PAIA MANUAL

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

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Manual owner	Ryan Aufrichtig

1. DEFINITIONS

“CEO” means the Chief Executive Officer of the Organisation.

“DIO” means a Deputy Information Officer.

“IO” means the Information Officer.

“Organisation” means Impact Settlement Capital.

“PAIA” means the Promotion of Access to Information Act 2 of 2000, as amended.

“POPIA” means the Protection of Personal Information Act 4 of 2013.

“Regulator” means the Information Regulator (South Africa).

2. PURPOSE OF THIS MANUAL

This Manual serves as a practical guide to accessing information held by the Organisation in accordance with the Promotion of Access to Information Act, 2000 (PAIA). It outlines the categories of records available, the process for requesting access to information, and the contact details of the Information Officer responsible for administering requests. The Manual also identifies records that may be available in terms of other applicable legislation and provides guidance on accessing the official PAIA Guide published by the Information Regulator.

In addition, this Manual promotes transparency regarding the Organisation's processing of personal information by describing the categories of personal information collected, the purposes for which it is processed, the categories of data subjects and recipients, any cross-border transfers of personal information, and the measures implemented to safeguard the confidentiality, integrity and availability of such information in accordance with applicable data protection legislation.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Information Officer	Ryan Aufrichtig · +27 83 255 3014 · ryan@isetcapital.com
Deputy Information Officer	Nyosi Tshabalala · +27 67 551 2635 · nyosi@isetcapital.com
General enquiries	info@isccapital.com
Registered / head office	107A FORREST ROAD, ATHOLL SANDTON, JOHANNESBURG, 2196
Website	www.isetcapital.com

4. GUIDE ON HOW TO USE PAIA

The Regulator publishes a Guide, in each official language and in braille, on how to use PAIA and POPIA. It explains the objects of both Acts, how to submit a request, the assistance available, and the remedies available if a request is refused. The Guide can be obtained from:

Information Regulator (South Africa)	27 Siemens Street, Braamfontein, Johannesburg, 2001
Telephone	010 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A REQUEST

The following categories of Impact Settlement Capital's records are available without a person having to submit a formal PAIA request, using the channel indicated:

Category	Record	On website	On request
Contact details	Information Officer / Deputy Information Officer details	X	X
Guide	PAIA Guide (official languages)		X
Policy	Privacy Policy	X	
Policy	Complaints Policy	X	
Policy	Conflict of Interest Management Policy	X	
Disclosure	FAIS Disclosure	X	
Product	Product information	X	

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

Impact Settlement Capital also holds the following records, available in accordance with legislation other than PAIA:

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Employee Contracts	Basic Conditions of Employment Act 75 of 1997
Client identification/verification (KYC)	Financial Intelligence Centre Act 38 of 2001
Risk Management & Compliance Programme	Financial Intelligence Centre Act 38 of 2001
Annual Financial Statements	Companies Act 71 of 2008 and Financial Advisory and Intermediary Services Act 37 of 200
Tax Records	Income Tax Act 58 of 1962
Board Minutes	Companies Act 71 of 2008

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

Subject	Categories of Records Held
Strategic	[Annual reports · strategic plan · board minutes]
Human Resources	[HR policies · employee records]
Finance	[Annual financial statements · banking records · tax records]
Operations	[Client records · contracts · SLAs · compliance documentation]
Information Technology	[IT and information security policies]

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing

Impact Settlement Capital collects and processes personal information to provide financial advice and/or intermediary services, administer client relationships, and meet its legal and regulatory obligations, including under FICA, the FAIS Act, and POPIA. Full details on how Impact Settlement Capital processes personal information is set out in its Privacy Policy.

8.2 Categories of Data Subjects and Information

Category of Data Subject	Personal Information Processed
Clients / customers	[Name · identity number · contact details · bank details · source of funds]
Service providers	[Name · registration and VAT numbers · contact and bank details]
Employees	[Name · ID number · contact details · CV · banking details]

8.3 Recipients of Personal Information

Impact Settlement Capital may disclose personal information only where necessary to fulfil its contractual, legal, regulatory or operational obligations. Personal information may be shared with the following categories of recipients:

Category of Information	Recipients
Identity and client verification information	Approved Know Your Customer (KYC), Financial Intelligence Centre Act (FICA) and Anti-Mone
Client personal and transactional information	Authorised employees and approved service providers engaged to support the delivery of regul
Regulatory and compliance information	Regulatory authorities, auditors, legal advisers and other authorised parties where disclosure is
Information technology and security data	Approved technology partners providing secure hosting, cyber security, data protection, digital r
Professional advisory information	External legal, compliance, accounting and professional advisers where necessary to support t

All third-party service providers are required to maintain appropriate technical and organisational safeguards to protect personal information and process such information only for authorised purposes.

8.4 Cross-Border Transfers

Impact Settlement Capital may use trusted technology service providers whose infrastructure or services involve the processing or storage of information outside the Republic of South Africa.

Where personal information is transferred across national borders, Impact Settlement Capital ensures that such transfers are undertaken in accordance with Chapter 9 of the Protection of Personal Information Act, 2013 (POPIA). Cross-border transfers are only undertaken where:

- the recipient is subject to laws, binding corporate rules or contractual obligations that provide an adequate level of protection for personal information;
- the transfer is necessary for the performance of a contract or the implementation of pre-contractual measures requested by the data subject;
- the data subject has provided consent where required; or
- the transfer is otherwise permitted under applicable law.

Where appropriate, personal information is protected through encryption and secure distributed data resilience technologies designed to safeguard confidentiality, integrity and availability throughout the information lifecycle.

8.5 Information Security Measures

Impact Settlement Capital is committed to protecting the confidentiality, integrity and availability of the personal information entrusted to it.

The Organisation implements appropriate technical and organisational security measures designed to safeguard personal information against unauthorised access, disclosure, alteration, loss or destruction. These measures include, where appropriate:

- Role-based access controls and least-privilege access management.
- Strong authentication controls, including multi-factor authentication where appropriate.
- Encryption of sensitive information during transmission and storage.

• Secure data storage supported by resilient backup and disaster recovery processes.

• Continuous monitoring of information systems and security controls.

• Cyber security policies, procedures and employee awareness programmes.

• Regular review and testing of information security controls.

• Secure management of third-party service providers and technology partners.

• Business continuity and incident response processes designed to minimise operational disruption.

To further strengthen the protection of sensitive information, Impact Settlement Capital has engaged advanced data resilience technologies provided by Binarii Labs. The Binarii Labs platform enhances the security and resilience of digital information through patented encryption, fragmentation and distributed storage technology, ensuring that no complete file is stored in a single location. This supports secure information management, strengthens business continuity, and contributes to the Organisation's overall cyber resilience and information governance framework.

These measures are reviewed periodically to ensure their continued effectiveness and alignment with applicable legal, regulatory and industry best practice requirements.

9. AVAILABILITY OF THE MANUAL

A copy of this Manual is available:

– On www.isetcapital.com

– at Impact Settlement Capital's head office, for inspection during business hours;

– to any person, on request and payment of the prescribed reproduction fee; and

– to the Regulator, on request.

10. UPDATING OF THE MANUAL

Impact Settlement Capital reviews this Manual at least annually. The Information Officer approves and records all amendments.

Issued by	Ryan Aufrichtig
Title	Chief Executive Officer

Executive Director