



PAIA MANUAL

(Promotion of Access to Information Act, 2000)

Black Broker House (Pty) Ltd

Reg No. 2022/679476/07 | FSP No. 52891

Unit 6, 16 Concord Place, Lenasia Ext 1, Johannesburg, Gauteng, 1820

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Email: info@bbhouse.co.za | www.blackbrokerhouse.co.za

1. INTRODUCTION

This Manual is prepared in terms of section 51 of the Promotion of Access to Information Act, 2000 (PAIA) to give effect to the constitutional right of access to information.

This Manual applies to Black Broker House (Pty) Ltd, Registration No. 2022/679476/07, an authorised Financial Services Provider, FSP No. 52891 (hereinafter referred to as "BBH") and sets out the procedures for requesting access to records held by BBH.

2. PURPOSE OF THIS MANUAL

The purpose of this Manual is to:

- Provide a description of the records held by BBH
- Describe the manner in which personal information is processed
- Facilitate requests for access to information
- Outline the procedures to be followed when requesting access to records

3. COMPANY DETAILS

Company Name:	Black Broker House (Pty) Ltd
Registration No.:	2022/679476/07
FSP Number:	52891
Address:	Unit 6, 16 Concord Place, Lenasia Ext 1, Johannesburg, Gauteng, 1820
Telephone:	011 854 1386
Email:	info@bbhouse.co.za

4. INFORMATION OFFICER

The Information Officer is responsible for ensuring compliance with PAIA and POPIA.

Name:	Mosimanecape Jeremiah Sesing
Capacity:	Director
Email:	jerry@bbhouse.co.za
Telephone:	011 854 1386

5. GUIDE ON HOW TO USE PAIA

A guide on how to use PAIA is available from the Information Regulator.

Information Regulator Contact Details

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: enquiries@inforegulator.org.za

6. WHO MAY REQUEST ACCESS TO INFORMATION

A requester is any person who requests access to a record held by BBH. A requester must be granted access to a record where:

- The record is required for the exercise or protection of a right
- The requester complies with the procedural requirements of PAIA
- Access is not refused in terms of the grounds for refusal

A request may be made:

- By the person to whom the information relates
- By a person acting on behalf of another person, provided sufficient authority is provided

7. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

The following records may be available without a formal PAIA request:

- Company profile and contact details
- Public website information
- Marketing material

8. RECORDS HELD BY BBH

8.1 Company Records

- Registration documents
- Shareholding records
- Board resolutions

8.2 Financial Records

- Accounting records
- Tax records

8.3 Personnel Records

- Employment contracts
- Training records

8.4 Client Records

- Client applications
- Policy information
- Complaints records

8.5 Compliance Records

- Risk Management and Compliance Programme (RMCP)
- Conflict of Interest Policy
- Complaints Management Policy
- Debarment Policy
- Privacy Policy
- Monitoring records

9. PROCESSING OF PERSONAL INFORMATION

BBH processes personal information in accordance with POPIA for the following purposes:

- To provide funeral policy services
- To comply with legal and regulatory obligations
- To manage client relationships
- To prevent fraud and unlawful activity

Categories of data subjects include:

- Clients and policyholders
- Beneficiaries
- Employees
- Service providers

Categories of personal information include:

- Identification information
- Contact details
- Financial and policy information

Personal information may be shared with:

- Insurers and product providers
- Regulatory authorities
- Service providers

BBH implements appropriate security measures to protect personal information.

10. REQUEST PROCEDURE

A requester must:

- Complete the prescribed PAIA request form
- Provide sufficient detail of the requested record
- Submit the request to the Information Officer

The requester may be required to pay prescribed fees.

11. FEES

Fees are payable in accordance with PAIA Regulations. A request may not be processed until the prescribed fees have been paid.

12. DECISION ON REQUESTS

The Information Officer shall, as soon as reasonably possible, but within 30 days of receiving the request:

- Decide whether to grant or refuse the request
- Notify the requester of the decision

This period may be extended where permitted by law.

13. GROUNDS FOR REFUSAL

Access may be refused where:

- Personal information is protected
- Confidential information is involved
- Commercial information is involved
- Legal privilege applies

14. REMEDIES AVAILABLE

If a request is refused, the requester may:

- Lodge a complaint with the Information Regulator
- Apply to a court of law

15. AVAILABILITY OF THE MANUAL

This Manual is available:

- On request from BBH
- On the BBH website

16. APPLICABLE LEGISLATION

Records are maintained in accordance with applicable legislation, including but not limited to:

- Financial Intelligence Centre Act
- Financial Advisory and Intermediary Services Act
- Companies Act
- Protection of Personal Information Act
- Promotion of Access to Information Act
- Consumer Protection Act

17. APPROVAL

This PAIA Manual is approved and adopted by the Information Officer of Black Broker House (Pty) Ltd.

Signature: _____

Mosimanecape Jeremiah Sesing

Capacity: Information Officer



Date: _____