

2025

Manual Prepared in Terms of Section 51 of
the Promotion of Access to Information Act,
No 2 of 2000



Bespoke Financial Services

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Promotion of Access to Information Act (PAIA) Manual

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A. INTRODUCTION

BESPOKE FINANCIAL SERVICES (PTY) LTD conducts business as a Financial Advisory and Intermediary Services company. We are an Authorised Financial Services Provider in terms of the Financial Advisory & Intermediary Service Act. Our FSP licence number is FSP 5398.

B. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

1. Company contact details

Directors:

- Mrs Kim Frost
- Mr. Stearn Frost
- Mr. Gary Alge
- Ms. Sia Chimbanga

All requests for information in terms of this manual should be directed to:

Information Officer: Mrs Kim Frost

Postal Address: P.O. Box 414164, Craighall 2024

Street Address: 167 Barry Hertzog Avenue, Emmarentia 2195

Phone Number: (011) 646 2286

Email: info@bespoke-fs.co.za

2. Guide on how to use the Promotion of Access to Information Act (PAIA)

The Information Regulator ("IR") has, in terms of section 10(1) of PAIA, updated and made available a revised Guide on how to use PAIA ("Guide") in an easily comprehensible form and manner, accessible by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act 2 of 2013 ("POPIA").

Should you require to exercise any right contemplated in PAIA and POPIA, we refer you to the Guide. It includes:

- (a) what the objects of PAIA and POPIA are;
- (b) the relevant contact details of each public and private body (where possible);



- (c) the process that needs to be followed to request access to records;
- (d) assistance available from the IR and Information Officers in terms of both PAIA and POPIA;
- (e) how to get access to the manual of a private body;
- (f) all the remedies available in law to you; and
- (g) details on prescribed fees payable in respect of requests for information.

This Guide is available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

Please direct any queries to:

Information Regulator

Postal address: JD House
27 Stiemens Street,
Braamfontein
Johannesburg 2001

Website: www.inforegulator.org.za

E-mail: enquiries@inforegulator.org.za

3. Disclosures required in terms of Section 51(1)(c) of PAIA insofar as POPIA is concerned

Bespoke will only collect, process and store personal information, with consent, and for legitimate purposes. This includes the following:

(a) Categories of data subjects:

Categories of Data Subjects	Personal Information that may be processed
Clients	Name and surname, nationality, address, contact details, registration numbers or identity numbers and date of birth, email address and bank details
Service Providers	Names, registration number, tax information, address, and bank details
Employees	Name, identity numbers, tax information, contact details, address, qualifications, gender and race



(b) Purpose of processing:**i) Procurement of consent**

This is where a data subject (client) has consented to the processing of the personal information provided as part of onboarding or any subsequent instructions relating to the data subject's investment(s). Bespoke is also required by law to collect certain personal information of its clients, the data subjects.

ii) Fulfilment of our contract with our clients (the data subjects)

Processing of personal information is necessary for us to provide investment management and other services and benefits as agreed between us and our clients (the data subjects).

iii) Compliance with legal obligations

Processing of personal information to comply with any binding legal obligations imposed on us by the relevant governmental or regulatory authority.

iv) Legitimate interests

Verification for the purposes of preventing and mitigating financial crimes, fraud or money laundering; adhering to local and international best practice guidelines to safeguard our client's investments; or performing the relevant IT due diligence testing to detect malicious data and cyber threats.

(c) Recipients of personal information

Bespoke shares personal information with third party service providers in compliance with its contractual and legal obligations.

(d) Transborder flows of personal information

The investment companies that Bespoke uses may transfer your (the client) personal information to a foreign country, where necessary, if you have offshore investments. These companies will ensure that anyone to whom it passes personal information, is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection, and the third party agrees to treat that personal information with the same level of protection as Bespoke is obliged to provide under POPIA.



Any cross-border transfer of personal information shall be with the data subject's (client's) consent and /or where it is necessary for the performance of a contract between Bespoke and the client (data subject).

(e) Storage and destruction of personal information

Bespoke will retain personal information for the duration of the relationship between Bespoke and the data subject in question. After such relationship ceases, Bespoke will keep personal information in accordance with retention requirements imposed by any law and for prudent record-keeping purposes. Personal information may be retained for longer than such periods, should it be the subject of any litigation or for other legal reasons. Bespoke may, with the necessary security controls in place, also keep personal information for research or statistical purposes.

(f) General description of security measures

Bespoke continuously implements appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of personal information processed. These measures are designed to prevent:

- loss of, damage to or unauthorised destruction of personal information; and
- unlawful access to or processing of personal information.

The measures taken by Bespoke include, but are not limited to:

i) Identity and Access Management

Defined, developed, adopted and documented standards and procedures covering all aspects of access management are implemented to minimise the risks associated with unauthorised or inappropriate access to applications and data.

ii) Threat and Vulnerability management

Defined, developed, adopted and documented standards and procedures covering all aspects to manage, monitor and respond to potential electronic threats and vulnerabilities are adopted and implemented.

Defined, developed, adopted and documented standards and procedures covering all aspects of the incident management process that supports the implementation of resolution and response to information security incidents.



iii) Patch Management

Defined and documented processes to implement and maintain preventive, detective and corrective measures to protect technology systems and data from malicious software are developed.

The effectiveness of these measures shall be regularly assessed and adjusted as necessary to align with evolving threats and regulatory requirements.

4. Types of Records

(a) Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to any of the entities listed in this manual, and the financial services industry in general, as it applies to the specific environment in which the entity operates, are available in accordance with said legislation.

(b) Records available without requesting access in terms of PAIA

A private entity (person or company) may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of PAIA. The Minister must publish any description so submitted by notice in the Government Gazette.

(c) Records available on request

Bespoke sets out below the subjects and categories of records that are, subject to access being denied as set out in PAIA, available upon request for the purposes of PAIA:

Records are held on the following subjects:

- Personnel records;
- Client-related records;
- Private entity records; and
- Records in the possession of or pertaining to other parties.

i) Personnel records

'Personnel' refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration, and any other person who assists in carrying out or



conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to Bespoke by our personnel;
- Any records a third party has provided to Bespoke about any of our personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

ii) Client-related records

A client (the data subject) includes any natural or juristic entity, which receives services from the private body. Client-related information includes the following:

- Any records a client has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the client (the data subject), including transactional records.

iii) Private body records

A private body's records relate to the body's own affairs and are considered to include, but are not limited to:

- Financial records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;



- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

iv) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/ holding/ sister companies, joint venture companies, service providers.

The following records fall under this category:

- Personnel, client or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

5. Requesting procedures

A person, having provided adequate proof of identity, may request:

- Bespoke to confirm, free of charge, whether or not it holds personal information about them.
- The record or a description of the personal information about the data subject held by Bespoke, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.
- Any record held by Bespoke that is required for the exercise or protection of the requestor's rights.

A person may request Bespoke to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.



A person who wants access to the records of any of the identified private bodies must complete the necessary request form.

The Bespoke request form (PAIA Form C) can be accessed on <https://www.bespoke-fs.co.za/> or <https://inforegulator.org.za/>. If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the email address provided in paragraph 1.

The completed request form must be sent to the address or email address provided in paragraph 1 and marked for the attention of the Information Officer.

The Information Officer will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on <https://www.bespoke-fs.co.za/> or via the Information Regulator <https://inforegulator.org.za/>.

All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Information Officer obtains such additional information.

Note: Access to some records may be refused if they fall under the reasons listed in Chapter 4 of Part 2 or Chapter 4 of Part 3 of PAIA.

<https://accesstoinformation.co.za/part-3-access-to-records-of-private-bodies/chapter-4-grounds-for-refusal-of-access-to-records>

If requests are made to access to personal information and some parts of that information must or may legally be withheld, the rest of the information that is not restricted must still be provided.

Mandatory grounds for refusal include, but are not limited to:

- Information for the protection of the privacy of individuals;
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information.

6. Availability of this Bespoke manual

Copies of this manual are available for inspection, free of charge, at the offices of Bespoke Financial Services (Pty) Ltd. Copies are also available on our website (<https://www.bespoke-fs.co.za/>).

