

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

TADMAN (PTY) LTD

Registration Number: 2012/171394/07

Financial Services Provider (FSP No. 52338)

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1. DEFINITIONS

For purposes of this Manual:

1.1 Data Subject

Means the person to whom the Personal Information relates.

1.2 FAIS Act

Means the Financial Advisory and Intermediary Services Act No. 37 of 2002.

1.3 FSCA

Means the Financial Sector Conduct Authority.

1.4 FSP

Means Financial Services Provider.

1.5 Information Regulator

Means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act 4 of 2013.

1.6 PAIA

Means the Promotion of Access to Information Act 2 of 2000, as amended.

1.7 Personal Information

Means information relating to an identifiable natural person or, where applicable, an identifiable juristic person, including but not limited to names, identification numbers, contact details, financial information, employment information and online identifiers.

1.8 POPIA

Means the Protection of Personal Information Act 4 of 2013.

1.9 Process or Processing

Means any operation or activity concerning Personal Information including collection, storage, use, dissemination, modification, deletion or destruction.

1.10 Record

Means any recorded information regardless of the form or medium, including written documents, electronic records, emails, audio recordings, video recordings and databases.

1.11 Responsible Party

Means a public or private body or any other person that determines the purpose of and means for Processing Personal Information.

2. INTRODUCTION

Tadman (Pty) Ltd is an authorised Financial Services Provider in terms of the Financial Advisory and Intermediary Services Act 37 of 2002 and is regulated by the Financial Sector Conduct Authority.

FSP Number: 52338

Tadman specialises in wealth, investment and advisory services, including private equity advisory and management, listed investment and fund management, project advisory, accounting services and personal affairs administration.

This Manual is prepared in accordance with section 51 of the Promotion of Access to Information Act and sets out the procedures for requesting access to records held by Tadman (Pty) Ltd.

3. PURPOSE OF THIS MANUAL

This Manual enables members of the public to:

- Understand how to request access to records held by the Company;
 - Identify the categories of records held by the Company;
 - Determine which records are available without a formal request;
 - Access the contact details of the Information Officer;
 - Understand how Personal Information is processed by the Company;
 - Understand the rights available under PAIA and POPIA;
 - Obtain details regarding the Information Regulator and its PAIA Guide.
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4. COMPANY CONTACT DETAILS

Physical Address: Abcon House, Fairway Office Park 52, Grosvenor Road, Bryanston, Gauteng 2021

Postal Address: PO Box 67663, Bryanston, Sandton, 2021

Telephone: +27 11 510 9754

Email: luke@tadman.co.za

Website: <https://abcongroup.co.za/tadman/>

Information Officer

Name: Luke Sparks

Telephone: +27 11 510 9754

Email: luke@tadman.co.za

Deputy Information Officer

At the date of publication of this Manual, no Deputy Information Officer has been appointed.

5. ACCESS TO RECORDS

PAIA grants a requester access to records held by a private body where:

- The record is required for the exercise or protection of any rights; and
- The procedural requirements of PAIA have been met.

Access may be refused on the grounds specified in PAIA.

The prescribed request forms and applicable fees must be used when requesting access to records.

6. INFORMATION REGULATOR

The Information Regulator has published a Guide explaining how to use PAIA.

Information Regulator (South Africa)

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

Website: <https://infoeregulator.org.za/>

Email: infoereg@justice.gov.za

PAIA Guide: <https://infoeregulator.org.za/paia-guidelines/>

PAIA Complaints: PAIAComplaints@infoeregulator.org.za

7. SCHEDULE OF RECORDS

Category of Records	Types of Records	Available on Website	Available Upon Request
Corporate Records	Memorandum of Incorporation, statutory records, shareholder records	No	Yes
Governance Records	Board resolutions, governance policies and procedures	No	Yes
Financial Records	Financial statements, accounting records, tax records	No	Yes
Human Resources	Employment records, HR policies, training records	No	Yes
Client Records	Client agreements, mandates, FICA documentation, correspondence	No	Yes
Compliance Records	FAIS compliance records, risk assessments, POPIA records	No	Yes
Marketing Records	Marketing material, newsletters, press releases	Yes	Yes
Supplier Records	Supplier agreements and service contracts	No	Yes
Information Technology Records	Security policies and technology governance records	No	Yes

8. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Category of Record	Applicable Legislation
Company Records	Companies Act 71 of 2008
Tax Records	Income Tax Act 58 of 1962
Employment Records	Basic Conditions of Employment Act 75 of 1997
Employment Equity Records	Employment Equity Act 55 of 1998
Skills Development Records	Skills Development Act 97 of 1998
Compensation Records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Client Advice and Intermediary Records	FAIS Act 37 of 2002
Anti-Money Laundering Records	Financial Intelligence Centre Act 38 of 2001
Personal Information Records	POPIA
PAIA Manual	PAIA

9. DESCRIPTION OF SUBJECTS AND RECORDS HELD

Subject	Categories of Records Held
Corporate Governance	MOI, resolutions, governance policies
Human Resources	Employment contracts, personnel records, leave records, disciplinary records
Finance	Accounting records, tax records, invoices, budgets and financial statements
Client Services	Client agreements, mandates, advice records, FICA documentation
Compliance and Risk	Compliance reports, complaints records and risk assessments
Information Technology	Information security records and system administration records
Marketing and Communications	Marketing material, website content and newsletters
Contracts and Procurement	Supplier agreements and service provider contracts

10. REQUEST PROCEDURE

10.1 Request Form

Requests for access to records must be submitted using the prescribed Form 2.

Form 2 is available from: <https://inforegulator.org.za/paia-forms/>

10.2 Submission of Requests

The completed Form 2 must be submitted to the Information Officer.

The requester must provide:

- Sufficient particulars to identify the requester;
- Sufficient details to identify the requested record;
- The form of access required;
- Contact details;
- The right to be exercised or protected; and
- An explanation of why the requested record is required.

10.3 Notification of Outcome

The Company will notify the requester of its decision in accordance with PAIA.

Where access is granted, the requester may be required to pay the applicable access fee before the records are released.

Where access is refused, written reasons will be provided.

11. PRESCRIBED FEES

A requester seeking access to a record containing Personal Information about themselves is not required to pay a request fee.

Other requesters may be required to pay:

- A request fee;
- Reproduction fees;
- Search and preparation fees; and
- Any applicable deposit prescribed under PAIA.

Applicable fees are determined in accordance with the Regulations issued under PAIA.

Records may be withheld until the required fees have been paid.

12. PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

12.1 Purpose of Processing

The Company processes Personal Information for purposes including:

- Providing financial products and services;
- Client relationship management;
- Regulatory compliance;
- Risk management;
- Human resource administration;
- Supplier management;
- Marketing and communication.

12.2 Categories of Data Subjects

The Company may process Personal Information relating to:

- Clients and prospective clients;
- Employees;
- Contractors and consultants;
- Suppliers and service providers;
- Directors and shareholders;
- Website users.

12.3 Categories of Personal Information

The Company may process:

- Identification information;
- Contact details;
- Financial information;
- Employment information;
- Regulatory compliance information;
- Electronic communications and correspondence.

12.4 Recipients of Personal Information

Personal Information may be disclosed to:

- Regulatory authorities;
- Financial institutions;
- Product providers;
- Auditors;
- Legal advisers;
- Compliance consultants;
- Information technology service providers;
- Government authorities where required by law.

12.5 Cross-Border Transfers

Personal Information may be transferred outside South Africa where required for legitimate business purposes and only where appropriate safeguards are in place in accordance with POPIA.

12.6 Security Measures

The Company maintains appropriate technical and organisational measures to protect Personal Information against unauthorised access, disclosure, loss, misuse, alteration or destruction.

12.7 Data Subject Rights

Data Subjects may:

- Request access to Personal Information;
- Request correction of inaccurate information;
- Request deletion where legally permissible;
- Object to certain processing activities;
- Lodge complaints with the Information Regulator.

12.8 Privacy Policy

Further information regarding the Company's Processing of Personal Information is available in the Company's Privacy Policy, available from the Information Officer and on the Company's website.

13. AVAILABILITY OF THIS MANUAL

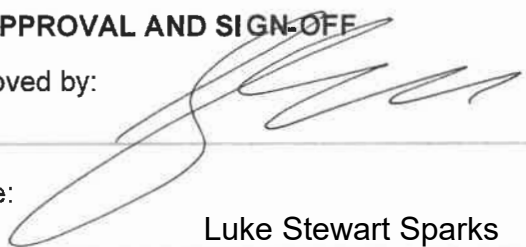
This Manual is available:

- At the Company's offices during normal business hours;
- From the Information Officer upon request;
- On the Company's website; and
- In accordance with the requirements of PAIA.

14. APPROVAL AND SIGN-OFF

Approved by:

Name:


Luke Stewart Sparks

Designation:

Director & Information Officer

Date:

22/06/2026