



FINANCIAL SERVICES CC

Authorized Financial Services Provider

FSP15998

info@dcjfinancialservices.co.za

Tel: (031) 765 6181

CK 88 -020545 -23

PAIA MANUAL

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

DATE OF COMPILATION: 29/10/2026

DATE OF REVISION: 29/10/2027



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FSP15998
info@dcjfinancialservices.co.za
Tel: (031) 765 6181
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TABLE OF CONTENTS

Contents

1.	LIST OF ACRONYMS AND ABBREVIATIONS.....	3
2.	PURPOSE OF PAIA MANUAL	3
3.	KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DCJ FINANCIAL SERVICES CC	5
4.	GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	6
6.	DESCRIPTION OF THE RECORDS OF DCJ FINANCIAL SERVICES CC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	11
7.	DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE DCJ FINANCIAL SERVICES CC	13
8.	PROCESSING OF PERSONAL INFORMATION	14
9.	AVAILABILITY OF THE MANUAL.....	23



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1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------------|---|
| 1.1 | "CEO" | Chief Executive Officer |
| 1.2 | "DIO" | Deputy Information Officer; |
| 1.3 | "IO" | Information Officer; |
| 1.4 | "Minister" | Minister of Justice and Correctional Services; |
| 1.5 | "PAIA"
2000(as | Promotion of Access to Information Act No. 2 of

Amended; |
| 1.6 | "POPIA"
2013; | Protection of Personal Information Act No.4 of |
| 1.7 | "Regulator" | Information Regulator; and |
| 1.8 | "Republic" | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;



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- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and



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2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF DCJ FINANCIAL SERVICES CC

3.1. Chief Information Officer

Name: Craig Charles Ivins
Tel: 031 765 6181
Email: craig@dcjfinancialservices.co.za

3.2. Deputy Information Officer

Name: Debbie Elizabeth Baker
Tel: 031 765 6181
Email: debbie@dcjfinancialservices.co.za

3.3 Access to information general contacts

Email: info@dcjfinancialservices.co.za

3.4 National or Head Office

Postal Address: PO Box 531
Kloof
3640

72 Old Main Road, Kloof, 3610
P.O. Box 531, Kloof 3640
www.dcjfinancialservices.co.za



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Tel: (031) 765 6181

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Physical Address: 72 Old Main Road
Kloof
3640

Telephone: 031 765 6181

Email: info@dcjfinancialservices.co.za

Website: <https://dcjfinancialservices.com/>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and



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- 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.



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- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access



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4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator
(<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and Afrikaans

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”



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5. CATEGORIES OF RECORDS OF DCJ FINANCIAL SERVICES CC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Corporate / General information	Company profile; contact details; service descriptions; general business information	X	X
Conflict of Interest	Conflict of Interest Management policy that complies with the provisions of the FAIS Act	X	X
Complaints Management Framework	Complaints Management Framework that complies with the provisions of the FAIS Act	X	X
PAIA / Privacy information	PAIA Manual; Privacy Policy and other privacy information intended for public distribution	X	X
Marketing material	General brochures, presentations and other non-confidential marketing material		X
Public notices	General notices and communications intended for public distribution		X

72 Old Main Road, Kloof, 3610

P.O. Box 531, Kloof 3640

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6. DESCRIPTION OF THE RECORDS OF DCJ FINANCIAL SERVICES CC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum of incorporation	Close Corporations Act 69 of 1984
Personal information and privacy records	Protection of Personal Information Act 4 of 2013
Financial crime prevention, client due-diligence and transaction records	Financial Intelligence Centre Act 38 of 2001
Tax and accounting records	Income Tax Act 58 of 1962
Employment and personnel records	Basic Conditions of Employment Act 75 of 1997
Complaint records and regulatory correspondence	Financial Advisory and Intermediary Services Act 37 of 2002 Consumer Protection Act 68 of 2008
•Client and investment administration records • FSP / representative and financial-services records Registers of representatives, key individuals, qualifications completed by intermediaries and competences. •Continued professional development (CPD) programme and activity records	Financial Advisory and Intermediary Services Act 37 of 2002



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<ul style="list-style-type: none"> •Records of financial and system procedures •Records evidencing supervision actions undertaken, including evidence regarding the rendering of services under supervision, the method followed and frequency thereof during the period under supervision. •Records evidencing the deployment of adequate technological resources to maintain client records and data integrity. •Records relating to business continuity plans. •Records relating to competency requirements (copies of Grade 12, FSCA recognised qualifications, class of business training, CPD and product-specific training). •Representative letters of authority •Key-individual authorisation letters •Compliance reports •FSP licence and addendum with conditions 	
VAT registration documents, VAT returns, Invoices	Value Added Tax Act, 89 of 1991



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7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE DCJ FINANCIAL SERVICES CC

Subjects on which the body holds records	Categories of records
Corporate / Governance	Company registers; governance records; resolutions; policies; PAIA and POPIA documentation; compliance records; contracts.
Financial / Accounting	Management accounts; invoices; receipts; bank-related records; budgets; accounting records; tax records; audit records.
Clients / Financial Advice	Client applications; client details; FICA/CDD records; financial needs analyses; risk assessments; records of advice; disclosures; investment / policy records; correspondence; service records.
Investments / Intermediary Administration	Investment instructions; transfer documentation; contribution and withdrawal records; product-provider correspondence; statements and confirmations; beneficiary / retirement records where applicable.
Compliance / Risk	Compliance monitoring; regulatory reports; risk assessments; compliance policies; registers; breach / incident records; complaints; regulatory correspondence.
FICA / AML	Client identification and verification; risk ratings; screening; source-of-funds / source-of-wealth

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Subjects on which the body holds records	Categories of records
	information where required; suspicious transaction reporting records; FICA correspondence.
Human Resources	Employee records; employment contracts; leave; payroll inputs; performance and training records; qualifications; disciplinary records where applicable, HR policies and procedures and Advertised posts.
Suppliers / Service Providers	Contracts; invoices; banking details; correspondence; service records; confidentiality arrangements.
Information Technology / Information Security	User-access records; system administration; backups; security incidents; IT support records.
Marketing / Communications	Marketing material; website content; client communications; general enquiries; consent / communication preferences where applicable.
Complaints / Disputes	Complaint records; investigation files; responses; supporting documentation; Ombud / regulator correspondence where applicable.
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

DCJ FINANCIAL SERVICES CC processes personal information for specific, explicitly defined and lawful purposes relating to the conduct and administration

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of its business as an authorised Financial Services Provider. These purposes may include:

- Conducting client onboarding, identification, verification and due diligence;
- Maintaining client records
- Establishing and maintaining client relationships.
- providing financial advice and intermediary services and administering client instructions;
- Obtaining quotations from product suppliers.
- Facilitating applications for financial products and services.
- assessing client needs, objectives, risk profile and suitability where required;
- processing investments, transfers, contributions, withdrawals, policy and product-provider administration, amendments, servicing requests, renewals and cancellations;
- Assisting with and processing claims.
- communicating with clients, prospective clients, representatives, suppliers and regulators;
- Maintaining records required by legislation and regulatory requirements.
- managing complaints, disputes, investigations and legal or regulatory matters;
- managing employees, recruitment, training, payroll and workplace administration;
- managing suppliers, service providers and professional advisers;
- protecting DCJ FINANCIAL SERVICES CC, its clients, employees and systems against fraud, financial crime, unauthorised access and other risks; and
- maintaining business, operational, IT, security and compliance records.
- Conducting compliance monitoring, internal reviews and audits.
- Sharing information with product suppliers, service providers, regulators or other authorised parties where necessary and lawful.

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- Protecting the FSP's information, systems, property and legitimate business interests
- Processing payments, accounting records and tax-related matters.
- Complying with applicable legal and regulatory obligations, including requirements under:
 - the Financial Advisory and Intermediary Services Act;
 - the Financial Intelligence Centre Act, where applicable;
 - the Protection of Personal Information Act; and
 - other applicable legislation.

Personal information will only be processed where there is an appropriate lawful basis for such processing and must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients and prospective customers / clients	Names and surnames; contact details; identity or passport number; registration information; date of birth; gender; marital status; residential, postal and business addresses; telephone numbers; email addresses; employment; banking details; tax information; income and financial information; insurance, investment and policy information; financial needs and objectives; risk profile; FICA/CDD information; correspondence or communication records.

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Categories of Data Subjects	Personal Information that may be processed
Policyholders, insured persons, beneficiaries and dependants	Names and surnames; identity or passport numbers; date of birth; relationship to the client or policyholder; contact details; beneficiary information; dependant information; policy information; and health or medical information where relevant to the financial product or service.
Service Providers, contractors and business partners	Names and surnames; contact details; company or entity registration information; VAT information where applicable; banking details; contract and service information; authorised contact information; professional information; and correspondence relating to the business relationship.
Representatives and Key Individuals	Names and surnames; identity numbers; contact details; employment information; qualifications; experience; regulatory examination information; Class of Business and product-specific training records; CPD records; competency information; fit and proper information; banking details; and screening or background information where lawfully required.
Employees	Names and surnames; identity numbers; contact details; residential addresses; banking details; tax information; employment history; qualifications; remuneration information; leave records; performance information; disciplinary information; training records; and criminal, credit or background screening information where lawfully required.
Job applicants	Contact details; CV and qualifications; employment history; references and related recruitment information.

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Categories of Data Subjects	Personal Information that may be processed
Product suppliers, insurers and other financial institutions	Names and contact details of relevant representatives; Business contact details; professional / organisational information; contractual information; registration or licence information; correspondence; and other information necessary for the management of the business relationship.
Regulatory authorities and statutory bodies	Names and contact information of relevant officials or contact persons; correspondence; regulatory submissions; reference numbers; and other information required for regulatory or statutory purposes.
Complainants and other persons interacting with the FSP	Names and surnames; contact details; identity information where required; complaint or enquiry details; correspondence; supporting documentation; and any other information reasonably necessary to investigate and resolve the matter.
Members	Names and surnames; identity numbers; contact details; residential addresses; shareholding or membership information; directorship information; financial interests; banking details; and regulatory or screening information where applicable.

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8.3 The recipients or categories of recipients to whom the personal information may be supplied.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Client identification and contact information	Product suppliers, insurers, investment providers, administrators, financial institutions, authorised service providers and regulatory authorities where required.
Financial needs, objectives, risk profile and advice information	Product suppliers, insurers, investment providers, administrators and other authorised parties involved in implementing or administering the financial service or product selected by the client.
Identity numbers, passport information and verification documentation	Product suppliers, insurers, authorised identity-verification or screening service providers, regulatory authorities and other parties where verification is required by law.
Financial information, income, assets, liabilities and affordability information	Product suppliers, insurers, investment providers, financial institutions and other authorised parties where required for the provision of financial advice or intermediary services.
Policy, insurance, investment and product information	Relevant product providers, investment platforms, administrators, insurers, retirement / pension providers, banks, other financial institutions involved in implementing client instructions and regulatory authorities and authorised service providers where necessary.

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Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Tax and accounting	SARS and authorised professional advisers / auditors where applicable.
Information required for legal proceedings or enforcement purposes	Attorneys, advocates, courts, tribunals, law-enforcement agencies, regulatory authorities and other persons where disclosure is required or permitted by law.
Electronic, system and access information	IT service providers, cloud service providers, cybersecurity providers, software providers and other authorised technology service providers involved in maintaining or protecting the FSP's systems and information.
Employee and prospective employee information	Payroll administrators, SARS, banks, pension or retirement fund administrators, medical schemes, training providers, screening or verification providers and other authorised service providers where applicable.
Banking and payment information	Product suppliers, insurers, investment providers, banks, payment service providers, administrators and other authorised financial institutions where necessary to process premiums, investments, claims, refunds or other transactions
Health and medical information, where applicable	Insurers, underwriting service providers, medical or claims assessors and other authorised parties where such information is required for underwriting, policy administration or claims purposes.

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Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Claims information and supporting documentation	Insurers, claims administrators, loss assessors, medical professionals or other authorised service providers involved in assessing or processing a claim.
Beneficiary and dependant information	Product suppliers, insurers, investment providers, retirement fund administrators and other authorised parties where required for policy, investment or benefit administration.
Client correspondence, instructions and communication records	Product suppliers, administrators, compliance service providers, auditors, legal advisers, regulators and other authorised parties where necessary for servicing, complaints, audits or regulatory purposes.
Complaint-related information	Product suppliers, insurers, internal or external complaints functions, legal advisers, relevant Ombud schemes, the FSCA and other regulatory or dispute-resolution bodies where applicable.
Representative and Key Individual information	FSCA, compliance officers, training providers, qualification-verification providers, screening service providers and other regulatory or professional bodies where applicable.
Personal information required for regulatory compliance	FSCA, Information Regulator, FIC where applicable, SARS, relevant Ombud schemes and other competent regulatory, supervisory or law-enforcement authorities where disclosure is required or permitted by law.



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Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Qualifications and competency information	FSCA, training institutions, professional bodies, qualification-verification providers and other authorised parties where verification is required.
Information required for compliance monitoring and auditing	Compliance officers, internal or external auditors, risk-management service providers and other authorised professional advisers subject to appropriate confidentiality obligations.
Company, director, member or shareholder information	Regulatory authorities, CIPC, banks, auditors, accountants, legal advisers, compliance service providers and other authorised parties where required for legitimate business or regulatory purposes.
Identity number and names, for criminal checks	South African Police Services
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

DCJ FINANCIAL SERVICES CC does not store or process personal information outside the Republic of South Africa.

DCJ FINANCIAL SERVICES CC does not currently have any planned transborder flows of personal information. Personal information processed



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by DCJ FINANCIAL SERVICES CC is retained and processed within the Republic of South Africa, subject to the applicable requirements of the Protection of Personal Information Act 4 of 2013 (POPIA).

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- password controls and, where supported, multi-factor authentication;
- appropriate antivirus, anti-malware, firewall and endpoint protections;
- secure electronic storage, backups and recovery procedures;
- confidentiality obligations for employees and service providers;
- secure transmission of personal information where reasonably practicable;
- physical security for office;
- secure disposal or destruction of records when retention periods expire and disposal is lawful;
- incident-management procedures for suspected loss, unauthorised access or compromise; and
- ongoing staff awareness, privacy and information-security training.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://dcjfinancialservices.com/> ,

9.1.2 office of DCJ FINANCIAL SERVICES CC for public inspection during normal business hours;



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CK 88 -020545 -23

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

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

10. UPDATING OF THE MANUAL

The head of DCJ FINANCIAL SERVICES CC will on a regular basis update this manual.

Issued by

Craig Charles Ivins

Member

A handwritten signature in blue ink, appearing to be 'Craig Charles Ivins', written over a horizontal line.

72 Old Main Road, Kloof, 3610

P.O. Box 531, Kloof 3640

www.dcjfinancialservices.co.za