



PAIA Manual

JTC Fund Solutions RSA (Pty) Ltd

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

5 September 2025



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List of Acronyms and Abbreviations

- “DIO” Deputy Information Officer;
- “IO” Information Officer;
- “PAIA” Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- “POPIA” Protection of Personal Information Act No.4 of 2013;
- “Regulator” Information Regulator; and
- “Republic” Republic of South Africa

Applicability

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act. Section 51 of the Promotion of Access to Information Act No.2 of 2000, (“PAIA”), as amended by the Protection of Personal Information Act no.4 of 2013 (“POPIA”) requires that JTC Fund Solutions RSA (Pty) Ltd (JTC SA), as a private body, compile a manual giving information to the public regarding the procedure to be followed in requesting information from JTC SA for the purpose of exercising or protecting rights in accordance with data protection constraints.

Purpose of the PAIA Manual

This PAIA Manual serves as a valuable resource for the public, allowing individuals to check the categories of records held by JTC SA that are readily available without needing to submit a formal PAIA request. It provides a comprehensive overview of the procedures for requesting access to records, including descriptions of the subjects on which records are maintained and the specific categories of records held for each subject.

Additionally, the Manual outlines which records are accessible in accordance with other legislation, and provides all relevant contact details for the Information Officer and the Deputy Information Officer, both of whom are available to assist the public in accessing the records they require. The Manual also describes the guide on using PAIA, as updated by the Regulator, and explains how to obtain access to it.

Furthermore, the Manual clarifies the purposes for processing personal information and offers descriptions of the categories of data subjects and the corresponding information or types of information involved. It informs the public about the recipients or categories of recipients who may be supplied with personal information, and addresses whether personal information will be transferred or processed outside the Republic of South Africa.

Lastly, the Manual assures the public that JTC SA has implemented appropriate security measures to maintain the confidentiality, integrity, and availability of personal information that is processed.

JTC Background

JTC Group was formed in 1987. Having been in business for over 25 years, the Group is a leading independent provider of corporate, fund and private wealth services. Our head office is located in Jersey’s financial district of St Helier and through our continued international expansion, we have local, representative and alliance offices in several key jurisdictions around the world including British Virgin Islands, Cayman Islands, Guernsey, Luxembourg, New Zealand, Switzerland, the UK, Dubai, Isle of Man, Mauritius, the USA, Hong Kong, Labuan, Malaysia, Netherlands, Singapore and South Africa.



JTC SA (Company Registration Number: 2006/028378/07) is a wholly owned subsidiary of JTC Fund Solutions (Guernsey) Limited which is registered in Guernsey and regulated by the Guernsey Financial Services Commission under The Protection of Investors (Bailiwick of Guernsey) Law 1987 as amended and The Regulation of Fiduciaries, Administration Businesses and Company Directors, etc. (Bailiwick of Guernsey) Law, 2000. JTC SA is regulated by the South African Financial Sector Conduct Authority (FSCA) as a Category I Financial Services Provider (FSP 36141) primarily to provide services from within the Republic of South Africa to its holding company and other entities within the JTC Group as well as its own clients.

JTC SA's services include administration, accounting and statutory reporting across a wide range of open and closed-ended structures from funds, hedge funds, private equity funds, mezzanine finance funds, infrastructure funds and real estate funds in the Guernsey, Jersey, UK, Cayman, US and Luxembourg markets.

General Information

Key Contact Details for Access to Information at JTC SA

The Act prescribes the appointment of an Information Officer responsible for assessing requests for access to information. In terms of s51, the Head of a Private Body fulfils this function. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013 (POPIA). The Information Officer oversees the functions and responsibilities as required for in terms of both Acts. For JTC SA the Information Officer is the Managing Director, who has sub-delegated certain functions to the Compliance Officer (Deputy Information Officer 1), to assist with fulfilling the s55 duties set out in POPIA.

Information Officer

Name: Elize Botha
Tel: 021 529 4860
Email: Elize.Botha@jtcgroup.com

Deputy Information Officer 1

Name: Shanelle Pather
Tel: 021 529 4860
Email: Shanelle.Pather@jtcgroup.com

Deputy Information Officer 2

Name: Pelonolo Mahura
Tel: 021 529 4860
Email: Pelonolo.Mahura@jtcgroup.com

General Information Contact

Email: POPIA@jtcgroup.com

Registered Address

Block B, Century Falls
Century Boulevard
Century City
7441



Access to the PAIA Guide

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use the Act in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the Act and POPIA.

The Guide can be obtained from the website of the Information Regulator (<https://inforegulator.org.za>) and is available in each of the official languages including braille.

Any queries relating to the PAIA guide should be directed to:
The Information Regulator (South Africa)
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
P.O Box 31533, Braamfontein, Johannesburg, 2017

Website: <https://inforegulator.org.za>
Email: enquiries@inforegulator.org.za

A copy of the Guide can also be provided upon request to the Information Officer. The guide is available in English and Afrikaans during normal business hours (08:30 – 17:30; Monday – Friday), for public inspection at JTC SA's office.

Availability of the JTC SA PAIA Manual

A copy of the JTC PAIA Manual is available on JTC's website ([South Africa - JTC](#)); at JTC SA's office for public inspection during normal business hours (as noted above); to any person upon request and upon the payment of a reasonable prescribed fee; and to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size page copied.

Categories of Records which are available without having to Request Access

The following categories of records are automatically available for inspection, purchase or photocopying without having to be requested in terms of the Act:

- Newsletters
- Booklets
- Pamphlets / Brochures
- Reports of a public nature
- Other information intended for public viewing

Types of Records

Records available in terms of legislation

All records kept and made available in terms of legislation applicable to JTC SA include, but is not limited to, the following:

- Basic Conditions of Employment Act 75 of 1997
- Collective Investment Schemes Control Act 45 of 2002
- Companies Act 71 of 2008



- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Constitution of the Republic of South Africa 2008
- Customs and Exercise Act No 91 of 1964
- Electronic Communications and Transaction Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Prevention of Organised Crime Act 121 of 1998
- Promotion of Access to Information Act 4 of 2013
- Protected Disclosure Act 26 of 2000
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication Related Information Act 70 of 2002
- Skills Development Levies Act 9 of 1999
- Skills Development Levies Act 1999
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

Records held by subject and category

The below table depicts the records maintained by JTC SA which may be requested in terms of PAIA by way of the formal request process:

Subjects on which JTC SA holds records	Categories of records
Personnel Records	- Personnel files - Disciplinary records - Employee benefit records - Salary and wage register - Retirement annuity agreement - Retirement annuity rules - Retirement annuity contribution reports - Attendance and leave registers - Expense accounts



	Group life assurance and disability income protection insurance Human resource policies and codes of conduct
Financial Records	Annual Financial Statements Books of account Invoices, statements, receipts, vouchers and bills of exchange Auditor's reports Income Tax returns VAT returns, invoices and supporting documentation
Banking Details	Bank facilities and account details Overdraft facilities Bank statements Bank signatory forms Other banking records and agreements
Operational Records	Policies and Procedures Internal phone lists Internal correspondence Information technology Property insurance Professional indemnity insurance Lease agreements Computer software, support and maintenance agreements Disaster recovery plans Complaints register Agreements with suppliers Confidentiality and/or non-disclosure agreements
Statutory company records	Memorandum of incorporation Certificates issued by the Registrar of Companies Company resolutions Proxy forms Company forms (CM and/or COR forms) lodged with the Registrar in terms of the Companies Act Minute books Share registers Director's attendance registers Shareholder agreements



Client information

Documentation and other information received from clients including information required in terms of the FIC Act 38 of 2001

Documentation and other information received from third parties

Correspondence with clients

Correspondence with third parties

Information prepared by employees for clients, including opinions, memoranda and reports

Processing of Personal Information

Purpose of Processing Personal Information

Personal information is collected to fulfil regulatory duties (primarily AML/KYC and tax), provide and administer services, manage risk, comply with contracts, and adhere to data protection and legal requirements.

The core principle is that data is only collected when there is a clear legal, regulatory, or business need—always in line with data protection laws and confidentiality standards.

JTCA SA commits to not processing personal information outside of reasonable expectations. Depending on the nature of JTC SA's interaction with persons, information subject to processing encompasses:

- contact information, including postal address, email address(es), telephone number(s), company details and where applicable, social media contact information;
- identity information, including current and former names, gender, date and place of birth, nationality, passport information, and birth certificate;
- preference information, including dietary restrictions, preferred correspondence language, etc.
- verification information, including government-issued documents, bank statements, and utility bills;
- taxation information, including domicile, tax identification number, tax returns and tax advice;
- source-of-wealth information, including pension plans, property sale documentation and loan documents;
- financial information, including, bank account information, assets held and on what basis (eg legal/beneficial ownership, etc);
- trusts information (if applicable), including settlor details and letters of wishes;
- employment information;
- criminal records or allegations information, including details of any official body's investigation and sanctions;
- insolvency/bankruptcy information (as applicable);
- debtor information;
- connected-persons information, including familial relationships;
- politically exposed person information, including political activities and relationships;
- information in the public domain;
- correspondence between you, your agents/representatives, and JTC SA;



- billing, transaction and payment information; and
- technical data, including information about how the JTC website is used, IT, communication and other systems.

Further information on how JTC SA process cookies data can be obtained by contacting the Information Officer/ Data Protection Governance Officer (DPGO).

Subjects and Categories of Personal Information Processed

The below table sets out the categories of data subjects together with a description of the personal information to be processed. Please note the list is non-exhaustive and depends on the services being provided by JTC SA.

Categories of Data Subject	Personal Information Processed
Clients / Prospective Clients: Natural Persons	Names; contact details; physical and postal addresses; dates of birth; identification numbers; financial information; nationality; confidential correspondence.
Clients / Prospective Clients: Juristic Persons	Names of contact persons; name of legal entity; physical / postal addresses and contact details; financial information; registration number; founding documents and related information; authorised
Contracted Service Providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; authorised signatories; BEE Certificates.
Employees/Potential Employees/Contracted Staff members	Gender; marital status; race; age; language; identity number; physical and postal addresses and contact details; financial information; pregnancy status; shareholder scheme information; educational information, employment history, medical history, criminal history, opinions.
JTC Group, Juristic Persons	Name of legal entity; physical / postal addresses and contact details; statutory information; financial information.

Categories of Recipients where Personal Information is Processed

In the normal course of business, there are instances where personal information is required to be shared, both internally (within the JTC Group) and externally (e.g. 3rd party service providers). These recipients include:

- other third parties used by JTC SA to help run the business, eg marketing agencies or website hosts;
- organisations with whom JTC SA co-host marketing events;
- professional advisors, including lawyers, regulatory specialists, and tax advisers;
- IT service providers;
- Insurers and banks;
- Intermediaries;



- Approved third parties, eg social media sites persons choose to link accounts with or third party payment providers;
- government agencies to whom JTC SA have disclosure obligations; and
- Competent courts and tribunals which issue orders that JTC SA are obliged to comply with.

Personal information is only shared with external parties when JTC SA is satisfied that appropriate measures are in place to protect it. Contractual obligations are imposed on service providers to ensure that personal information is used solely for the purpose of providing services to JTC SA and its clients.

On occasion JTC SA may be required to:

- share personal information with external auditors, e.g. in relation to ISO accreditation and the audit of its accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with its legal and regulatory obligations;
- share personal information with other parties, such as potential acquisitions or during a restructuring—usually, information will be anonymised but this may not always be possible, however, in these cases the recipient of the information will be bound by confidentiality obligations.

Transborder Flows of Personal Information

By dealing with JTC SA, personal information will be processed in South Africa and is subject to POPIA. In addition, as an entity which offers services into the European Union, where JTC SA may process information of persons resident in the Union, the GDPR also applies to JTC SA. Personal information may be processed by any of the JTC Group offices, inside and outside the European Union or South Africa. There are agreements in place between the JTC Group offices to protect all personal information to GDPR / POPIA compliant standards. Should you require further information please contact the Information Officer.

Personal Information Security Measures

JTC has adopted security measures to ensure confidentiality, integrity, and availability of information aligned with its responsibilities. These measures are implemented to prevent accidental loss, unlawful use, or unauthorised access to personal information. Access to personal information is restricted exclusively to individuals with a legitimate business need. All persons processing information are required to do so only in an authorised manner and are bound by a duty of confidentiality. Procedures have been established to address any suspected data security breaches. In the event of a suspected data protection breach, notification will be provided to affected individuals and any relevant supervisory authorities where required by law.

Requesting Information Procedure

A person who wants access to the records must complete the prescribed request form (refer to Appendix A - Form 2). The completed form must be sent to the address or fax number provided above and marked for the attention of the Information Officer. The requester must indicate which form of access is required, and identify the right that is sought to be exercised or protected, and provide an explanation of why the requested record is required for the exercise or protection of that right. If a request is being made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request. The Information Officer, or designated Deputy Information Officers will process the request and inform the requester of the access fee (if any) to be paid upon access and the procedures to be followed.



Updating of the Manual

The Managing Director of JTC Fund Solutions RSA (Pty) Ltd will on a regular basis review and, where necessary, update this manual.



Elize Botha
Managing Director & Information Officer



Appendix A – Prescribed Form for Requesting Records



PAIA - Reg7 - Form
2

Appendix B – Prescribed Fees for Requesting Information



PAIA - Reg 8 - Form
3

