA;
- Evaluated against statutory requirements and grounds for refusal;
- Approved, partially approved or refused; and
- Responded to within prescribed timeframes.

7.3. Timeframes

Requests are processed within the timeframes prescribed by PAIA, unless extensions are permitted in law.

8. FEES

Fees may be payable in accordance with PAIA regulations.

Details of applicable fees are set out in **Annexure D**.

No fee is charged for POPIA data subject requests relating to access, correction, or deletion of personal information, unless permitted by law.

9. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused where:

- Disclosure would infringe the privacy or personal information of a third party;
- Records are protected by confidentiality, privilege or commercial sensitivity;
- Disclosure would prejudice regulatory, legal or investigative processes;
- Refusal is permitted or required under PAIA or other legislation.

Each refusal decision is documented and communicated with reasons.

10. REMEDIES AVAILABLE TO REQUESTERS

Where access is refused, requesters may:

- Request reasons for refusal;
- Lodge a complaint with the Information Regulator; or
- Approach a court of competent jurisdiction.

Internal escalation does not replace statutory remedies.

11. POPIA ALIGNMENT AND DATA SUBJECT RIGHTS

Requests involving personal information are processed in accordance with POPIA. Data subjects have the right to:

- Access personal information held about them;
- Request correction or deletion;
- Object to processing in certain circumstances; and
- Lodge complaints with the Information Regulator.

POPIA rights are exercised using the forms contained in **Annexures B and C**.

12. RECORD KEEPING AND AUDIT TRAIL

All PAIA and POPIA requests, decisions and correspondence are:

- Properly documented;
- Retained in accordance with statutory requirements; and
- Made available for regulatory inspection upon request.

13. REVIEW AND MAINTENANCE

This PAIA Manual is:

- Reviewed at least annually;
- Updated where legislative or operational changes occur; and
- Approved by management of Wenru (Pty) Ltd.

VERSION CONTROL

Version: 2.0

Effective Date: 23 January 2026

Approved by: Key Individual

Review Cycle: Annual

ANNEXURES

- **Annexure A:** PAIA Request Form
- **Annexure B:** POPIA Data Subject Access / Correction Request Form
- **Annexure C:** POPIA Objection to Processing Form
- **Annexure D:** PAIA Fee Schedule

ANNEXURE A: PAIA REQUEST FORM

	Information
Full Name / Entity Name	
Identity / Registration Number	
Postal Address	
Physical Address	
Telephone Number	
Email Address	
Capacity of Requester	
Description of Record Requested	
Reference Number (if known)	
Date Range	
Form of Access Required	
Signature	
Date	

ANNEXURE B: POPIA DATA SUBJECT ACCESS / CORRECTION REQUEST FORM

	Information
Full Name	
Identity Number	
Contact Number	
Email Address	
Request Type (Access / Correction / Deletion)	
Description of Personal Information	
Reason for Request	
Supporting Documentation Attached	
Signature	
Date	

ANNEXURE C: POPIA OBJECTION TO PROCESSING FORM

	Information
Full Name	
Identity Number	
Contact Number	
Email Address	
Type of Processing Objected To	
Grounds for Objection	
Effective Date of Objection	
Signature	
Date	

ANNEXURE D: PAIA FEE SCHEDULE

Description	Fee
Request Fee (non-personal)	R140.00
Photocopy per A4 page	R2.00
Printed copy per A4 page	R2.00
Copy on flash drive	R40.00
Transcription per A4 page	R15.00
Search & preparation (per hour)	R30.00
Deposit (if applicable)	Up to 1/3 of total